

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Jennifer Gunby
Date: Thursday, May 14, 2020 9:14:24 AM

Commenter Contact Information

Name: Jennifer Gunby
Date: 5/14/2020 12:00:00 AM
Representing: U.S. Green Building Council
Mailing Address
Number and Street: 2101 L Street NW, Suite 500
City: Washington
State: DC
Zip Code: 20037
Telephone #: 9134889094
Email: jgunby@usgbc.org

Proposed Building Standard

Title 24 Part #:
Section #: Table 4A
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.

The proposed revision to Table 4-A in the California Mechanical Code, eliminating the option to reduce air change rates when 100% outdoor air systems are used, should be rescinded. The proposed change will

- have an adverse impact on the energy use in hospitals and certain Medical Office Buildings in California. 100% outside air systems in mild climates, such as California, use less energy than recirculated systems by using heat recovery systems and less fan energy.

- have a negative effect on the health and safety of the public as it will unnecessarily increase the energy use of hospitals, increasing carbon emissions. Studies have shown that California hospital infection rates are not statistically different than the national average, despite the extensive use of 100% outdoor air systems.

- increase the cost of healthcare construction in California as AHU's and ducts will increase due to increased airflow and the need for three duct systems instead of two.

9 Point Criteria Info:
18930(a) 3