



**CALIFORNIA
HOSPITAL
ASSOCIATION**

*Providing Leadership in
Health Policy and Advocacy*

March 25, 2010

Thomas L. Sheehy
Acting Secretary, State and Consumer Services Agency
and Chair, California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

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 CALIFORNIA BUILDING
 STANDARDS COMMISSION

Dear Commission Chair Sheehy:

The California Hospital Association (CHA), which represents approximately 450 hospitals and health systems, supports the Office of Statewide Health Planning and Development's (OSHPD) proposed emergency building standards regarding the California Code of Regulations, Title 24, Part 1, Chapters 6 and 7. The proposed regulations update the Hazards U.S. (HAZUS) methodology used to reclassify Structural Performance Category 1 general acute care inpatient hospital buildings.

The hospital regulations were developed in concert with two Hospital Building Safety Board (HBSB) Ad Hoc Committees and the entire HBSB. All meetings allowed for public comment. CHA believes that the proposed regulations meet the Nine-Point Criteria for building standards. CHA concurs with OSHPD's analysis on how each of the Nine-Point Criteria are met under this emergency regulation package.

The hospital seismic mandate (SB 1953, Chapter 740, Statutes of 1994) has estimated costs of as high as \$110 billion by RAND. The proposed regulations allow hospitals to focus on structural and non-structural replacements and retrofits in the highest risk buildings. This results in billions of dollars of savings for hospitals and associated health care costs. Also, the regulations do not exempt any hospital buildings from the seismic mandate.

CHA thanks the California Building Standards Commission for the opportunity to comment. Please contact me at (916) 552-7570 or rrichter@calhospital.org if you have any questions.

Sincerely,

Roger Richter
Senior Vice President, Professional Services

RR:kb

cc ✓ David Walls, Executive Director, CBSC
Paul Coleman, Deputy Director, Facilities Development Division, OSHPD