



# City of San Dimas

## Building and Safety Division

Phone: (909) 394-6260 E-Mail: [building@sandimasca.gov](mailto:building@sandimasca.gov)

### **CHANGE OF OCCUPANCY R-3 to R-3.1**

A change of occupancy from an R-3 to an R-3.1 will require a full set of plans to be prepared and stamped by a licensed California design professional (Architect, Civil, etc., as appropriate). Plans are to include elevations, floor plans, framing plans, electrical plans, plumbing plans, energy compliance, and similar depending on the project scope of work.

#### **Door Requirements under the California Existing Building Code, California Building Code, and California Residential Code**

##### **1. Code Basis for Change of Occupancy**

Where an existing building or portion of an existing building undergoes a change of occupancy to a special use or occupancy category described in Chapter 4 of the California Building Code (CBC), the building (or affected portion) must comply with all applicable requirements of CBC Chapter 4 for that new occupancy. (California Existing Building Code [CEBC] Section 1002.1)

Group R-3.1 (licensed 24-hour residential care facilities for six or fewer clients) is subject to these enhanced provisions because it may serve clients who are non-ambulatory, bedridden, or otherwise unable to self-preserve in an emergency. This creates a higher life-safety hazard category than standard Group R-3 (single-family dwellings), necessitating stricter means-of-egress requirements.

##### **2. Means-of-Egress Requirements for Group R-3.1**

Per California Residential Code (CRC) Section R335.6.1, Group R-3.1 occupancies must satisfy the general means of egress rules in CBC Chapter 10, Section 1003 through 1015, in addition to the special provisions in CRC Section R335.6.

Key requirements include:

- A minimum of two exits from the facility.
- A means of egress shall not pass through more than one intervening room.
- A means of egress shall not pass through kitchens, storerooms, closets, garages, or similar spaces.
  - Exception: Kitchens that do not form separate rooms by construction are permitted.
- These rules supplement the general criteria in CBC Sections 1003 through 1015.

##### **3. Door Requirements in the Means of Egress**

All doors forming part of a required means of egress must comply with CBC Section 1010.1 (general), 1010.1.1 through 1010.3.4 (specific technical criteria), and, for exterior doors serving an exit, Section 1022.2.

### **Key performance criteria (CBC 1010.1 and 1010.1.1):**

Doors must be readily distinguishable from adjacent construction and finishes so they are easily recognizable as doors. Mirrors or reflective materials are prohibited on means-of-egress doors. Means-of-egress doors shall not be concealed by curtains, drapes, decorations, or similar materials.

Swinging doors must provide a minimum 32-inch clear opening width, measured between the face of the door and the stop with the door open 90 degrees.

Minimum clear height is 80 inches.

**\*\*\*Important note on exceptions:** CBC Section 1010.1.1 provides limited exceptions allowing narrower interior doors in Groups R-2, R-3, and R-4 dwelling/sleeping units that are not required to be adaptable or accessible under Chapter 11A. No such exceptions apply to Group R-3.1. Therefore, every door in the means-of-egress path including interior bedroom and bathroom doors must achieve the full 32-inch clear width.

A typical 30-inch nominal door yields only about 28½ inches clear; a 36-inch nominal door is normally required to achieve 32-inches clear after accounting for hinges, stops, and hardware.

### **4. Why Interior Doors Are Included in the Means-of-Egress Path**

CBC defines a means of egress as a continuous and unobstructed path of vertical and horizontal egress travel from any occupied portion of the building to a public way (CBC Section 1002). The path begins at the occupied space itself (CBC Section 1003).

**Bedroom doors:** These rooms are occupied spaces. For non-ambulatory or bedridden clients, the door must also support emergency mattress or bed evacuation (a common practice in R-3.1 facilities and reinforced by CBC Section 435 special provisions for bedridden clients).

**Bathroom doors:** If the bathroom is an occupied space used by clients (standard in care facilities), its door is part of the continuous egress path and must meet the 32-inch clear width standard to prevent clients from becoming trapped during an emergency.

CBC Section 1003 requires the path to remain unobstructed with consistent minimum width and headroom throughout.

### **5. Practical Implications for This Change of Occupancy**

Because the existing building was originally permitted as Group R-3, many interior doors (especially bedroom and bathroom doors) were likely installed to the more permissive R-3 standards (e.g., 28- or 30-inch nominal widths). Under the R-3.1 classification, these doors must now satisfy the 32-inch clear-width rule with no residential exceptions.

#### **Recommended actions:**

- Survey every door in the required egress path (exterior exit doors, corridor doors, bedroom doors, and bathroom doors serving client areas).
- Replace or modify any door that does not provide 32-inches clear (typically requires enlarging the rough opening and installing a 36-inch nominal door leaf).

- Ensure all replacement doors are side-hinged swinging type, readily distinguishable, and (where serving bedridden clients) self-closing and positive-latching per CBC Section 435.
- Verify that no means-of-egress door is concealed or disguised.

#### **6. Housing Non-Ambulatory Clients:**

In Group R-3.1 occupancy, bedrooms used by non-ambulatory clients shall have at least one of the required exits which shall conform to one of the following:

- Egress through a hallway or area into a bedroom in the immediate area which has an exit directly to the exterior and the corridor/hallway is constructed consistent with the dwelling unit interior walls. The hallway shall be separated from common area by solid wood door not less than 1-3/8-inch thick, maintained self-closing or shall be automatic closing by actuation of smoke detector installed in accordance with Section 716.5.9 of the California Building Code.
- Egress through a hallway which has an exit directly to the exterior. The hallway shall be separated from the rest of the house by a wall constructed consistent with the dwelling unit interior walls and opening protected by a solid wood door not less than 1-3/8-inch thick, maintained self-closing or shall be automatic closing by actuation of a smoke detector installed in accordance with section 716.5.9 of the California Building Code.
- Direct exit from the bedroom to the exterior, such doors shall be of a size to permit the installation of a door not less than 3-feet in width and not less than 6-feet 8-inches in height. When installed, doors must be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exit way is not less than 32-inches.
- Egress through an adjoining bedroom which exits to the exterior.

#### **7. Housing only one bedridden client:**

Group R-3.1 occupancies housing a bedridden client and are not provided with an approved automatic fire sprinkler system shall comply with all the following requirements:

- A direct exit to the exterior of the residence shall be provided from the client's sleeping room.
- Doors to bedridden client's sleeping room shall be of a self-closing, positive latching 1 3/8-inch solid wood door. Such doors shall be provided with a gasket so installed as to provide a seal where the door meets the jam on both sides and across the top. Doors shall be maintained self-closing or shall be automatic closing by actuation of a smoke detector in accordance with Section 716.5.9 of the California Building Code.
- The doors shall not have a night latch, dead bolt, security chain or any similar locking device installed on any interior door leading from a bedridden client's sleeping room to any interior area such as the corridor, hallway and or general use area of the residence in accordance with Chapter 10 of the California Building Code.
- The exterior door to a bedridden client's sleeping room shall be operable from both the interior and exterior of the residence.
- Every required exit doorway from a bedridden client sleeping room shall be of a size to permit the installation of a door not less than 3 feet in width and not less than 6-feet 8-inches in height. When installed in exit doorways, exit doors shall be capable of opening at least 90 degrees and shall be mounted that the clear width of the exit way is not less than 32-inches.

- NOTE: A sliding glass door can be used as an exterior exit doorway as long as it is operable from the inside and outside and the clear width of the exit is not less than 32-inches.

**8. Change of Elevations, Ramps, Guardrails under the California Building Code and the California Residential Code**

The California Residential Code Section R335.6.4 Group R-3.1 occupancies housing nonambulatory clients' that have interior changes in level up to ¼-inch may be vertical and without edge treatment. Changes in level between ¼-inch and ½-inch shall be beveled with a slope no greater than 50% slope. Changes in level greater than ½-inch shall be accomplished by a means of a ramp.

<b>Ramps used as part of a Means of Egress in R-3.1 Occupancies</b>		
<b>Component of Ramp</b>	<b>Standard for compliance</b>	<b>Code Reference</b>
Slope	Not to exceed 8.3%	CBC 1012.2
Cross Slope	Not to exceed 2%	CBC 1012.3
Vertical Rise	30-inch maximum	CBC 1012.4
Width	36-inches clear	CBC 1012.5.1
Headroom	80-inches clear (ramp and landing)	CBC 1012.5.2
Surface of Ramp	Slip-resistant.	CBC 1012.7.1
Handrails Required	Rise greater than 6-inches require handrails on both sides of the ramp.  Rise less than 6-inches, the ramp shall be equipped with either handrails or floor finish material that contrast with the adjacent floor finish materials.	CBC 1012.8
Edge Protection Required	Edge protection is required on each side of ramp runs and at each side of ramp landings. EXCEPTIONS: <ol style="list-style-type: none"> <li>1. Edge protection is not required on ramps that are not required to have handrails, provided they have flared sides that comply with Chapter 11A or 11B.</li> <li>2. Edge protection is not required on sides of ramp landings serving an adjoining ramp run or stairway.</li> <li>3. Edge protection is not required on the sides of ramp landings having a vertical drop-off of not more than ½-inch within 10-inches horizontally of the required landing area.</li> </ol>	CBC 1012.10
Edge Protection Type	A curb, rail, wall or barrier shall be provided to serve as edge protection. <ol style="list-style-type: none"> <li>1. A curb not less than 4-inches in height.</li> </ol>	CBC 1012.10, 1012.1, 1012.10.2

	<p>2. Barriers shall be constructed so that the barrier prevents the passage of a 4-inch sphere, where any portion of the sphere is within 4-inches of the floor or ground surface.</p> <p>3. The floor or ground surface of the ramp run, or landing shall extend 12-inches minimum beyond the inside face of a handrail complying with Section 1014.I</p>	
Landing length	Landings shall be 48-inches in length minimum in the direction of travel.	CBC 1012.6.3
Landing width	Not less than the width of the widest ramp run adjoining the landing.	CBC 1012.6.2
Handrails	Handrails serving the ramp must comply with CBC Section 1014	CBC 1012.8

**9. Unsafe Conditions:**

Where the change of occupancy is made, all unsafe electrical conditions shall be corrected without requiring that all parts of the electrical system comply with the California Electrical Code.

Light and ventilation requirements must comply with the requirements for the new occupancy.

**10. Address Numbers:**

Address numbers must be posted on the structure and visible from the street. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification shall contrast with their background. Address numbers shall be Arabic numbers or alphabetic letters. Numbers shall not be spelled out. Each character shall be not less than 4-inches in height with a stroke width of not less than ½-inch. Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building address cannot be viewed from the public way, a monument, pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.