

## Communication from Public

**Name:** Simon Ha

**Date Submitted:** 09/09/2025 10:44 AM

**Council File No:** 25-0247

**Comments for Public Posting:** 9/9/2025 Re: CF 25-0247 (Legalizing Single-Stair Buildings Up to 6 Stories) Honorable Planning and Land Use Committee Members, I'm writing in support of the draft ordinance to allow single-stair buildings in the City of Los Angeles, with the following comments. Passing this ordinance will not be a silver bullet for our housing supply and affordability challenges; however, along with other pro-housing production policies—such as ADU reform, density bonuses, and CEQA reform—these incremental changes can collectively help address the housing crisis. The draft ordinance published on Thursday, 9/4/2025, was the first time our working group of architects and consultants had a chance to review the language. As written, I believe there are redundancies and unnecessarily restrictive provisions that may negate the intent to produce more housing. The goal is to maintain the same level of life-safety by tailoring the building and fire codes to achieve equivalency and to unlock the potential to produce housing on underutilized small lots. If the code goes beyond equivalency and introduces unreasonable restrictions, this ordinance may fail to produce housing. Here are some provisions that need to be clarified or removed: #4 – “The net floor area of each floor (story or basement) shall not exceed 4,000 square feet.” • In a mixed-use building with ground-floor commercial and five stories of residential above, does this provision apply to the commercial floor as well? We want these small-lot infill buildings on our commercial corridors to replace single-story, single-use buildings with housing over shops. The ordinance should not intentionally or unintentionally prohibit these types of buildings. #9 – “Each dwelling unit or accessory dwelling unit shall be limited to a maximum of six habitable spaces as defined in Chapter 2 of the CBC.” • Living rooms, kitchens, dining rooms, and bedrooms are considered habitable spaces. This measure may prevent four-bedroom units. Is it the intent to limit larger family-size apartments or condos? #26 and #27 – These are not typical requirements found in Seattle or other jurisdictions and should be removed. We had a flurry of email discussions over the weekend to prepare for the PLUM hearing, but given the time constraints, the professional community has not had an opportunity to test-drive the draft ordinance. To ensure the final ordinance is effective, I ask the PLUM Committee to approve the

draft ordinance while directing staff to refine the requirements between now and the full Council vote. LADBS, LAFD, LADCP, and any other involved departments should consult with AIA LA and LCI prior to finalizing the ordinance. Thank you for the opportunity to provide comments on this issue. Sincerely, Simon Ha, AIA, LEED AP Founder SH Housing Solutions

## Communication from Public

**Name:** Christian Stayner

**Date Submitted:** 09/09/2025 11:24 AM

**Council File No:** 25-0247

**Comments for Public Posting:** I support the draft ordinance for single-stair buildings in Los Angeles, recognizing it as one of several incremental changes needed to address the housing crisis. The goal is to achieve life-safety equivalency and unlock housing potential on small lots; unreasonable restrictions will prevent this. Specific provisions needing clarification or removal include: #4: "Net floor area... shall not exceed 4,000 square feet." This may unintentionally prohibit mixed-use buildings with ground-floor commercial, which we want to encourage on commercial corridors. Please consider adjusting the language to exempt nonresidential uses from the floor area (such as "Net floor area for residential uses..."). #9: "Each dwelling unit... shall be limited to a maximum of six habitable spaces." This could prevent four-bedroom units and limit larger family-sized housing. #26 and #27: These are unusual requirements not found in other single-stair jurisdictions, are already covered by other code requirements, and should be removed. Given the limited time for review, I encourage the PLUM Committee approve the draft ordinance but direct staff to refine requirements with the relevant stakeholders (e.g., LADBS, LAFD, LADCP, AIA LA, and LCI) before the full Council vote this month. Christian Stayner, Architect

## Communication from Public

**Name:** Will Wright  
**Date Submitted:** 09/09/2025 11:45 AM  
**Council File No:** 25-0247  
**Comments for Public Posting:** Attached, please find our specific recommendations to help make this ordinance more effective.

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

MEMBERS: COUNCILMEMBER BOB BLUMENFIELD, CHAIR  
COUNCILMEMBER HEATHER HUTT  
COUNCILMEMBER ADRIN NAZARIAN  
COUNCILMEMBER JOHN S. LEE  
COUNCILMEMBER NITHYA RAMAN

**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), 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