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September 11, 2025

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Dear Honorable Members:

CEQA ANALYSIS FOR PROPOSED SINGLE STAIR ORDINANCE (CF 25-0247)

The proposed Ordinance would introduce a new Building Code section, Los Angeles Municipal Code (LAMC) Section 91.1006.3.5, which would allow for single-exit apartment buildings of up to six stories under specific conditions. Additionally, the Los Angeles Fire Department (LAFD) will submit a separate proposed ordinance to amend Chapter 10 of the CFC. This proposed ordinance is an effort to allow for housing types that aren't permitted today by the Building Code and alleviate the housing crisis in the City and further the goals of the Housing Element of the General Plan.

Adoption of the proposed Ordinance will implement several of the goals, policies, objectives and programs identified in the 2021-2029 Housing Element of the City of Los Angeles. The main purpose of the Housing Element is to plan for achieving its housing goals, as expressed by the Regional Housing Needs Assessment (RHNA) Allocation, which is 456,643 housing units, by the end of the Housing Element 6th cycle in 2029.

As such, the adopted 2021-2021 Housing Element identifies numerous policies and implementation strategies to facilitate innovative housing typologies not currently permitted today, including Policy 1.2.3, which directs the City to "Facilitate innovative housing models and promote regulatory reforms that reduce the costs of housing production while also promoting broader Citywide Housing Priorities." In addition, Program 62 (Facilitate Housing Innovation) calls for the city to "Adopt various amendments to the Zoning Code to accommodate innovative multifamily housing types." Adoption of the Proposed Ordinance directly supports implementation of these policies and programs of the Housing Element by allowing for more efficient use of small lots for multifamily construction and reducing construction costs as described in the findings associated with the Proposed Ordinance.

An Environmental Impact Report (EIR) (ENV-2020-6762-EIR, SCH No. 2021010130) that analyzed the environmental effects of the 2021-2029 General Plan Housing Element and Safety

Element, and a Rezoning Program for the creation of additional housing was certified by the Los Angeles City Council on November 24, 2021. Two Addendums to the EIR (ENV-2020-6762-EIR) were subsequently certified by the Los Angeles City Council. EIR (ENV-2020-6762-EIR-ADD1) was certified on June 14, 2022, and a second addendum EIR (ENV-2020-6762-EIR-ADD2) was certified on February 7, 2025. For the purposes of this report, the EIR and Addendums will be referred to as the Housing Element EIR.

The Housing Element EIR was prepared to examine the potential environmental effects of the 2021-2029 Housing Element Update, including build out of the Regional Housing Needs Assessment (RHNA) Allocation, as well as the programs and policies that have the potential to result in physical environmental effects. Additionally, the EIR analyzed the potential effect from the construction and operation of 420,327 housing units (full RHNA build out of 456,643 units minus the 36,316 housing units that have been approved but not built). The Housing Element EIR found that the environmental impacts of several of the issue areas were significant and unavoidable, even with imposition of mitigation measures. Based on the analysis in the Housing Element EIR, the EIR concluded the implementation of the 2021-2029 Housing Element Update would result in unavoidable significant environmental impacts with regard to:

- Air Quality (Exceedance of Criteria Pollutants—Construction and Operations)
- Biological Resources (Special Status Species, Sensitive Habitats, Wildlife Corridors)
- Cultural Resources (Historical Resources and Archaeological Resources)
- Geology and Soils (Paleontological Resources)
- Hazards and Hazardous Materials (Hazardous Materials Near Schools and Hazardous Materials Sites)
- Noise (Construction Noise, Operation Noise, and Construction Vibration)
- Public Services (Fire Protection, Police Protection, and School Facilities)
- Recreation (Deterioration of Recreational Facilities and Construction of Recreational Facilities)
- Transportation (Freeway Queuing)
- Tribal Cultural Resources (Construction: Ground Disturbance during Construction)
- Wildfire (Impair Emergency Response Plan, Exacerbate Wildfire Risks in State Responsibility Area or VHFHSZ, Require Infrastructure that may Exacerbate Fire Risk, Expose People or Structures to Significant Risks in State Responsibility Area or VHFHSZ, and Expose People or Structures to Significant Risks Involving Wildland Fires)

The Housing Element EIR also identified the following significant impacts that were anticipated to be reduced to less than significant with identified mitigation measures:

- Air Quality: Construction-related emissions of toxic air contaminants
- Hydrology: Impeding or Redirect Flood Flows

- Transportation: Circulation Plan Consistency, Hazardous Design, Emergency Access

The proposed ordinance will facilitate the production of housing in the City and accommodate the build out of the City's RHNA Allocation and furthers the policies and implementation programs of the Housing Element as described above. The Housing Element EIR fully analyzed the environmental impacts that could occur because of the implementation of the 2021-2029 Housing Element, including the construction and operation of up to 420,327 housing units (including 185,000 affordable units and 75,091 moderate income units), and rezoning programs to facilitate the construction and operation of those housing units. Any and all types of potential housing development were analyzed in the EIR. Housing developments able to take advantage of the proposed ordinance are anticipated to be proposed in a variety of locations throughout the City, on sites that have a zoning and/or general plan land use designation that accommodates construction of multi-family housing. The Housing Element EIR anticipated and fully analyzed that the construction of these housing units would require further action to facilitate innovative housing types. The City does not find there is a change to the project, change to circumstances, or new information as described in PRC Section 21166 or CEQA Guidelines Section 15162(a).

In addition, the Proposed Ordinance includes provisions that would be expected to further prevent unique site-specific conditions which could create a new impact or change to the project, including a prohibition on parcels located in a Very High Fire Hazard Severity Zones (VHFHSZ) or a High Fire Hazard Severity Zone. This aligns with the Housing Element EIR analysis, which anticipated focusing new growth away from these areas. The Proposed Ordinance also includes many additional health-safety regulations intended to ensure the project is no less restrictive (or safe for residents) compared to other types of housing, including strict limits on the size, occupancy and life-safety systems in these buildings. The findings associated with the Ordinance provide additional evidence that the Ordinance will not endanger the health and safety of residents of the community, including data from a 2025 study prepared by the Pew Charitable Trusts on the safety record of single-stair buildings.

While the Proposed Ordinance allows a limited deviation from standard building codes, it does not alter any underlying zoning or density provisions, which were analyzed in the EIR. Additionally, projects must be located on sites where the residential zoning or land use designation permits the construction of multi-family housing units, meaning that the site is already zoned or planned for multi-family housing.

Therefore, it is not anticipated that projects approved under the Proposed Ordinance would have any site-specific conditions or unique features which would change the project, circumstances, or information relied upon in the Housing Element EIR.

Section 15162 and 15164 of the CEQA Guidelines lists the conditions that would require the preparation of a subsequent EIR, negative declaration or an addendum. These include the following:

Section 15162

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The Proposed Project was analyzed in the EIR and has been reviewed by the City of Los Angeles in light of Sections 15162 of the CEQA Guidelines. As the CEQA Lead Agency, the City of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR because there are no changes to the Housing Element EIR project, no changes to the circumstances, or new information. As such no new addendum, and no subsequent or supplemental EIR is required.

Incorporation by Reference

The following documents were used in the preparation of these findings, and incorporated herein by reference, consistent with Section 15150 of the Guidelines: Citywide Housing Element 2021-2029 and Safety Element Update, Final Environmental Impact Report (SCH No. 2021010130), certified November 24, 2021. Referred to herein as the Housing Element EIR.

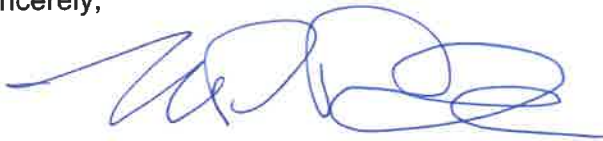
The Housing Element EIR is available for review at the City of Los Angeles, Department of City Planning Records Management, 221 N. Figueroa Street, Room 1450 Los Angeles, and online at the following weblinks:

- Draft EIR: <https://planning.lacity.org/development-services/eir/Housing-Element-2021-2029-Update-Safety-Element-Update-deir>
- Final EIR: <https://planning.lacity.org/development-services/eir/housing-element-2021-2029-update-safety-element-update-0>

- EIR Administrative Record: Los Angeles City Council File 21-1230 - <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230>
- Addendums to the EIR: https://clkrep.lacity.org/onlinedocs/2021/21-1230-S1_misc_7_5-24-22.pdf
https://cityclerk.lacity.org/onlinedocs/2021/21-1230-S6_misc_6_11-13-24.pdf
- Addendum Administrative Record: Los Angeles City Council File 21-1230-S1 - <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230-S1>

For questions regarding this report, please contact Matt Glesne in the Department of City Planning at matthew.glesne@lacity.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Vincent P. Bertoni', with a stylized, cursive script.

VINCENT P. BERTONI, AICP
Director of Planning

VPB:KK:AV:JM:MG:JO