
CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Disciplines: Structural, Fire and Life Safety,
Accessibility

History: Revised 02/04/22
Original Issue 08/15/08

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 when plans and specifications for alteration, reconstruction or small new construction projects on existing public (K–12) school and community college sites are not required to be submitted to DSA for review and approval, and to clarify project inspection, testing and DSA construction oversight requirements for such projects. This IR is not applicable to state-owned or state-leased essential services facilities.

BACKGROUND

Certain alteration, reconstruction or small new construction projects on existing public (K–12) school and community college sites, regardless of previous construction date, may be exempt from DSA plan review and approval and construction observation as described in this IR. **When authorizing construction of exempt projects, the school district assumes responsibility to assure compliance with all code provisions.** In authorizing and completing the design and construction of exempt projects, the school board assumes the responsibility for employing appropriately licensed architects or registered engineers to prepare the construction documents. The school district also assumes the responsibility for employing inspectors and laboratories to provide for the required testing and inspection of materials and work of construction.

For this IR, “design professional in responsible charge” or “design professional” shall mean the architect, structural engineer, or professional engineer (e.g., mechanical engineer for mechanical-only projects; electrical engineer for electrical-only projects) who is responsible for the completion of the project design work. Architects and engineers providing project design and/or construction oversight must be licensed to practice in California as required by the rules governing the licensing of architects and engineers and in accordance with DSA *IR A-19: Design Professional’s Signature and Seal (Stamp) on Construction Documents*. See California Business and Professions Code Sections 6735 and 5535 through 5538.

DSA concurrence that a project is exempt is not required; however, written concurrence may be requested in accordance with DSA procedure *PR 14-02: Exempt Concurrence*. Refer to Section 2.1.2 below for exempt items which are submitted as part of a larger project.

1. CALIFORNIA BUILDING STANDARDS CODE COMPLIANCE

All public school construction projects, including exempt projects, must comply with the currently effective Title 24, California Code of Regulations (CCR) as adopted and amended by the State Fire Marshal and DSA, or where denoted in this IR as adopted by the California Building Standards Commission (CBSC).

Exception: For reconstruction projects due to fire damage, Education Code, Section 17280 allows using construction documents approved for the original construction. (See *IR A-32: Partial Demolition* for additional information.) Reconstruction cost thresholds noted in Section 1.3.2 below apply. However, such work is considered an alteration project for Access Compliance (AC) requirements and will require access compliance review and approval.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

NOTE: For the purposes of this IR, unless noted otherwise, project construction cost shall be the entire contracted scope of work, including exempt items (see *IR A-23: Construction Cost Reporting and DSA Fees* for DSA fees based on project construction costs).

1.1 “Access Only” Projects

Projects receiving only access compliance review and approval from DSA do not receive DSA construction oversight, nor certification. School districts should be aware this may lead to DSA approval difficulties for future projects relying on that prior completed construction work as an existing compliant path of travel (see *PR 15-01: Required Information for Path of Travel Upgrades on Construction Documents*) or unreasonable hardship determinations (see *IR 11B-10: Scoping and Path of Travel Upgrade Requirements for Facility Alteration, Addition and Structural Repair Projects*).

1.2 Project Exempt Based on Project Scope Regardless of Construction Cost and Subject to Title 24, CCR Adopted by CBSC

The work in Sections 1.2.1 through 1.2.3 below do not require DSA structural (SS) and fire and life safety (FLS) review and approval and construction oversight and are exempt from the Field Act. This work shall comply with all currently effective design, construction, inspection and material testing provisions of the CCR, Title 24, as adopted by CBSC. Plans and specifications shall be prepared by appropriately licensed architects or registered engineers. It is acceptable, though not required, to use DSA-certified inspectors and Laboratory Evaluation and Acceptance (LEA)-accepted laboratories to meet applicable verification requirements of materials and construction work; however, adequate testing and inspections must be provided per the CCR, Title 24, as adopted by CBSC.

1.2.1 Structures or items not considered a school building per California Administrative Code (CAC), Section 4-314 and identified in the Appendix below. DSA access review may be required per the Appendix.

1.2.2 Non-school structures per CAC Section 4-310 and maintenance of those structures. In accordance with CAC Section 4-310, a copy of the resolution passed by the school board shall be submitted to DSA, and the signage restricting pupil and teacher entry and stating the structure or building does not meet the structural standards imposed by law for earthquake safety shall be posted on these non-school structures. Additionally, measures shall be taken to prevent such use and prevent injuries to pupils or teachers as a result of collapse of such structures. Protection is most commonly provided utilizing fencing located a distance away from the structure’s perimeter at least equal to the structure height. DSA access compliance review may be required per the Appendix.

1.2.3 Charter schools not funded under the Charter School Facilities Program (CSFP), administered by the Office of Public School Construction (OPSC), in accordance with DSA policy *PL 17-01: Charter Schools Enforcement Jurisdiction*.

1.3 Project Exempt Based on Project Scope, and for Reconstruction and Alteration to School Buildings Project Cost, and Subject to Title 24, CCR Adopted by DSA

Unless otherwise noted, the work in Sections 1.3.1 through 1.3.3 below do not require DSA review and approval and construction oversight. However, this work shall comply with all currently effective design, construction, inspection and material testing provisions of Title 24, CCR, adopted by DSA. Construction documents shall be prepared appropriately by a California licensed or registered design professional and shall comply with Section 2. below. Inspection shall be performed by a DSA-certified project inspector. Material testing shall be performed by a laboratory accepted under the DSA LEA Program.

1.3.1 Maintenance work per CAC Section 4-315 as defined in CAC Section 4-314.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

1.3.2 Reconstruction or alteration projects to school buildings less than specified construction cost thresholds.

Note: Site improvement projects and solar system installation or alteration projects, are not exempt under the construction cost threshold exemptions.

1.3.2.1 SS, FLS and AC reconstruction or alteration projects not in excess of \$119,230 in cost for 2022 (adjusted annually per CAC Section 4-308 by using the first January issue of *Engineering News-Record's U.S. 20 City Construction Cost Index*).

1.3.2.2 SS and FLS reconstruction or alteration projects in excess of \$119,230 but less than \$268,268 in cost for 2022 (adjusted annually per CAC Section 4-309(a) same as Section 1.3.2.1 above) when **all** of the following conditions are met:

1.3.2.2.1 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. Work of a structural nature includes modifications to the building structure and any new or changes to nonstructural components attached to the building structure that are required by the California Building Code (CBC) to resist structural loads, such as equipment, ceilings, partitions, cabinets, veneer, solar systems or elements, etc. The statement must attest that the work does not cause any alteration or reconstruction of structural elements nor trigger structural rehabilitation per CAC Section 4-309(c). This statement shall bear the signature and stamp or seal of the structural engineer and shall be filed with the appropriate DSA regional office.

1.3.2.2.2 The design professional in responsible charge of the project shall prepare a statement certifying that the plans and specifications (1) contain no work that is regulated by the accessibility standards of Title 24, (2) contain no work that triggers accessibility upgrades to existing buildings or facilities and (3) meet all applicable fire and life safety standards. This statement shall bear the signature and stamp or seal of the design professional and shall be filed with the appropriate DSA regional office.

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

1.3.2.3 Project Cost Determination

For projects under Section 1.3.2 above, the construction cost shall be determined at the completion of project design (to be included on the form *DSA 1: Application for Approval of Plans and Specifications*) and at the completion of construction. If the final actual project cost exceeds the specified cost thresholds, the project is no longer exempt and will require submittal to DSA for approval and construction oversight.

For the purpose of determining project cost, the scope of the project shall be limited to construction on one site only.

In accordance with Education Code, Section 17280, the construction cost used in determining exemption from DSA review shall not include the cost of air-conditioning equipment (see Note 1 below) and insulation materials (see Note 2 below), and installation cost of such equipment and materials when such installation does not cause structural alterations (see Note 3 below) to a school building (i.e., affects primary or secondary framing members). In cases where such installation causes structural alterations to a school building, the provisions of CAC Section 4-309 will apply and the project may require DSA review and approval.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Note 1: For purposes of this provision, air-conditioning equipment includes heating, ventilation and air-conditioning (HVAC), air-conditioning units, heating units, or ventilation units, and does not include ductwork or utility services (i.e., electrical and/or gas service) to the equipment.

Note 2: For purposes of this provision, insulation materials must be of the same type as previously installed in accordance with building standards.

Note 3: For purposes of this provision, the exclusion of HVAC-related cost is valid only when a determination of no structural alteration is made by a California-registered structural engineer in accordance with requirements of Section 1.3.2.2.1 above.

1.3.2.4 Subdivision of Projects Prohibited

Construction projects shall not be subdivided for the purpose of obtaining exemption from DSA review and approval.

1.3.3 Certain partial demolition work identified in IR A-32 as exempt from DSA review.

1.3.4 Projects Not Limited by Construction Costs

For projects in which the scope of work consists entirely of exempt structures or items not considered a school building or maintenance listed in the Appendix, the estimated construction cost limitations per CAC Sections 4-308 and 4-309(a) will not apply.

2. CONSTRUCTION PROJECTS AND ITEMS ELIGIBLE FOR EXEMPTION

Where indicated in Section 1 above, see Appendix for a list of construction projects and items eligible for exemption from DSA SS, FLS and/or AC plan review and approval and construction oversight. Footnotes clarify any special conditions.

2.1 Items listed in the Appendix are exempt only when complying with one of the following:

2.1.1 The item(s) constitutes the entire scope of a project.

2.1.2 The item(s) is part of a set of plans submitted to DSA for approval for a larger school project and Item 2.1.2 below and, when applicable, Item 2.1.2.2 below are provided:

2.1.2.1 A note on the construction documents stating the item(s) is “not part of the DSA approval.” Without this note, DSA will treat this item(s) as described in Section 3 below.

2.1.2.2 For occupiable buildings identified in the Appendix, a letter by the school district board, superintendent, or facilities director acknowledging the item will not be approved or certified by DSA.

3. VOLUNTARY SUBMITTAL

This interpretation does not preclude a design professional or school district from choosing to submit plans and specifications for exempt projects defined in Section 1. above, with the appropriate fee, to DSA for review. Voluntary submittal of an exempt project or item will trigger full DSA plan review for code conformance and construction oversight, including inspections and materials testing.

4. EXEMPT PROJECT CERTIFICATION REQUIREMENTS

DSA will neither supervise nor certify the construction for exempt projects not submitted to DSA or for projects consisting of access compliance work only, and, except as noted in Section 1.3.2 above, the reporting requirements for certification of construction per the CAC will not be required to be submitted to DSA.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW**Appendix – Construction Projects and Items Eligible for Exemption**

Disclaimer: If using assistive technology to read this document, please adjust your settings to recognize footnotes.

Project Description	Is SS Review Required?	Is AC Review Required?	Is FLS Review Required?	IR Section Reference
1. Cell or antenna towers and poles less than 35 ft. tall supported on grade (lighting poles, flag poles, poles supporting open mesh fences, etc.).	No ⁷	No	No ^{7, 18}	1.2.1
2. Cell or antenna towers and poles 35 ft. tall or greater supported on grade.	Yes ⁶	No	Yes ¹⁸	-
3. Soil retaining walls less than four feet tall above the top of foundation without surcharge or a sloping backfill.	No	No	No	1.2.1
4. Baseball dugouts less than 250 sq.ft. of interior floor area with lightweight roof construction.	No	Yes ¹	No	1.2.1, 2.1.2
5. Ball walls or yard walls less than six feet above grade.	No	Yes ^{4, 12}	No ¹⁸	1.2.1
6. The following free standing elements with apex less than eight feet above adjacent grade: signs, variable message signs and scoreboards.	No	No ³	No	1.2.1
7. Solid clad fences of which the apex is less than eight feet above the highest adjacent grade and not constructed of concrete or masonry.	No	Yes ⁴	No ¹⁸	1.2.1
8. Bleachers and grandstands five rows of seats or less with the first row starting at ground level.	No	Yes ^{2, 12}	No	1.2.1
9. Ancillary accessory facilities to athletic fields (one-story, not over 250 sq.ft. of floor area, used for equipment storage [no fuel or flammable storage allowed, except that amount necessary for maintenance purposes and operation of equipment], toilets, snack bar, ticket booths, etc.).	No	Yes ^{2, 12}	No	1.2.1, 2.1.2
10. Playhouses less than 250 sq.ft. of floor area and playground equipment of any size.	No ¹⁵	Yes ^{2, 12}	No ²⁵	1.2.1, 2.1.2
11. Open-mesh baseball backstops less than 35 ft. in height consisting of cantilevered pole systems.	No ⁷	Yes ^{4, 12}	No ⁷	1.2.1
12. Open-mesh fences less than 35 ft. in height or ornamental and security fencing with spaced rails and pickets less than eight feet in height not affecting egress.	No ⁷	Yes ⁴	No ^{7, 18}	1.2.1

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project Description	Is SS Review Required?	Is AC Review Required?	Is FLS Review Required?	IR Section Reference
13. New or replacement of exterior walking surfaces.	No	Yes ¹²	No ¹⁸	1.2.1
14. Landscaping consisting of vegetation, irrigation and ground cover.	No	No ²³	No	1.2.1
15. Replacement in-kind of mechanical (including, but not limited to, heating, ventilation, air-conditioning) and electrical units.	No ⁹	No ^{13, a}	No ^{9, b, c}	1.3.1
16. Replacement of plumbing fixtures.	No ⁹	Yes ¹²	No ⁹	1.3.1
17. Cosmetic maintenance work such as painting, wallpapering, etc., as defined in Title 24, Part 1, Section 4-314.	No	No	No	1.3.1
18a. Replacement of interior floor coverings of like material.	No	No ³²	No	1.3.1
18b. Replacement of interior floor coverings: change of floor material.	No	Yes ³³	No	1.3.1
19. Installation or replacement of synthetic (artificial turf) play fields or running tracks.	No	Yes ¹²	No	1.2.1
20. Installation of new parking areas.	No	Yes ¹²	No ¹⁸	1.2.1
21a. Installation of new surface over existing parking areas (such as asphalt overlays or seal coat) last improved prior to January 1, 2014.	No	Yes ³⁴	No ^{18, 26}	1.2.1
21b. Installation of new surface over existing parking areas with matching striping (such as asphalt overlays or seal coat) last improved January 1, 2014 and later.	No	No	No ^{18, 26}	1.2.1
22. Removal and replacement of existing parking area surface.	No	Yes	No ^{18, 26}	1.3.1
23. Batting cages with open-mesh sidewalls and loose netting roof: batting cages consisting of cantilever poles with loose netting sidewalls and roofs.	No	Yes ^{2, 12}	No	1.2.1, 2.1.2
24. Reroofing with in-kind roof or "cool" roof or replacing with light-weight, non-metal, non-tile roof and insulation system.	No ¹⁰	No ¹¹	No ^d	1.3.1
25. Weatherization/caulking.	No	No ¹¹	No	1.3.1
26. Window glazing replacement only (does not include the replacement of the window frame assembly or affect window operability, fire rating, or safety glazing).	No	No ¹¹	No	1.3.1

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project Description	Is SS Review Required?	Is AC Review Required?	Is FLS Review Required?	IR Section Reference
27. Window shading devices—window screens (applied to glazing only), and solar shading devices as furnishings and requiring no structural attachment.	No	No^a	No²⁷	1.3.1
28. Energy Management Systems.	No	No¹³	No	1.3.2
29. Lighting upgrade of buildings: re-lamping, ballast replacement, luminaire replacement.	No	No^{13, a}	No	1.3.1
30. Crossarm and/or luminaire replacement on light poles greater than 35 ft in height.	Yes⁶	No¹³	Yes⁶	-
31. Water-heating upgrades, not including solar thermal installations on roofs.	No¹⁷	No¹³	No^b	1.3.1
32. Small skylights, including tubular, installations for which no structural framing member is altered or penetrations of fire-resistance-rated assemblies.	No¹⁴	Yes¹²	No	1.3.2
33. Fire alarm systems: Includes new systems and replacements or alterations to existing systems.	No	No⁸	Yes⁸	-
34. Greenhouses, barns and materials or equipment storage sheds used exclusively for plant or animal production or protection and not used for classroom instruction.	No²⁰	Yes^{12, 20}	No²⁰	1.2.1, 2.1.2
35. Temporary student constructed structures not located within a building.	No²¹	No²¹	No²¹	1.2.1, 2.1.2
36. Buildings or structures used solely for housing, warehouses and storage buildings, 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 as such for school purposes.	No	Yes	No	1.2.2, 2.1.2
37. On locations separated from school sites (Note: if located on school sites, such shall not be exempt): residential dwelling units for school district employees; district-wide administrative buildings.	No¹⁹	Yes¹⁹	No¹⁹	1.2.2, 2.1.2
38. School-based health centers, social services, or support services qualifying under the provisions of Ed Code 17296.	No^{19, 22}	Yes^{19, 24}	No^{19, 22}	1.2.2, 2.1.2

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Project Description	Is SS Review Required?	Is AC Review Required?	Is FLS Review Required?	IR Section Reference
39. Underground utility replacement in-kind of water piping and sewer (including, but not limited to, septic tanks and leach fields).	No ³⁰	No ^{29, 30}	No ^{18, 30}	1.3.2
40. Site improvements only involving grading, fill placement, paving, storm drains, or other work not supporting structures nor involving their utilities.	No ²⁸	Yes	No ^{18, 28}	1.2.1
41. New installations or alterations to roof- or ground-mounted solar systems, elements, equipment, storage devices and associated utilities.	Yes ³¹	Yes ³¹	Yes ³¹	1.3.2
42. Installation of or alteration to underground fire service water piping for fire hydrants or automatic fire protection systems.	No	No	Yes	1.3.2
43. Installation of or alteration to underground conduits containing fire alarm system conductors or cables.	No	No	Yes	1.3.2

Notes:

1. Baseball dugouts of any size and construction are not exempt from AC review.
2. Required for all; specified area limits, height limits, or construction materials provide no exception for AC review.
3. AC review of variable message signs is required if scoping provisions of CBC Chapter 11B require compliance. Scoping provisions apply only to variable message signs for transportation facilities and buildings designed as emergency shelters.
4. AC review required to determine if an accessible route is affected by, required to the area, or crosses the installation of the wall, fence or gate.
5. Not used.
6. For any component, regardless of size, type, or cost, added to an existing tower or pole, the tower or pole and the component connection to the tower or pole will require DSA SS and FLS review. The cost exemptions of Section 1.3.2 above do not apply since this work is an addition and not an alteration. Installation of additional cellular equipment or replacement of existing cellular equipment mounted at grade will require DSA review unless the equipment is confined within an enclosed (fenced) area previously approved and certified by DSA for cell tower equipment, and the equipment is located a minimum distance from the fence equal to the height of the structure.
7. If open-mesh fences or backstops exceeding eight feet in height are clad with windscreens, slats, signs, or similar attachments, DSA SS and FLS review will be required.
8. Review of fire alarm system components that affect accessibility will be provided by DSA FLS staff as part of the FLS review process. AC review fees are not required.
9. Mechanical, electrical and plumbing unit replacement "in-kind" includes any or all units on a building when all of the following requirements are met:
 - Each new unit must be of equal or lesser weight to the existing unit being replaced, and weigh no greater than 2000 lbs.
 - Each new unit must be placed in the same location as the existing unit.
 - Each new unit must be placed without requiring alteration to the existing structural framing or altering existing supporting curb or platform. Exception: Adaptive metal curbs may be utilized provided the applied combined gravity plus lateral forces to the structure are not increased.
 - Each new unit must be placed without requiring alteration to the existing ceiling.
 - Each new unit must be placed without requiring replacement of ductwork, grilles, electrical components, etc.
10. Weight of new roof covering and insulation must not exceed the weight of the removed existing roof covering and insulation, except that "in-kind" replacement of tile roof systems will not be exempt and will require submission to DSA. Changes in roofing systems are limited to lightweight non-metal, non-tile roof and insulation systems; if such changes weigh significantly less than the previous roofing system, the change shall be considered an alteration, not maintenance, and the cost thresholds in Section 1.3.2 above apply. Applications of an in-kind second roofing layer may be exempt provided the additional layer does not exceed the weight of the original roofing material. Note: If dry-rot or other issue requiring structural repair is found

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

during a reroofing only project, such repair shall be considered an alteration, not maintenance, and the repair shall be considered in cost thresholds in Section 1.3.2 above.

11. Considered normal maintenance.
12. Defined as an alteration per CBC Chapter 2; therefore, work is subject to *path of travel* improvements per CBC Section 11B-202.4.
13. Work consisting of changes to mechanical and electrical systems only are not subject to *path of travel* improvements. Structural improvements related to mechanical and electrical system installations do trigger access compliance review and *path of travel* improvements.
14. The installation of tubular or small skylights (2 ft. x 2 ft. max.) in which no structural framing member is altered shall be exempt unless the number of skylights would cause more than 5 percent of the roof diaphragm to be removed.
15. SS review is required for shade canopies that are provided by the playground equipment manufacturer as a feature integral with playground equipment unless both the following requirements are satisfied:
 - Plan area of shade canopy does not exceed 120 sq.ft.. Where individual elements (e.g., sails) overlap or make up a larger canopy, the square footage used in the exemption determination is the sum of each separate element with no discount for overlapping area, and
 - Shade canopy design provides a dedicated structure (independent but not necessarily separate) to the ground that does not rely on playground equipment for vertical support.

When not eligible for exemption, from SS review, shade canopies integral with playground equipment are permitted to be a deferred submittal. All members, components and connections in the load path(s) resisting the code-prescribed forces applied to the shade canopy shall be evaluated (e.g., foundation, columns, poles, shade support members, etc.). Other playground equipment components (e.g., platforms, slides, climbing walls, etc.) outside these load paths and not directly supporting the shade canopy need not be reviewed.

16. Not used.
17. Tankless systems exceeding 20 pounds located in any location are NOT exempt from DSA SS review.
18. Noted item, including gates, shall not impede egress or reduce required egress width, or be located in, or impede designated fire lane(s) or emergency access routes.
19. Upon completion, such structures are not used for school purposes nor intended to be entered by pupils, teachers or school employees for school purposes.
20. Small groups of pupils and teachers may enter these structures for short periods of time.
21. 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.
22. Proof of qualification from other agencies and copy of building permit from the local building official shall be provided to DSA prior to start of construction.
23. Landscape only projects are exempt from DSA review. See Section 1. above. Projects submitted to DSA for review that have landscape elements must submit a form *DSA 1-L: Outdoor Water Use Self-Certification of Landscape Irrigation Design and Documentation*.
24. If completely privately-funded, see footnote 22. If ANY school funds are provided, AC review is required.
25. FLS review is required when playhouses or structures are placed within building(s) protected by automatic sprinkler systems.
26. FLS review is required where reconfiguration or restriping of parking lots incorporate fire apparatus access routes (fire lanes).
27. Shading devices and films shall not be applied to fire-resistance-rated glazing.
28. Refer to *IR A-9: Site Improvements for School Building Projects* for additional information and requirements.
29. Paved surfaces that are part of an accessible route shall be subject to AC review.
30. New or replacement water supply wells require DSA review and approval.
31. Installation of new and alterations to existing solar systems are not exempt from DSA review. The cost exemptions of Section 1.3.2 above do not apply since this work is an addition and not an alteration. See *IR 16-8: Solar Photovoltaic and Thermal Systems Review and Approval Requirements* for structural and fire and life safety, and *IR 11B-9: Accessibility Requirements for Solar Photovoltaic Systems at School Sites* for access compliance pertaining to solar systems.
32. A change in floor material from like product to like product does not require access review by DSA. The school district is still required to comply with federal law and CBC which requires *path of travel* improvements to be undertaken.
33. A change in floor material from the product installed (i.e., carpet to vinyl tile) will require AC review. *Path of travel* improvements are also required.
34. AC review is required due to CBC changes effective January 1, 2014 which requires 1 van accessible space for every six accessible spaces. Per CBC Section 11B-202.4 Exception 5, *path of travel* improvements are not required.

Code requirements related to the exemption or non-exemption:

- a. Controls require compliance with the operable parts requirements of CBC Chapter 11B.
- b. Fuel-burning appliances/equipment shall not be located in, or have direct communication with classrooms.
- c. Ensure automatic shutoff of HVAC units where CFM exceeds 2000 (see California Mechanical Code).

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

- d. For buildings and structures located within a designated hazardous fire area, all roof materials and assemblies shall have Class A fire hazard classification.

REFERENCES:

California Code of Regulations (CCR) Title 24

Part 1: California Administrative Code (CAC), Sections 4-306, 4-308, 4-309, 4-310, 4-314, 4-315, 4-406, 5-102

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.