

September 9, 2025

Planning and Land Use Management Committee
JOHN FERRARO COUNCIL CHAMBER
ROOM 340, CITY HALL
200 NORTH SPRING STREET, LOS ANGELES, CA 90012

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COUNCILMEMBER JOHN S. LEE
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RE: CF 25-0247 – Recommendations for a Feasible and Effective Single-Stair Building Ordinance

Dear Chair Blumenfield and Honorable Committee Members,

As the Director of Government and Public Affairs for the Los Angeles Chapter of the American Institute of Architects (AIA LA), I am writing to share support for the City's efforts to legalize single-stair residential buildings up to six stories and our support for the core mission of ordinance CF 25-0247. Legalizing single-stair residential buildings is a pivotal, common-sense reform that can unlock thousands of underutilized lots, facilitate better housing design, and create the family-sized homes Los Angeles desperately needs.

While we commend the collaboration between LADBS, LAFD, and LADCP, we have significant concerns that the current draft includes requirements that go far beyond proven safety standards. These provisions will, unfortunately, render this typology financially and spatially infeasible, undermining the ordinance's primary goals. Our recommendations aim to align the ordinance with successful precedents in cities like Seattle and countless others worldwide.

A Proven International Model for Safety and Livability

The requirement for two staircases is a historical anomaly of 20th-century American building codes. For centuries, dense, vibrant cities have been built around single-stair buildings, which remain the dominant form of housing in cities like **Paris, Vienna, and Tokyo**. These cities prove that life safety is not achieved through redundant stairs, but through a modern, layered approach combining:

- **Automatic sprinkler systems**
- **Pressurized stairwells to keep smoke out**
- **Strict limits on the number of units per floor**

- **Fire-rated construction materials and methods**

Research by organizations like the **Pew Charitable Trusts** has shown no discernible difference in fire mortality rates between buildings with one and two staircases when these modern protections are in place. Los Angeles can and should confidently adopt this global standard.

Critical Recommendations for a Workable Ordinance

AIALA supports the ordinance's core components, including the **six-story height limit**, the **four-unit-per-floor maximum**, and maintaining limits in **High Fire Hazard Severity Zones**. To ensure the policy's success, we offer the following critical recommendations.

1. Align with Modern Safety Codes on Rescue Openings (Item #26)

This is our most urgent concern. The draft **eliminates key exceptions** in the California Building Code (CBC § 1031.2) that rightly permit buildings of fire-resistant, non-combustible construction (Type III, II, or I) to forgo emergency rescue windows.

- **The Problem:** Mandating rescue windows in every bedroom of a six-story building forces an **8-foot yard setback** for fire ladder access. On a typical 50-foot-wide LA lot, this makes a functional building footprint virtually impossible to achieve.
- **The Solution:** The CBC provides these exceptions precisely because the combination of sprinklers, pressurized stairs, and fire-resistant construction provides a superior, systemic level of safety.
- **Recommendation:** We strongly urge you to **strike the following language** from Item #26: *"Exceptions 1, 2, 3, 5, 6, 7, and 8, listed in CBC Section 1031.2, shall not apply."*

2. Provide Greater Flexibility for Feasible Design

Successful ordinances in other cities allow for practical design. The LA draft includes several unnecessarily restrictive limits that we do not support:

- **Increase Travel Distance:** A **20-foot** travel distance from a unit door to the stair is overly restrictive. A **40-foot** distance is a safe and reasonable standard that allows for better building layouts, including designs with open-air courtyards, without compromising safety.
- **Allow Two Buildings Per Lot:** Limiting sites to one single-stair building prevents efficient design on larger or consolidated lots. We recommend permitting up to **two buildings** per lot, which is common in other jurisdictions.

- **Permit Mixed Occupancies:** Prohibiting the integration of residential (R-2) with other uses prevents proven mixed-use typologies, such as ground-floor retail with apartments or live-work units above. This flexibility is essential for creating vibrant, walkable corridors.

3. Clarify Technical Requirements to Avoid Unintended Costs

The ordinance must clarify if buildings over four stories will require **emergency backup power for elevators**. Under the current code, this expensive requirement (often necessitating a gas generator) is triggered unless a horizontal exit is provided. This could be an unforeseen poison pill for many projects, and its necessity should be evaluated.

A Collaborative Path Forward

The success of this ordinance hinges on getting the technical details right. We are concerned that the professional design community has not yet had a formal opportunity to collaborate with City staff to vet the draft's real-world implications.

We ask the PLUM Committee to **approve the ordinance in principle while directing staff to consult with technical experts from AIALA** and the broader community of architects and engineers to refine these critical requirements before the ordinance proceeds to the full City Council.

With these data-driven amendments, Los Angeles can pass a landmark ordinance that follows global best practices, maintains the highest level of safety, and delivers on its promise to increase our housing supply.

We urge you to **support the motion** and **adopt our recommendation to establish a technical advisory panel**. AIALA and our members are ready to assist in this vital work to build a more affordable, resilient, and beautiful Los Angeles.

Thank you for your leadership on this vital issue.

Truly yours,



Will Wright, Hon. AIALA
Director, Government & Public Affairs