Purpose: The purpose of this Interpretation of Regulations (IR) is to clarify that mechanical only projects do not require DSA Access Compliance review.

Discussion: Mechanical only means projects where all work is undertaken solely for the purpose of heating, ventilation or air conditioning (HVAC). California Building Code (CBC) Section 1134B.2 indicates that all existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings.

However, the building code also states that for existing buildings, projects which consist only of HVAC are not considered alteration projects for the purposes of accessibility for persons with disabilities and are not subject to the accessibility provisions of the code.

DSA Access Compliance considers structural work that is required solely for the purpose of performing the mechanical work to be incidental to the mechanical project which is exempt work per CBC Section 1134B.2.1, Exception 4.

Exemption from DSA Access Compliance Review: Mechanical only projects are exempt by accessibility code provisions and do not require DSA Access Compliance review or approval. This includes mechanical only projects that contain incidental structural upgrades required solely for the purpose of performing mechanical only work. It should be noted that compliance with the building code is still required (i.e. the height of thermostats shall be installed 48” above the finish floor to the operating handle).