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**Building Codes Division**

*Working with Oregonians  
to ensure safe building  
construction while  
supporting a positive  
business climate.*

**Statewide Code Interpretation****02/21/07****No: 2004 OSSC 1107.1  
2004 Oregon Structural Specialty Code**

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**Code Section:** 1107.1**Code Edition:** 2004 Oregon Structural Specialty Code**Date:** February 21, 2007**Subject:** Use of areas of rescue assistance on the ground floor.**Question:**

1. Can an area of rescue assistance be provided to satisfy the accessible means of egress requirements of a building where the first story floor level is greater than 6 inches above grade?
2. If an area of rescue assistance can satisfy the accessible means of egress requirements as noted above and a sprinkler system is installed, is exception 1 to OSSC 1107.1 still applicable?

**Answer:**

1. Yes.
2. Yes.

**Analysis:**

To preface this discussion, OSSC 1108.1.1.2 requires at least one accessible public entry in every affected building. In as much, the following analysis is only applicable to other required exits.

OSSC 1107.1 states; “Where a required exit from an occupiable level above or below a **level of accessible exit discharge** is not accessible, an area of rescue assistance shall be provided on each such level (in a number equal to that of inaccessible required exits).”

The threshold for determining whether or not a “required” exit must be accessible is found in OSSC section 1107.3 which requires that **all exits** within 6 inches of grade and adjacent to accessible areas be made accessible (ramps, etc.).

It is important to understand the distinction between the “**first story floor level**” of a building and the term “**level of exit discharge**” as used in 1107.1.

The OSSC defines the **exit discharge** as the area between the **exit** (which includes **exterior exit stairs**) and the **public way**. In turn, the **level of exit discharge** is defined as; “The horizontal plane located at the point at which an **exit** terminates and an **exit discharge** begins.”

Where a required exit is greater than 6 inches above grade, the designer may choose to install exterior exit stairs from the first story floor level to adjacent grade and provide an area of rescue assistance in the building. As noted above,

the point at which the *exterior exit stairs* terminate is by definition, the “*level of exit discharge*.”

In buildings equipped with a sprinkler system, the area of rescue assistance may be eliminated. In such cases, 1107.5 will require directional signs at non-accessible exits to indicate the route to the nearest accessible exit.

*Editorial Note: ORS 447.220 directs the Department of Consumer and Business Services to adopt accessibility guidelines that are consistent with the Americans with Disabilities Act. In keeping with this directive, BCD staff recently conferred with both the US Access Board (promulgators of the ADA Architectural Guidelines) and the US Department of Justice. Both entities concurred there is no restriction in the ADAAG from providing areas of rescue assistance when the occupiable level is above or below the level of exit discharge.*

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