

**NOTICE OF PROPOSED ACTION
TO BUILDING STANDARDS OF THE
STATE FIRE MARSHAL
REGARDING THE 2025 CALIFORNIA MECHANICAL CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 4
(SFM 02/25)**

Notice is hereby given that the California Building Standards Commission (CBSC) on behalf of State Fire Marshal proposes to adopt, approve, codify, and publish changes to building standards contained in the California Code of Regulations (CCR), Title 24, Part 4. The SFM is proposing building standards related to 2025 Intervening rulemaking code cycle.

PUBLIC COMMENT PERIOD

Reference: Government Code Sections 11346.5(a)(1), 11346.5(a)(15) and 11346.5(a)(17).

A public hearing has not been scheduled; however, written comments will be accepted from **March 27, 2026**, until midnight on **May 11, 2026**.

Comments may be submitted to CBSC via:

Email: cbsc@dgs.ca.gov

US Mail postmarked no later than **May 11, 2026**:

California Building Standards Commission

Attention: Public Comments

2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

All written comments received are considered part of the public record and will be made available for public inspection via [CBSC's website](#). Public comments may include personally identifiable information (PII) such as name, email address or mailing address. Interested persons are not required to submit their PII to comment on this rulemaking. However, any PII submitted is subject to posting on the publicly accessible [CBSC website](#) without redaction. Also, only comments received in an accessible format will be viewable on CBSC's website. Non-accessible comments will be listed on the website and made available upon request. Any interested person, or his or her duly authorized representative, may request, no later than 15 days prior to the close of the written comment period, that a public hearing be held.

The public will have an opportunity to provide written and oral comments regarding the proposed action on building standards at a public meeting to be conducted by CBSC, to be scheduled at a date near the end of the current adoption cycle. A meeting notice will be issued announcing the date, time, and location of the public meeting.

POST-HEARING MODIFICATIONS TO THE TEXT OF THE REGULATIONS

Reference: Government Code Section 11346.5(a)(18).

Following the public comment period, CBSC may adopt the proposed building standards substantially as proposed in this notice or with modifications that are sufficiently related to the original proposed text and notice of proposed changes. If modifications are made, the full text of the proposed modifications, clearly indicated, will be made available to the

public for at least 15 days prior to the date on which CBSC adopts, amends, or repeals the regulation(s). CBSC will accept written comments on the modified building standards during the 15-day period.

NOTE: To be notified of any modifications, you must submit written/oral comments or request that you be notified of any modifications.

AUTHORITY AND REFERENCE

Reference: Government Code Section 11346.5(a)(2).

CBSC proposes to adopt these building standards under the authority granted by Health and Safety Code Section 18949.2. The purpose of these building standards is to implement, interpret, or make specific the provisions of Sections 13108, 13143, 13145, 13146, 18930, 18944.21, and 18949.2 of the Health and Safety Code.

The SFM is proposing this regulatory action based on Sections 13108, 13143, 13145, 13146, 18928, 18930, 18934, 18944.21, 18949.2 Health and Safety Code.

INFORMATIVE DIGEST

Reference: Government Code Section 11346.5(a)(3).

Summary of Existing Laws

Health and Safety Code Section 13108.

(a) Except as limited by Chapter 6 (commencing with Section 140) of Division 1 of the Labor Code and Section 18930 of this code, the State Fire Marshal shall prepare and adopt building standards, not inconsistent with existing laws or ordinances, relating to fire protection in the design and construction ...

Health and Safety Code Section 13143.

Grants the State Fire Marshal authority to prepare and adopt regulations establishing minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in any building or structure used or intended for use as an asylum, jail, mental hospital, hospital, home for the elderly, children's nursery, children's home or institution not otherwise excluded from the coverage of this subdivision, school, or any similar occupancy of any capacity, and in any assembly occupancy where 50 or more persons may gather together in a building, room, or structure for the purpose of amusement, entertainment, instruction, deliberation, worship, drinking or dining, awaiting transportation, or education.

Health and Safety Code Section 13145.

The State Fire Marshal, the chief of any city, county, or city and county fire department or district providing fire protection services, or a Designated Campus Fire Marshal, and their authorized representatives, shall enforce in their respective areas building standards relating to fire and panic safety adopted by the State Fire Marshal and published in the California Building Standards Code and other regulations that have been formally adopted by the State Fire Marshal for the prevention of fire or the protection of life and property against fire or panic.

Health and Safety Code Section 13146.

Enforcement of the State Fire Marshal fire and panic safety building standards is delegated to either the fire chief or the chief building official.

Health and Safety Code Section 18928.

Requires each state agency adopting or proposing adoption of a model code, national standards, or specification shall reference the most recent edition of applicable model codes, national standards, or specifications.

Health and Safety Code Section 18930

Health and Safety Code Section 18930 establishes the criteria and process for adopting building standards in California. It requires that any building standard proposed by a state agency be submitted to and approved by the California Building Standards Commission (CBSC) before it can be codified in the California Building Standards Code. The adopting agency must provide an analysis demonstrating that the proposed standard satisfies the statutory "nine-point criteria," including that the standard does not conflict with existing regulations, is within the agency's authority, serves the public interest (such as health and safety), is reasonable and cost-effective, and incorporates applicable national standards or model codes where appropriate.

Health and Safety Code Section 18934

State agencies proposing to adopt building standards shall adopt, and the commission shall approve, regulations establishing procedures to ensure public participation in the development of building standards and regulations

Health and Safety Code Section 18944.21

The commission was required to consider adopting the latest specified ASHRAE and UL consensus safety standards for refrigeration systems into the California Building Standards Code.

Health and Safety Code Section 18949.2

(a) Any responsibilities of the State Fire Marshal to adopt, through a formal rulemaking process as provided in Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, relating to building standards, including, but not limited to, Sections 13108, 13143, 13143.6, and 13211, are hereby transferred to the commission.

(b) The State Fire Marshal shall remain the state agency responsible for developing building standards to implement the state's fire and life safety policy. In its role as the fire and life safety standard developing agency, the State Fire Marshal shall continue its existing activities and forums designed to facilitate compromise and consensus among the various individuals and groups involved in the development of the state's codes related to fire and life safety.

(c) The state's fire and life safety building standards, as developed by the State Fire Marshal and as adopted by the commission, shall continue to be based on the state's fire and life safety policy goals and mandates as they existed prior to the enactment of this chapter and as they are amended.

Summary of Existing Regulations

The SFM currently adopts the California Code of Regulations, Title 24, Part 4, 2025 California Mechanical Code with SFM amendments and additional building standards relating to regulations that establish minimum requirements for the prevention of fire and for the protection of life and property against fire and in any building or structure used or intended for use as defined in each of the Health and Safety Code references shown above. SFM has the statutory authority to propose the adoption of the ASHRAE 15 safety standard by reference, which governs the design, installation, and operation of building and HVAC systems, ensuring uniform compliance and protection for the public.

Summary of Effect

The general purpose of this proposed action is principally intended to adopt/amend/repeal certain provisions in the 2025 California Mechanical Code (California Code of Regulations, Title 24, Part 4) based upon updated information or recent actions of the SFM. This proposed action:

- Update ASHRAE 15 standard to the latest edition

Comparable Federal Statute or Regulations

The SFM has determined that there are no comparable federal regulations or statutes addressing the fire and life safety requirements as presented in this notice.

Policy Statement Overview

The specific purpose of this rulemaking effort by the SFM is to promote consistency, clarity, and technical accuracy across the building, mechanical, and fire safety industries. The proposed amendment aims to strengthen public health and safety by enhancing worker safety through the provision of enforceable requirements for contractors, engineers, the fire service, and inspectors who handle or work near flammable refrigerant piping and equipment. The proposed amendment also supports environmental protection by removing barriers for the use of low-GWP refrigerants, thereby reducing greenhouse gas emissions from the built environment.

Evaluation of Consistency

The proposed regulations are consistent with existing state regulations.

OTHER MATTERS PRESCRIBED BY STATUTE APPLICABLE TO THE AGENCY OR TO ANY SPECIFIC REGULATION OR CLASS OF REGULATIONS

Reference: Government Code Section 11346.5(a)(4).

The SFM has determined that there are no other prescribed statutes or specific regulations or classes of regulations applicable to the amendments and building standards related to the 2025 California Mechanical Code.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

Reference: Government Code Section 11346.5(a)(5).

SFM has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

ESTIMATE OF COST OR SAVINGS

Reference: Government Code Section 11346.5(a)(6).

An estimate, prepared in accordance with instructions adopted by Department of Finance, of costs or savings to any state agency, local agency, or school district.

- A. Cost or Savings to any state agency: **NO**
- B. Cost to any local agency required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**
- C. Cost to any school district required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**
- D. Other nondiscretionary cost or savings imposed on local agencies: **NO**
- E. Cost or savings in federal funding to the state: **NO**

Estimate: 0

INITIAL DETERMINATION OF NO SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT ON BUSINESSES

Reference: Government Code Section 11346.5(a)(8).

If the agency makes an initial determination that the adoption/amendment/repeal of this regulation will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect.

SFM has made an initial determination that the adoption/amendment/repeal of this regulation will not have a significant statewide adverse economic impact on businesses, including the ability of California businesses to compete with businesses in other states.

Declaration of Evidence

Reference: Government Code Section 11346.5(a)(8).

In making the declaration, the agency shall provide in the record of facts, evidence, documents, testimony, or other evidence that the agency relied upon to support its initial determination of no effect.

The State Fire Marshal affirms that this rulemaking action of no effect will not impose new requirements, costs, or compliance burdens on businesses, as it maintains consistency with existing California building standards and nationally recognized consensus standards. By aligning California with standards already adopted in other jurisdictions, the action supports regulatory uniformity and does not place California businesses at a competitive disadvantage relative to businesses in other states. Based on expert input and comparative analysis, the SFM has determined that the proposal will not result in significant statewide adverse economic impacts on businesses, including their ability to compete.

COST IMPACT ON REPRESENTATIVE PRIVATE PERSON OR BUSINESS

Reference: Government Code Section 11346.5(a)(9).

Describe all cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action. If no cost impact, provide the following statement:

SFM is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION

Reference: Government Code Section 11346.5(a)(10).

The SFM has assessed whether and to what extent this proposal will affect the following:

A. The creation or elimination of jobs within the State of California.

These regulations will not affect the creation or cause the elimination of jobs within the State of California.

B. The creation of new businesses or the elimination of existing businesses within the State of California.

These regulations will not affect the creation of new businesses or the elimination of existing businesses within the State of California.

C. The expansion of businesses currently doing business within the State of California.

These regulations will not affect the expansion of businesses currently doing business within the State of California

D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.

These regulations will strengthen environmental protection as well as provide the latest fire safety standards

FINDING OF NECESSITY FOR THE PUBLIC'S HEALTH, SAFETY, OR WELFARE

Reference: Government Code Section 11346.5(a)(11).

Any regulation that requires a report shall not apply to businesses unless the agency makes a finding that it is necessary for the health, safety, or welfare of the public that the regulations apply to businesses.

N/A

ESTIMATED COST OF COMPLIANCE OF STANDARDS THAT WOULD IMPACT HOUSING

Reference: Government Code Section 11346.5(a)(12).

The SFM has determined that no additional cost of compliance with standards would impact housing.

CONSIDERATION OF ALTERNATIVES

Reference: Government Code Section 11346.5(a)(13).

SFM has determined that no reasonable alternative considered by SFM or that has otherwise been identified and brought to the attention of SFM would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action. In addition, no reasonable alternative considered by SFM or that has otherwise been identified and brought to the attention of SFM would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

AVAILABILITY OF RULEMAKING DOCUMENTS

Reference: Government Code Sections 11346.5(a)(16) and 11346.5(a)(20).

All of the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public review by contacting the person named below. This notice, the express terms, and initial statement of reasons can be accessed from the CBSC website: dgs.ca.gov/BSC/BSC.

Reference: Government Code Section 11346.5(a)(19).

Interested parties may obtain a copy of the final statement of reasons, once it has been prepared, by making a written request to the contact person named below or at the [CBSC website](https://www.dgs.ca.gov/en/BSC): <https://www.dgs.ca.gov/en/BSC>.

Reference: Government Code Section 11346.5(a)(21).

SFM shall provide, upon request, a description of proposed changes included in the proposed action, in the manner provided by Section 11346.6, to accommodate a person with a visual or other disability for which effective communication is required under state or federal law. The statement shall note that providing the accessible description of proposed changes may require extending the period of public comment for the proposed action.

CBSC CONTACT PERSON FOR PROCEDURAL AND ADMINISTRATIVE QUESTIONS

Reference: Government Code Section 11346.5(a)(14).

General questions regarding procedural and administrative issues should be addressed to:

Kevin Day, Deputy Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833
Telephone: (916) 263-0916

PROPOSING STATE AGENCY CONTACT PERSON FOR SUBSTANTIVE OR TECHNICAL QUESTIONS ON THE PROPOSED CHANGES TO BUILDING STANDARDS

Specific questions regarding the substantive or technical aspects of the proposed changes to the building standards should be addressed to:

Primary Contact:

Crystal Sujeski, Division Chief
CALFIRE – Office of the State Fire Marshal
Code Development and Analysis Division
510-846-1276
Crystal.Sujeski@fire.ca.gov

Back up Contact:

Jena Garcia, DSFM III Supervisor
CALFIRE – Office of the State Fire Marshal
Code Development and Analysis Division
916-531-7650
Jena.Garcia@fire.ca.gov