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## **BULLETIN: GROUND MOUNT SOLAR PHOTOVOLTAIC PANEL SYSTEMS**

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

### **PURPOSE**

This bulletin is intended to provide notice to DSA staff and stakeholders that the exemption for ground mount solar panel systems in prior versions of Interpretation of Regulations (IR), [IR 16-8: Solar Photovoltaic and Thermal Systems Review and Approval Requirements](#) has been removed in the current version of the IR 16-8. This bulletin also clarifies the effective date after which DSA approved plans will be required prior to start of construction.

### **BACKGROUND**

On July 23, 2020, the DSA published a revised IR 16-8 to update the interpretation to the 2019 California Building Code (CBC). This publication included significant updates to program and design requirements, including that ground mount solar photovoltaic panel systems will no longer be eligible for exemption from DSA review, regardless whether located within a fenced enclosure and/or posted with signage noting the area is not open to students, staff or public. This determination was based upon Section 17280(a)(1) of the California Education Code (EDC) that the design and construction of all school buildings and structures shall be supervised by DSA under the Department of General Services (DGS), and that Section 4-314, California Administrative Code (CAC) defines utility systems and their supporting structure as school buildings for the safety of students and teachers.

At time of issuance of revised IR 16-8, notification was also issued continuing the exemption in Section 5 in the previous Jan. 25, 2017 version of IR 16-8 until Oct. 1, 2020; after which, all ground mount systems will require submission to DSA for approval and construction oversight. Likewise, the notification was included on the [DSA News](#) webpage on July 24, 2020.

### **IMPLEMENTATION**

On or after January 1, 2021, construction of ground mount photovoltaic solar systems shall not commence without approved plans by DSA. Project inspection shall be provided in accordance with Section 4-333, CAC.

DSA's regional offices will work with clients to meet project deadlines for the review and approval of project plans for ground mount solar photovoltaic projects affected by elimination of the exception in IR 16-8. It is appropriate and recommended to contact the DSA Regional Manager or Plan Review Supervising Structural Engineer to discuss project scope, submittal date, and anticipated construction start date in order to meet the project schedule.