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**MEMORANDUM**

Subject: Building Rehabilitation – Tenant Separation Wall Renovations	Memo #: 2021-006
	Effective: Sept 23, 2021
Authority: Deputy Chief Josh Bunting, Fire Marshal 	Internal (FMO Staff)

The Life Safety Code (NFPA 101) classifies building rehabilitation work done to existing buildings into one of six (6) work categories, arranged in increasing scale of work:

1. Repair
2. Renovation
3. Modification
4. Reconstruction
5. Change of Use/Occupancy Classification
6. Addition

NFPA 101 also provides the work scope and requirements consistent with the improved life safety elements applicable to the occupancy and rehabilitation work.

For dwelling unit/tenant space rehabilitation projects classified as “Renovations,” NFPA 101 permits the work in this category to be completed with “in-kind” materials and compliance in accordance with the Existing chapter for the particular occupancy. In some cases of older structures being renovated, existing wall/ceiling assemblies separating adjacent dwelling units/tenant spaces may not contain any demonstratable degree of fire resistance and replacement with in-kind materials would not improve the life safety of the unit or structure.

Where Renovation projects involve the removal of any portion of a tenant/unit separation wall and/or ceiling covering and the exposure of structural members (studs/joists), the work to the tenant/unit separation shall be classified as a “Modification,” and shall comply with the applicable requirements of NFPA 101, along with the following:

1. The wall/ceiling shall be constructed to provide continuous fire separation, including opening protectives, using construction materials that demonstrate fire resistance consistent with new construction (ie. gypsum) and/or an approved, listed fire-rated assembly.
2. Work shall only be required to be performed on the side of the wall/ceiling of the dwelling unit or tenant space that is part of the rehabilitation work area.