

**FINAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE STATE FIRE MARSHAL
REGARDING THE 2025 CALIFORNIA MECHANICAL CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 4
(SFM 02/25)**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a Final Statement of Reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this particular rulemaking action:

UPDATES TO THE INITIAL STATEMENT OF REASONS:

Government Code Section 11346.9(a)(1) requires an update of the information contained in the Initial Statement of Reasons. If the update identifies any data or any technical, theoretical, or empirical study, report, or similar document on which the state agency is relying that was not identified in the Initial Statement of Reasons, the state agency shall comply with Government Code Section 11347.1.

The State Fire Marshal has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether the proposed action would impose a mandate, the agency shall state whether the mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the mandate is not reimbursable, it shall state the reasons for the finding(s).

The State Fire Marshal (SFM) has determined that the proposed regulatory action WOULD NOT impose a mandate on local agencies or school districts.

The SFM has determined that the proposed regulatory action does not impose a mandate on local agencies or school districts. The regulations apply to building standards and do not require local agencies or school districts to perform any new program or higher level of service.

OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).

Government Code Section 11346.9(a)(3) requires a summary of EACH objection or recommendation regarding the specific adoption, amendment, or repeal proposed, and an explanation of how the proposed action was changed to accommodate each objection or recommendation, or the reasons for making no change. This requirement applies only to objections or recommendations specifically directed at the agency's proposed action or to the procedures followed by the agency in proposing or adopting the action, or reasons for

making no change. Irrelevant or repetitive comments may be aggregated and summarized as a group.

The text with proposed changes was made available to the public for a 45-day comment period from March 27, 2026, until May 11, 2026. During the comment period, the SFM received an Industry Coalition Support letter, and no further comments were received.

Item 1

Chapter 18 Reference Standards, ASHRAE 15

The State Fire Marshal (SFM) proposes to adopt the 2024 edition of ASHRAE 15 “Safety Standard for Refrigeration Systems,” including Addendum A.

Commenter(s) and Recommendation:

California Business Properties Association, California Building Industry Association, Building Owners & Managers Association, Association of Commercial Real Estate, California Apartment Association, California Retailers Association, Institute of Real Estate Management, and Commercial Real Estate Development Association (NAIOP of California).

The industry coalition supports updating ASHRAE Standard 15 in California codes because the current shaft-enclosure requirements for A2L refrigerant piping create major cost and retrofit barriers that slow the state’s transition to low-GWP refrigerants. This provides a safe, technically validated alternative that removes the shaft requirement when piping is tested, lowering retrofit costs while maintaining safety.

Agency Response:

The SFM appreciates the Industry Coalition’s support. The State Fire Marshal proposed amendment clarifies code requirements without incurring additional costs or regulatory impact and complies with criterion (A) of HSC 18942(a)(2).

DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS

Government Code Section 11346.9(a)(4) requires a determination with supporting information that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, or would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

The SFM has determined that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the proposed amendments. There are no alternatives available to the SFM regarding the proposed adoption and amendments to this code.

REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

N/A