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## TEMPORARY APPROVAL FOR SCHOOL USE OF HCD COMMERCIAL COACHES

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# IR A-1

References:

- California Code of Regulations (CCR), Title 24
  - Part 1, California Administrative Code, Sections 4-302(b) and 4-321.
  - Part 2, 2010 California Building Code (CBC), Section 907.2.3.7
  - Part 2, 2007 CBC, Section 907.2.3.8
- California Education Code, Sections 17074.52, 17280-17317 and 81130-81149

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Discipline: ALL

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 (grades 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.

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**Purpose:** The purpose of this IR is to provide a means for obtaining a temporary approval for the installation of Department of Housing & Community Development (HCD) commercial coaches as buildings on public school campuses. Temporary approval is valid for a maximum period of two years from the date of installation. If an unanticipated school use need for the building(s) exceeds two years, DSA shall be notified and may extend the temporary approval for one additional year.

This IR provides for temporary approval to use HCD commercial coaches without DSA review and approval of the structural system of the HCD building itself.

**Background:** HCD commercial coaches may be used as a building construction alternative when fully conforming relocatable buildings are not practical or available. In accordance with Section 4-302(b), Part 1, Title 24, California Code of Regulations, this DSA IR provides an expedited process for school districts to use for Division of the State Architect (DSA) approval of small relocatable buildings.

The school district is highly encouraged to contact DSA immediately if there is intent to install temporary buildings using this expedited process.

**Emergency Use:** In case of emergencies, including but not limited to damage to school buildings as 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 the HCD temporary use building in advance of securing DSA temporary approval. This emergency use procedure may also be used for emergency installation of DSA Pre-Checked relocatable buildings.

DSA must be notified immediately after the emergency of the district's intent to use this emergency use IR.

Within 14 days following the installation of these emergency temporary use 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 emergency temporary use buildings, the

design professional representing the school district shall provide DSA with a complete submittal package as described in this procedure.

**Use During Modernization Projects:** School use of HCD temporary approved buildings during modernization projects would require DSA review and approval and receipt of a temporary approval per this procedure prior to placement. The emergency use procedures of this IR may be used when, during the modernization project, there is an unanticipated immediate need for a building for displaced or unhoused students.

**Submittal:** The school district shall provide the following to the Division of the State Architect (DSA) Regional Office serving its area:

**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 school use of \_\_\_ HCD commercial coaches". For example line 5 would read "Construction of: temporary approval for school use of 2 HCD commercial coaches" if two buildings are being installed.

**2. Fee:** The school district will submit fees with the initial application per Fee Schedule II, Section 4-321, Part 1, Title 24 and per Section 5-104, Part 1, Title 24 for access compliance review. 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. 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 24 months from the date of installation.

**4. Plans, Specifications and Calculations:** shall be provided, including the following:

**Note:** Plans, specifications and calculations for the HCD building are not required if the HCD building is certified per Section 6 and a letter is provided, from the architect/engineer in responsible charge, stating that the building has not had alterations, or suffered deterioration, that affect access compliance, structural safety or fire/life safety code regulated elements. For example: addition of wall supported casework is an alteration to the building. If altered, complete plans, specifications and calculations, as needed for the altered portion of the building, shall be submitted for review and approval. Maintenance work does not need to be included in the submittal. See the definition of "maintenance" in Section 4-314, Part 1 of Title 24, California Code of Regulations.

**4.1 Cover Sheet of Plans:** Add a note stating that these buildings are only for temporary use and are limited to use for 24 months from the date of installation.

**4.2 Structural Safety (SS):** Submitted plans, specifications and calculations shall indicate the following:

**4.2.1 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. A drawing showing the footprint of the building, except as noted in this IR, is generally adequate for the HCD building.

**4.2.2 Foundation System:** Complete plans specifications and calculations for the anchorage and bracing of the building in accordance with the current California Building Code (CBC) through December 31, 2010; after this date foundation

designs shall be in accordance with the 2010 CBC. Foundation system plans could receive DSA pre-check (PC) approval (see DSA Policy 07-01), and be submitted over-the-counter (OTC), with DSA Regional Office coordination. Some foundation systems may require soils reports and/or soil testing and anchorage system testing. For first time foundation system submittals, pre-submittal coordination with the local regional office is highly encouraged.

**4.2.3 Non-Structural Elements:** Plans and specifications shall detail the anchorage of all overhead non-structural elements, labeled as existing or new, as appropriate.

**4.3 Access Compliance (AC):** The construction must comply with all access compliance regulations. No alternatives are available. A complete submittal shall include but is not limited to the following;

**4.3.1 For exterior construction:** Complete plans and specifications of the disabled access features of the site placement for the HCD building, including:

- An accessible pedestrian route from the main entrance of the site to each commercial coach and linking accessibility elements.
- A code compliant ramp to the front door of the building;
- At least one hi-lo drinking fountain centrally located.
- At least one set of accessible separate sex toilet facilities centrally located and available for use.
- Van-accessible parking.

**4.3.2 For interior construction:** Code required accessibility features for the HCD building itself shall be provided. For example:

- Accessible lever door hardware and threshold provided at the entrance door of each commercial coach with allowable closer pressure.
- Toilets, or any other code regulated accessibility features inside the HCD building, must be fully detailed on the plans.

**4.4 Fire and Life Safety (FLS):** Complete and accurate plans, specifications and calculations shall be submitted as follows:

**4.4.1 Site Plan:** A site plan must be submitted with the stamp and signature of the local fire authority indicating approval of:

- the placement of the buildings
- the fire apparatus access road
- access gates and
- use in a designated very high to moderate fire hazard severity zone (where applicable).

**4.4.2 Placement:** Separation distances shall be as provided in CBC, Section 602.

**4.4.3 Egress:** The path of egress to the public way or to the safe dispersal area(s) has/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 area(s) has/have been located, size and occupant loads identified, and the dimensions from buildings clearly indicated (minimum 50 feet) on the site plan.

- 4.4.4 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 (25) feet apart are provided with additional audible devices to ensure fire alarm can be heard within adjacent buildings.
- 4.4.5 Communications:** Units more than 25 feet from other buildings, including other temporary buildings, with a standalone 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.
- 4.4.6 Fire Extinguisher:** Each HCD 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 exist(s) and within 75 foot travel distance from any point within the building. (Note: "Travel distance" shall not include paths through normally locked doors.)
- 4.4.7 Occupancies:** HCD Coaches shall not be used as a science lab, shop classroom, cafeteria or dining room with 100 or more occupants, or for assembly with 300 or more occupants.

**5. 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 e-mail approving the design of the project for temporary two year use. In some circumstances the over-the-counter (OTC) process may be used (See Section 4.2.3 of this policy).

**6. HCD Building Certification:** Certification must be provided by a design professional licensed to practice in California and countersigned by the school district that each commercial coach to be utilized was built after Dec. 19, 1979. In lieu of the proceeding sentence, the owner of the HCD building may provide the school district with a letter that provides the HCD insignia numbers, serial numbers and dates of manufacture for each building. A copy of the letter will be submitted to DSA. The certification or letter must also indicate the design live load, snow load, and the wind load for the building.

**7. Inspection Requirements:** A DSA certified inspector must perform the required inspection and complete and sign a verified report (Form DSA-6) which indicates the serial numbers, insignia numbers, roof load, floor load, and wind load as shown on the building tag.

The inspector must make specific statements on the final verified report indicating that:

- Proper installation of the approved foundation system has been done per approved drawings.
- Anchorage of the non-structural elements has been done per the approved drawings;

- Installation and testing of the approved fire alarm system, for each building has been done, Sound levels of fire alarm audible appliances have been measured at 15 dBA above ambient noise level (per NFPA 72).
- All access compliance provisions for the project on the final approved drawings and specifications have been completed.
- Any changes to the approved plans need DSA approval.
- If any deterioration of or damage to the HCD building is discovered that affect access compliance, structural safety, or fire/life safety code regulated elements, DSA and the design professional shall be notified immediately and the design professional will provide DSA with plans and calculations as needed for those portions of the building for DSA review and approval. Maintenance and/or repairs that are replacement to match original construction does not require a submittal to DSA. For a definition of "maintenance" see Section 4-314, Part 1 of Title 24, California Code of Regulations.

**8. 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 Section 4-339, Part 1, Title 24, California Code of Regulations. Temporary buildings or structures shall be completely removed upon the expiration of the time limit stated in the temporary certification letter.