



OFFICE OF THE STATE FIRE MARSHAL

Code Interpretation 22-001

Issued: May 19, 2022

Access to Emergency Escape and Rescue Openings

OVERVIEW

Code Section(s): California Fire Code (CFC) 504.1, California Building Code (CBC) 1030.1
Edition: 2019 California Fire Code, California Building Code
Requested By: Steve Kuchenski
Date Received: February 9, 2022

QUESTION

SFM Interpretation 18-005 states that Emergency Escape and Rescue Openings (EERO) in Group R Occupancies (not meeting exceptions) are required to be accessible utilizing ground ladders. CFC 504.1 requires an Approved Access Walkway leading from the firefighter access road to the required EERO, and the EERO must be maintained “readily accessible”. We infer from both 18-005 and 504.1 that the Approved Access Walkway is to be utilized for purposes of transporting the ground ladders to the ground location in the vicinity of the EERO.

1. Does the SFM Interpretation 18-005 also constitute a prescriptive requirement for the Approved Access Walkway to also provide clear ground space for purposes of ladder placement, including additional clear ground floor space below the EERO if necessary for setting the angle of inclination of the ground ladder when the ladder is utilized?
2. If the answer to #1 is “yes”, is there a method of prescriptively determine the horizontal distance as measured from the EERO’s vertical wall to the base of the ladder, based on the adopted codes?
3. If the answer to #1 is “yes”, must the ladder be placed on the sill of the EERO, or are other placement configurations allowable?

ANSWER

1. No, there is no prescriptive requirement in SFM Interpretation 18-005 (based on 2016 CBC 1030.1) or CFC 504.1 to provide clear ground floor space for utilizing a ladder.
2. No response necessary.
3. No response necessary.