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December 5, 2016

The Honorable Jose Huizar
Chair, Planning and Land Use Management Committee
City Clerk, Room 395
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-4801

Date: 12/6/16
Submitted in PLUM Committee
Council File No 14-1478
Item No. 5
Deputy: COMM. FROM PUBLIC

RE: Existing Buildings Energy and Water Efficiency Program (Council File: 14-1478)

Dear Mr. Huizar,

The Hospital Association of Southern California (HASC), represents 170 hospitals in the six county region, of which approximately 45 are located within the City of Los Angeles' jurisdiction, appreciates this opportunity to comment on the draft ordinance related to **Existing Buildings Energy and Water Efficiency (EBEWE) Program**. A key goal for EBEWE is to reduce energy and water consumption in buildings within the City of Los Angeles.

HASC commends the City of Los Angeles for its vision and goal to lower energy and water consumption, as our state continues to face below normal rainfall. Water conservation, for example, not only helps preserve a precious natural resource but helps reduce the costs associated with consumption, which we believe is a win-win. Annual benchmarking is an important tool toward achieving this goal. The drought has required hospitals to continue their effort to explore opportunities for water conservation within the confines of Health and Safety regulations. Water consumption is largely tied to a hospital's mission and its core functions which require water at all times.

Hospital use includes:

- Patient care and hygiene
- Infection prevention and control
- Sterilization of instruments
- Disinfection / cleaning of patient rooms and other areas
- Food preparation and dietary services
- Laundry
- Heating and cooling systems (HVAC)
- Processing equipment for radiology
- Analytical equipment in the lab

Hospitals are considered critical infrastructure given the service they provide 24-hours a day, 7 days a week to individuals who are acutely ill or injured. This requires hospitals to remain continually mindful of their infrastructure and to make appropriate upgrades as needed and within their program capital dollars. Hospital engineers are continually aware of their water and energy usage which they balance against mandated state regulations that

involve sterilization of equipment and ambient room control, for example. HASC is concerned that audit costs that will be incurred at the end of the day will not yield any new information that a hospital engineer is not already aware. For an average 300,000 square foot mid-size hospital, the audit will cost \$45,000 or more. This new fee does not include costs that are currently incurred when a hospital's plan is reviewed by architects and engineers at the Office of Statewide Health Planning and Development (OSHPD).

OSHPD is responsible for overseeing all aspects of general acute care hospital construction in California. The department reviews the plans and specifications for new construction, alteration, renovation or additions to health facilities.

Outside the patient care area, hospitals continue to implement conservation measures where appropriate. The following are some of the short-term and more immediate actions being taken:

- Auditing water use with sub-meters to identify trends and conservation opportunities
- Adopting water conservation policies and using more efficient equipment and appliances
- Replacing in-ground sprinkler systems with drip irrigation systems
- Replacing turf with drought-resistant landscaping
- Minimizing waste and adjusting landscape watering schedules to comply with local ordinances
- Using low-flow plumbing fixtures and automatic faucets
- Using recycled water for irrigation where available
- Recycling cooling tower blow down water
- Minimizing cooling tower blow down through best management practices
- Enlisting employee support with water conservation efforts

It is important to note, that energy and water conservation measures are being incorporated by hospitals as they are retrofitted or rebuilt in order to meet the state unfunded mandate of seismic compliance.

In closing, HASC recommends that the Planning and Land Use Committee adopt language that factors the work already undertaken by hospitals to identify projects and equipment that promote energy and water conservation, which we believe meets the intent of the audit and retro-commissioning requirements.

Thank you for your time, and please contact me at (213) 538-0702 or at jgarcia@hasc.org with any questions.

Sincerely,



JAIME GARCIA
Regional Vice President – Los Angeles Region

cc: The Honorable Marqueece Harris-Dawson
The Honorable Mitchell Englander
The Honorable Gilbert Cedillo
The Honorable Curren D. Price, Jr.