From:
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 To:
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Cc: Enright, Lawrence@HCAI; Travis R English; Marvelli, Mia@HCAI; Nelson, Ryan@HCAI; Austin Barolin

Subject: Title 24, Part 4 - Edit to Section 407.5.1.4 - New Requirement 2025 OSHPD Amendments to 2025 California

Mechanical Code

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407.5.1.4

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.

Recommendation:

The language in this ("controls on the return or exhaust duct system to maintain constant air flows") is vague and open to interpretation. If clear prescriptive language is desired a listing of acceptable control mechanisms should be included (VAV box, VFD on return fan, etc.) in the code to clarify. Otherwise, enforcement will be a challenge. I suggest that prescriptive language not be attempted here as good performance language exists already in the national standard, ASHRAE 170.

Thank you,

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