
BULLETIN: APPLICATION OF FIRE AND LIFE SAFETY PROVISIONS OF THE 2025 CALIFORNIA EXISTING BUILDING CODE: EFFECTIVE JANUARY 1, 2026

Division of the State Architect (DSA) documents referenced within this publication are available on the [DSA Forms](#) or [DSA Publications](#) webpages.

DISCIPLINE(S)

Fire and Life Safety (FLS)

PURPOSE

This bulletin clarifies the applicable fire and life safety requirements of the 2025 California Existing Building Code (CEBC), effective January 1, 2026, for public schools (K-12) and community colleges throughout the State of California.

BACKGROUND

Existing public school (K-12) and community college buildings and structures comply with the California Code of Regulations, Title 24, California Building Standards Code, Parts 1 through 12, effective at the time of construction. The CEBC establishes minimum requirements for those existing buildings and structures which subsequently undergo repairs, alterations, changes of occupancy, and additions utilizing specific compliance methods as adopted and amended by the Office of the State Fire Marshal (SFM).

APPLICABILITY

Any repair, alteration, change of occupancy, or addition to existing buildings and structures on public school (K-12) and community college campuses within the State of California shall comply with the applicable provisions of the 2025 CEBC and 2025 California Administrative Code (CAC).

1. 2025 CEBC COMPLIANCE REQUIREMENTS

1.1 Chapter 1 – Administration

The SFM has adopted specific sections of this chapter.

1.2 Chapter 2 – Definitions

The SFM has adopted specific definitions of this chapter. Pursuant to CEBC Section 201.3, for terms not defined or adopted in the CEBC, refer to the CAC Section 4-314 and the California Building Code (CBC) Chapter 2.

1.3 Chapter 3 – Provisions For All Compliance Methods

The SFM has adopted specific sections of this chapter. This chapter provides an explanation of the compliance method options and provides general requirements applicable to repairs, alterations, changes of occupancy, and additions. Refer to Figure 1.3 below for compliance methods and applicable code requirements. **Note:** DSA-SS (Structural Safety) and DSA-AC (Access Compliance) do not adopt the Prescriptive Compliance Method or the Work Area Compliance Method.

Per CEBC Section 301.3, the Prescriptive Compliance Method and Work Area Compliance Method shall not be applied in combination with each other.

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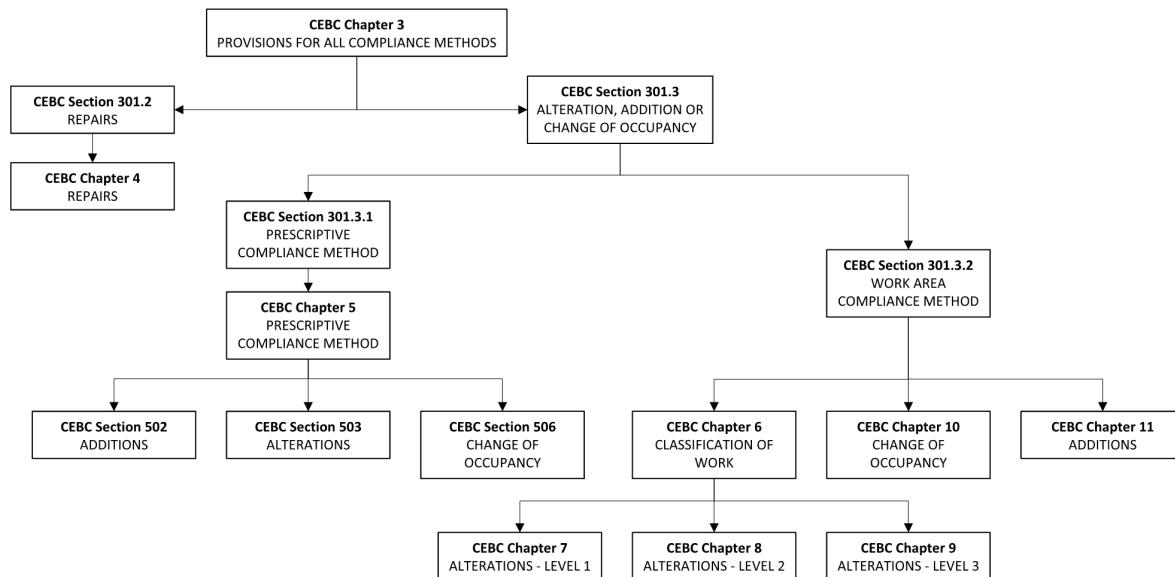


Figure 1.3

1.4 Chapter 4 – Repairs

The SFM has adopted specific sections of this chapter. REPAIR, as defined by CEBC Chapter 2, of existing buildings and structures shall comply with all applicable provisions of CEBC Chapter 4.

1.5 Chapter 5 – Prescriptive Compliance Method

The SFM has adopted specific sections of this chapter which provide specific requirements for the Prescriptive Compliance Method. This method is one of two compliance options adopted by the SFM, for buildings and structures undergoing alterations, changes of occupancy, or additions.

1.6 Chapter 6 – Classification of Work (Work Area Compliance Method)

The SFM has adopted the entire chapter as amended which provides general requirements for the Work Area Compliance Method. This method is one of two compliance options adopted by the SFM, for buildings and structures undergoing alterations, changes of occupancy, or additions. This chapter defines the different classifications of alteration – Alteration Level 1, 2, and 3. Specific requirements for alterations, changes of occupancy, and additions utilizing the Work Area Compliance Method are specified in CEBC Chapters 7 through 11.

Per CEBC Section 601.1, the Work Area Compliance Method is not permitted in Group H and I occupancies, and HIGH-RISE BUILDINGS, as defined by CBC Chapter 2, related to public schools (K-12) and community colleges.

1.6.1 Alterations

1.6.1.1 Chapter 7 – Alterations – Level 1

The SFM has adopted the entire chapter as amended. Per CEBC Section 602.1, Level 1 alterations include the removal and replacement or the covering of existing materials, elements, equipment, or fixtures using new materials, elements, equipment, or fixtures that serve the same purpose.

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1.6.1.2 Chapter 8 – Alterations – Level 2

The SFM has adopted the entire chapter as amended. Per CEBC Section 603.1, Level 2 alterations include the addition or elimination of any door or window, the reconfiguration or extension of any space or system, or the installation of any equipment, and shall apply where the Work Area is equal to or less than 50 percent of the building area.

1.6.1.3 Chapter 9 – Alterations – Level 3

The SFM has adopted the entire chapter as amended. Per CEBC Section 604.1, Level 3 alterations apply where the Work Area exceeds 50 percent of the building area.

1.6.2 Chapter 10 – Change of Occupancy

The SFM has adopted the entire chapter as amended. This chapter provides specific requirements of the Work Area Compliance Method where an existing building is subject to a change of occupancy, change of occupancy classification, change of use, and change in the purpose of, level of activity or application of code requirements.

1.6.3 Chapter 11 – Additions

The SFM has adopted the entire chapter as amended. This chapter provides specific requirements of the Work Area Compliance Method for additions, which are required to comply with the California Building Standards Code for new construction without requiring the existing building or structure to comply with those requirements except as required by this chapter.

1.7 Chapter 12 – Historic Buildings

This chapter is not adopted by the State of California.

1.8 Chapter 13 – Performance Compliance Method

This chapter is not adopted by the State of California.

1.9 Chapter 14 – Relocated or Moved Buildings

This chapter is not adopted by the Division of the State Architect (DSA).

1.10 Chapter 15 – Construction Safeguards

The SFM has adopted the entire chapter. Fire safety during the demolition and construction of existing buildings and structures shall comply with the provisions of this chapter and the written site safety plan.

1.11 Chapter 16 – Referenced Standards

The SFM has adopted the entire chapter as amended.

2. PRE-APPLICATION MEETINGS

2.1 The design professional is required to request a pre-application meeting for projects utilizing the Work Area Compliance Method.

3. PROJECT DOCUMENTS

3.1 Per CEBC Section 301.3, the Design Professional (DP) shall identify the compliance method on the project plans: Prescriptive Compliance Method or Work Area Compliance Method – Alteration Level 1, 2, or 3.

3.2 Per CEBC Section 601.2, when utilizing the Work Area Compliance Method, the DP shall clearly identify the Work Area, as defined in CEBC Chapter 2, on the overall floor plan or other accepted location on the project plans. DSA may require building and/or floor area calculations to

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justify the level of alteration based on the scope of work and area percentages.

4. EXEMPTIONS

4.1 For repairs or alterations that are exempt from DSA-FLS review, approval, and construction oversight refer to DSA *IR A-22: Construction Projects and Items Exempt from DSA Review*. Projects exempted from DSA review pursuant to IR A-22, shall comply with the California Code of Regulations, Title 24, California Building Standards Code.

REFERENCES:

2025 California Code of Regulations (CCR) Title 24
Part 10, California Existing Building Code (CEBC)

A DSA Bulletin is a notification to its stakeholders regarding any issue intended to be directed to a broad group of external stakeholders as well as DSA staff.