



April 20, 2021

International Mechanical Code Committee
c/o Mike Pfeiffer
International Code Council
500 New Jersey Avenue, NW 6th Floor
Washington, DC 20001

Re: International Mechanical Code 2021 Group A Committee Action Hearings

Dear International Mechanical Code Committee Members:

The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease through education, advocacy and research. In 2019, lung disease was the fourth leading cause of death in the United States, and lung cancer is the leading cancer killer among men and women. Nearly 25 million people, including close to six million children, suffer from asthma. According to the U.S. Centers for Disease Control and Prevention, as of April 19, 2021, more than 31 million people have been diagnosed with COVID -19 which has resulted in more than 560,000 deaths. The COVID-19 pandemic has highlighted the importance of preparing for respiratory pandemics and investing in infrastructure to facilitate the prevention of infection.

The American Lung Association supports updates to the International Mechanical Code to prepare for future respiratory pandemics. Improving ventilation systems such as the Clean Air Ready (M25-21) and the Demand Control Ventilation (M26-21) proposals are important steps to ensure that buildings are designed to improve ventilation and safeguard occupants.

The Demand Control Ventilation proposal will require that all occupiable spaces have CO2 sensors and that the building ventilation system be utilized to satisfy outdoor air thresholds. Elevated CO2 can be a marker for inadequate ventilation and the CO2 sensor can provide notification to building occupants and prompt mitigation steps.

The Clean Air Ready proposal will prepare mechanical systems to accommodate a MERV 13 filter for future use without having to redesign or replace the system. Such use of MERV 13 filters may be important provide additional ventilation and filtration which may be needed to address an airborne containment such as a virus. This proposal also requires that occupiable spaces be equipped with the electrical infrastructure needed to increase clean air delivery at the zonal level, such as using a HEPA room air cleaning machine.

COVID-19 has taken an enormous toll on the public. We urge the International Mechanical Code Committee to consider these commonsense changes to prepare buildings to address future health threats posed by airborne viruses.

Sincerely,

A handwritten signature in black ink that reads "Harold Wimmer".

Harold P. Wimmer
National President and CEO

Cc: Mark Lessans, Johnson Controls