
APPROVAL FOR TEMPORARY SCHOOL USE OF DSA APPROVED RELOCATABLE BUILDINGS

Disciplines: All

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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 Regulation (IR) is to provide a means for obtaining approval for the installation of Division of the State Architect (DSA) approved relocatable buildings on public school campuses for temporary emergency use or temporary interim use during modernization projects.

BACKGROUND

For use during emergency or modernization projects, this IR provides a process for obtaining approval for installation of relocatable buildings for temporary use. All relocatable buildings for temporary use during emergency or modernization projects must be DSA approved buildings.

In the event of an emergency, this IR provides an expedited process for school districts to obtain DSA approval of temporary relocatable buildings in accordance with California Code of Regulation (CCR), Title 24, Part 1, section 4-302(b).

(Note: Emergency relocatable buildings may be for non-temporary use when meeting all provisions of the California Administrative and Building Codes. The expedited process may also be used for non-temporary emergency relocatable buildings.)

1. APPROVAL FOR TEMPORARY USE DURING EMERGENCIES

In case of emergencies, including but not limited to damage to school building from earthquakes, fires and floods, or for health and safety issues such as mold or other contamination, or from unanticipated increase in students wherein educational facilities are immediately needed for displaced or unhoused pupils, the procedure detailed in this IR, sections 3 through 6, permits placement and use of DSA approved relocatable buildings in advance of securing DSA approval for temporary site placement. DSA must be notified immediately after the emergency of the district's intent to use relocatable buildings for emergency purposes in accordance with this IR.

Approval for temporary emergency use is valid for a maximum period of three years from the date of installation. If an unanticipated school use need for the building(s) exceeds three years, the school district shall notify DSA, and DSA may extend the approval for an additional three years.

Within 14 days following the installation of these relocatable buildings, the school district will notify DSA of the extent of the damage to their permanent school buildings and the number of temporary buildings installed to house displaced students. Within 60 days following installation of these relocatable buildings, the design professional representing the school district shall provide DSA with a complete submittal package as described in this IR for review and approval.

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2. APPROVAL FOR TEMPORARY USE DURING MODERNIZATION PROJECTS

Temporary relocatable buildings during modernization projects are typically used for interim housing. DSA approved relocatable buildings are required for temporary school use during modernization projects and will require DSA review and approval per sections 3 through 6 of this IR prior to placement of the buildings. Such projects will be reviewed as a regular project and will not be expedited unless authorized by DSA prior to submittal.

Approval for temporary use is valid for a maximum period of three years from the date of installation. If an unanticipated school use need for the building(s) exceeds three years, DSA shall be notified and may extend the temporary approval for up to three additional years.

3. SUBMITTAL

For temporary emergency use or temporary use during modernization projects, the school district shall provide the following to the DSA regional office serving its area:

3.1 DSA 1: Application for Approval of Plans and Specifications for Temporary School Use

Fill in form DSA1 completely. To describe the project, on line 5 of form DSA1 write "approval for (emergency) temporary school use of DSA approved relocatable buildings." For example, line 5 would read "Construction of: Approval for (emergency) temporary school use of two DSA approved relocatable buildings" if two buildings are being installed.

3.2 Fee

The school district will submit fees for structural and fire and life safety review with the initial application in accordance with CCR, Title 24, Part 1, sections 4-321 and 4-420, and will submit fees for access compliance review in accordance with section 5-104. For purposes of calculating the fee, the construction cost should be based on the cost of any site work, improvements to the building and/or repairs and the costs for moving the building.

3.3 Letter

A letter from the school district (Superintendent or Facilities Director) acknowledging that these buildings are only for temporary use and are limited to use for three years accordingly from the date of installation.

3.4 Plans, Specifications and Calculations

Plans, specifications and calculations shall be provided in accordance with the current edition of *IR 16-1: Design and Construction Requirements for Relocatable Buildings and Modular Elevator Towers: 2019 CBC and Policy (PL) 07-02: Over-the-Counter Review of Projects Using Pre-Check Approved Designs* if submitted for over-the-counter (OTC) review, including the following:

3.4.1 Cover Sheet of Plans

Add a note stating that these buildings are only for temporary use and limited to a maximum use of three years from the date of installation.

3.4.2 Structural Safety (SS)

Submitted plans, specifications and calculations shall indicate the following:

3.4.2.1 Floor Area

The building is one story and has a floor area of no more than 2,160 square feet (sq. ft.). The floor area shall be shown on the drawings.

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3.4.3 Access Compliance (AC)

The construction must comply with all access compliance regulations.

3.4.4 Fire and Life Safety (FLS)

Approval of fire alarm and/or fire sprinkler systems for temporary use buildings shall be in accordance with the Chapter 9, CCR, Title 24, Part 2. Complete and accurate plans, specifications and calculations shall be submitted as follows:

3.4.4.1 Site Plan

A site plan must be submitted along with a completed form DSA-810: Fire & Life Safety Site Conditions Submittal for local fire authority review and acceptance.

3.4.4.2 Placement

Separation distances shall be as provided in California Building Code (CBC).

3.4.4.3 Egress

The path of egress to the public way or to the safe dispersal area(s) have been identified and shown on the site plans, and all gates in the path of egress travel have been identified and equipped with panic hardware. Safe dispersal area(s) have been located, dimensioned, occupant loads identified, and the distance (minimum 50 feet) from all buildings clearly indicated on the site plan.

3.4.4.4 Fire Alarm

For buildings sited less than three years and used for educational purposes (instruction), provide an approved manual fire alarm system consisting of manual pull-stations, visual notification appliances and audible device(s) (with a minimum rating of 95 dBA at 10 feet). Buildings more than 25 feet apart are to be provided with additional audible devices to ensure the fire alarm signal can be heard within adjacent buildings.

3.4.4.5 Communications

Buildings more than 25 feet from other buildings, including other temporary buildings, with a stand-alone fire alarm system must be provided with approved "two-way communication" with the main administration offices consisting of an intercom system, permanently mounted telephone or "walkie-talkie" devices or other similar systems. Buildings that are less than 25 feet from existing permanent buildings on the site shall be interconnected with the campus fire alarm system.

3.4.4.6 Fire Extinguisher

Each building must be equipped with at least one minimum rated 2A:10BC fire extinguisher, mounted at not more than 48 inches to the handle above the finished floor, near the main exit(s) and within 75 foot-travel distance from any point within the building. (Note: "Travel distance" shall not include paths through normally locked doors.)

4. DSA APPROVAL OF PLAN AND SPECIFICATIONS

DSA will review the submitted documents. The documents will be returned to the design professional noted on the application to respond to comments. The design professional shall contact DSA to schedule a backcheck appointment. Once all the comments have been addressed, DSA will initial and date the DSA stamp on the drawings and provide a letter approving the design of the project for temporary three year use. In some circumstances, the OTC process may be used.

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5. INSPECTION REQUIREMENTS

A DSA certified inspector must perform the required site inspection and complete and sign a verified report *DSA-6PI: Project Inspector Verified Report* and *DSA 211: Attachment for Additional Comments/Information* under the approved application and indicating the serial numbers as shown on the building tag. Refer to IR 16-1, Appendix A for a list of site inspection items that are to be completed by the Project Inspector (PI) for relocatable building projects.

6. DSA CERTIFICATION OF CONSTRUCTION

Upon receipt and acceptance by DSA of the inspector's final verified report and any other required documents, DSA will issue a certification of compliance for temporary school use in accordance with CCR, Title 24, Part 1, section 4-339. Temporary buildings or structures shall be completely removed upon the expiration of the time limit stated in the temporary certification letter.

REFERENCES:

California Code of Regulations (CCR), Title 24
Part 1: California Administrative Code, Sections 4-302(b), 4-320, 4-321 and 4-339
Part 2: California Building Code Sections 907.2.3
California Education Code, Sections 17074.52, 17280 17317 and 81130-81149

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 at the time of project application submittal to DSA are considered applicable.