
**MECHANICAL ONLY PROJECTS
EXEMPT FROM ACCESSIBILITY REVIEW**

IR 11B-6

References:
California Building Code, Section 1134B.2.1, Exception 4

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Discipline: Access Compliance

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. 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.

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

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

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

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

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