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**HOSPITAL
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*Providing Leadership in
Health Policy and Advocacy*

November 16, 2006

Robert F. Sawyer, Ph.D.
Chair, California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Dear Chairman Sawyer:

The California Hospital Association (CHA), represents over 400 hospitals and health systems throughout the state and appreciates the opportunity to provide comments on the amendments to the AB2588 Air Toxics "Hot Spots Emission Inventory Criteria and Guidelines Regulation".

In the development of the final regulation order of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines, exemption (7) pertaining to emission standards and operating requirements for new stationary and in-use emergency standby diesel fueled C I engines >50 brake horsepower, hospitals received an extension to permit in-use stationary emergency standby diesel-fueled engines that will be removed from service or replaced prior to January 1, 2009.

The exemption was granted due to the number of hospital buildings that were mandated to meet hospital seismic requirements by 2009. Between January 1, 2003 and December 31, 2005 Davis Langdon, an international cost consulting firm, determined that California hospital construction costs increased 66 percent during that three year period. As a result the hospital seismic safety mandate has a projected cost of over \$50 billion by 2030 without financing costs. SB 1661 (Chapter 679, statutes of 2006) allows hospitals an additional 2 year extension for meeting the 2008 mandate under prescribed conditions due to the cost increases.

Due to the major role hospitals play in life/safety issues and disaster response as well as the fact that hospitals face a \$50 billion unfunded mandate, over 50 percent of hospitals lost money on operations during 2005. CHA requests the Air Resources Board postpone "Hot Spots" applicability requirements for diesel backup generators at hospitals until after 2011. This action is being requested because many hospitals that will remain in operation by 2011 will be replacing or retrofitting generators in conjunction with the seismic mandate. Hospitals can more efficiently retrofit/replace their generators in coordination with the seismic mandate thus avoiding duplicative requirements.

Thank you for your attention to this request. Please contact me if you have any questions at (916) 552-7570 or richter@calhospital.org.

Sincerely,

Roger Richter
Senior Vice President

Robert F. Sawyer, Ph.D.
November 16, 2006

cc: Sandra Berg, Public Member, California Air Resources Board
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