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Subject: Title 24, Part 4 - Edit to Section 407.5.1.5 - New Requirement 2025 OSHPD Amendments to 2025 California Mechanical Code
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407.5.1.5



Comment #2:

407.5.1.5 adds confusion to the previous code language by not stating the intent and instead could be misinterpreted as requiring automatic modulating return dampers for all zones to operate a VAV system. The language as it is written, appears to be restrictive and has a requirement beyond ASHRAE Standard 170. The risk is that, if misinterpreted, it leaves the door open for designers to design full CAV for all zones including NR zones, despite the resulting increase in energy consumption, especially the increase in required reheat energy. It is recommended that 407.5.1.5 should not be issued into the 2025 Code Cycle.

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