



April 22, 2015

Jessica Bean  
State Water Resources Control Board  
P.O. Box 100  
1001 I Street  
Sacramento, CA 95812

**SUBJECT: Comments to the Draft Emergency Water Conservation Regulations**

Dear Ms. Bean:

The California Hospital Association (CHA), which represents more than 400 hospitals and health systems, thanks the State Water Resources Control Board (SWRCB) for the opportunity to comment on the draft emergency water conservation regulations.

CHA commends the Governor's actions to address the drought impacting our state. CHA urges the SWRCB to give special consideration to the needs of California's acute care hospitals. The large majority of their water consumption can be tied in some way to their mission and core function. Hospitals and health care facilities are unique water consumers. Much of their water consumption can be tied in some way to their mission and core function. They must remain operational 24/7, 365 days a year. The following are some of the critical and essential areas that require water:

- 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

Water usage for these critical purposes cannot be cut without harming patient care or public health and safety.

However, there are ways that hospitals can minimize their water usage. Some of these methods are immediate and short term, while others are longer-term strategies.

The following are some of the short-term and more immediate actions being taken by hospitals:

- 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
- Turning off outdoor water features
- Using low-flow plumbing fixtures and automatic faucets
- Using recycled water for irrigation
- Recycling cooling tower blow down water
- Minimizing cooling tower blow down through best management practices
- Enlisting employee support with water conservation efforts

Over the past decade, hospitals have made tremendous progress in water conservation. As older facilities have been retrofitted or replaced with new buildings, less efficient fixtures and equipment have been replaced by low-flow fixtures and high-efficiency appliances. CHA will be working with Office of Statewide Health Planning and Development (OSHPD) to ensure that upcoming building code changes will address water conservation measures for hospital plumbing renovations and new construction.

As California enters its fourth drought year, hospitals will do their part while still preserving patient safety and public health. It is critical that California's conservation efforts do not require hospitals to reduce water usage in a way that would compromise health and safety.

CHA also asks the SWRCB to exempt hospitals from any increased rates and/or fees. As estimated by Rand, the current seismic mandate on hospitals is estimated at \$110 billion dollars. Hospitals will meet water conservation measures in meeting the seismic mandate.

Again, CHA thanks you for the opportunity to comment on these proposed regulations and appreciates your consideration of CHA's comments and the vital mission that hospitals serve to their communities and the state.

If you have any questions, please contact me at (916) 552-7681 or [chummel@calhospital.org](mailto:chummel@calhospital.org).

Sincerely,



Cheri Hummel  
Vice President Emergency Management and Facilities