
**CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM
DSA REVIEW**

Disciplines: All**History:** Revised 04/23/25
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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

This Interpretation of Regulations (IR) clarifies the scope of construction work that is eligible to be exempt from plan review and approval by DSA. Construction documents for alteration, reconstruction, or new construction projects meeting the criteria defined herein need not be submitted to DSA. Additionally, this IR clarifies inspection, testing, construction oversight, and certification requirements for such projects.

SCOPE

This IR is applicable to construction projects at public K-12 schools and community colleges. It addresses plan review and approval exemptions for each of the three DSA plan review disciplines: Structural Safety (SS), Fire and Life Safety (FLS), and Access Compliance (AC). In many cases, plan review and approval exemptions vary by plan review discipline. This IR is not applicable to state-owned or state-leased essential service facilities, which also fall under DSA jurisdiction.

BACKGROUND

California Administrative Code (CAC) Section 4-310 defines various buildings and structures that are commonly constructed, owned, and operated by school districts but are not governed by the jurisdiction of the Field Act. CAC Section 4-314 defines the term “School Building” and in so doing excludes various elements and ancillary structures from this definition. These provisions inform the scope of construction work that is eligible for exemption from DSA review, approval, and construction oversight; however, some work not governed by the Field Act requires AC review and approval per CAC Section 5-101.

Separately, CAC Section 4-315 excludes maintenance work from review and approval requirements. Maintenance work is defined in CAC Section 4-314 and is governed by the jurisdiction of the Field Act.

CAC Sections 4-308 and 4-309(a) define project cost thresholds below which alteration or reconstruction projects may be exempt from plan review, approval, and construction oversight by DSA. Maintenance work is separate from the work of alteration and reconstruction projects and is therefore excluded from the project cost in consideration of these thresholds.

For the purposes of this IR, the design professional in general responsible charge (DPGRC) is as established in CAC Section 4-316(a).

1. CODE COMPLIANCE

All public school construction projects, including those exempt from DSA review, approval, and construction oversight, must comply with the currently effective Title 24, California Code of Regulations (CCR).



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1.1 School District Responsibility

When authorizing construction of exempt projects, the school district assumes responsibility to ensure compliance with all applicable code provisions.

1.1.1 The school board is responsible to employ or retain appropriately licensed architects or registered engineers to prepare the construction documents.

1.1.2 The school district is responsible to employ or retain inspectors and laboratories to provide the required testing and inspection of materials and construction work.

1.1.3 See Section 5.1.1 below for DSA concurrence of the determination that construction work is exempt from DSA review.

1.2 “Access Only” Projects

Projects requiring only AC plan review and approval are not subject to DSA oversight during construction, nor are such projects certified by DSA. School districts should be aware that this can lead to the following difficulties:

1.2.1 Potential delays in DSA approval for future projects relying on construction work completed in the uncertified project to establish a compliant path of travel. See *Procedure (PR) 15-01: Required Information for Path of Travel Upgrades on Construction Documents* for additional information.

1.2.2 Denial of future unreasonable hardship determinations. See *PR 24-04 Request for Finding of Unreasonable Hardship Per CBC 11B-202.4 Exception 8*, for information relating to a request for a finding of unreasonable hardship.

2. EXEMPTION BASED ON SCOPE

The scope of construction work not governed by the Field Act is eligible for exemption from plan review and approval in accordance with Sections 2.1 and 2.2 below. DSA policy permits other scopes of work to be exempt from some plan review disciplines in accordance with Section 2.3 below.

2.1 Work not Governed by the Field Act

The following construction work does not require SS and FLS plan review, approval, or construction oversight. These scopes of work are itemized in Appendix A below.

2.1.1 Structures or elements excluded from the definition of a “School Building” per CAC Section 4-314 as itemized in Appendix A below. AC review and approval may be required as denoted in the appendix.

2.1.2 Buildings or structures excluded from the jurisdiction of the Field Act per CAC Section 4-310. Refer to Section 2.2.3 below for requirements associated with this exemption. AC review and approval may be required as itemized in Appendix A below.

2.1.3 Charter schools not funded under the Charter School Facilities Program, administered by the Office of Public School Construction. Refer to *Policy (PL) 17-01: Charter Schools Enforcement Jurisdiction* for additional information.

2.2 Regulatory Requirements

Design and construction of the work described in Section 2.1 above must comply with Title 24, CCR as adopted and amended by the California Building Standards Commission.

2.2.1 Construction documents shall be prepared by appropriately licensed architects or registered engineers.

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2.2.2 To comply with Section 1.1.2 above, it is recommended that the school district hire DSA-certified inspectors and a Laboratory Evaluation and Acceptance (LEA) qualified laboratory to perform code-required testing and inspections during construction; however, this work may be inspected and tested by personnel and agencies without these qualifications.

2.2.3 Buildings or structures exempt from plan review, approval, and construction oversight per Section 2.1.2 above shall comply with the following requirements per CAC Section 4-310:

2.2.3.1 A copy of the resolution passed by the school board shall be submitted to the DSA regional office with jurisdiction over the school site.

2.2.3.2 Signage restricting pupil and teacher entry and stating the structure does not meet the structural standards imposed by law for earthquake safety of school use shall be posted.

2.2.3.3 Measures shall be taken to prevent use by and injuries to pupils and teachers as a result of collapse of the structure. The most commonly accepted measure taken for this purpose is constructing fencing around the structure, set back a distance equal to its height.

2.3 Exempt Scope per DSA Policy

In addition to and separate from the scopes of work excluded from Field Act jurisdiction, DSA policy has determined that plan review and approval of other work is not required by some plan review disciplines. These scopes of work are itemized in Appendix C below.

2.3.1 DSA has determined that the work itemized in Appendix C constitutes a school building as defined in CAC Section 4-314. In most cases these elements fall under “utility systems or facilities necessary to the complete functioning of the structures...”

2.3.2 Because the elements listed in Appendix C are subject to the jurisdiction of the Field Act, their design and construction must comply with Title 24, CCR as adopted and amended by DSA, including construction oversight by a DSA-certified project inspector and an LEA qualified laboratory.

2.4 Playground Equipment with Shade Canopy

Playground equipment is not a school building in accordance with CAC Section 4-314.

2.4.1 SS plan review and approval is required for shade canopies that are provided by the playground equipment manufacturer as a feature integral with the playground equipment unless both the following requirements are satisfied:

2.4.1.1 The plan area of the shade canopy does not exceed 120 square feet. Where individual elements (e.g., sails) overlap, the square footage used in the determination of this exemption is the sum of each separate element with no discount for overlapping area.

2.4.1.2 The shade canopy design provides a dedicated structure to the ground that does not rely on playground equipment for vertical support. The dedicated structure must be independent of (but not necessarily separate from) the playground equipment structure.

2.4.2 When not eligible for an SS plan review exemption, shade canopies integral with playground equipment are permitted to be a deferred submittal.

2.4.3 All members, components, and connections in the load paths resisting the code-prescribed forces shall be evaluated (e.g., foundation, columns, poles, shade support members, etc.). Other playground equipment elements (e.g., platforms, slides, climbing walls, etc.) outside these load paths and not directly supporting the shade canopy need not be reviewed.

2.5 Electric Vehicle (EV) Charging Stations

Additional considerations for EV charging stations are provided in this section.

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2.5.1 New parking areas require electrical vehicle charging stations per California Green Building Standards Code (CALGreen) Section 5.106.5.6.

2.5.2 Restriping of reconfiguration of existing parking areas resulting in additional parking spaces requires EV charging stations per CALGreen Section 5.106.5.6.4.

2.5.3 The equipment installed for EV charging stations requires SS review of new or modified parking areas per Section 2.5.1 and 2.5.2 above.

3. MAINTENANCE

Maintenance work is defined in CAC Section 4-314 and does not require DSA review and approval in accordance with CAC Section 4-315. Common types of maintenance work are summarized in Appendix B below.

3.1 Reroofing

Reroofing includes both “roof recover” and “roof replacement” in accordance with the definitions of all three terms in California Building Code (CBC) Section 202 and California Existing Building Code (CEBC) Section 202. While the CEBC classifies reroofing as an alteration, the definition of maintenance in CAC Section 4-314 permits some reroofing projects to be classified as maintenance. For reroofing to be considered maintenance, it must comply with the limitations of the definition and this section.

3.1.1 Reroofing shall comply with CBC Section 1512.

3.1.2 Replacement of clay tile, concrete tile, slate shingles, and metal panel roof systems are not considered “in-kind” replacement due to the unique nature of their fastening requirements. These systems are not exempt and require DSA review and approval.

3.1.3 Changing a roof system is not an “in-kind” replacement and therefore does not qualify as maintenance per the CAC definition. Changing a roof system is an alteration, not maintenance. The cost thresholds described in Section 4.1 below may apply.

3.1.4 Recovering with a second layer of the same roofing material is exempt as reroofing maintenance provided the additional layer does not exceed the weight of the original roofing material. Recovering with a different roofing material does not qualify as maintenance per the CAC definition and is, therefore, an alteration. The cost thresholds described in Section 4.1 below may apply.

3.1.5 If dry-rot or another issue requiring structural repair is discovered during a reroofing only project, such repair will be considered reconstruction, not maintenance. The cost thresholds described in Section 4.1 below may apply.

3.1.6 Reroofing is exempt from AC review and approval in accordance with CBC Section 11B-202.4, Exception 7.

3.2 Mechanical, Electrical, and Plumbing Equipment

The definition of maintenance in CAC Section 4-314 prohibits “the replacement of large mechanical, electrical, or plumbing units or systems” from being classified as maintenance.

3.2.1 The replacement of existing, functioning equipment is not considered maintenance.

3.2.2 The replacement of all units in an existing system is not considered maintenance.

3.2.3 Replacement “in-kind” of failed or failing mechanical, electrical, and plumbing equipment is considered maintenance and is exempt when the new unit(s) complies with all of the following:

3.2.3.1 Weighs less than or equal to the unit it is replacing.

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3.2.3.2 Weighs no more than 2,000 pounds.

3.2.3.3 Installed in the same location as the unit it is replacing.

3.2.3.4 Installed without requiring alteration of the existing structural framing, alteration of the existing supporting curb or platform, or the introduction of an adaptive metal curb that raises the center of gravity of the unit or requires fasteners that cannot be determined from the “replacement in-kind” principle.

3.2.3.5 Installation does not require alteration of the existing ceiling.

3.2.3.6 Installation does not require replacement of ductwork, grilles, electrical components, etc.

3.2.4 Mechanical and electrical maintenance work is exempt from AC review and approval in accordance with CBC Section 11B-202.4, Exception 7; however, replacement of plumbing fixtures is not exempt and must be submitted for AC review and approval. Refer to *IR 11B-6: Accessibility Review of Mechanical (HVAC) Projects*.

4. ALTERATION OR RECONSTRUCTION PROJECT EXEMPTION BASED ON COST

Reconstruction or alteration projects to existing school buildings with construction cost less than the thresholds defined by the regulations do not require DSA review, approval, and construction oversight. The cost thresholds are adjusted annually for inflation in accordance with *U.S. 20 City Construction Cost Index* published in the January issue of Engineering News-Record.

4.1 Exempt Scope

4.1.1 Alteration or reconstruction projects to existing school buildings contracted in 2025 with construction cost less than or equal to \$130,398 are exempt from SS, FLS, and AC plan review, approval, and construction oversight in accordance with CAC Section 4-308.

4.1.2 Alteration or reconstruction projects to existing school buildings contracted in 2025 with construction cost exceeding \$130,398 but less than \$293,397 are exempt from SS and FLS plan review, approval, and construction oversight in accordance with CAC Section 4-309(a) when **all** the conditions of Section 4.2.3 below are met, which includes submitting documentation to DSA.

4.1.3 Site work projects do not constitute an alteration or reconstruction of an existing school building.

4.2 Regulatory Requirements

Design and construction of the work described in Section 4.1 above must comply with Title 24, CCR as adopted and amended by DSA and the State Fire Marshal.

4.2.1 Construction documents shall be prepared by a design professional appropriately licensed or registered in the state of California.

4.2.2 Inspection shall be performed by a DSA-certified project inspector. Material testing shall be performed by a qualified laboratory under the DSA LEA Program.

4.2.3 Buildings or structures exempt from plan review, approval, and construction oversight per Section 4.1.2 above shall comply with the following per CAC Section 4-309(a):

4.2.3.1 A California-registered structural engineer shall examine the project and prepare a written statement certifying that the project does not contain any work of a structural nature. The statement must attest that the work does not cause any alteration or reconstruction of structural components nor trigger structural rehabilitation per CAC Section 4-309(c). This statement shall bear the stamp (seal) and signature of the structural engineer and be submitted to the DSA

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regional office with jurisdiction over the school site prior to commencing construction. Work of a structural nature includes the following:

4.2.3.1.1 Alteration to or reconstruction of the building structure.

4.2.3.1.2 New or changes to existing nonstructural components attached to the building structure that are required by the CBC to resist structural loads, such as equipment, ceilings, partitions, cabinets, veneer, etc.

4.2.3.2 The DPGRC of the project shall prepare a statement and submit it to the DSA regional office with jurisdiction over the school site prior to commencing construction. This statement shall bear the stamp (seal) and signature of the DPGRC and certify that the construction documents comply with the following:

4.2.3.2.1 Contain no work that is regulated by the accessibility standards of Title 24, CCR.

4.2.3.2.2 Contain no work that triggers accessibility upgrades to any existing building or the facility.

4.2.3.2.3 Meet all applicable fire and life safety requirements.

4.2.3.3 Within 10 days of completion of construction, a DSA-certified project inspector shall sign and submit to DSA a verified report, form *DSA 999: Inspection Verified Report for Projects Exempt from DSA Approval*, indicating that the completed project is in conformance with the construction documents. The form DSA 999 is not required for other exempt alteration or reconstruction projects.

4.3 Project Cost Determination

For the purpose of this IR and unless noted otherwise, the project construction cost shall be the entire contracted scope of work, including exempt elements. Refer to *IR A-23: Construction Cost Reporting and DSA Fees* for additional information. Project cost shall be based on the construction scope at one site only.

4.3.1 The construction cost shall be determined at the completion of project design and again at the completion of construction. If the final actual project cost exceeds the cost threshold defined by the regulations, the project is not exempt from DSA oversight. In such cases, the school district shall notify the DSA regional office with jurisdiction over the school site and meet with a manager or supervisor to discuss and establish compliance requirements based on the specifics of the project.

4.3.2 In accordance with California Education Code (EDC) Section 17280, the construction cost used in determining eligibility for the DSA review exemption shall not include the cost of air-conditioning equipment and insulation material cost. For purposes of this provision, air-conditioning equipment includes heating, ventilation, and air-conditioning (HVAC): air conditioning units, heating units, or ventilation units. The cost of ductwork or utility services (i.e., electrical or gas service) to the equipment shall not be excluded.

4.3.2.1 Installation costs for the work of Section 4.3.2 above may also be excluded.

4.3.2.2 Costs of removing and replacing finishes required to accomplish the work of Section 4.3.2 above shall not be excluded.

4.3.3 In accordance with CAC Sections 4-308 and 4-309(a), construction projects shall not be subdivided for the purpose of evading DSA review, approval, and construction oversight.

4.3.4 In accordance with CAC Section 4-308, work classified as maintenance per CAC Section 4-314 need not be included in the project construction cost.

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4.4 Additions

The project cost thresholds established in CAC Section 4-308 and 4-309(a) do not apply to projects categorized as additions. Refer to *IR EB-1: Existing Building Regulations Overview* Section 4.1 for additional information.

4.4.1 Installation of new and modifications to existing solar systems are not exempt from DSA review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Refer to *IR 16-8: Solar Photovoltaic and Thermal Systems Review and Approval Requirements* for SS and FLS review; refer to *IR 11B-9: Accessibility Requirements for Solar Photovoltaic Systems at School Sites* for AC review.

4.4.2 The addition of any component, regardless of size, type, or cost, to an existing tower or pole, requires SS and FLS review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Installation of additional cellular equipment or replacement of existing cellular equipment mounted at grade requires review unless the equipment is confined within an enclosed (i.e., fenced) area previously approved and certified by DSA for cell tower equipment, and the equipment is set back from the fence a distance equal to or greater than the height of the equipment.

5. DOCUMENTATION REQUIREMENTS

An entire project or elements within a larger project may be exempt from DSA review, approval, and construction oversight. The exemption may apply to one, some, or all DSA plan review disciplines: SS, FLS, and AC.

5.1 Project Exemption

In accordance with Section 4 above, small alteration or reconstruction projects may be exempt in their entirety. Alternatively, if the project scope consists only of exempt elements per Sections 2 or 3 above, the entire project is exempt.

5.1.1 If the exemption applies to all DSA plan review disciplines, the project need not be submitted to DSA. DSA concurrence of exempt construction work is not required; however, written concurrence may be requested in accordance with *PR 14-02: Exempt Concurrence*.

5.1.2 If the exemption applies to some but not all DSA plan review disciplines, the project shall be submitted to DSA with the exempt plan review disciplines left unchecked on Line 11 of the form *DSA 1: Application for Approval of Plans and Specifications*. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

5.1.3 Certain scope items (e.g., fencing, site work, etc.) listed in Appendices A and C below require FLS review and approval to verify that the work does not impact the aspects of FLS compliance listed in the subsections below. Site plans must clearly identify all fire protection equipment (e.g., fire hydrants, post indicator valves, backflow preventers, etc.) and clarify how access will be provided for the local fire authority. If the project applicant believes their project does not impact the aspects of FLS compliance listed below, the applicant must submit a form *DSA 7: Application for Concurrence: Project is Exempt* and obtain DSA concurrence.

5.1.3.1 Impede egress.

5.1.3.2 Reduce required egress width.

5.1.3.3 Impede or be located in a designated fire lane.

5.1.3.4 Impede or be located in an emergency access route.

5.1.3.5 Reconfiguration or restriping of parking lots incorporate fire apparatus access routes (i.e., fire lanes).

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5.2 Element Exemption

In accordance with Section 2 above, elements within a larger project may be exempt from DSA review, approval, and construction oversight. In these cases, the following requirements apply to the exempt elements, as applicable:

5.2.1 Notes shall be placed on the construction documents stating the element(s) is “NOT PART OF THE DSA APPROVAL”. If the exemption applies to some but not all DSA plan review disciplines, the note shall specify which disciplines will not review and approve the element. In the absence of this note, DSA will review the element(s) as described in Section 5.3.2 below.

5.2.2 For an exempt occupiable building, the school district board, superintendent, or facilities director shall prepare and submit a signed letter acknowledging that it will not be approved nor certified by DSA.

5.3 Voluntary Submission

This interpretation does not preclude a design professional or school district from electing to submit construction documents for exempt work to DSA for review and approval.

5.3.1 Voluntary submission of an exempt project will trigger full DSA plan review for code conformance and construction oversight, provided the appropriate fees are paid. Review and approval of voluntary submissions will be in accordance with the governing provisions of the Field Act.

5.3.2 Noncompliance with Section 5.2.1 or 5.2.2 above will result in full DSA plan review for code conformance and construction oversight of any element included on the construction documents submitted to DSA.

5.4 Project Certification

DSA will neither oversee nor certify the construction of exempt projects not submitted to and approved by DSA. Except as noted in Section 4.2.3.3 above, the reporting requirements for certification of construction set forth in the CAC are not required and need not be submitted to DSA. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

REFERENCES:

California Code of Regulations (CCR) Title 24

Part 1: California Administrative Code (CAC): Sections 4-308, 4-309, 4-310, 4-314, 4-315, 4-316.

Part 2: California Building Code (CBC): Sections 202, 11B-202.4, 1512.

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.

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Appendix A: Construction Exempt from the Field Act

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A1. Lighting poles and antenna towers less than 35 feet tall supported on grade.	No	No	No	2.1.1	
A2. Poles and towers 35 feet tall or greater supported on grade.	Yes	Yes	No	4.4.2	
A3. Soil retaining walls less than four feet tall above the top of foundation without surcharge or a sloping backfill.	No	No	No	2.1.1	
A4. Concrete or masonry fences less than six feet above grade.	No	Yes	Yes	2.1.1, 5.1.3	
A5. Ball walls or yard walls less than six feet above grade.	No	No	Yes	2.1.1	
A6. Signs, variable message signs (VMS), or scoreboards whose apex is less than eight feet above adjacent grade.	No	No	No	2.1.1	AC: Review of VMS is required if scoping provisions of CBC Chapter 11B require compliance. If VMS are provided at transportation stops or in facilities that may be used as emergency shelters or centers, review is required.
A7. Solid clad fences whose apex is less than eight feet above the highest adjacent grade and not constructed of concrete or masonry.	No	No	Yes	2.1.1, 5.1.3	
A8. Open-mesh baseball backstops less than 35 feet in height consisting of cantilevered pole systems.	No	No	Yes	2.1.1	SS and FLS: Open-mesh backstops of a height 8-feet or greater clad with windscreens, slats, signs, or similar attachments require review.

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Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A9. Open-mesh fences less than 35 feet in height or ornamental and security fencing with spaced rails and pickets less than eight feet in height.	No	Yes	Yes	2.1.1, 5.1.3	SS: Open-mesh fences of a height 8-feet or greater clad with windscreens, slats, signs, or similar attachments require review.
A10. Baseball dugouts less than 250 square feet of interior floor area with lightweight roof construction.	No	No	Yes	2.1.1, 5.2.2	
A11. Batting cages consisting of cantilever poles with loose netting sidewalls and roofs.	No	No	Yes	2.1.1, 5.2.2	
A12. Bleachers and grandstands five rows of seats or less with the first row starting at ground level.	No	No	Yes	2.1.1	FLS: Review is required for bleachers and grandstands located in areas enclosed by fencing.
A13. Folding and telescopic seating systems five rows of seats or less.	No	Yes	Yes	2.1.1	
A14. Single-story accessory facilities to athletic fields not exceeding 250 square feet of floor area (e.g., equipment storage, toilets, snack bar, ticket booths).	No	No	Yes	2.1.1, 5.2.2	SS and FLS: Storage of flammable gases or flammable or combustible liquids exceeding that quantity necessary for maintenance purposes and operation of the equipment, voids the exemption.
A15. Playhouses less than 250 square feet of floor area and playground equipment of any size.	No	No	Yes	2.1.1, 2.4, 5.2.2	FLS: Review is required when playhouses or structures are placed within a building protected by automatic sprinkler systems.
A16. Landscaping consisting of vegetation, irrigation and ground cover.	No	No	No	2.1.1	
A17. Installation of new or replacement of existing synthetic (artificial turf) play fields or running tracks.	No	No	Yes	2.1.1	

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Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A18. Greenhouses, barns, and material or equipment storage sheds used exclusively for plant or animal production or protection and not used for classroom instruction.	No	No	Yes	2.1.1, 5.2.2	Small groups of pupils and teachers may enter these structures for short periods of time.
A19. Temporary student-constructed structures not located within a building.	No	No	No	2.1.1, 5.2.2	Upon completion, such structures are not used for school purposes nor intended to be entered by pupils, teachers, or school employees for school purposes. These structures shall not remain onsite for more than 90 days following completion, unless all provisions of CAC Section 4-310 are met.
A20. Buildings or structures used solely for, warehouses and storage buildings, storing buses and minor mechanical equipment or for non-school use where such buildings or structures do not provide facilities for either pupils or teachers and are not intended to be entered by them for school purposes.	No	No	Yes	2.1.2, 2.2.3, 5.2.2	
A21. Residential dwelling units for teachers or district employees or their family.	No	No	No	2.1.2, 2.2.3, 5.2.2	Refer to <i>PL 24-01: Workforce Housing Projects and Community College Student Housing Projects Submitted to DSA</i> .
A22. District-wide administrative buildings on locations separated from school sites.	No	No	Yes	2.1.2	
A23. School-based health centers, social services, or support services qualifying under the provisions of Education Code Section 17296, housed in standalone buildings located on school property but not used for school purposes.	No	No	Yes	2.1.2, 2.2.3, 5.2.2	Proof of qualification from another agency(s) and copy of a building permit from the local building official shall be provided to DSA prior to start of construction. AC: If ANY school district funds are provided, review is required. If completely funded privately, see note above.

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Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
A24. Temporary-use Community College building.	No	No	Yes	2.1.1, 5.2.2	



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Appendix B: Exempt Maintenance Work

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
B1. Replacement in-kind of mechanical (including, but not limited to, heating, ventilation, and air-conditioning) and electrical units.	No	No	No	3.2	FLS: Review required where fuel-burning appliances or equipment have direct communication with classrooms. Design professionals shall ensure automatic shutoff of HVAC units is provided where velocity exceeds 2000-cfm (see California Mechanical Code). AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.
B2. Replacement of plumbing fixtures.	No	No	Yes	3.2	
B3. Cosmetic maintenance work such as painting and wallpapering.	No	No	No	3	
B4. Replacement in-kind of interior floor coverings.	No	No	No	3	AC: The school district is still required to comply with federal law and the CBC which requires <i>path of travel</i> improvements to be undertaken.
B5. Replacement of interior floor coverings: change of floor material.	No	No	Yes	3	
B6. Reroofing classified as maintenance per Section 3.1 above.	No	No	No	3.1	FLS: For buildings and structures located within a designated hazardous fire area, all roof coverings and assemblies shall have Class A fire hazard classification.
B7. Weatherization/caulking.	No	No	No	3	
B8. Window glazing replacement that does not involve the replacement of the window frame assembly or affect window operability, fire rating, or safety glazing.	No	No	No	3	

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Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
B9. Window shading devices: window screens (applied to glazing only) and solar shading devices as furnishings and requiring no structural attachment.	No	No	No	3	FLS: Shading devices and films shall not be applied to fire-resistance-rated glazing. AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.
B10. Lighting upgrade of buildings: re-lamping, ballast replacement, luminaire replacement.	No	No	No	3	AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.



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Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
C1. New or replacement of exterior walking surfaces.	No	Yes	Yes	2.3	
C2. Installation of new surface over existing parking areas (such as asphalt overlays or seal coat) last improved prior to January 1, 2020.	No	Yes	Yes	2.3, 2.5.2, 5.1.3	
C3. Installation of new surface over existing parking areas with matching striping (such as asphalt overlays or seal coat) last improved January 1, 2020 or later.	No	Yes	No	2.3, 5.1.3	
C4. Removal and replacement of existing parking area surface.	No	Yes	Yes	2.3, 2.5.2, 5.1.3	
C5. Crossarm and/or luminaire replacement on light poles greater than 35 feet in height.	Yes	Yes	No	2.3, 4.4.2	
C6. Fire alarm systems: Includes new systems and replacements or alterations to existing systems.	No	Yes	No	2.3	AC: Review of fire alarm system components that affect accessibility will be reviewed by the FLS plan reviewer. AC review fees are not required.
C7. Underground utility replacement in-kind of water piping and sewer (including, but not limited to, septic tanks and leach fields).	No	Yes	No	2.3, 5.1.3	New or replacement water supply wells require review and approval. AC: Paved surfaces that are part of an accessible route shall be subject to review.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project or Element Description	SS Review Required	FLS Review Required	AC Review Required	IR Section Reference	Notes
C8. Site improvements only involving grading, fill placement, paving, storm drains, or other work not supporting structures nor involving their utilities.	No	Yes	Yes	2.3, 5.1.3	Refer to <i>IR A-9: Site Improvements for School Building Projects</i> for additional information and requirements.
C9. Installation of or alteration to underground fire service water piping for fire hydrants or automatic fire protection systems.	No	Yes	No	2.3	AC: Paved surfaces that are part of an accessible route shall be subject to review.
C10. Installation of or alteration to underground conduits containing fire alarm system conductors or cables.	No	Yes	No	2.3	AC: Paved surfaces that are part of an accessible route shall be subject to review.