

From: [Stephen Smith](#)
To: [Curb, Dustin \(DES\)](#)
Subject: Single-exit proposal
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External Email

Hi Dustin,

I saw that the WA single-exit TAG submitted a proposal. I have some comments on it. I would like to give them over a video call if there are any more opportunities for that, but I wanted to put them in writing in case there are not. Please see below. Thank you for your efforts on this code section, and I hope these changes can be integrated in a way that makes projects feasible outside of Seattle.

1. Seattle building officials have interpreted their code code section to allow six-story apartment buildings to be served by a single stair, despite the text's restriction that only five stories of R-2 occupancy can be served by a single exit stair (I was told this by Ardel in person, but you can also find six-story fully-residential single-stair buildings in Seattle that demonstrate the interpretation). They have used the logic that the ground floor is not served by the exit stair since occupants can exit without using it, therefore it does not count towards the five-story limit.

However, I have found that officials outside of Seattle are very confused by this language, and usually interpret it (or misinterpret it, given the intent) to mean that a six-story building is only allowed if the ground floor is not R-2, but rather commercial, parking, etc.

I would like to see this clarified in the text. The easiest way would be to change "5 stories" in XX101.2 to just "6 stories" (item 1 would ensure that this cannot be interpreted to mean the building can be seven stories), or changing "served by a single exit" to "served by a single exit without any other means of egressing from the building."

This lack of clarity has already caused a lot of issues outside of WA State, as jurisdictions look to copy Seattle's successful model, but misinterpret what is pretty confusing language. I think you could head this off in WA State by clarifying this in the code text.

2. The fire safety and evacuation plan seems to be putting its thumbs on the scale and putting these buildings up to a level of scrutiny that has never been applied to larger two-stair buildings that have a much higher risk of evacuation snafus given their higher occupant loads. It will force designers to get in the minds of firefighters, without any guidance for how to proceed. A large project might have the resources to handle this complication and risk, but this is not realistic to expect from an architect on a very small multifamily building (and certainly projects of this size cannot afford the expense of fire protection engineers). If this is going to be a requirement, then the SBCC should come up with a model plan that designers can adapt to their buildings. Without this, any responsible designer will have to tell their client that any single-stair plan they draw up will be highly speculative and risk being shot down by the AHJ, and developers are unlikely to proceed under those circumstances. The TAG's efforts will likely be for naught, since most will not feel they can realistically proceed under the risk

that this section introduces.

As an example of why this is applying a double standard that would stymie even currently code compliant buildings: two-stair buildings contain a pretty serious conflict between building code and fire service operations, and that is the idea that the fire service will compromise one stairway and close it off to evacuations in order to use it for hose operations, despite the fact that the building code assumes that both stairways will be available for occupant evacuation (e.g., see the travel distance limits – measured to the *nearest* stair, not the second nearest). During this whole single-stair debate, nobody has ever explained this inconsistency between code and fire service training for two-stair buildings – an inconsistency that would surely arise if somebody were made to create a fire safety and evacuation plan for a two-stair building with a large double-loaded corridor.

In attempting to draw up the same for a single-stair building, designers and officials will be faced with similar questions – questions that have seemingly never been an issue in Seattle or New York City in the real world (at least at any level that's risen to the attention of anybody involved in this broader nationwide single-stair debate), but which somebody trying to come up with one of these plans will feel compelled to address, and skeptical fire officials (who, let's be honest, are already uncomfortable with the idea and disinclined to accept arguments for their safety) will ask for. What if sprinklers fail to contain a larger battery-fueled fire, hose operations begin, the stairway is compromised in a way that the pressurization system cannot compensate for, and somebody in a wheelchair is discovered? The truth is that the FD will proceed the best they can, but no building can be made perfectly safe, and something very similar could happen in a two-stair building which implicitly defines the acceptable risk in the code that a single-stair building should try to match. But this is not something that many people will be comfortable putting in writing or signing off on, since that creates a huge liability that simply following a prescriptive code section does not.

Thank you,

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