# INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS



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## **September 14, 2025**

To: The Honorable Mayor of Los Angeles and Members of the Los Angeles City Council

From: Stephen Gilman, 10th District Vice President, IAFF

Subject: Critical Safety Concerns Regarding Proposed Single-Stairwell Apartment Designs

#### Overview

As Los Angeles continues to grapple with a housing crisis, proposals to allow *single-stairwell* apartment designs are being presented as a way to reduce construction costs and increase housing supply. While increasing housing is vital, any policy that sacrifices life safety for marginal cost savings is unacceptable. A single-stairwell design presents severe and foreseeable risks for both occupants and first responders, risks that cannot be justified by speculative savings.

#### Life Safety Risks of a Single Stairwell

A single-stairwell building provides only one path of egress in an emergency. If that sole escape route is blocked by fire, smoke, explosion, or structural failure, residents and firefighters face catastrophic consequences:

### Triangle Shirtwaist Factory Fire (1911):

The dangers of limited egress are not new. At the Triangle Shirtwaist Factory in New York City, 146 garment workers, mostly young immigrant women, perished when a fire broke out in the upper floors.

 Locked exit doors trapped workers inside, and the building had only one exterior fire escape, which quickly collapsed under the weight of fleeing workers.



# UNITED FIREFIGHTERS LOS ANGELES CITY

Local 112 IAFF AFL-CIO-CLC

September 10, 2025

Los Angeles City Council 200 N. Spring Street Los Angeles, CA 90012

Honorable City Council Members:

On behalf of the nearly 3,400 members of United Firefighters of Los Angeles City (UFLAC), we write in strong opposition to any proposal that would allow multi-family residential buildings of up to six stories to be constructed with a single exit stairway.

This is a critical matter for public and firefighter safety. In a residential fire, stairways are lifelines for residents evacuating and for firefighters advancing hose lines and conducting rescues. Reducing egress to a single stairway creates a single point of failure. When that stairway fills with heat, smoke, flames, or is obstructed by evacuees or debris, safe egress and timely interior attack can be lost immediately.

Our city's history is filled with painful lessons about the role unprotected or inadequately controlled stairways can play in turning routine fires into mass-casualty incidents, including:

- The Ponet Square Hotel fire on September 13, 1970, when 19 residents died after fire and smoke raced up open, unprotected stairs and corridors. These conditions were so deadly that the City enacted the "Ponet Doors" ordinance to require enclosed stairways and rated doors in older multi-story residential buildings.
- The Stratford Apartments fire on November 15, 1973, when 25 people were killed and 51 injured after a lobby fire raced up open stairways and mushroomed at the upper floors.
   This tragic incident once again highlighted how unprotected stairways and corridor openings can become heat and smoke chimneys and essentially result in death traps for occupants.

- The Dorothy Mae Apartment Hotel fire on September 4, 1982, when 25 lives were lost after flames and smoke moved through corridors and stairways when doors were opened. This fire led to the "Dorothy Mae" ordinance which mandated additional sprinklers and door controls in residential buildings.
- The 330 S. Burlington Avenue fire on May 3, 1993, when 10 residents (including 7 children) were killed in a Westlake apartment arson. Officials reported a stairway and roof door left open created a chimney effect, drawing smoke and fire upward through the building. This case is yet another reminder that when stairways are compromised, consequences are immediate and lethal.

While these tragic events differ in specifics, the common operational truth was and remains the same - once fire or toxic smoke takes the stairways, both civilian egress and firefighter ingress are jeopardized. That's why Los Angeles has, for decades, required protected, redundant egress in multi-family buildings. It's also why the Los Angeles City Council has historically tightened, not loosened, stairway and safety requirements after tragedies. Supporting an ordinance to allow for single exit, single stairway buildings of up to six stories is a big step in the wrong direction that will inevitably have tragic results for public and firefighter safety.

While it may sound good in theory to say that single stairway exits can be made safe with additional building requirements, that's not the reality on the ground here in Los Angeles. The truth is that buildings age, systems are deferred, doors are propped, stairways get cluttered or even broken, maintenance lapses, and human behavior is imperfect, especially under stress. Our members routinely encounter disabled fire doors, compromised ventilation, and stairwells choked with storage. In the real world that our members operate in every single day, redundancy is not a luxury. It can and will mean the difference between life and death.

We heard the recent remarks in PLUM Committee on September 9, 2025, from our LAFD Fire Marshal regarding the safety of this proposal and, to be blunt, he's either flat out wrong or merely afraid to tell the truth. There's a reason why the International Association of Fire Fighters, California Professional Firefighters, and every fire union in California that we are aware of oppose single stairway exits. They are simply not safe.

It's important to note that as of today, there is not a single city in the State of California that has passed a single stairway ordinance. The discussion in Los Angeles has included numerous references to the City of Seattle, which does allow single stairways in their building code. However, it's critical to know that Karen Grove, Seattle's Executive Director of Fire Prevention who reports to the city's fire marshal, said this about single stairways as the State of Washington was considering adopting a similar statewide policy:

"The city building department, the fire marshal, and myself are all against the single exit stair as the code for everyone because we feel that most jurisdictions are not situated like we are in Seattle. We were comfortable with this in Seattle because we have a hydrant on every corner. We have a well-funded municipal career fire department with outstanding response times. We have a good complement of aerial ladders distributed throughout the city that we could put quickly on scene if we need to affect a rescue." (Single Stair, Many Questions. NFPA Journal, August 6, 2024, by Jesse Roman)

Policymakers can't point to a couple of cities in different states, then pick and choose the data to fit their preconceived narrative. In the City of Los Angeles, we do NOT have a hydrant on every corner, a well-funded municipal fire department with outstanding response times, or nearly enough aerial ladders distributed throughout our city. We have the most understaffed big city fire department in America, water supply issues, not nearly enough functioning trucks and engines, and response times that far exceed the nationally accepted standards.

Common sense and any firefighter in the LAFD will tell you that two exits are better than one. Most recently, we saw a version of the chaos that can occur during a fire as residents in the Pacific Palisades were trying to evacuate from the community in their cars while fire engines were desperately trying to head the opposite way towards the fire. Residents couldn't get out, and firefighters couldn't get to the fire. This same problem will repeat in apartment buildings with up to six stories and only one way in and one way out. It's just not safe.

Unfortunately, recent policy and budget decisions have been made that will compromise public safety. In March of last year, voters passed the misleading "Healthy Streets Los Angeles" initiative that will only lead to slower emergency response times when your constituents need us the most. Then, earlier this year, the FY 2025-26 Budget was approved and included the elimination of 42 critical Emergency Incident Technician firefighter positions. We implore each one of you to stop this trend.

Our firefighters have no issue with building more housing, but safety requirements should never be reduced just because developers and self-appointed experts say that doing it the right way costs too much. If enacted, this ordinance will lead to more total occupants per building (by adding the two- and three-bedroom units) while simultaneously reducing the number of entrances/exits down to a single stairway. Adding more people with fewer options for evacuation and rescue is not a good idea for anyone. While this proposal may be well intentioned, there simply can't be a price tag placed on the safety of local families and our firefighters.

Finally, it's disheartening that we are having this discussion and sending this letter to you on the eve of the 24<sup>th</sup> anniversary of one of the greatest tragedies that our country has ever experienced. We don't have to recap what happened on that fateful day, but we will point out the fact that it is never a good situation to have fewer exits and entrances and to have people race down while first responders race up in the same chaotic, confined spaces.

We thank you for your careful consideration of our position on this issue and respectfully ask you to vote NO on this draft ordinance when it comes to the full City Council.

Sincerely,

John Bagala

IAFF L-112 Conservator

Jason Powell

Treasurer

Kent Koffler

Director

**Doug Coates** 

1st Vice President

**Ryan Quigley** 

Secretary

Dave Fabela

Director

**Rich Ramirez** 

2<sup>nd</sup> Vice President

**Dave Riles** 

Director

Cevin Frank

Director

CC: Mayor Karen Bass

City Attorney Hydee Feldstein-Soto Interim Fire Chief Ronnie Villanueva

Board of Fire Commissioners



## **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 regretfully 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** 

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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

Name: Fred Sutton

**Date Submitted:** 09/15/2025 08:44 PM

Council File No: 25-0247

Comments for Public Posting: Attached, please find a letter of support for item 17.



September 15, 2025

Via Electronic Mail Only

Council President Harris-Dawson City of Los Angeles 200 North Spring Street Los Angeles, CA 90012

RE: Item 17- Single Stair Reform (25-0247)

Dear Council President and Members of the Los Angeles City Council:

On behalf of the California Apartment Association (CAA), I am writing to express strong support for permitting the development of single-stair multifamily housing in Los Angeles. This ordinance represents a meaningful step toward addressing the city's urgent housing shortage by enabling the creation of safe, high-quality, and family-friendly homes on more parcels across the city.

Single-stair buildings are a proven housing typology already used successfully in cities across the country. By making development feasible on smaller and underutilized sites, this ordinance will unlock opportunities to build more housing, increase affordability, and better serve the diverse needs of Angelenos.

We urge the Council leadership to advance this important reform. At a time when so many Los Angeles families are struggling to find housing due to limited availability, this ordinance will help ensure a more livable and inclusive city.

Sincerely,

Fred Sutton

California Apartment Association

Frelik bitt

Name: Abundant Housing LA

Date Submitted: 09/15/2025 10:38 AM

Council File No: 25-0247

Comments for Public Posting: Abundant Housing LA supports Single Stair Motion with

Amendments



9/14/2025

LA City Planning and Land Use Committee Los Angeles City Hall 200 North Spring Street Los Angeles, CA 90012

RE: CF 25-0247 (Legalizing Single-Stair Buildings Up to 6 Stories)

Dear Planning and Land Use Committee Members:

We write to express strong support for CF 25-0247, which if amended as outlined below, can help build high quality, livable, and extraordinarily safe housing for families of all sizes in LA. The City Council has shown great leadership in advancing single-stair through three PLUM Committee hearings and two hearings before the full council. We also have great appreciation for the Los Angeles Department of Building and Safety (DBS), Los Angeles Fire Department (LAFD), and the Department of City Planning (DCP), who have worked in strong collaboration to move forward this ordinance at a quick pace to meet a key state deadline. However, after careful review by experts in the development field, Abundant Housing LA has identified certain provisions that are unnecessary from a safety perspective and will make it challenging if not impossible to develop single stair buildings on many parcels.

We strongly urge the council to make the following amendments:

- Item 26 eliminates an exception for non-combustible buildings to not include rescue windows, and Item 27 requires 8 foot side yards to access those rescue windows. The robust layering of safety provisions in the draft ordinance, including sprinklers, pressurized stairways, floor area limitations, etc. creates equivalency and eliminates the need for rescue windows. If rescue windows are required (and the 8-foot side yard setbacks needed to serve them) it would be virtually impossible to build single stair buildings on many narrow lots. Please eliminate this extremely restrictive provision by deleting Items 26 and 27 from the draft ordinance.
- Requiring exits to terminate onto a public right of way of 20 feet (as per Item 24) will
  make it very challenging to develop mixed use single stair buildings on commercial
  corridors as envisioned by the Livable Communities Initiative (LCI). Please amend both
  references to require a right of way width of 15 feet so that exits can terminate at
  standard size alleys.
- The agenda language on the operative date for the ordinance reads as follows, but for an unknown reason, the underlined language is missing from the draft ordinance itself:

"This ordinance shall become operative only if and when both of the following occur, upon the effective date of the later to occur: (a) the State <u>either</u> amends the California Building Code to make lawful the provisions of this ordinance which allows single-exit, single-stairway buildings of greater than three stories, <u>or the provisions of this ordinance are approved by the California Building Standards Commission</u>; and (b) the City amends its Fire Code to reflect the life safety enhancements required by this ordinance or otherwise required by City Council upon recommendation from the Los Angeles Fire Department." Please amend the ordinance to include the underlined language. Without that language, LA will be unable to proceed with permitting single stair buildings ahead of the statewide process.

Permitting single-stair residential structures will help us build more well-designed buildings and a more beautiful city. LA's current code requirement for two stairways per building means that almost all new multifamily housing be built on large sites and include double-loaded corridors connecting the two stairways (hallways with apartments on both sides). This typology often necessitates assembling multiple parcels, and produces small units with limited access to light and air. Single-stair buildings on the other hand could easily be built on typical parcels in Los Angeles, and would produce larger family-sized units with cross-ventilation and quality shared open space. Because the overall structures are smaller in scale, they also fit nicely within the fabric of existing neighborhoods. More and more cities in California and across the United States are taking steps to legalize single-stair buildings as a common-sense reform that unlocks the potential of small parcels and creates a product that is attractive to many families.

We must state clearly that allowing for just one staircase in the building code does not make any sacrifices when it comes to safety from fire or other hazards. That's thanks to mandatory fire safety features, like sprinklers and fire-resistant materials. These are the factors that prevent tragedy from striking in American cities. As shown by research from Pew Charitable Trusts, mandating two staircases is an unnecessary regulation dating back to an era before the modern fire suppression and containment technologies. **In fact, the Pew study found no difference in fire mortality rates in buildings with two staircases, compared to those with just one**. Furthermore, here in Los Angeles, both the LAFD and now the State Fire Marshall have had a seat at the table in crafting this pivotal reform.

Ordinances like this one cannot wait. In Los Angeles, 17% of the city's renters live in overcrowded conditions. 42,000 of the city's residents are experiencing homelessness, and the average unhoused resident dies more than 20 years younger than the average housed one. If we care about the safety of Angelenos, we must end scarcity and start building more homes. Our housing shortage has only gotten worse this year since the loss of 12,000 local homes during

wildfires in Pacific Palisades and Altadena. We must move with more urgency to reform all aspects of our housing delivery system, so we can build faster and meet the needs of everyone.

The motion as amended in the ways outlined above meets the urgency of the moment, and will help us: (1) boost housing production by putting more parcels into play, (2) revitalize commercial corridors, and (3) create higher quality housing options for families. Thank you for your leadership.

Sincerely,

**Azeen Khanmalek** 

**Executive Director** 

Abundant Housing LA

Name: Colin Warn

**Date Submitted:** 09/15/2025 03:23 PM

Council File No: 25-0247

Comments for Public Posting: Writing to express my support for single stair reform.

Name: Simon Ha

**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 ½ 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





Stephen Gilman • 10th District Vice President
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Many victims were forced to jump from windows to escape the flames.

This tragedy spurred some of America's first modern fire codes and reinforced a lesson still relevant today: multiple, reliable escape routes save lives.

A single-stairwell apartment design recreates these same deadly conditions—one narrow escape path where any obstruction, structural failure, or act of negligence can turn a building into a death trap.

## • Historical Context - 9/11 Lessons:

As we recently marked the 24th anniversary of September 11, 2001, we must remember the critical role of redundant escape routes.

- In the South Tower, only 18 people managed to escape from above the impact zone because one stairwell remained partially passable.
- In the North Tower, where all stairwells were destroyed, no one above the impact zone survived.

Imagine a similar scenario in a modern apartment: a single explosion or rapidly spreading fire could take out the only means of escape, leaving every resident above the fire trapped.

#### Firefighter Safety:

Los Angeles firefighters routinely enter burning structures to rescue occupants. A single stairwell creates a deadly "choke point," concentrating smoke, heat, and evacuees in the same space firefighters must use to enter and exit. This dramatically increases the risk of firefighter injury or death and complicates rescue operations.



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS

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## **Cost-Cutting at the Expense of Human Life**

History repeatedly shows that when cost savings are prioritized over safety, tragedy follows:

Boeing 737 MAX:

To compete with Airbus, Boeing cut corners on pilot training and concealed a critical flight-control system flaw to save money and speed production. Two crashes killed 346 people, leading to a global grounding of the fleet and billions in losses.

Ford Pinto Fuel Tank:

In the 1970s, Ford executives knowingly decided not to reinforce or redesign the Pinto's fuel tank, despite internal crash tests showing it would rupture in low speed rear-end collisions. Strengthening the tank with a protective shield or relocating it would have cost roughly \$11 per vehicle, but company executives concluded, based on a now-infamous cost—benefit analysis, that it was cheaper to pay legal settlements for burn deaths and injuries than to fix the defect. Hundreds of people died in fiery crashes that were entirely preventable. Los Angeles must not repeat these lessons in their housing policy. Safety shortcuts may save dollars in the short term but cost lives and public trust in the long run.



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## **Questionable Economic Benefits**

Advocates for single-stairwell construction argue that the design will lower development costs and increase affordability. There is zero guarantee that these cost savings will be passed on to renters.

Today's housing market is heavily influenced by venture capital and private equity firms that:

- Drive up demand by aggressively acquiring apartment buildings,
- Boost profits through rent hikes and "value-add" renovations,
- Prioritize quick returns through cost-slashing and rapid resale at higher valuations.

Unlike traditional "mom-and-pop" landlords, these investors often treat housing as a short-term financial instrument, not a long-term community asset. Their practices have already contributed to escalating rents across Los Angeles and other major cities. Allowing single-stairwell construction would hand these investors another tool to cut costs while continuing to raise rent.

## Recommendations

- Reject Single-Stairwell Proposals: Maintain the requirement for multiple means of egress in all new multifamily construction.
- Prioritize Firefighter and Resident Safety: Enforce design standards that protect both residents and first responders in emergencies.





Stephen Gilman • 10th District Vice President Arizona, California, Hawaii, New Mexico, and CNMI Mobile: (602) 418-3766 • sgilman@iaff.org

#### Conclusion

Housing affordability is critical, but human life is priceless. The pursuit of lower construction costs must never come at the expense of fundamental safety. The lessons of the, 9/11, the Boeing 737 MAX, and the Ford Pinto are clear: when cost-cutting overrides safety, lives are lost. Los Angeles must lead with courage and reject any proposal that compromises the well-being of their residents and the firefighters who protect them.

## Stephen Gilman

10th District Vice President

International Association of Fire Fighters

cc: John Bagala, IAFF Conservator

Executive Board, United Firefighters of Los Angeles City

Stephen Gilman, IAFF 10th District Vice President

Karen Bass, Mayor

Marqueece Harris-Dawson, Council President

Members, Los Angeles City Council

Matt Szabo, Chief Administrative Officer

Matt Hale, Deputy Mayor