

***BIC Regular Meeting  
of  
May 18, 2022***

***Minutes RE  
Agenda Item 7 -  
Public  
submittal - AIA***

## GENERAL INTRODUCTORY COMMENTS

- **Thank you for letting us provides comments today regarding the draft proposal to replace the current Information Sheet EG-02. We all recognize the importance of providing the appropriate level of life-safety in designing and constructing housing and that implementing the requirements of the EERO code section based on the State Fire Marshals interpretation requiring ladder access are going to be challenging due to zero lot line zoning and the unique topography of San Francisco.**
- **Implementing any new regulatory requirements always have consequences and we believe that the impact of the draft revisions to EG-02 will have negative impacts on design, the permitting process, and construction. Since we all want to contribute to lessening the impacts of the high cost and shortage of housing in San Francisco we believe a very aggressive approach to reducing those negative impacts is appropriate.**
- **We have appreciated the opportunity to work with SFFD, DBI, and Planning on the re-drafting of EG-02. In addition to the three meetings we have had with SFFD, DBI, and Planning we have also been included in a number of meetings with subcommittees and the full Code Advisory Committee. These meetings have included spirited discussions about the complexity of implementing the code change and honest exchanges.**

## **DESIGN**

- **Straight shot for firefighters carrying 22' long ladder will restrict internal planning**
- **Inclined rescue ladders and platforms will restrict window locations and impact light and air to rear facing rooms**
- **Inclined rescue ladders and platforms will impact the privacy and views of adjacent properties**

## **PERMITTING PROCESS**

- **Too many variations of existing housing stock and differing topography to have a prescriptive solution that will apply to all so many projects will have to be evaluated on a case-by-case basis**
- **Multiple agencies involved in approval**
- **Subjective criteria required to evaluate which will negate consistent application**
- **Process and impact to permitting ADU's, legalization of unwarranted units, and units created through the SB-9 legislation recently enacted not yet clearly defined**

## **CONSTRUCTION**

- **Significant additional costs**
- **Additional complexity will extend duration**
- **Inspection and maintenance of additional elements will be required**

## IMPLEMENTATION

### Draft

- Take time to get it right

### Training

- Thorough
- Consistent
- Clearly defined hierarchy
- Multi-agency
- Ombudsperson

### Triggers

- Language is vague and subject to interpretation
- Clearly define what “further restricts” means?
- Clearly define what is “existing” versus “new” construction?
- Note distinct exceptions. We offer the following suggestions:
  - a. Repairing and/or replacing siding, framing, or windows on rear facing walls that define bedrooms
  - b. Rebuilding existing decks or stair due to maintenance issues
  - c. Enlarging or re-configuring existing rear-facing bedrooms
  - d. Foundation system repair or upgrades
  - e. Kitchen and bath renovations

## **OPTIONS 1-4**

### **Option 1**

- **Explicitly note that a car in the garage would not be considered an obstacle**
- **provide example template of how to measure the path of travel for the ladder provided. Note the required clearance at hallways and doors**
- **Note that intervening spaces do not need to be rated**

### **Option 2**

- **Explicitly note that upgrading a Type VB to a Type VA and providing sprinkler systems as required for the specific building type are acceptable**
- **Reference to the sprinkler requirements as defined by FS-03**

### **Option 3**

- **Note that emergency rescue access (not stair) can be made of wood or metal**
- **Note fire walls at property lines not required**
- **Provide the specific dimensions of all elements – width of stair, riser and tread dimensions, landing dimensions, access platform at roof level, handrail requirements similar to how all elements of fire escapes are defined**

### **Option 4**

- **Note that emergency rescue access (not stair) can be made of wood or metal**
- **Note fire walls at property lines not required**
- **Provide the specific dimensions of all elements – width of stair, riser and tread dimensions, landing dimensions, access platform at roof level, handrail requirements similar to how all elements of fire escapes are defined**

## **A. ADDITIONAL MISCELANEOUS CONCERNS**

- **Options 3 and 4 - Planning needs to review zoning code issues and 311 notification in regard to how they will treat the addition of stairs.**
- **For any changes to street facing facades due to adding exit passage Planning needs to review how to handle vis-à-vis Historic Preservation review**
- **What liability is triggered by providing a rear stair that is not per the CBC given they are allowing the angle to be 72 degrees?**
- **What liability is being triggered by providing access from bedroom EERO balconies to the roof?**
- **What will be the process for non-permitted units that Planning wants legalized? If the non-permitted units conflict with the EERO requirements how is that resolved?**
- **How will projects still be able to be approved OTC give the multiple agency review and the requirement to file an AB-005**