

From: Robyn Rothman <rrothman@hcwh.org>
Sent: Friday, September 17, 2021 9:19 AM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Bumbalov, Stoyan (DES) <stoyan.bumbalov@des.wa.gov>
Subject: Comments - commercial energy code proposals 21-GP1-103 and 21-GP1-136

External Email

Dear Members of the Washington State Building Code Council,

The [Washington Health Care Climate Alliance](#) is a coalition of healthcare systems and hospitals who are dedicated to reducing their carbon footprint, building climate resilience, and advocating for climate action to prevent the worst health impacts of climate change for their patients and communities.

We support building decarbonization and electrification, but request amendments to the commercial energy code proposals 21-GP1-103 and 21-GP1-136 for hospitals. Hospitals have unique thermal requirements due to their 24x7 continuous operations and numerous federal, healthcare specific regulations pertaining to ventilation, heating, humidification requirements that vary depending on room type in a hospital facility.

Hospitals are also required under federal regulations to store fuel on-site to sustain operations for at least a 96 hour loss of utility supply. Currently, the only allowable fuel source for back-up power is fossil fuel based, with diesel generators as the required standard of care, which currently work with natural gas to supply a redundant heating source.

Due to the enormous, federal thermal and back-up power requirements for hospitals, we request the following amendment to the exceptions sections in both 21-GP1-103 and 21-GP1-136:

If the council, in consultation with the Department of Health Construction Review Services, determines that there are unique technological, cost, or regulatory barriers for hospitals licensed under chapter 70.41 RCW or chapter 71.12 RCW due to their heating, ventilation, humidification or back-up power requirements, the council may delay the fossil fuel free requirements of the proposed energy code for hospitals for these purposes until feasible.

We also would be supportive of energy code amendments to require reductions in natural gas energy use in hospitals, which we would love to discuss in more detail at a future meeting.

Thank you for your consideration and we look forward to working with you moving forward.

Best,
Robyn Rothman

Robyn Rothman, JD
Associate Director, State Policy Programs
Health Care Without Harm U.S. | noharm.org/climateandhealth
[Washington Health Care Climate Alliance](#)
(888) 518-3404 mobile | rrothman@hcwh.org