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August 07, 2025

Honorable Members of the City Council
City of Los Angeles City Hall, Room 395
Los Angeles, CA 90012

**REVISED REPORT ON PROPOSED AMENDMENTS TO THE LOS ANGELES BUILDING
CODE REGARDING SINGLE-EXIT AND SINGLE-STAIRWAY FOR MULTIFAMILY
RESIDENTIAL BUILDINGS UP TO SIX STORIES**

On April 2, 2025, the City Council adopted a motion (CF 25-0247, Raman - Yaroslavsky - Blumenfield) that instructed the Los Angeles Department of Building and Safety (LADBS), in consultation with the Los Angeles Fire Department (LAFD), the Department of City Planning (DCP), and with requested input from Livable Cities Initiative (LCI) and the American Institute of Architects Los Angeles (AIA LA), to present within 90 days modifications to the Los Angeles Building Code (LABC) which would allow for single-exit, single-stairway, multifamily unit residential buildings of up to six stories.

BACKGROUND

Various jurisdictions adopt and amend the International Building Code (IBC), which is developed by the International Code Council (ICC). These model codes, which the State of California adopts and modifies, currently allow for single-exit buildings up to three stories (California Building Code (CBC) 1006.3.4) with a maximum of four dwelling units per story.

In major cities with higher-density housing and smaller lot sizes, reducing the space allocated for egress stairs can create additional room for larger or additional dwelling units. Major cities such as New York, Seattle, Memphis, Austin, and Honolulu have amended their building codes to permit four-, five-, or six-story, single-exit apartment buildings containing up to four units per floor.

However, cities like New York, Seattle, Austin, and Honolulu have adopted regulations for single-exit buildings that include stricter requirements for building materials, shorter travel distance limits, and reduced building area per story, as well as stairway pressurization, among other requirements.

STATE AND LOCAL BUILDING CODES

In California, the California Building Standards Commission (CBSC) is responsible for publishing the California Building Standards Code, also known as Title 24 of the California Code of Regulations. This responsibility is mandated by the Health and Safety Code (HSC) Division 13, Part 2.5, starting with Section 18901. Currently, Title 24 consists of 12 parts that govern the design and construction of buildings throughout the State. Title 24 Part 2 is the California Building Code (CBC).

The Department of Housing and Community Development (HCD) is responsible for adopting building standards that apply to residential occupancies, such as apartments, as mandated by State law (see HSC Division 13, Part 1.5, starting with Section 17910).

Additionally, the Office of the State Fire Marshal (SFM) is responsible for adopting building standards focused on fire and panic safety for residential occupancies (refer to HSC Division 13, Part 1.5, starting with Section 17910).

Section 1006.3.4 in Chapter 10 of the CBC restricts apartment buildings to a maximum of three stories, with no more than four units on each story, when only one exit is provided. An amendment to this section of the CBC would be necessary to permit single-exit apartment buildings with more than three stories.

State law requires local jurisdictions to follow the current edition of Title 24, as indicated in HSC § 13145, 13146, 17960, 17961, 17962, 18948, and 19958; Gov. Code § 54350.

Various State laws, including HSC § 18941.5, permit local governments to enact ordinances that amend the building standards outlined in Title 24.

A local government may or may not adopt Title 24 by reference in their local ordinances. When a local government does not adopt Title 24 by ordinance, Title 24 becomes the applicable code for all building occupancies by default. This is specified in HSC § 17950, § 17958, and § 18938(b), and CBC, Chapter 1, Division 1, Section 1.1.3. The City of Los Angeles adopts and amends the CBC through its ordinances. Currently, the Los Angeles Municipal Code (LAMC) does not modify any sections of Chapter 10 of the CBC. Therefore, buildings in the City of Los Angeles must adhere to CBC Section 1006.3.4, limiting single-exit buildings to three stories and four units per story.

State law allows local governments to make amendments to building standards as long as express findings for each amendment, addition, or deletion based on local climatic, topographical, geological and environmental conditions (environmental in the case of amendments to the California Green Building Standards Code (Part 11 of Title 24)) are made. However, State law requires local amendments to the California Building Standards Code to be more restrictive than the standard provisions. The State law articulates this in HSC § 18941.5, § 17958.5, § 17958.7, CBC 1.1.8 and 1.8.6.2.

This would prevent a local government in California from proposing an amendment that is less restrictive than the CBC. Reducing the number of exits for buildings taller than three stories would be less stringent than the required State regulation. Although additional restrictions may be imposed on a building to provide more stringent requirements (such as stair pressurization, requiring only an NFPA 13 sprinkler system, and limiting the area per story, among other regulations), the number of exits required by State code would ultimately be reduced. LADBS will defer to the Office of the City Attorney regarding the legality of modifying the California Building Code to allow a single-exit stair in buildings over three stories, provided certain requirements are met, such as stairway pressurization, as well as other requirements similar to those in different jurisdictions.

Assembly Bill 835

California AB 835 was signed into law in 2023, instructing the SFM to research and develop standards for single-stairway, multi-unit residential buildings with more than three stories. AB 835 requires the SFM to submit a report to the Senate Committee on Governmental Organization, the Assembly Committee on Emergency Management, the Joint Legislative Committee on Emergency Management, and the CBSC by January 1, 2026. The report would provide information on single-exit buildings over three stories, and may include the cost impacts of reducing the number of exits, a fire protection analysis of single-exit buildings, a code comparison between various cities' code requirements, a single-exit egress analysis, the history of single-exit buildings, and an examination of fire department capabilities in regards to responding to emergencies in single-exit buildings.

Livable Cities Initiative (LCI) and the American Institute of Architects Los Angeles (AIA LA)

LADBS consulted with the LCI and the AIA LA regarding regulations for residential buildings with a single exit that exceed three stories. According to LCI, the 2027 IBC is expected to introduce proposed changes allowing single-exit residential buildings of up to four stories. If California does not amend the relevant sections of the 2027 IBC to permit such buildings, the California Building Code (CBC) will allow single-exit buildings of over three stories starting in the 2028 edition, which will take effect on January 1, 2029.

LCI advocates for expanding the scope of single-exit buildings in Los Angeles beyond the proposed four-story limit, citing the City's firefighting capabilities. They suggest that Los Angeles adopt provisions similar to the E24-24 proposal (see Attachment E) while allowing for taller, light-wood frame constructions without requiring direct aerial access to each unit. Please refer to LCI's letter in Attachment F for more details.

Similarly, AIA LA supports allowing single-exit buildings beyond the three-story limit while limiting each level to four units and permitting the use of combustible or wood light-framing construction. AIA LA has cited several advantages of single-exit buildings that exceed three stories, including:

- Elimination of redundant stairs and associated corridors would increase leasable residential space, improving financial viability on smaller sites.
- A smaller stairwell footprint would allow for more flexible unit layouts and enable development on previously constrained lots.
- Single-exit buildings are well-suited for creating smaller apartment buildings and courtyard housing on infill sites.

According to AIA LA, allowing well-designed and fire-protected single-stair buildings of up to six stories could help Los Angeles better utilize many underused smaller parcels. This change would make multifamily housing financially feasible in areas where it was previously not possible. These strategic reforms to building codes have the potential to increase the housing supply significantly, encourage diverse urban designs, lower construction costs, reduce embodied carbon emissions, and ultimately contribute to a more affordable and vibrant city.

PEER CITY REVIEWS

The LADBS conducted a peer review of codes from other jurisdictions regarding the codes related to the allowance of a single exit in buildings up to six stories in height. The following highlights the key provisions of the single exit/stairway requirements for the cities surveyed, for the full code requirements, please refer to attachments A through D.

City of Seattle

- Applies to residential buildings up to six stories high with no more than four apartments on any given floor.
- Doors from individual apartments cannot open directly into the exit stairway. There must be a corridor separating the apartment door from the stairwell door.
- To compensate for having only one exit, the building must have a high level of fire protection. This includes being built with at least one-hour fire-resistive construction and having a complete automatic sprinkler system throughout.
- The single exit stairway must be pressurized to prevent smoke from entering, keeping the exit path clear during a fire.
- The distance an occupant has to travel from their apartment's front door to the door of the exit stairway is limited to no more than 20 feet.
- If the building has other types of businesses in it (like a retail store), those areas cannot be connected to the residential floors or the single exit stairway. An exception is made for accessory parking garages.

Please refer to Attachment A for the full code requirements.

New York City

- Applies to residential buildings up to six stories high if less than 2,000 square feet per story or four stories high if less than 2,500 square feet per story.

- Individual apartments with exit paths to areas having at least two independent exits.
- For apartment buildings up to four stories:
 - Each dwelling unit must have a window facing a street or yard for emergency access.
 - The exit stairway must be enclosed in 2-hour fire-rated walls.
 - The entire building must have an automatic sprinkler system.
- Mixed-use buildings: Single exits allowed for specific areas if completely separated from other business types by fire-rated construction and each business type has its own unshared exit path.

Please refer to Attachment B for the full code requirements.

City of Honolulu

- Applies to residential buildings up to five stories high with no more than four units per floor.
- Boarding houses do not qualify.
- One-hour fire-resistive construction and automatic sprinkler system required.
- Maximum of two single exit/stairways per building.
- Exterior or pressurized interior exit stairways required.
- Dwelling unit doors must be separated from interior exit stairways by a corridor.
- Maximum 20 feet travel distance from unit door to the exit stairway and a 125 ft exit travel distance.

Please refer to Attachment C for the full code requirements.

City of Austin

- Applies to residential buildings up to five stories with up to four units per floor.
- Requires automatic sprinklers, emergency escape openings, and distinctions between dwelling and sleeping units.
- These buildings have a maximum net floor area of 4,000 sq ft per floor served by a single exit.
- The maximum travel distance from a dwelling unit to the exit stairway is 20 ft and a 125 ft exit travel distance.
- Mandatory manual fire alarm and automatic smoke detection systems in common spaces.
- Prohibition of electrical receptacles in single exit stairways.
- Requirement for elevator access.

Please refer to Attachment D for the full code requirements.

LADBS RECOMMENDATION

1. It is recommended that the City Council direct the Department of Building and Safety and Fire Department, in consultation with the City Attorney and the Department of City Planning to prepare and present a draft ordinance, including the necessary findings based on local climatic, topographical, and geological conditions, to amend the applicable provisions of the Los Angeles Building Codes and Fire Codes in order to permit the use of a single exit in residential apartment buildings up to six stories in height using the City of Seattle's policies as a model.

Should you have any questions, please contact Rodolfo Arias by email at rodolfo.arias@lacity.org.



—
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