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# ACCESSIBILITY REVIEW OF MECHANICAL (HVAC) PROJECTS

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**Disciplines:** Access

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Division of the State Architect (DSA) documents referenced within this publication are available on the [DSA Forms](#) or [DSA Publications](#) webpages.

## PURPOSE

The purpose of this Interpretation of Regulations (IR) is to clarify when DSA Access Compliance review is required for mechanical heating, ventilation, and air conditioning (HVAC) work.

## SCOPE

The California Building Code (CBC) requires alterations to existing buildings or facilities to comply with all applicable provisions of CBC Chapter 11B. Per CBC Section 11B-202.4, when alterations or additions are made to existing buildings or facilities, an accessible path of travel to the specific area of alteration or addition shall be provided. CBC Section 11B-202.4 Exception 7 exempts HVAC “only” projects from the accessible path of travel requirements.

## BACKGROUND

Per CBC Section 11B-202.4 Exception 7, projects consisting only of HVAC work are not required to comply with CBC Section 11B-202.4 unless they affect the usability of the building or facility. HVAC “only” means projects where the work and related components are specific to the HVAC system replacement or installation. Such projects may also include improvements that are necessary for the installation of the equipment, such as reroofing limited to roofing material replacement, the installation of new equipment curbs, or the addition of support members to the existing structural system to distribute the weight of the new equipment. These improvements are incidental to the installation of the HVAC equipment, and as a result, do not require the application of CBC Section 11B-202.4.

Projects where the installation or replacement of rooftop HVAC units involves changes or rearrangement of structural parts or elements of the building such as beams, columns and foundations or reinforcement of the roof diaphragm are considered alterations. CBC Chapter 2 defines “alteration” as *a change, addition or modification in construction.....including but not limited to.....rehabilitation, reconstruction.....changes or rearrangement of the structural parts or elements....*” This interpretation is aligned with Opinion 94-1109 issued by the California Office of the Attorney General. Per CBC Section 11B-202.4, alterations are subject to the accessible path of travel requirements; therefore, projects whose scope of work includes accessibility improvements are subject to accessibility review by DSA.

## 1. DETERMINATION OF DSA ACCESS COMPLIANCE REVIEW

**1.1** HVAC “only” projects are exempt by accessibility code provisions and do not require DSA Access Compliance review or approval. This includes incidental upgrades required solely for the purpose of performing HVAC “only” work. Compliance with CBC Section 11B-309 is still required for operable parts of the system, such as thermostats and carbon dioxide monitors, if applicable.

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**1.2** Mechanical projects that require structural improvements to the main structural system are not HVAC “only” projects and, in addition to compliance with CBC Section 11B-309, are subject to the accessible path of travel improvements required by CBC Section 11B-202.4.

**1.3** Design professionals are encouraged to request a pre-application meeting to determine applicability of CBC Section 11B-202.4 for their HVAC replacement or installation projects when the structural system or roof diaphragm will be affected. A pre-application meeting request is accomplished by the submission of DSA Forms: 91, 92, 93 or 94 to the DSA Regional Office that will review the project.

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### REFERENCES:

California Code of Regulations (CCR) Title 24  
Part 2: California Building Code (CBC), Chapter 2 Definition of Alteration  
Part 2: California Building Code (CBC), Section 11B-202.4  
Part 2: California Building Code (CBC), Section 11B-309

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This IR is intended for use by DSA staff and by design professionals to promote statewide consistency for review and approval of plans and specifications as well as construction oversight of projects within the jurisdiction of DSA, which includes State of California public schools (K–12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is subject to revision at any time. Please check DSA’s website for currently effective IRs. Only IRs listed on the webpage at [www.dgs.ca.gov/dsa/publications](http://www.dgs.ca.gov/dsa/publications) at the time of project application submittal to DSA are considered applicable.