



FAMILY HEALTH CENTERS OF SAN DIEGO
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- Beach Area
Family Health Center
3705 Mission Boulevard
San Diego, CA 92109
- Black Infant Health Program
12 North Euclid Avenue
National City, CA 91950
- Chase Avenue
Family Health Center
1111 West Chase Avenue
El Cajon, CA 92020
- Chula Vista
Family Health Center
251 Landis Avenue
Chula Vista, CA 91910
- City Heights
Family Health Center
5454 El Cajon Boulevard
San Diego, CA 92115
- Diamond Neighborhoods
Family Health Center
220 Euclid Avenue, Suite 40
San Diego, CA 92114
- Downtown
Family Health Center
1145 Broadway
San Diego, CA 92101
- Elm Street
Family Health Center
140 Elm Street
San Diego, CA 92101
- Grossmont Spring Valley
Family Health Center
8788 Jamacha Road
Spring Valley, CA 91977
- Healthy Development Services-
Central Region
2114 National Avenue
San Diego, CA 92113
- Healthy Development Services-
East Region
1234 Broadway
El Cajon, CA 92021
- Lemon Grove
Family Health Center
7592 Broadway
Lemon Grove, CA 91945
- Logan Heights
Family Counseling Center
2204 National Avenue
San Diego, CA 92113
- Logan Heights
Family Health Center
1809 National Avenue
San Diego, CA 92113
- North Park
Family Health Center
3544 30th Street
San Diego, CA 92104
- Sherman Heights
Family Health Center
2391 Island Avenue
San Diego, CA 92102
- Teen Health Center
1643 Logan Avenue
San Diego, CA 92113

November 4, 2013

State of California
 Department of General Services
 Building Standards Commission
 2525 Natomas Park Drive, Suite 130
 Sacramento, CA 95833
 Email: cbssc@dgs.ca.gov

Re: Agenda Items 5, 7, and 8- REJECT THIS PROPOSAL

Dear Madam Chair and Members of the Commission,

Family Health Centers of San Diego is a private, non-profit system of community health centers who provide caring, affordable, high quality healthcare and supportive services to everyone, with a special commitment to uninsured, low income and medically underserved persons.

In 2012, we provided care to more than 173,000 patients through more than 650,000 health encounters. Nearly 60% of our patients are uninsured and 76% of live below the federal poverty level.

We are writing you today to alert you to our grave concerns with the revised OSHPD proposal to eliminate the OSHPD 3SE plumbing standards that were adopted by the Building Standards Commission in April. We are requesting the Commission reject this proposal.

Through the California Primary Care Association, we have participated in months of stakeholder meetings and worked with OSHPD staff to develop a new category of plumbing requirements for licensed community clinics and health centers (CCHC) that appropriately reflects how we differ from hospitals. The commission met in April, applied the criteria set forth by your mandate and ruled that these standards are appropriate.

We were deeply disappointed and surprised to learn that as a result of a recent lawsuit, these codified, common sense buildings standards are now at risk. If the building standards are allowed to be changed, it will create barriers to affordable health care and ultimately hurt those who proponents espouse to protect.

Private physician offices and county clinics, who provide services similar to CCHC's, currently operate outside of the hospital-based construction requirements without any documented risk to public health, safety or environmental protections.



November 4, 2013
Letter to Building Standards Commission
Page 2

As such, it is inappropriate to require CCHC's to incur hundreds of thousands of dollars in costs for unnecessary plumbing standards that do not offer any public health benefit.

We applaud Governor Jerry Brown's leadership to streamline overly burdensome regulations. OSHPD 3SE plumbing standards are a perfect example of this work. OSHPD 3SE is safe, sensible and appropriate. It must be allowed to stand.

We therefore respectfully urge the Building Standards Commission to stand by their decision in April and reject this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben S. Avey', written over a horizontal line.

Ben S. Avey
Manager, Government and Media Relations

cc: California Primary Care Association