



September 7, 2023

To Members of the New York State Fire Prevention and Building Code Council:

The New York and national public health organizations, leading non-profits focused on healthier buildings, trade associations, and industry leaders listed above write to express our strong support for including Indoor Air Quality (IAQ) improvement proposals into the body of the New York Uniform Fire Prevention and Building Code.

**Specifically, we respectfully ask that MC04-0023 and MC04-0024 appendices be adopted as part of the Code.** They are summarized below.

Last year, the first IAQ-focused code proposals since the pandemic were adopted as an Appendix to the 2024 International Mechanical Code for Group A, B, E, and I occupancies. These code proposals require that HVAC system design airflows can accommodate a MERV 13 filter when greater air filtration is required (**MC04-0023**), and that CO<sub>2</sub> (carbon dioxide) sensors be installed every 500 sq. feet of occupiable space (**MC04-0024**).

Adopting these proposals into the Uniform Fire Prevention and Building Code will help improve indoor air quality, support occupant health, and encourage the return of occupants to numerous building types, including offices. They provide cost- and energy-effective tools to building owners to better respond to the next pandemic or contagion while preventing overventilation of spaces.

According to the U.S. Environmental Protection Agency (EPA), indoor pollutant levels are on average two to five times — and sometimes one hundred times — higher than outdoor levels. Ensuring that the air circulating inside buildings is free from pollutants, viruses and bacteria improves the safety, health, and productivity of building occupants. Improved air quality has

also been shown to increase comfort, decrease absenteeism and reduce respiratory illness infection risk.

We respectfully request that you adopt the **MC04-0023** and **MC04-0024** appendices as part of the Uniform Fire Prevention and Building Code. By doing so, New York will be demonstrating code leadership on indoor air quality — leadership that will safeguard occupants now while also fortifying buildings against future health threats.

Thank you.

Sincerely,

AIA-New York State  
American Lung Association-New York  
Asthma and Allergy Foundation of America  
Carrier  
Global Green  
Green Seal  
International WELL Building Institute  
Johnson Controls  
United Spinal Association  
U.S. Green Building Council