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**JUN 03 2008**  
**REAL ESTATE  
SERVICES DIVISION**

California Department of General Services  
Real Estate Services Division  
Professional Service Branch, Environmental Services Section  
Attn: Valerie Namba, Senior Environmental Planner  
707 Third Street, Third Floor, MS 509  
Wes Sacramento, CA 95605-9052

May 21, 2008

Dear Ms. Namba;

This letter is in response to the Draft Environmental Impact Report (DEIR) pertaining to the use of PEX as currently outlined in the California Building Standards Commission (CBSC) sections 604 as well as section 613.1 as it relates specifically to applications as a medical device in hospitals in the State of California.

Stanford University Hospital and Lucile Packard Children's Hospital strive to provide world class state of the art health care. State of the art care in the dialysis field is increasingly related to lower and lower levels of microbiological content. Periodic chemical disinfection is the traditional method for achieving this goal. Chemical disinfection is no longer regarded as state of the art. Instead, heat has been identified as the superior disinfection method. The materials allowed under sections 604 and 613.1 are neither heat tolerant, nor economically attractive. In addition, these materials are structurally inferior to PEX and actually help promote microbiological growth.

We strongly support any effort to revise these sections so that major health care institutions like Stanford can truly provide state of the art care for their patients.

We would also recommend that any new language adopted through this process be broad enough so as to allow the use of similar, not yet available, materials.

Finally, we are also concerned about the awkward juxtaposition of FDA and its authority over approved medical devices like dialysis water purification systems, and CBSC authority over building construction codes. In those cases where a clearly defined and federally approved medical device somehow conflicts with construction codes it would be helpful to have some clause or provision that would help establish clear precedence. Under the current code, building standards trump medical equipment and manufacturing standards, and this is simply NOT an appropriate application of building construction codes. The overlap is simply inappropriate and unreasonable. Language should be included in these standards to somehow help alleviate this problem.

Stanford University Medical Center and Lucile Packard Children's Hospital's are fully committed to providing state of the art health care in the state of California. With the changes offered above, our quest for these goals is substantially improved.

Sincerely,

A handwritten signature in black ink that reads "Purna Prasad". The signature is written in a cursive style with a large, prominent initial "P".

Purna Prasad, M.S., C.C.E