

TEMPORARY APPROVAL FOR SCHOOL USE OF DSA APPROVED RELOCATABLE BUILDINGS: 2016 CBC

Disciplines: ALL

History:

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

BACKGROUND: For use during emergency or modernization projects, this DSA IR provides a process for obtaining temporary approval for relocatable buildings utilizing alternate approval of fire alarm and/or fire sprinkler systems in accordance with the California Code of Regulations (CCR), Title 24, Part 2, Sections 903.2.19 and 907.2.29. All temporary relocatable buildings for use during emergency or modernization must be DSA approved buildings.

In the event of an emergency, this DSA IR provides an expedited process for school districts to obtain DSA approval of temporary relocatable buildings in accordance with both CCR, Title 24, Part 1, Section 4-302(b), and Part 2, Sections 903.2.19 and 907.2.29. (Note: Emergency relocatable buildings may be for non-temporary use when meeting all provisions of the California Administrative and Building Codes, and not involving alternate approvals per Part 2, Sections 903.2.19 and 907.2.29. The expedited process may also be used for non-temporary emergency relocatable buildings.)

1. TEMPORARY APPROVAL DURING EMERGENCY USE: 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 permits placement of already fabricated DSA approved relocatable buildings in advance of securing DSA temporary approval for site placement. DSA must be notified immediately after the emergency of the district's intent to use this IR for emergency purposes.

Temporary approval 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 temporary 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.

2. TEMPORARY APPROVAL DURING MODERNIZATION PROJECTS: Temporary relocatable buildings during modernization projects are typically used for interim housing utilizing alternate approval of fire alarm and/or fire sprinkler systems in accordance with Chapter 9 of the California Building Code (CBC). School use of DSA approved relocatable buildings during modernization projects will require DSA review and receipt of a temporary approval per this IR prior to placement. Such projects will be reviewed as a regular project and will not be expedited unless authorized by DSA prior to submittal.

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Temporary approval 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 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 Temporary Approval of Plans and Specifications:** Fill in form DSA-1 completely. To describe the project, on line 5 of form DSA-1 write “temporary approval for (emergency) school use of DSA approved relocatable buildings.” For example, line 5 would read “Construction of: Temporary approval for (emergency) 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 36 months accordingly from the date of installation.
- 3.4 Plans, Specifications and Calculations:** shall be provided in accordance with the current edition of IR 16-1 and PL 07-02 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 are limited to use for 36 months accordingly from the date of installation.
- 3.4.2 Structural Safety (SS):** Submitted plans, specifications and calculations shall indicate the following:
- **Floor Area:** The building is one story and has a floor area of no more than 2,160 square feet. The floor area shall be shown on the drawings.
- 3.4.3 Access Compliance (AC):** The construction must comply with all access compliance regulations. No alternatives are available.
- 3.4.4 Fire and Life Safety (FLS):** Complete and accurate plans, specifications and calculations shall be submitted as follows:
- **Site Plan:** A site plan must be submitted along with DSA-810 for local fire authority review and acceptance, when necessary.
 - **Placement:** Separation distances shall be as provided in CBC, Section 602.
 - **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 have been identified and equipped with panic hardware. Safe dispersal

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area(s) have been located, size and occupant loads identified, and the distance (minimum 50 feet) from buildings clearly indicated on the site plan.

- **Fire Alarm:** For buildings used for educational purposes (instruction), provide an approved fire alarm system consisting of a manual pull-station and audible device(s) (with a minimum decibel rating of 95 at 10 feet) powered by the building's electrical system and backup battery power. Building units more than twenty five (25) feet apart are provided with additional audible devices to ensure fire alarm can be heard within adjacent buildings.
- **Communications:** Units more than twenty five (25) feet from other buildings, including other temporary buildings, with a stand-alone fire alarm system must be provided with "two-way communication" with the main administration offices via an intercom system, permanently mounted telephone or "walkie-talkie" devices or other similar systems. Buildings that are less than twenty (25) feet from existing permanent buildings on the site shall be interconnected with the fire alarm system of the campus.
- **Fire Extinguisher:** Each building must be equipped with at least one minimum rated 2A:10B:C fire extinguisher, mounted at 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 by email approving the design of the project for temporary three year use. In some circumstances, the over-the-counter (OTC) process may be used.

5. Inspection Requirements: A DSA certified inspector must perform the required site inspection and complete and sign a verified report (DSA-6PI and DSA-211) indicating the serial numbers as shown on the building tag.

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 temporary certification of compliance 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.

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REFERENCES:

California Code of Regulations (CCR), Title 24

Part 1, 2013 & 2016 California Administrative Code

Sections 4-302(b), 4-320, 4-321 and 4-339

Part 2, 2013 & 2016

California Building Code Section 907.2.3.7 & 907.2.3.8

California Education Code, Sections 17074.52, 17280-17317 and 81130-81149

This Interpretation of Regulations (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA which includes State of California public elementary and secondary schools (grade 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 reviewed on a regular basis and is subject to revision at any time. Please check the DSA web site for currently effective IRs. Only IRs listed in the document at <http://www.dgs.ca.gov/dsa/Resources/IRManual.aspx> at the time of plan submittal to DSA are considered applicable.