



LIVABLE  
COMMUNITIES  
INITIATIVE



Dear Faruk Sezer and Rodolfo Arias,

Thank you for taking the time to meet with us on May 28, 2025, regarding the City Council-mandated suggestions for modifications to the city's building code to allow taller single-exit, single-stairway apartment buildings. Per our conversation, we would like to present to you the following opinions from our organizations regarding how Los Angeles should approach this issue.

### **CAL FIRE work group**

The Office of the State Fire Marshal is currently holding [monthly work group meetings](#) on the topic, as mandated by the state legislature. We would encourage the Los Angeles Fire Department and Los Angeles Department of Building and Safety to attend those sessions, both to learn more about the topic and also to share the perspective of the state's largest city and one of its most housing-constrained.

### **Specific single-stair conditions**

We feel that the six-story height limit being discussed is arbitrary, and not rooted in any existing thresholds in the California Building Code. We would urge you to expand the scope of consideration to any R-2 occupancy in a building not meeting the high-rise definition, as this more properly aligns with firefighting capability and existing code precedent.

Below that limit, we think it may be appropriate to apply different conditions to different heights. Late last year in Long Beach, the International Code Committee's Means of Egress Committee for the model International Building Code voted to approve a [modification](#) of the E24-24 proposal, allowing single-stair apartment buildings up to four stories. This language or something very similar is expected to be adopted into the 2027 model International Building Code. We think these should be the set of conditions under which single-stair apartment buildings are allowed at four stories (not to override the current rules for buildings up to three stories).

These rules were intended for adoption across the United States, by jurisdictions regardless of firefighting capabilities. Given Los Angeles's very strong firefighting capabilities – in response times, apparatus availability, career staffing, fire station density, and water availability – it would not be appropriate for the city to stop at the same language as rural areas with all-volunteer fire departments and only allow buildings up to four stories. Therefore we urge LADBS and LAFD to work with stakeholders to arrive at reasonable language to allow single-stair apartment buildings **beyond this four-story limit, up to the high-rise height limit.**

Above four stories, we would encourage Los Angeles to work with designers and developers to ensure financial feasibility for housing aimed at a range of incomes. Los Angeles has a culture, workforce, and supply chain geared towards light wood-frame construction, with the current



LIVABLE  
COMMUNITIES  
INITIATIVE



code requiring extensive mitigations to ensure the safety of combustible construction. Light wood-frame construction types should be allowed for single-stair buildings, within the limits currently prescribed for R-2 occupancies.

U.S. jurisdictions and those abroad do not as a rule require direct aerial apparatus access to each unit from the street (particularly when buildings are equipped with sprinklers and alarms, stairways are equipped with smoke control, etc.). Requiring this would seriously impair the ability to design more than two or three apartments per story and would be very problematic for Los Angeles's narrow but deep lots and buildings.

U.S. and foreign jurisdictions which build single-stair buildings also do not require wider exit stairs. There are some North American jurisdictions who have required them in recently enacted code sections, but few to no buildings have been built under these conditions. The spatial and dollar costs of wider stairs are very high – because of the geometry of landings and switchback stairs, the floor area occupied by the stairway increases at a rate faster than the width of the stairway. In other words, small increases in stair widths can lead to big additional costs.

Contrary to some assertions, the purpose of multiple exits in the current code is not for the fire department to be able to segregate simultaneous firefighter attack and occupant egress into different stairways. If this were the case, stairways would not be required to be remote from each other. There would also be some sort of permanent labeling of doors or required public announcement system in non-high-rise buildings to facilitate segregated flows. Finally, maximum exit access travel distances in CBC 1017.3 would be measured to the second nearest (or even farthest) exit, not “to the nearest exit” as is written in the current code. Because every exit in a two-stair building must be assumed to have occupants evacuating down it and cannot necessarily be closed off to evacuation, it is only logical to assume that minimum stairway widths in the current code would be adequate for rescue and firefighting operations in single-stair buildings as long as the number of occupants in the building is limited to that of no more than half the number that would be found in a two-stair building.

The United States has extremely expensive and large elevators, and for the mid-rise heights in question where firefighting does not depend on elevators, we would like to see designers continue to have the flexibility to provide elevators as they see fit. While we support the greater provision of elevators, this is a separate topic that should be left out of code language for single-stair buildings. It risks imperiling the project, especially for affordable housing, smaller lots, and lower heights.

So-called “chained point access blocks” – multiple single-stair conditions on a single site or even within a single structure, with appropriate fire-rated assemblies separating single-stair conditions – are a common typology in New York City, abroad, and even in U.S. suburbs throughout the country in the form of garden apartments. We would like to see the future code



LIVABLE  
COMMUNITIES  
INITIATIVE



section allow these for larger sites where designers find efficiencies in chaining multiple single-stair blocks together.

Exterior stairways are a commonly used solution in Seattle and other jurisdictions to ensure that smoke cannot accumulate in single stairways, and Los Angeles has a history of them for low-rise structures, given its mild climate. We would like them to remain an option (but not the only option) for single-stair buildings here as well. We have heard from designers that differing interpretations of certain code sections can make them difficult to implement today, and we would like either the code language proposed or bulletins related to it to clarify that they are not to be punished through application of, for example, exit access travel distance limits to travel down exterior exits themselves.

### **Equivalency**

Because building codes do not have objective performance goals, new proposals must be judged against levels of protection afforded by currently adopted codes. It is important to judge single-stair proposals not against the same-sized building with two stairs – which is not realistic, and is not currently being built – but against more common and practical building types built under current codes.

One type is what is informally known in Los Angeles as the double duplex, common in areas of the city zoned for low-density multifamily. These are very large R-3 occupancies, often four stories tall, with two dwelling units in each building (“duplex”), with sometimes two built on each lot (“double”). They are built to the California Building Code, with dozens of rooms with en-suite bathrooms within a single dwelling unit rented out to individual tenants who share a kitchen and living room. They are built with lower levels of fire protection than required by, for example, Seattle’s single-stair building code section (individually rented bedrooms open directly onto the stair, for example). On our call, LADBS indicated that they were unaware of the building type, lending credence to our belief that there have been no major fires and these buildings have generally proven to be safe.

Another type of building is the double-loaded corridor design for R-2 occupancies. While these have two exits, they are arranged at opposite ends of very long corridors, often with more occupants sharing a corridor on a single story than a six-story single-stair building would have in total across all stories. One Santa Fe – a very large double-loaded corridor in the Arts District – has even been [described as](#) a “skyscraper flipped on its side.” The current California Building Code allows for occupant loads that could, in theory, have 100,000 square feet of apartments on a single story sharing just two exits. Practically speaking, travel distances might limit a two-stair building to around half this size. Either limit still leaves a vast corridor acting as a single smoke compartment, with huge numbers of residents at risk in the event of a fire that escapes containment by sprinklers and self-closing doors.



LIVABLE  
COMMUNITIES  
INITIATIVE



Development of a single-stair code section should consider the fact that single-stair buildings, by virtue of their limited floor plates, will tend to have far fewer occupants relying on each stairway than a typical double-loaded corridor building with two stairs and far more than twice as many occupants. If LADBS and LAFD are comfortable with current code limits for two-stair buildings – and we have heard no complaints from them about these – then they should be comfortable with much less risk in more compartmented single-stair buildings.

### **Fire service capacity**

Many objections to taller single-stair buildings have been raised by smaller jurisdictions in more rural areas with volunteer fire departments, or with these departments in mind. While single-stair code sections in other cities are written to make buildings mostly self-reliant in the case of fires, the issue of rescues, fire service suppression, and general capabilities still comes up. Seattle's executive director of fire prevention expressed this view when [she told NFPA Journal](#): “We were comfortable with [our single-stair code section] because we have a hydrant on every corner. We have a well-funded municipal career fire department with outstanding response times. We have a good complement of aerial ladders distributed throughout the city that we could put quickly on scene if we need to [effect] a rescue.”

All of these descriptions apply equally to the Los Angeles Fire Department. Los Angeles has [fire hydrants on every corner](#). We have a career fire department with an annual budget of [over \\$920 million](#) – very close to Seattle's in per capita terms. We have an [extensive fleet](#) of aerial truck companies, stationed throughout the city. LAFD [proudly displays](#) its Class 1 ISO rating on its apparatus. It is important for Los Angeles taxpayers to reap the rewards of our spending, and for the city to recognize its fire service capacity when developing its building code.

### **Use of fire loss data**

The Los Angeles Fire Department, like those around the country, reports the outcomes of fires to the federal government through the National Fire Incident Reporting System. We would like to see this data used to evaluate how often fires develop into major incidents in modern apartment buildings built to recent codes with all of the passive and active systems that have been required. Real-life incident data collected over the years in our city should inform the development of single-stair code sections and evaluation of how likely various failures of existing required systems are. We should not rely solely on hypothetical arguments or anecdotes about what might happen in the event of failures of unknown likelihood in buildings that already contain multiple layers of protection.

### **Negative or limited recommendation**

We believe that LADBS and LAFD can work together with stakeholders to make recommendations for code language to allow single-stair apartment buildings under buildable conditions up to at least six stories, and ideally up to the high-rise height limit. However, in the event that the department recommends otherwise, we would like to see an extensive, evidence-driven justification. If the city determines that state legislation does not allow the city to



LIVABLE  
COMMUNITIES  
INITIATIVE



allow taller single-stair buildings under either the body of its building code or alternative means, for example, we would like to see an explanation for why Seattle and New York City have been able to adopt building codes allowing such buildings despite similar language from their respective states ([RCW 19.27.040](#) in Washington, and [Sec. 379 of the New York State Uniform Fire Prevention Building Code Act](#)). If the city determines that LAFD does not have the capacity of fire departments in other places that have or will soon allow single-stair apartment buildings above three stories (including Seattle, New York City, Honolulu, Vermont, Georgia, Minnesota, Puerto Rico, Knoxville, Memphis, and the entire nation through eventual likely adoption of the modification to E24-24), we would like to see a data-driven justification for this lack of capacity. If the city determines that very large R-3 duplexes have more safety features or lower risk than a single-stair R-2 occupancy over three stories built under a reasonable hypothetical code section, we would like to see evidence of that.

Eduardo Mendoza  
Policy Director  
Livable Communities Initiative

Scott Epstein  
Director of Policy and Research  
Abundant Housing LA