**SFM Part 4 California Mechanical Code**

**Item #5** (5-1 through 5-59) on the SFM Part 4 Matrix

Date: June 2, 2023

To: The California Building Standards Commission

From: Robert E. Raymer, PE

Representing: California Building Industry Association

 California Apartment Association

 California Business Properties Association

 Building Owners & Managers Association

The California Building Industry Association (CBIA), California Apartment Association (CAA), California Business Properties Association, and Building Owners and Managers Association all respectfully request approval of SFM Part 4, Item 5 (A2L refrigerants).

The four organizations cited above support the early adoption of A2L building standards published in the Uniform Mechanical Code by the International Association of Plumbing and Mechanical Officials, just as we all supported the early adoption of Exterior Elevated Elements provisions published in the International Building Code.

Our support is predicated on the understanding that the new language being proposed by the Office of the State Fire Marshal is essentially the same as that being published in IAPMO’s 2024 Uniform Mechanical Code. While this edition of the UMC is not available for public purchase yet, the SFM has noted numerous times in their Initial Statement of Reasons that:

***“The SFM has evaluated the published copy of the 2024 Uniform Mechanical Code provided by courtesy of IAPMO; there are no changes required from the initial proposal to match exactly what is published.”***

Given this assurance by the SFM, the groups cited above will support the early adoption of the A2L language.

We are, however, asking the Office of the State Fire Marshal to reconvene their A2L Working Group to review and comment on this language during the upcoming Triennial Code Adoption Cycle to ensure California’s adoption mirrors that of the International Association of Plumbing & Mechanical Officials.

 Thank you for your consideration.