

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

Disciplines:	All Disciplines	History:	Revised 08-25-15	Revised in its entirety 08-14-14
			Revised 06-16-15	Revised 03-22-13
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PURPOSE: The purpose of this Interpretation of Regulations (IR) is to clarify when plans and specifications for small construction projects on existing public school sites are required to be submitted to the Division of the State Architect (DSA) for review, approval, and construction oversight.

INTERPRETATION:

1. CALIFORNIA BUILDING STANDARDS CODE COMPLIANCE:

- 1.1 The following does not require DSA structural and fire and life safety approval. However, this work shall comply with all currently effective design, construction, and inspection provisions of the California Code of Regulations (CCR), Title 24, as amended by DSA. Inspection shall be performed by a DSA certified project inspector.
- Maintenance work per Section 4-315, Part 1, California Administration Code (CAC) and defined in Section 4-314 Part 1, CAC.
- 1.2 The following do not require DSA structural and fire and life safety approval and are exempt from the Field Act. However, this work shall comply with all currently effective design, construction, and inspection provisions of the CCR, Title 24, as adopted by the California Building Standards Commission.
- Structures or items not considered a school building per Section 4-314, Part 1, CAC.
 - Non-school structures per Section 4-310, Part 1, CAC and maintenance of those structures.

When authorizing construction of exempt projects described in this interpretation, the school district assumes responsibility to assure compliance with all code provisions. Architects and engineers providing project design must be licensed as required by the rules governing the licensing of architects and engineers. See Business and Professions Code Sections 6735 and 5535 through 5538.

It is not mandatory to obtain DSA concurrence that a project is exempt. However, written concurrence may be requested in accordance with DSA procedure [PR 14-02](#).

2. ACCESS COMPLIANCE REQUIREMENTS: All projects, whether governed by the Field Act or not, shall comply with all applicable accessibility provisions of the CCR, Title 24. Some projects that are exempt from DSA structural and fire and life safety approval, including non-school structures per Section 4-310, Part 1, CAC, are required to be submitted to DSA for review and approval by the access compliance section per Government Code Sections 4450-4461. See Appendix A for project types that fall into this category.

3. CONSTRUCTION PROJECTS AND ITEMS ELIGIBLE FOR EXEMPTION:

See Appendix A for a list of construction projects and items eligible for exemption from DSA structural safety, fire and life safety, and/or access compliance review and approval. Checkmarks in Appendix A are used to indicate whether an item is or is not eligible for exemption from review by one or more disciplines. Footnotes clarify any special conditions under which an item is or is not eligible for exemption.

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

- a. The item(s) constitutes the entire scope of a project.
- b. The item(s) is part of a set of plans for a larger school project, and both of the following are provided:
 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 5.
 2. A letter by the school district board, superintendent, or facilities director acknowledging the item will not be approved or certified by DSA.

3.2 For projects in which the scope of work consists entirely of exempt structures or items not considered a school building or maintenance listed in Appendix A, the estimated construction costs limitations per Sections 4-308 and 4-309(a), Part 1, CAC (see also IR A-10) will not apply.

4. EXEMPT RECONSTRUCTION AND ALTERATIONS: In addition to projects listed in Appendix A, projects involving alterations or repairs to existing approved school buildings may be exempt from DSA review and approval based on the estimated construction costs. Refer to [IR A-10](#) “Alteration and Reconstruction Projects–DSA Approval Exemption.”

For exempt alteration or reconstruction projects constructed in accordance with Section 4-309(a), Part 1, CCR, form DSA 999 “Inspection Verified Report for Projects Exempt From DSA Approval” will be required.

5. VOLUNTARY SUBMITTAL: This interpretation does not preclude a school district from choosing to submit plans and specifications for exempt projects, 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.

6. PROJECT INSPECTION REQUIREMENTS: Exempt projects not submitted to DSA or projects consisting of access compliance work only, DSA will not supervise nor certify the construction, and the reporting requirements for certification of construction per Part 1, CCR will not be required to be submitted to DSA.

This administrative 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 (grades K-12 and community colleges), and state-owned or state-leased essential services buildings. This IR indicates acceptable practices as stipulated in the California Administrative code (CCR, Title 24, Part 1) and aligning with DSA policies and procedures. This IR is reviewed on a regular basis and is subject to revision at any time. Please check the DSA website for currently effective IRs. Administrative and technical IRs are listed on the DSA website at: <http://www.dgs.ca.gov/dsa/Resources/IRManual.aspx>.

Administrative IRs are effective upon publication. Questions regarding the effect for existing projects can be directed to the DSA Regional Office with plan review and construction oversight authority for the project.

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Appendix A—Construction Projects and Items Eligible for Exemption

Project Description	Exempt from SS Review		Exempt from AC Review		Exempt from FLS Review	
	No	Yes	No	Yes	No	Yes
1. Cell or antenna towers and poles less than 35 ft. tall (lighting poles, flag poles, poles supporting open mesh fences, etc.) not in designated fire lane(s).		✓		✓ ¹		✓
2. Cell or antenna towers and poles greater than 35 ft. above grade not in designated fire lane(s).	✓ ⁶			✓	✓	
3. Soil retaining walls less than four feet tall without surcharge or a sloping backfill.		✓		✓ ¹		✓
4. Baseball dugouts less than 250 sq.ft. of floor area with lightweight roof construction and soil retaining walls less than four feet tall without surcharge or a sloping backfill (if applicable).		✓	✓ ²			✓
5. Ball walls or yard walls less than six feet above grade, not in a designated fire lane.		✓		✓ ¹		✓
6. Free standing signs, scrolling message signs, scoreboards, or solid clad fences of which the apex is less than eight feet above the highest adjacent grade.		✓		✓ ^{1, 4}		✓
7. Bleachers and grandstands five rows of seats or less with the first row starting at ground level.		✓	✓ ²			✓
8. Ancillary accessory facilities to athletic fields (one-story, not over 250 sq.ft., used for equipment storage, toilets, snack bar, ticket booths, etc.).		✓	✓ ²			✓
9. Playhouses less than 250 sq.ft. of floor area and playground equipment of any size.		✓	✓ ³			✓
10. Open-mesh baseball backstops less than 35 ft. in height for cantilevered pole systems.		✓ ⁷	✓ ³			✓ ⁷
11. 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.		✓ ⁷		✓ ⁴		✓ ⁷
12. New or replacement of sidewalks.		✓	✓			✓
13. Landscaping.		✓	✓ ⁴			✓
14. Replacement in-kind of mechanical, electrical, or plumbing units. ¹⁶		✓ ⁹		✓ ¹³		✓ ⁹
15. Cosmetic maintenance work such as painting, wallpapering, etc., as defined in Title 24, Part 1, Section 4-314. ¹⁶		✓		✓ ¹⁵		✓



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Project Description	Exempt from SS Review		Exempt from AC Review		Exempt from FLS Review	
	No	Yes	No	Yes	No	Yes
16. Installation of synthetic (artificial turf) play fields or running tracks.		✓	✓			✓
17. Installation of new parking areas not involving fire lane(s).		✓	✓			✓
18. Installation of new surfacing over existing parking areas (such as asphalt overlays).		✓	✓ ⁵			✓
19. Removal and replacement of existing parking area surfacing. ¹⁶		✓	✓ ⁵			✓
20. Installation of seal-coating at existing parking areas (including new striping), or normal maintenance such as restriping or the filling of potholes and cracks. ¹⁶		✓		✓		✓
21. Batting cages with open-mesh sidewalls and loose netting roof: batting cages consisting of cantilever poles with loose netting sidewalls and roofs.		✓	✓ ³			✓
22. Reroofing with in-kind roof or replacing with light-weight, non-metal, non-tile roof, and insulation system. ¹⁶		✓ ¹⁰		✓ ¹¹		✓
23. Weatherization/caulking. ¹⁶		✓		✓ ¹¹		✓
24. Window replacement (glazing only—not rated or requiring frame replacement). ¹⁶		✓		✓ ¹¹		✓
25. Window shading devices—window screens (applied to glazing only), and solar shading devices requiring no structural attachment. ¹⁶		✓		✓ ¹¹		✓
26. Energy Management Systems.		✓		✓ ¹³		✓
27. Lighting upgrade: re-lamping, ballast replacement, fixture replacement. ¹⁶		✓		✓ ¹³		✓
28. Water-heating upgrades, not including solar thermal installations on roofs. ¹⁶		✓		✓ ¹³		✓
29. Solar tubes or small skylight installations for which no structural framing member is altered or penetrations of fire rated assemblies.		✓ ¹⁴	✓ ¹²			✓
30. Fire alarm systems: Includes new systems and replacements or alterations to existing systems.		✓		✓	✓ ⁸	

Notes:

1. No height limit for access compliance exemption.
2. Required for all, no exception.
3. Playground structures must comply with Chapter 11B, Section 11B-1008 Play Structures of the 2013 CBC and may also trigger path of travel upgrade requirements under Chapter 11B, Section 11B-202.4.
4. Required if accessible path of travel is impacted. Required if the fence or gate crosses any accessible route of travel. Gates for pedestrian use on an accessible route of travel are required to comply with applicable accessibility requirements; installation of fencing and/or gates does not trigger other CBC, Section 11B-202.4 requirements.
5. US Department of Justice has issued guidance that resurfacing of parking facilities is an alteration. Restriping, as a maintenance activity, may require access review if accessible parking spaces are impacted.

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6. For any component, regardless of size, type, or cost, added to an existing tower, the tower and the component connection to the tower will require DSA structural and fire and life safety review. The cost exemptions of IR A-10 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 greater than eight feet are clad with windscreens, slats, signs, or similar attachments, DSA structural and fire and life safety review will be required.
8. AC review will be provided by the 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 is not to exceed the weight of the removed existing roof covering and insulation. Changes in roofing systems are limited to lightweight non-metal, non-tile roof and insulation systems. 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.
11. Considered normal maintenance which does not affect the “usability of the building,” this construction falls under CBC Section 11B-202.4 Exception 7.
12. Considered an Alteration per CBC Chapter 2 Section 202, this construction is not exempt from the requirements of CBC Section 11B-202.4.
13. Under the definition of “Alteration” in Chapter 2 Section 202 of the CBC, this work is considered “changes to mechanical and electrical systems” that is not an alteration for purposes of accessibility. It also falls under CBC Section 11B-202.4 Exception 7 and does not trigger path of travel upgrade requirements unless usability (read “accessibility”) of the facility is affected.
14. The installation of solar tubes or small skylights (2 ft x 2 ft max) in which no structural framing member is altered shall be exempt unless the number of solar tubes or skylights would cause more than 5% of the roof diaphragm to be removed.
15. Changing or replacement of floor coverings is an alteration for purposes of accessibility and in addition to meeting accessibility requirements may trigger path of travel upgrades in accordance with Chapter 11B Section 11B-202.4.
16. Items are considered maintenance and shall be exempt subject to the provisions of Section 1.1 of this Interpretation.

