



September 15, 2025

The Honorable Marqueece Harris-Dawson, President
Los Angeles City Council
200 N. Spring St., Room 450
Los Angeles, CA 90012

RE: Proposed Single Staircase Ordinance

Dear Council President Harris-Dawson:

The California Professional Firefighters (CPF), state council of the International Association of Fire Fighters, representing over 35,000 career firefighting and emergency medical service personnel statewide, must regrettably oppose the Council's proposed ordinance to allow for multi-unit residential buildings of up to six stories to be constructed with only a single staircase.

While California's housing shortage crisis is a critical issue that must be addressed, it is just as important that the homes that are built to address the shortage do not lessen the level of fire and life safety provided to their residents. Building safety standards, particularly for multiunit residential buildings that house dozens if not hundreds of people in close proximity to each other, have been created to ensure that in the case of an emergency those within the building have the greatest possible chance of escaping to safety. Any steps taken to lessen these standards not only present an imminent threat to the lives of the building's residents but also the emergency responders such as firefighters who are tasked with protecting their safety. The Building Code, including the fire and life safety elements, are minimum standards to protect the public.

A multiunit residential building over three stories that has only one stairway and one exit is not safe. Multiple egress points are a key safety consideration for these types of buildings for several reasons – ensuring all residents are close to a stairway, preventing crowding during an uncertain and unsafe situation, and ensuring that if one stairway or exit is blocked another remains available are just a few. The space saved in a building by reducing the number of stairways would not meaningfully address the housing shortage and is not enough to justify these lowered health and life safety standards. A building over three stories with only one stairway and only one exit would endanger the safety of the residents and the firefighters working to rescue them in an emergency.

Following the passage of AB 835 (Lee, 2023), a working group has been established at the Office of the State Fire Marshal to examine the safety of single-exit, single-stairway multiunit

residential buildings above three stories and make recommendations to the Legislature. This work is still ongoing, with the report due to the Legislature no later than January 1, 2026.

As part of the working group's discussions, they have received presentations from organizations including the National Fire Protection Association (NFPA) regarding their research into the safety of single-staircase buildings, as well as concerns from the organization regarding proposals to increase the height of single-staircase buildings to six stories outside of the code development process. Key concerns include the creation of a single point of egress failure, a lack of sufficient fire resistance in allowed construction, impacts to emergency response, congestion in exits from occupants exiting while emergency responders enter, and additional hazards created by occupants such as obstructed exits and poor inspection and maintenance practices.

Areas where additional data are needed have also been identified, including fire modeling to address evacuation concerns, the impact of new technologies such as lithium-ion batteries, and detailed analysis to compare existing structures. All of this indicates that there are significant health and safety risks with single-staircase buildings that have not yet been addressed as well as the need for extensive research and work that is best completed within existing rigorous building code development process.

We agree that we need to collaborate on solutions to create more affordable housing options. However, affordability should not determine the minimum level of safety of housing. Every person deserves access to safe, affordable housing options. The status of one's economic situation should not be the determining factor when it comes to safety; everyone should have safe options that adhere to at least the minimum standards of the California Building Code.

For these reasons, we must respectfully oppose this proposal and urge you to reject it when it comes before you.

Sincerely,



BRIAN K. RICE

President, California Professional Firefighters

BKR:bt

**c: Members, Los Angeles City Council
Mayor Karen Bass, City of Los Angeles
Members, United Firefighters of Los Angeles City Local 112 Executive Board
City Attorney Hydee Feldstein-Soto
Interim Fire Chief Ronnie Villanueva, LAFD
Members, Board of Fire Commissioners, LAFD**