



(Due: May 11, 2025)

California Building Standards Commission  
Attention: Public Comments  
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[2025 Public Comment Page](#)  
OSHPD 5/25

April 28, 2026

Regarding: [Notice of Proposed Action — OSHPD 05/25](#) - Code changes intended for the 2025 California Building Standards Code Supplement.

To whom it may concern:

The Western States Council of SMART (WSC) represents Sheet Metal Workers' Local Unions and their nearly 20,000 members in California, Arizona, Nevada, and Hawaii. Our members install and perform testing, adjusting, and balancing (TAB) on all types of Heating, Ventilation, and Air Conditioning (HVAC) systems, both residential and commercial, and are committed to not only ensuring indoor comfort through heating and cooling but also safeguarding air quality and promoting energy efficiency within the built environment.

We partner with the Joint Committee on Energy and Environmental Policy (JCEEP) to research and accelerate best practices in the industry along with our contractor partners - including the Sheet Metal and Air Conditioning Contractors' National Association (SMACNA). In California alone, the WSC operates over 15 training facilities, where thousands of HVAC technicians are trained daily in all aspects of HVACR, including heat pump installations.

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### **Justification for Recommended Change**

WSC supports the requirement for a certified TAB contractor; however, we recommend closer alignment with Section 403.10 of the California Mechanical Code (CMC), which requires that the technician performing the onsite TAB work on mechanical ventilation systems be individually certified by the Associated Air Balance Council (AABC), the National Environmental Balancing Bureau (NEBB), or the Testing, Adjusting, and Balancing Bureau (TABB).

Requiring only the TAB contractor to hold certification does not ensure that certified personnel are actually present onsite to perform, verify, and validate the work. The intent of Section 403.10 is to ensure that qualified, certified technicians directly execute and document the balancing process, thereby improving accountability and reliability of system performance.



To avoid confusion between Sections 407.3 and 403.10 for both contractors and AHJs, we recommend that Section 407.3 incorporate the requirements from Section 403.10, including, that TAB work on ventilation systems be performed by certified technicians, while allowing for the additional requirement of an independently certified, TAB contractor which appropriate to the critical environments governed by Section 407.

This approach improves clarity, aligns with existing CMC provisions, and ensures that both organizational and individual qualifications are addressed, resulting in more reliable system performance and compliance.

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### **Recommended Language**

#### **407.3 Air Balance.**

**407.3.1** *The ventilation systems shall be designed and balanced to provide the general air balance relationship to adjacent areas, shown in Table 4-A. The ventilation systems shall be tested, adjusted, and balanced in accordance with Section 403.10 and the latest edition of standards published by the Associated Air Balance Council (AABC), the National Environmental Balancing Bureau (NEBB), or the Testing, Adjusting and Balancing Bureau (TABB). All testing and balancing shall be performed by a qualified independent agency and certified by the AABC, NEBB, or TABB. Air balance tolerancing values shall not result in noncompliance of the minimum required pressurization per Table 4-A.*

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### **Referenced Sections of the 2025 CMC**

**403.10 Air Balance.** *All mechanical ventilation systems shall be tested, balanced, and operated to demonstrate that the installation and performance of the systems are in accordance with the design intent. All testing and balancing shall be performed by a technician certified by the Associated Air Balance Council (AABC), the National Environmental Balancing Bureau (NEBB), the Testing, Adjusting and Balancing Bureau (TABB), or other equivalent approved agencies.*

*Exception: For single family residential, compliance with Section 403.10 shall not be required.*

#### **407.0 Ventilation System Details**

##### **407.3 Air Balance**

*The ventilation systems shall be designed and balanced to provide the general air balance relationship to adjacent areas, shown in Table 4-A. The ventilation systems shall be balanced in accordance with the latest edition of standards published by the Associated Air Balance Council (AABC), the National Environmental Balancing Bureau (NEBB), or the Testing, Adjusting and Balancing Bureau (TABB). Air balance tolerancing values shall not result in noncompliance of the minimum required pressurization per Table 4-A.*



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As experts in the installation, testing, and maintenance of HVAC systems, the WSC of Sheet Metal Workers is available to assist in any matters related to HVAC systems. We are more than willing to provide Subject Matter Experts (SMEs) upon request to support efforts that enhance the safety, performance, and overall quality of the built environment.

A handwritten signature in black ink, appearing to read "J. Zeedyk".

Jeremy Zeedyk  
SMART Western States Council  
Grant Administrator/Special Projects Coordinator

A handwritten signature in black ink, appearing to read "Christopher Ruch".

Christopher Ruch  
Sheet Metal Workers Local 104  
Codes and Standards Representative