

Communication from Public

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Date Submitted: 09/14/2025 07:48 PM

Council File No: 25-0247

Comments for Public Posting: Re: CF 25-0247 (Legalizing Single-Stair Buildings Up to 6 Stories) Dear Honorable City Council Members, I am writing in support of the single-stair reform and urge Council Members to vote yes on the proposed ordinance. The LA Housing Element calls for 456,643 new homes to meet our city's housing needs. Our mayor has declared a local emergency in response to the housing crisis. We must act with a sense of urgency through strong and decisive action to address the housing shortage and affordability crisis. This ordinance, like the Adaptive Reuse Ordinance that made the Downtown Renaissance possible, will be an important policy to help ease the housing crisis and can boost the production of lower-cost homes. The City of LA and UCLA City Lab's Small Lot, Big Impact initiative identified about 24,000 undeveloped and underutilized lots under ¼ acre (10,890 sf). These lots are often too small to develop and sit empty. Single-stair reform can unlock the development potential of these lots. If we can build an average of 9.5 units per lot, we could produce half of the city's housing goal. Single-stair is not a silver bullet, but it will be a powerful tool to incrementally chip away at our housing goals. Three-story single-stair buildings are currently allowed. The International Code Council is considering increasing this to 4 stories. LA's single-stair ordinance proposes to increase this to 6 stories by adding additional fire/life safety measures to offset risk. LADBS, LAFD, and LADCP have proposed these measures to ensure single-stair buildings up to 6 stories are as safe as any other buildings. For this ordinance to be effective, it is critical that the additional safety measures do not intentionally or unintentionally make it ineffective. The proposed ordinance adds several provisions that are onerous and will limit feasibility on smaller lots, such as the 8' yard requirement in #26 and the elimination of standard exceptions for non-combustible buildings in #27. These two measures are not found in any other jurisdictions that have adopted single-stair reform, such as Seattle, which has allowed this since 1979, and Austin and the State of Texas, which passed the reform just a few months ago. #26 is redundant and unnecessary. Buildings that require egress windows already must provide ground ladder access for 2nd and 3rd floor windows. That space requirement is typically around 8'. #27 eliminates the standard provision in the building code that

exempts rescue windows for buildings constructed with non-combustible materials and higher fire ratings. Some of my own projects that could have been built with Type V construction opted to upgrade to Type III because of this flexibility. Type III construction requires a 2-hour fire rating for exterior bearing walls and stair walls, compared to a 1-hour rating in Type V. The doubled fire rating gives occupants more time to evacuate and firefighters more time to fight fires or rescue occupants. Allowing this exception will incentivise developments to be built with higher fire protection. Opponents such as United Firefighters of Los Angeles City (UFLAC) do not support the ordinance. Their opposition is understandable, since their objective is to ensure maximum safety and well-being of their members regardless of the public benefit of making housing more abundant and affordable. Public safety and firefighter safety will still be protected through the additional fire/life safety measures added to the ordinance. According to Pew Charitable Trusts' research, the data concluded that Small Single-Stairway Apartment Buildings Have a Strong Safety Record, and Revised Building Codes Could Encourage Construction and Boost Supply of Lower-Cost Homes. Please vote yes. Sincerely, Simon Ha, AIA, LEED AP Founder SH Housing Solutions