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Proposed Building Standard
Title 24 Part #: Part 4
Section #: Table 4-A
Proposing State Agency: OSHPD
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Disapprove

In support of your recommendation above, provide the rationale based on the criteria of
Health and Safety Code Section 18930(a). If you
recommend anything other than approve, cite the criteria in your comment. If you oppose a
proposed building standard, offer a solution or alternative for the state agency to consider.

I highly recommend that the proposal to delete the 100%OA column be rescinded for the following reasons :
1. Once of the reason stated is compliance with ASHRAE 170. ASHRAE research project CO-RP3 has found that more than 70% of ASHRAE 170 requirements have no scientific evidence
2. I propose that OSHPD work with Medicare to insure that the Table4-A requirements are an alternative path of compliance for hospitals located in CA
3. This change will increase energy use. On a recent project in Sacramento, we have found that a 100%OA system had an Energy Use Intensity (EUI) that was 15% lower than a recirculating system.
4. In 2015, I have published a paper (co-authored by an OSHPD employee and Kaiser) titled "Natural Experiment in California Hospitals" and concluded that there was no statistical difference in HAIs between CA hospitals which uses 100%OA and other hospitals nationwide
5. The proposed change will increase construction cost since a third exhaust duct will be needed

9 Point Criteria Info:
18930(a) 3