

## Communication from Public

**Name:** Zachary Pitts  
**Date Submitted:** 08/19/2025 05:52 PM  
**Council File No:** 25-0247  
**Comments for Public Posting:** Please find attached correspondence from YIMBY Law in support of Los Angeles' draft Single-Stair policy. Sincerely, Zachary Pitts  
YIMBY Action

8/18/2025

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

Via email: [cpc@lacity.org](mailto:cpc@lacity.org)

Re: Authority for Los Angeles to Adopt Single-Stair Standards up to Six Stories

Dear Los Angeles City Council,

YIMBY Law is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. YIMBY Law sues municipalities when they fail to comply with state housing laws, and offers research and support for safe, pro-housing policies. Los Angeles' proposed single stair policy, which would allow for single-exit and single-stairway residential buildings up to six stories is responsible and legally justifiable policy. We encourage the City to adopt this policy, which is well within the power of its officials.

While California law does not permit building regulations which are less restrictive than the state building code, the proposed policy will not fail because restrictiveness, as considered under the state building code, is not a question that analyzes a single criteria; stringency is a broader inquiry into building safety in context with all applicable standards. With the safety protocols as drafted by the City, this measure is lawful and responsible.

Under the California Building Standards Law,<sup>1</sup> cities are expressly authorized to adopt local building standards that differ from Title 24 so long as they are not "less stringent." Los Angeles has repeatedly exercised this authority—through the Alternative Materials, Design, and Methods of Construction (AMMR) process and through local amendments adopted by ordinance. CBC §104.11 allows "alternative materials, design and methods of construction" where the official finds the proposal is "not less than the equivalent" of the code's prescriptive level of safety. These provisions explicitly contemplate that cities may establish different construction methods where safety is preserved or enhanced.

Moreover, California has already extended authority to localities: Assembly Bill 835 (2023) created a pathway for state-level adoption of single-stair standards, but nothing in AB 835 displaced or restricted local authority under existing law. It was intended to encourage adoption of single-stair policies where, as with Los Angeles, they maintain necessary safety protections.

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<sup>1</sup> Health & Safety Code §§ 18941.5, 17958.7.

Stringency is not a prohibition on any difference in prescriptive standards such as building height. As applied in the California Building Code, stringency is a conflict-resolution device in structural and energy contexts, not a ban on local equivalency in egress design. A code is less stringent only when it provides less safety. The number of exits is governed by CBC Chapter 10 (Means of Egress), not Chapter 16 (Structural Design). The code already permits single exits for certain occupancies and story counts.<sup>2</sup> Los Angeles' proposal simply extends this typology with compensating safeguards. To treat this as a structural stringency conflict is misplaced. The proper framework is the CBC's equivalency provisions,<sup>3</sup> which explicitly allow alternate methods if equivalent safety is demonstrated. Where mitigation measures (enhanced fire ratings, sprinklers, pressurized stairs, reduced travel distances, limits on units per floor, etc.) yield safety outcomes equal to or greater than the two-exit baseline, Los Angeles' rules would not be less stringent.

Pursuant to Council direction, LADBS and LAFD have developed a package of mitigations which would provide the necessary restrictions and tenant safety. The Fire Department was afforded the opportunity to object but did not, likely having been convinced by the safety measures presented by limits on units per floor, reduced travel distances, enhanced fire resistance, and full sprinkler coverage. Taken together, these standards will equal or exceed the life-safety protections of the state code.

Similarly, San Francisco has a long practice of approving local equivalencies in egress (e.g., AB-019, AB-020), which are recognized under state law. These examples confirm that a local government may regulate differently, provided that the resulting standards do not reduce safety. These bulletins outline conditions under which the local department is likely to find that a fire escape can provide equivalent means of the safety usually provided by a second exit, even where that staircase does not meet California or San Francisco Building Code exit criteria. These are case specific allowances, not broad changes to local building codes. In fact, San Francisco has a general procedure for approval of local equivalency; AB-005 created a case by case review process for standards that are different (arguably less stringent) from existing regulations, but provide enough substantiated alternatives to receive approval.

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<sup>2</sup> California Building Code § 1006.3.4.

<sup>3</sup> California Building Code § 104.11.

New York<sup>4</sup> and Washington<sup>5</sup> states have similar restrictions on local codes and three story single stair rules. Nonetheless, New York City<sup>6</sup> and Seattle<sup>7</sup> have adopted six story single stair policies. Both policies allow for mitigations to fire risk and neither, per our research, have been challenged.

YIMBY Law respects the considered effort of this Council, the Los Angeles Fire Department, the Department of Building and Public Safety, and the City Planning Department. Those efforts have crafted a policy that complies with California law while providing safe, efficient housing to Los Angeles residents. I am signing this letter both in my capacity as the Executive Director of YIMBY Law, and as a resident of California who is affected by the shortage of housing in our state.

Sincerely,

A handwritten signature in black ink that reads "Sonja Trauss". The signature is written in a cursive, flowing style with a large, decorative flourish at the end of the name.

Sonja Trauss  
Executive Director  
YIMBY Law

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<sup>4</sup> NYS Uniform Fire Prevention and Building Code Act: Nothing in this article shall be construed to prohibit any municipality from adopting or enacting any building regulations relating to any matter as to which the uniform fire prevention and building code does not provide, but no municipality shall have the power to supersede, void, repeal or make more or less restrictive any provisions of this article or of rules or regulations made pursuant hereto.

<sup>5</sup> RCW 19.27.040: The governing body of each county or city is authorized to amend the state building code as it applies within the jurisdiction of the county or city. The minimum performance standards of the codes and the objectives enumerated in RCW 19.27.020 shall not be diminished by any county or city amendments.

<sup>6</sup> NYC BC 1006.3.2, item 7.

<sup>7</sup> SBC 1006.3.3, item 7.