
**CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM
DSA REVIEW**

Disciplines: All**History:** Revised 02/04/25^A
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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 the scope of construction work that is eligible to be exempt from plan review and approval by DSA. Construction documents for alteration, reconstruction, or new construction projects meeting the criteria defined herein need not be submitted to DSA. Additionally, this IR clarifies inspection, testing, construction oversight, and certification requirements for such projects.

SCOPE

This IR is applicable to construction projects at public K–12 schools and community colleges. It addresses plan review and approval exemptions for each of the three DSA plan review disciplines: Structural Safety (SS), Fire and Life Safety (FLS), and Access Compliance (AC). In many cases, plan review and approval exemptions vary by plan review discipline. This IR is not applicable to state-owned or state-leased essential service facilities, which also fall under DSA jurisdiction.

BACKGROUND

California Administrative Code (CAC) Section 4-310 defines various buildings and structures that are commonly constructed, owned, and operated by school districts but are not governed by the jurisdiction of the Field Act. CAC Section 4-314 defines the term “School Building” and in so doing excludes various elements and ancillary structures from this definition. These provisions inform the scope of construction work that is eligible for exemption from DSA review, approval, and construction oversight; however, some work not governed by the Field Act requires AC review and approval per CAC Section 5-101.

Separately, CAC Section 4-315 excludes maintenance work from review and approval requirements. Maintenance work is defined in CAC Section 4-314 and is governed by the jurisdiction of the Field Act.

CAC Sections 4-308 and 4-309(a) define project cost thresholds below which alteration or reconstruction projects may be exempt from plan review, approval, and construction oversight by DSA. Maintenance work is separate from the work of alteration and reconstruction projects and is therefore excluded from the project cost in consideration of these thresholds.

For the purposes of this IR, the design professional in general responsible charge (DPGRC) is as established in CAC Section 4-316(a).

1. CODE COMPLIANCE

All public school construction projects, including those exempt from DSA review, approval, and construction oversight, must comply with the currently effective Title 24, California Code of Regulations (CCR) except as permitted in Section 1.3 below.

^A This update contains extensive organizational revisions to improve the usability of the IR. These organizational changes are too numerous to document with margin markings, so such notations are omitted in this reissue.

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1.1 School District Responsibility

When authorizing construction of exempt projects, the school district assumes responsibility to ensure compliance with all applicable code provisions.

1.1.1 The school board is responsible to employ or retain appropriately licensed architects or registered engineers to prepare the construction documents.

1.1.2 The school district is responsible to employ or retain inspectors and laboratories to provide the required testing and inspection of materials and construction work.

1.1.3 See Section 5.1.1 below for DSA concurrence of the determination that construction work is exempt from DSA review.

1.2 “Access Only” Projects

Projects requiring only AC plan review and approval are not subject to DSA oversight during construction, nor are such projects certified by DSA. School districts should be aware that this can lead to the following difficulties:

1.2.1 Potential delays in DSA approval for future projects relying on construction work completed in the uncertified project to establish a compliant path of travel. See *Procedure (PR) 15-01: Required Information for Path of Travel Upgrades on Construction Documents* for additional information.

1.2.2 Denial of future unreasonable hardship determinations. See *IR 11B-10: Scoping and Path of Travel Upgrade Requirements for Facility Alteration, Addition and Structural Repair Projects*.

1.3 Reconstruction of Fire Damage

The exception of CAC Section 4-309(a), in accordance with Education Code (EDC) Section 17280, permits reconstruction of fire damage utilizing the construction documents approved for the original construction.

1.3.1 In accordance with *IR A-32: Partial Demolition*, partial demolition for fire damage reconstruction may proceed prior to submitting the fire damage reconstruction project to DSA.

1.3.2 Reconstruction of fire damage is considered an alteration, as defined in California Building Code (CBC) Chapter 2, for the purposes of path of travel improvement requirements. AC review and approval is required.

2. EXEMPTION BASED ON SCOPE

The scope of construction work not governed by the Field Act is eligible for exemption.

2.1 Exempt Scope

The following construction work does not require SS and FLS plan review, approval, or construction oversight.

2.1.1 Structures or elements excluded from the definition of a “School Building” per CAC Section 4-314 as itemized in Appendix A below. AC review and approval is required in some cases.

2.1.2 Buildings or structures excluded from the jurisdiction of the Field Act per CAC Section 4-310. Refer to Section 2.2.3 below for requirements associated with this exemption. AC review and approval may be required as itemized in Appendix A below.

2.1.3 Charter schools not funded under the Charter School Facilities Program, administered by the Office of Public School Construction. Refer to *Policy (PL) 17-01: Charter Schools Enforcement Jurisdiction* for additional information.

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2.2 Regulatory Requirements

Design and construction of the work described in Section 2.1 above must comply with Title 24, CCR as adopted and amended by the California Building Standards Commission.

2.2.1 Construction documents shall be prepared by appropriately licensed architects or registered engineers.

2.2.2 To comply with Section 1.1.2 above, it is recommended that the school district hire DSA-certified inspectors and a Laboratory Evaluation and Acceptance (LEA) qualified laboratory to perform code-required testing and inspections during construction.

2.2.3 Buildings or structures exempt from plan review, approval, and construction oversight per Section 2.1.2 above shall comply with the following requirements per CAC Section 4-310:

2.2.3.1 A copy of the resolution passed by the school board shall be submitted to the appropriate DSA regional office.

2.2.3.2 Signage restricting pupil and teacher entry and stating the structure does not meet the structural standards imposed by law for earthquake safety for school use shall be posted.

2.2.3.3 Measures shall be taken to prevent use by and injuries to pupils and teachers as a result of collapse of the structure. The most commonly accepted measure taken for this purpose is constructing fencing around the structure, set back a distance equal to its height.

3. MAINTENANCE

Maintenance work is defined in CAC Section 4-314 and does not require DSA review and approval in accordance with CAC Section 4-315. Unlike the scope of work described in Section 2 above, maintenance work is subject to the Field Act. Common types of maintenance work are summarized in Appendix B below.

3.1 Reroofing

For reroofing to be considered maintenance, the weight of the new roof covering and insulation must not exceed the weight of the existing roof covering and insulation that is being removed.

3.1.1 Replacement of tile roof systems “in-kind” are not exempt and will require submission to DSA.

3.1.2 Exempt changes in roofing systems are limited to lightweight non-metal, non-tile roof and insulation systems. If a changed roofing system weighs significantly less than the existing system, the change will be considered an alteration, not maintenance, and the cost thresholds in Section 4.1 below apply.

3.1.3 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.

3.1.4 If dry-rot or another issue requiring structural repair is discovered during a reroofing only project, such repair will be considered reconstruction, not maintenance, and the repair shall be considered in the cost thresholds in Section 4.1 below.

3.2 Mechanical, Electrical, and Plumbing Equipment

Exempt “in-kind” replacement of mechanical, electrical, and plumbing equipment includes any or all units when all of the following requirements are met:

3.2.1 Each new unit weighs less than or equal to the existing unit it is replacing and no more than 2,000 pounds.

3.2.2 Each new unit is placed in the same location as the existing unit it is replacing.

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3.2.3 Each new unit is placed without requiring alteration of the existing structural framing, alteration of the existing supporting curb or platform, or the introduction of an adaptive metal curb that raises the center of gravity of the unit or requires fasteners that cannot be determined from the “replacement in-kind” principle.

3.2.4 Each new unit is placed without requiring alteration of the existing ceiling.

3.2.5 Each new unit is placed without requiring replacement of ductwork, grilles, electrical components, etc.

4. ALTERATION OR RECONSTRUCTION PROJECT EXEMPTION BASED ON COST

Reconstruction or alteration projects to existing school buildings with construction cost less than the code-specified thresholds do not require DSA review, approval, and construction oversight. The cost thresholds are adjusted annually for inflation in accordance with *U.S. 20 City Construction Cost Index* published in the January issue of Engineering News-Record.

4.1 Exempt Scope

4.1.1 Alteration or reconstruction projects to existing school buildings submitted in 2025 with construction cost less than or equal to \$130,398 are exempt from SS, FLS, and AC plan review, approval, and construction oversight in accordance with CAC Section 4-308.

4.1.2 Alteration or reconstruction projects to existing school buildings submitted in 2025 with construction cost exceeding \$130,398 but less than \$293,397 are exempt from SS and FLS plan review, approval, and construction oversight in accordance with CAC Section 4-309(a) when **all** the conditions of Section 4.2.3 below are met, which includes submitting documentation to DSA.

4.1.3 Certain partial demolition work identified in IR A-32 is exempt from DSA review.

4.1.4 Site improvement projects do not constitute an alteration or reconstruction of an existing school building.

4.2 Regulatory Requirements

Design and construction of the work described in Section 4.1 above must comply with Title 24, CCR as adopted and amended by DSA and the State Fire Marshal.

4.2.1 Construction documents shall be prepared appropriately by a California licensed or registered design professional.

4.2.2 Inspection shall be performed by a DSA-certified project inspector. Material testing shall be performed by a qualified laboratory under the DSA LEA Program.

4.2.3 Buildings or structures exempt from plan review, approval, and construction oversight per Section 4.1.2 above shall comply with the following per CAC Section 4-309(a):

4.2.3.1 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. The statement must attest that the work does not cause any alteration or reconstruction of structural components nor trigger structural rehabilitation per CAC Section 4-309(c). This statement shall bear the stamp (seal) and signature of the structural engineer and shall be submitted to the appropriate DSA regional office. Work of a structural nature includes the following:

4.2.3.1.1 Alteration to or reconstruction of the building structure.

4.2.3.1.2 New or changes to existing nonstructural components attached to the building structure that are required by the CBC to resist structural loads, such as equipment, ceilings, partitions, cabinets, veneer, etc.

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4.2.3.2 The DPGRC of the project shall prepare a statement and submit it to the appropriate DSA regional office. This statement shall bear the stamp (seal) and signature of the DPGRC and certify that the construction documents comply with the following:

4.2.3.2.1 Contain no work that is regulated by the accessibility standards of Title 24, CCR.

4.2.3.2.2 Contain no work that triggers accessibility upgrades to any existing building or the facility.

4.2.3.2.3 Meet all applicable fire and life safety standards.

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

4.3 Project Cost Determination

For the purpose of this IR and unless noted otherwise, the project construction cost shall be the entire contracted scope of work, including exempt elements. Refer to *IR A-23: Construction Cost Reporting and DSA Fees* for additional information. Project cost shall be based on the construction scope at one site only.

4.3.1 The construction cost shall be determined at the completion of project design and again at the completion of construction.

4.3.1.1 At the completion of design, the construction cost is included on the form *DSA 1: Application for Approval of Plans and Specifications*; however, the form DSA 1 is typically not completed for exempt projects not submitted to DSA.

4.3.1.2 If the final actual project cost exceeds the code-specified cost thresholds, the project is not exempt from DSA review, approval, and construction oversight. In such cases, the school district shall notify the appropriate DSA regional office and meet with a manager or supervisor to discuss and establish compliance requirements based on the specifics of the project.

4.3.2 In accordance with EDC Section 17280, the construction cost used in determining exemption from DSA review shall not include the cost of air-conditioning equipment, insulation materials, and installation of such equipment and materials when the installation does not cause structural alterations to a school building (i.e., it does not affect the primary or secondary framing members). In cases where such installation causes structural alterations to a school building, the provisions of CAC Section 4-309 apply, and DSA review and approval is required unless the project complies with Section 4.1.1 above.

4.3.2.1 Air-conditioning equipment includes heating units, ventilation units, and air-conditioning units (HVAC). It does not include ductwork or utility services (i.e., electrical and/or gas service) to the equipment.

4.3.2.2 Insulation materials must be of the same type as previously installed in accordance with building standards.

4.3.2.3 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 the requirements of Section 4.2.3.1 above.

4.3.3 In accordance with CAC Sections 4-308 and 4-309(a), construction projects shall not be subdivided for the purpose of evading DSA review, approval, and construction oversight.

4.3.4 In accordance with CAC Section 4-308, work classified as maintenance per CAC Section 4-314 need not be included in the project construction cost.

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4.4 Additions

The project cost thresholds established in CAC Section 4-308 and 4-309(a) do not apply to projects categorized as additions. Refer to *IR EB-1: Existing Building Regulations Overview* Section 4.1 for additional information.

4.4.1 Installation of new and modifications to existing solar systems are not exempt from DSA review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Refer to *IR 16-8: Solar Photovoltaic and Thermal Systems Review and Approval Requirements* for SS and FLS review; refer to *IR 11B-9: Accessibility Requirements for Solar Photovoltaic Systems at School Sites* for AC review.

4.4.2 The addition of any component, regardless of size, type, or cost, to an existing tower or pole, requires SS and FLS review. The cost exemptions of Section 4.1 above do not apply because this work is an addition, not an alteration. Installation of additional cellular equipment or replacement of existing cellular equipment mounted at grade requires review unless the equipment is confined within an enclosed (i.e., fenced) area previously approved and certified by DSA for cell tower equipment, and the equipment is set back from the fence a distance equal to or greater than the height of the equipment.

5. DOCUMENTATION REQUIREMENTS

An entire project or elements within a larger project may be exempt from DSA review, approval, and construction oversight. The exemption may apply to one, some, or all DSA plan review disciplines: SS, FLS, and AC.

5.1 Project Exemption

In accordance with Section 4 above, small alteration or reconstruction projects may be exempt in their entirety. Additionally, if the project scope consists only of exempt elements per Sections 2 or 3 above, the entire project is exempt.

5.1.1 If the exemption applies to all DSA plan review disciplines, the project need not be submitted to DSA. DSA concurrence of exempt construction work is not required; however, written concurrence may be requested in accordance with *PR 14-02: Exempt Concurrence*.

5.1.2 If the exemption applies to some but not all DSA plan review disciplines, the project shall be submitted to DSA with the exempt plan review disciplines left unchecked on Line 11 of the form DSA 1. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

5.2 Element Exemption

In accordance with Section 2 above, elements within a larger project may be exempt from DSA review, approval, and construction oversight. In these cases, the following requirements apply to the exempt elements, as applicable:

5.2.1 Notes shall be placed on the construction documents stating the element(s) is “NOT PART OF THE DSA APPROVAL”. If the exemption applies to some but not all DSA plan review disciplines, the note shall specify which disciplines will not review and approve the element. In the absence of this note, DSA will review the element(s) as described in Section 5.3.2 below.

5.2.2 For an exempt occupiable building, the school district board, superintendent, or facilities director shall prepare and submit a signed letter acknowledging that it will not be approved nor certified by DSA.

5.3 Voluntary Submission

This interpretation does not preclude a design professional or school district from electing to submit construction documents for exempt work to DSA for review and approval.

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5.3.1 Voluntary submission of an exempt project will trigger full DSA plan review for code conformance and construction oversight, provided the appropriate fees are paid.

5.3.2 Noncompliance with Section 5.2.1 or 5.2.2 above will trigger full DSA plan review for code conformance and construction oversight of any element included on the construction documents submitted to DSA.

6. PROJECT CERTIFICATION

DSA will neither oversee nor certify the construction of exempt projects not submitted to and approved by DSA. Except as noted in Section 4.2.3.3 above, the reporting requirements for certification of construction set forth in the CAC are not required and need not be submitted to DSA. Refer to Section 1.2 above for projects requiring only AC plan review and approval.

REFERENCES:

California Code of Regulations (CCR) Title 24

Part 1: California Administrative Code (CAC), Sections 4-308, 4-309, 4-310, 4-314, 4-315, 4-316.

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.

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW**Appendix A: Construction Eligible for Exemption**

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

| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|--|---------------------------|----------------------------|---------------------------|-----------------------------|---|
| A1. Poles and towers less than 35 feet tall supported on grade. Includes cell towers/poles for antenna, lighting poles, flag poles, and poles supporting open mesh fences. | No | No ⁴ | No | 2.1.1 | SS and FLS: Open-mesh fences or backstops of a height 8-feet or greater clad with windscreens, slats, signs, or similar attachments require review. |
| A2. Poles and towers 35 feet tall or greater supported on grade of uses described in A1. | Yes | Yes ⁴ | No | 4.4.2 | |
| A3. Crossarm and/or luminaire replacement on light poles greater than 35 feet in height. | Yes | Yes | No ² | 4.4.2 | |
| A4. Soil retaining walls less than four feet tall above the top of foundation without surcharge or a sloping backfill. | No | No | No | 2.1.1 | |
| A5. Baseball dugouts less than 250 square feet of interior floor area with lightweight roof construction. | No | No | Yes | 2.1.1, 5.2 | AC: Baseball dugouts of any size and construction are not exempt from review. |
| A6. Batting cages consisting of cantilever poles with loose netting sidewalls and roofs. | No | No | Yes | 2.1.1, 5.2 | |
| A7. Concrete or masonry fences less than six feet above grade. | No | No ⁴ | Yes ¹ | 2.1.1 | |
| A8. Ball walls or yard walls less than six feet above grade. | No | No ⁴ | Yes ¹ | 2.1.1 | |

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| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|--------------------|---------------------|--------------------|----------------------|---|
| A9. Signs, variable message signs, or scoreboards with apex less than eight feet above adjacent grade. | No | No | No | 2.1.1 | 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. |
| A10. 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 | No ⁴ | Yes ¹ | 2.1.1 | |
| A11. Bleachers and grandstands five rows of seats or less with the first row starting at ground level. | No | No | Yes | 2.1.1 | |
| A12. Folding and telescopic seating systems five rows of seats or less. | No | Yes | Yes | 2.1.1 | |
| A13. Single-story accessory facilities to athletic fields not exceeding 250 square feet of floor area (e.g., equipment storage, toilets, snack bar, ticket booths). | No | No | Yes | 2.1.1, 5.2 | SS and FLS: Fuel or flammable storage exceeding that amount necessary for maintenance purposes and operation of the equipment voids the exemption. |
| A14. Playhouses less than 250 square feet of floor area and playground equipment of any size. | No ³ | No | Yes | 2.1.1, 5.2 | FLS: Review is required when playhouses or structures are placed within building(s) protected by automatic sprinkler systems. |
| A15. Open-mesh baseball backstops less than 35 feet in height consisting of cantilevered pole systems. | No | No | Yes ¹ | 2.1.1 | SS and FLS: Open-mesh backstops of a height 8-feet or greater clad with windscreens, slats, signs, or similar attachments require review. |

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| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|---------------------------|----------------------------|---------------------------|-----------------------------|--|
| A16. Open-mesh fences less than 35 feet in height or ornamental and security fencing with spaced rails and pickets less than eight feet in height not affecting egress. | No | No ⁴ | Yes ¹ | 2.1.1 | SS and FLS: Open-mesh fences of a height 8-feet or greater clad with windscreens, slats, signs, or similar attachments require review. |
| A17. New or replacement of exterior walking surfaces. | No | No ⁴ | Yes | 2.1.1 | |
| A18. Landscaping consisting of vegetation, irrigation and ground cover. | No | No | No | 2.1.1 | Landscape only projects are exempt from review. Projects submitted to DSA for review that have landscape elements must submit a form <i>DSA 1-L: Outdoor Water Use Self-Certification of Landscape Irrigation Design and Documentation</i> . |
| A19. Installation of new or replacement of existing synthetic (artificial turf) play fields or running tracks. | No | No | Yes | 2.1.1 | |
| A20. Installation of new parking areas. | Yes | No ⁴ | Yes | 2.1.1 | |
| A21. Installation of new surface over existing parking areas (such as asphalt overlays or seal coat) last improved prior to January 1, 2014. | No | No ⁴ | Yes | 2.1.1 | SS: If restriping or reconfiguration results in additional parking spaces, then electric vehicle charging stations and review are required. FLS: Review is required where reconfiguration or restriping of parking lots incorporate fire apparatus access routes (i.e., fire lanes). AC: Review is required because the CBC requires 1 van accessible space for every six accessible spaces. Per CBC Section 11B-202.4 Exception 5, <i>path of travel</i> improvements are not required. |

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| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|--|---------------------------|----------------------------|---------------------------|-----------------------------|---|
| A22. Installation of new surface over existing parking areas with matching striping (such as asphalt overlays or seal coat) last improved January 1, 2014 or later. | No | No ⁴ | No | 2.1.1 | FLS: Review is required where reconfiguration or restriping of parking lots incorporate fire apparatus access routes (i.e., fire lanes). |
| A23. Energy Management Systems. | No | No | No ² | 4.1 | |
| A24. Small skylights, including tubular, installations (2 feet by 2 feet maximum) for which no structural framing member is altered or penetrations of fire-resistance-rated assemblies. | No | No | Yes | 4.1 | SS: Review required if the number of skylights would cause more than 5 percent of the roof diaphragm to be removed. |
| A25. Fire alarm systems: Includes new systems and replacements or alterations to existing systems. | No | Yes | No | - | AC: Review of fire alarm system components that affect accessibility will be reviewed by DSA FLS staff. AC review fees are not required. |
| A26. Greenhouses, barns, and material or equipment storage sheds used exclusively for plant or animal production or protection and not used for classroom instruction. | No | No | Yes | 2.1.1, 5.2 | Small groups of pupils and teachers may enter these structures for short periods of time. |
| A27. Temporary student constructed structures not located within a building. | No | No | No | 2.1.1, 5.2 | 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. |

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| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|--------------------|---------------------|--------------------|----------------------|---|
| A28. Buildings or structures used solely for, warehouses and storage buildings, storing 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 | No | Yes | 2.1.2, 2.2.3, 5.2 | |
| A29. Residential dwelling units for teachers or district employees or their family. | No | No | No | 2.1.2, 2.2.3, 5.2 | Refer to <i>PL 24-01: Workforce Housing Projects and Community College Student Housing Projects Submitted to DSA</i> . |
| A30. District-wide administrative buildings on locations separated from school sites. | No | No | Yes | 2.1.2, 2.2.3, 5.2 | Upon completion, such structures are not used for school purposes nor intended to be entered by pupils, teachers or school employees for school purposes. |
| A31. School-based health centers, social services, or support services qualifying under the provisions of Education Code Section 17296. | No | No | Yes | 2.1.2, 2.2.3, 5.2 | Upon completion, such structures are not used for school purposes nor intended to be entered by pupils, teachers or school employees for school purposes. 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. AC: If ANY school funds are provided, review is required. If completely funded privately, see notes above. |
| A32. Underground utility replacement in-kind of water piping and sewer (including, but not limited to, septic tanks and leach fields). | No | No ⁴ | No | 4.1 | New or replacement water supply wells require review and approval. AC: Paved surfaces that are part of an accessible route shall be subject to review. |

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| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|--------------------|---------------------|--------------------|----------------------|---|
| A33. Site improvements only involving grading, fill placement, paving, storm drains, or other work not supporting structures nor involving their utilities. | No | No ⁴ | Yes | 2.1.1 | Refer to <i>IR A-9: Site Improvements for School Building Projects</i> for additional information and requirements. |
| A34. New installations or alterations to roof- or ground-mounted solar systems, elements, equipment, storage devices and associated utilities. | Yes | Yes | Yes | 4.4.1 | |
| A35. Installation of or alteration to underground fire service water piping for fire hydrants or automatic fire protection systems. | No | Yes | No | 4.1 | AC: Paved surfaces that are part of an accessible route shall be subject to review. |
| A36. Installation of or alteration to underground conduits containing fire alarm system conductors or cables. | No | Yes | No | 4.1 | AC: Paved surfaces that are part of an accessible route shall be subject to review. |

Footnotes:

1. 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.
2. 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.
3. 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 square feet. 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 shall be evaluated (e.g., foundation, columns, poles, shade support members, etc.). Other playground equipment elements (e.g., platforms, slides, climbing walls, etc.) outside these load paths and not directly supporting the shade canopy need not be reviewed.
4. 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. Site plans must clearly identify all fire protection equipment (e.g., fire hydrants, post indicator valves, backflow preventers, etc.) and clarify how access will be provided for the local fire authority.

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Appendix B: Exempt Maintenance Work

| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|--------------------|---------------------|--------------------|----------------------|--|
| B1. Replacement in-kind of mechanical (including, but not limited to, heating, ventilation, air-conditioning) and electrical units. | No | No | No | 3.2 | <p>FLS: Fuel-burning appliances/equipment shall not be located in nor have direct communication with classrooms.</p> <p>FLS: Ensure automatic shutoff of HVAC units where CFM exceeds 2000 (see California Mechanical Code).</p> <p>AC: Pursuant to CBC Section 11B-202.4 exception 7.</p> <p>AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.</p> |
| B2. Replacement of plumbing fixtures. | No | No | Yes | 3.2 | AC: Defined as an alteration per CBC Chapter 2; therefore, work is subject to path of travel improvements per CBC Section 11B-202.4. |
| B3. Cosmetic maintenance work such as painting and wallpapering. | No | No | No | 3 | |
| B4. Replacement of interior floor coverings with like material. | No | No | No | 3 | AC: A change in floor material from like product to like product does not require review by DSA. The school district is still required to comply with federal law and the CBC which requires <i>path of travel</i> improvements to be undertaken. |
| B5. Replacement of interior floor coverings: change of floor material. | No | No | Yes | 3 | AC: A change in floor material from the product installed (i.e., carpet to vinyl tile) requires review. <i>Path of travel</i> improvements are also required. |

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|--|--------------------|---------------------|--------------------|----------------------|---|
| B6. Removal and replacement of existing parking area surface. | No | No | Yes | 3 | <p>SS: If restriping or reconfiguration results in additional parking spaces, then electric vehicle charging stations and review are required.</p> <p>FLS review is required where reconfiguration or restriping of parking lots incorporate fire apparatus access routes (i.e., fire lanes). Work, 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.</p> |
| B7. Reroofing with in-kind roof or “cool” roof or replacing with lightweight, non-metal, non-tile roof and insulation system. | No | No | No | 3.1 | <p>FLS: For buildings and structures located within a designated hazardous fire area, all roof materials and assemblies shall have Class A fire hazard classification.</p> <p>AC: Considered normal maintenance.</p> |
| B8. Weatherization/caulking. | No | No | No | 3 | AC: Considered normal maintenance. |
| B9. Window glazing replacement only that does not involve the replacement of the window frame assembly or affect window operability, fire rating, or safety glazing. | No | No | No | 3 | AC: Considered normal maintenance. |
| B10. Window shading devices: window screens (applied to glazing only), and solar shading devices as furnishings and requiring no structural attachment. | No | No | No | 3 | <p>FLS: Shading devices and films shall not be applied to fire-resistance-rated glazing.</p> <p>AC: Controls require compliance with the operable parts requirements of CBC Chapter 11B.</p> |

CONSTRUCTION PROJECTS AND ITEMS EXEMPT FROM DSA REVIEW

| Project or Element Description | SS Review Required | FLS Review Required | AC Review Required | IR Section Reference | Notes |
|---|--------------------|---------------------|--------------------|----------------------|--|
| B11. Lighting upgrade of buildings: re-lamping, ballast replacement, luminaire replacement. | No | No | No | 3 | AC: Work consisting of changes to mechanical and electrical systems only are not subject to <i>path of travel</i> improvements. Structural improvements related to mechanical and electrical system installations do trigger access compliance review and <i>path of travel</i> improvements. Controls require compliance with the operable parts requirements of CBC Chapter 11B. |
| B12. Water-heating upgrades, not including solar thermal installations on roofs. | No | No | No | 3 | <p>SS: Review required if tankless systems exceeding 20 pounds in any location.</p> <p>FLS: Fuel-burning appliances/equipment shall not be located in nor have direct communication with classrooms.</p> <p>AC: 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</p> |