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 407.5.1.5 - New Requirement 2025 OSHPD Amendments to 2025 California

Mechanical Code

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## 407.5.1.5

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] eturn 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:

This is prescriptive language. A more appropriate way to address VAV in the healthcare environment may be with performance-style language. Reference the language in ASHRAE 170. Section 7.1.a.1 which states: "If any form of variable-air-volume or load-shedding system is used for energy conservation, it shall not compromise the pressure balancing relationships or the minimum air changes required by the table." Combine this with the CMC Section 407.4.1.3, which prohibits using a corridor to transfer air, and you've got good performance language.

Thank you,

## **Dave Mason PE**

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