



## INFORMATION SHEET

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No. EG-02

**DATE** : December 19, 2023

**CATEGORY** : Egress

**SUBJECT** : **Emergency Escape and Rescue Openings (EEROs) to Yard or Court for Existing or New Buildings of Group R-3 Occupancies**

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**REFERENCE** : California Building Code (CBC), Current Edition  
San Francisco Building Code (SFBC), Current Edition  
San Francisco Fire Code (SFFC), Current Edition  
CBC Section 1031, Emergency Escape and Rescue  
SFBC Administrative Bulletin AB-005 Procedures for Approval of Local Equivalencies  
SFBC Administrative Bulletin AB-028 Pre-application and Pre-addendum Plan Review Procedures

**INTENT** : To clarify local equivalency requirements for emergency escape and rescue openings that open to a yard or court without direct access to a public way for Group R-3 occupancies

**BACKGROUND** :

CBC Section 1031 requires that emergency escape and rescue openings (EEROs) open directly to a public way or to a yard or court that opens to a public way. On December 3, 2018, the California State Fire Marshal issued a code interpretation that EEROs in Group R-3 occupancies are required to be accessible by emergency rescue personnel using ground ladders. This information sheet addresses the condition where the EEROs in Group R-3 occupancies are open to a yard or court that does not open to a public way and thus inhibits the ability for ground ladder access to the EEROs for rescue. The applicability of EEROs and associated requirements are prescribed in CBC Section 1031. In addition, projects are subjected to review of CBC Section 1031 where proposed scopes of work further restricts access for emergency rescue personnel to perform rescue operations at EEROs.

**DISCUSSION** :

The intent of the code is that (1) EEROs be available so that occupants may **escape** from sleeping rooms directly through the EEROs to the exterior of the building without necessitating additional travel through

the building; and (2) EEROs be available for emergency rescue personnel to access sleeping rooms to **rescue** occupants. Where EEROs are open to a yard or court that does not have access to a public way, then the intent of the code to accomplish both escape and rescue are not met.

Projects may request for the approval of a local design equivalency where both of the following conditions are met:

1. The **escape** criteria for the EERO may be accomplished where the EERO opens into a yard with a minimum of 25 feet in depth. The 25-foot depth shall be measured from the most remote point of the lot to any portion of the building, including any combustible projections.
2. The **rescue** criteria for the EERO at a yard or court that does not open to a public way shall be proposed by the project sponsor and evaluated at the time of submittal on a case-by-case basis by a Department of Building Inspection (DBI) and San Francisco Fire Department (SFFD) plan review supervisor or manager. Acceptable local design equivalency alternatives for the rescue criteria are listed in this information sheet.

Other conditions may be evaluated on a case-by-case basis by a DBI and a SFFD supervisor or manager. A pre-application meeting and/or approval of a local equivalency request per SFBC Administrative Bulletin AB-005 is required.

### **ACCEPTABLE LOCAL EQUIVALENCIES FOR RESCUE:**

In the event that EEROs are open to a yard or court that does not open to a public way in Group R-3 occupancies, the following three local equivalencies for the rescue criteria are acceptable by DBI and SFFD. Request to use the following local equivalencies shall be accompanied by a request for a local design equivalency approval per SFBC Administrative Bulletin AB-005 and will be reviewed and approved on a case-by-case basis. These requirements do not alleviate and shall not diminish any other code requirements established in the SFBC and SFFC.

#### **Rescue Criteria Alternative 1 – Fire Department Ground Ladder Access:**

The rescue criteria for the EERO at a yard or court that does not open to a public way may be accomplished by providing a minimum 3 feet wide pathway that can accommodate a 22-foot straight ladder from the Public Right of Way to the yard or court. A rescue pathway diagram shall be provided on the plans demonstrating the ability for a 22-foot ladder to be carried from the public way to the yard or court where the EERO faces and lifted into place. NOTE: The rescue pathway may travel through garage doors, swing doors and sliding patio doors; but not windows. The rescue pathway may also lead directly to the bedroom door.

##### *Commentary for Rescue Criteria Alternative 1:*

*The Fire Department uses a 22-foot straight ladder or a 35-foot extension ladder to reach EERO's on the 2<sup>nd</sup> and 3<sup>rd</sup> floors. Thus, the Fire Department needs a minimum 3 feet wide clear pathway to carry the 22-foot straight ladder and 35-foot extension ladder (21 feet unextended) from the street, through a building, to the ground below the EERO. Obstructions, such as fences or detached accessory buildings in the rescue yard or court shall not require that the ladder be raised to navigate around such obstacle. Thus, the entire ladder must be positioned at ground level in the yard/court before it is raised to lean against the building.*

#### **Rescue Criteria Alternative 2 – Roof Access for Rescue:**

The rescue criteria may be accomplished by providing vertical access to the EEROs from the roof level. The roof slope shall be limited to not more than 4:12 pitch at any location along the roof access route to

