

Bernhard

August 12, 2024

CBSC

Attention: Public
Comments

California Building
Standards
Commission
2525 Natomas Park
Drive Suite 130
Sacramento, CA
95833

Email:
CBSC@dgs.ca.gov

Title

Variable Air Volume Control in California Mechanical Code

Purpose

Remove the amendment language requiring control of return air in HVAC systems. The proposed CMC amendments by OSHPD 01/24 are not aligned with nationally acceptable HVAC design practices for VAV system control and do not benefit the health safety and welfare of the occupants.

Background

Proposed modifications by OSHPD 01/24 — *Adopt and Amend the 2025 edition of the California Mechanical Code, Part 4, Title 24*

407.5.1.4 Sensitive areas or rooms shall be provided with an automatic modulating damper on the supply and [begin double underline] controls [end double underline] on the return or exhaust [begin double underline] duct system [end double underline] air for each space where needed to maintain constant air flows.

407.5.1.5 NR spaces per Table 4-A for pressurization shall utilize a modulating damper in the r [begin double underline] R [end double underline] return air [begin double underline] controls shall be provided [end double underline] for each zone or zones [begin double underline] system, floor or area [end double underline] with similar conditions.

Recommendation

Reject the proposed amendments for 407.5.1.4 & 407.5.1.5.

Consider removing requirements for return air system control from the CMC.

The requirements for controlling return air are unnecessary. ASHRAE has no such requirement and nor does any other accepted mechanical ventilation code.

Sincerely,

Casper Briggs, PE
Vice President, Engineering
901-600-1742
casper.briggs@bernhard.com