



Ahmed Tigani, Commissioner
New York City Department of Buildings (DOB)
280 Broadway, 7th Floor
New York, New York 10007

RE: Request for Amendments to the Local Law 77 A2L Refrigerant Rule

Dear Mr. Tigani,

The undersigned associations are writing to express our concerns with the Local Law 77 (LL77) A2L Refrigerant Rule issued on April 15, 2026. We respectfully request that the Department of Buildings (DOB) amend specific provisions of the rule as outlined below. Our members share concerns about several New York City-specific requirements that depart from ASHRAE Standards 15, 15.2, and 34. These provisions substantially increase material, labor and design costs while making otherwise viable refrigerant system configurations impractical.

Specifically, we request that DOB:

1. Revise §7011-01(h)(3) to recognize continuous or field-tested refrigerant piping without requiring pipe-in-pipe construction and an additional two-hour fire-resistance-rated enclosure;
2. Revise §7011-01(h)(5) to allow refrigerant piping in public corridors when it complies with the charge, testing, penetration, and mitigation requirements of current ASHRAE Standard 15; and
3. Restore ASHRAE Standard 15's unmodified definition of "air circulation" and delete the additional restriction in §7011-01(f)(2).

First, we strongly recommend that DOB adopt the 2024 editions of ASHRAE 15, ASHRAE 15.2, and ASHRAE 34, rather than the 2022 editions that are currently referenced in LL77. The 2024 editions of ASHRAE 15 and ASHRAE 15.2 contain important updates that further align with model codes and provide enhanced consistency with ASHRAE 34. Addenda a and n to the 2022 edition of ASHRAE 34 added values of burning velocity for several refrigerants and revised lower flammability limit (LFL) and refrigerant concentration limit (RCL) values of several refrigerants to the standard. These changes were incorporated into the 2024 edition of ASHRAE 34. The International Code Council (ICC) found the corrections to ASHRAE 34 to be of such critical importance that they issued an Interim Critical Amendment, ICA TSG-000001, to the 2024 edition of the International Mechanical Code (IMC) to correct these values in Table 1103.1.

Additionally, in §7011-01 of LL77, there is a requirement to enclose refrigerant piping in an outer sleeve consisting of piping of the same material and further enclosed in construction having a 2-hour fire-resistance rating. This applies as an exception to the Effective Dispersion

Volume (EDV) calculation and to piping installed in public corridors in (h)(3) and (h)(5). This deviates from §9.12.1.3 of ASHRAE 15. The 2024 editions of ASHRAE 15 and ASHRAE 15.2 contain updated requirements for refrigerant piping containing A2L refrigerants. ASHRAE 15 §7.2.3.1.1 Exempted Spaces, clearly states “areas that contain only continuous *refrigerant piping*, or contain only joints and connections that have been tested in accordance with Section 9.13, are exempt from the *effective dispersal volume* calculation unless these areas are part of *connected spaces* per Section 7.2.3.2.” In both the 2027 IMC and in Addenda a and b of ASHRAE 15-2024, allowances have been made for A2L refrigerant piping to not be subject to the fire-resistance-rated shaft requirement due to the lower risk associated with these refrigerants. We encourage DOB to update the requirements to match the 2024 editions of ASHRAE 15 and ASHRAE 15.2.

§7015–02 also modifies ASHRAE 15’s definition of air circulation by removing “a space or.” This modification restricts air circulation to ducted units serving more than one room. Depending on interpretation, it could be understood that DOB rule requires ASHRAE 15 §7.6.1.2 for even ducted system for multiple rooms, due to wording in §7011-01 F(2). Air circulation from a non-ducted unit or a ducted unit serving a single space has been proven effective through physical testing and computational fluid dynamics modeling. We recommend using the ASHRAE 15 definition without modification and the deletion of the language in §7011-01 F(2) that indicates adjoining air spaces and ducted outside air is required.

LL77 adopted outdated ASHRAE standards with additional local deviations thus, these regulations do not align with what has been adopted in other states and local jurisdictions. Many states and jurisdictions are adopting ASHRAE 15-2024 and ASHRAE 34-2024 and relevant addenda, reflecting updated safety data and corrections. This divergence creates regulatory fragmentation across markets, increased compliance burden for building owners, designers, engineers, manufacturers and distributors, and uncertainty for building owners and project developers. Consistency with national standards is critical to ensure efficient product deployment, supply chain stability, and scalable compliance.

Certain provisions (e.g., pipe-in-pipe, broad shaft requirements, new air-circulation definition and associated EDVC requirements) are not in the market. These requirements:

- require significant redesign and construction changes;
- limit the ability to use readily available, compliant products/systems; and
- create installation and distribution challenges across the value chain.

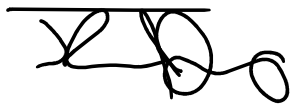
Requirements should reflect commercial availability and real-world installation practices to avoid supply disruptions.

Furthermore, New York City’s building stock depends heavily on retrofits and equipment replacement. LL77 transforms routine upgrades into major construction projects that may require complex redesign and permitting processes. This may result in delayed modernization across building systems, including projects related to LL97 compliance, as well as a reduced ability to efficiently upgrade equipment across sectors. Buildings in New York City are space-constrained, diverse, and often retrofit-driven. The recently added provisions in LL77 limit

design flexibility and reduce available system configurations across mechanical and electrical systems. As a result, this slows retrofit projects and delays broad deployment of next-generation technologies across multiple industries. Flexible, performance-based standards are essential to support multi-system integration in real-world building conditions.

Aligning LL77 with current national standards will reduce the regulatory burden on manufacturers, installers, building owners, and project developers while maintaining robust safety protections for New Yorkers and enabling access to emerging low-Global Warming Potential (GWP) technologies. We strongly encourage that DOB adopt the 2024 edition ASHRAE 15, 15.2, and 34, with all addenda published through June 2026, and remove impractical NYC-specific requirements (such as pipe-in-pipe containment).

Sincerely,



Thomas J. Deary

Senior Director of Codes



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Zac Johnson

Senior Policy Lead – Codes and Rebates

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