AIA Los Angeles

September 30, 2021

Cynthia McClain-Hill - President
Susana Reyes - Vice President
Jill Banks Barad-Hopkins – Commissioner
Nicole Neeman Brady - Commissioner
Mia Lehrer, FASLA - Commissioner
Board of Water and Power Commissioners
Department of Water and Power of the City of Los Angeles
Room 1555-H, 111 North Hope Street
Los Angeles, CA 90012

RE: Needed Best-Practices to Optimize Safety, Environmental Performance, Constructability, Efficiency and Access To Affordable Housing

Dear President McClain-Hill and Honorable Commissioners,

On behalf of The American Institute of Architects Los Angeles (AIA LA) and our 4500 plus members, please find herein specific recommendations to improve the processes of the Los Angeles Department of Water and Power (LADWP). Upon implementation, they will provide greater clarity and certainty to the design and development process, optimize land-use, beautify neighborhoods with healthier tree canopies, enhance walkability, save LADWP time, money, and resources, and through these actions, most importantly assist in addressing our housing affordability crisis. These recommendations are the outcome of more than 12 months of outreach to architects, engineers, community stakeholders, and housing providers.

In formulating these recommendations, we are grateful for the leadership of the LADWP Power New Business Development and Technology Applications Division including Jeff Carivau, Eric Taylor, David Siewert, and their colleagues, and acknowledge their expertise and willingness to meet with members of the LA-area architecture and design community to address issues that obstruct housing production.

We look forward to working with LADWP to further discuss specific next steps to ensure these recommendations are implemented. We request, at your earliest convenience, to schedule a meeting with the LADWP Commission and the Office of the General Manager to identify proactive next steps.

To further coordinate, please contact Will Wright, AIA LA's Director of Government & Public Affairs, at (213) 639-0764 or via email at will@aialosangeles.org.

Very truly yours,

Wade Killefer, FAIA
President
American Institute of Architects, Los Angeles Chapter

Cc: Martin L. Adams - General Manager and Chief Engineer, Los Angeles Department of Water and Power

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AIA LA RECOMMENDATIONS TO LADWP FOR IMPROVED SERVICE

Architects often encounter LADWP processes, rules, and regulations that are not well-communicated, reduce the number of housing units achievable on sites, diminish community character, and contradict other City planning and urban design policies. Application of LADWP rules and approval processes are also seen by applicants to be inconsistent, and the requisite information and access to LADWP staff is often not available. Even when the regulations are understood, the LADWP approval process is opaque, unnecessarily lengthy, and often substantially delays projects, imperiling financial feasibility and implementation.

The following AIA LA recommendations are best design practices and provide efficiencies that will improve outcomes for LADWP, the design community, and the community-at-large, which urgently needs safe, affordable housing that enhance healthy and equitable neighborhoods.

The architecture community is excited to partner with LADWP to implement these solutions, which will allow all of us to achieve the City's objective to create high-quality and affordable housing, planning, and architecture for Los Angeles.

RECOMMENDATIONS

I. REFORM ON-SITE STAGING AREA STANDARDS FOR TRANSFORMERS

Challenges:

Due to recent changes in standards for staging areas for pad mounted transformers, requirements “to stage” service delivery in the public way along sidewalks and streets result in the removal of street trees and the reduction of tree canopy, exacerbating the urban heat island and diminishing the beauty of streetscapes. Unsightly transformers along the frontage of buildings also undermine the urban design of sidewalks and streets.

Additionally, by placing staging areas (and transformers) in front of projects that have an alley, LADWP is decreasing the allowable number of units by approximately 10-20%, depending on the size of the lot and the height of the building.

Requiring a front-facing staging area also goes against good urban design practice The Citywide Design Guidelines, which were adopted by the City Planning Commission on 10/24/2019 promote ‘pedestrian-first design’ as well as Crime-Prevention-Through-Environmental-Design (CPTED) 'defensible space’. Placing equipment closer to busy streets, while requiring the removal or elimination of trees and landscaping, fosters ’neglected’ areas, reduces circulation routes around buildings and establishes an overly functionalized townscape.

Furthermore, when street trees are required to be removed by LADWP, Los Angeles City Planning requires a 2:1 replacement, which increases costs – yet those newly planted trees are often not placed in rights-of-way and will take decades to regain the benefits of the trees that were removed.

AIA LA also notes that other utilities have more flexible standards that provide additional options for utility infrastructure. These include:

1. Customer Station hatches in the public way
2. Vaults in the public way
3. Installation of pad-mounts on private property such that clearances extend over the public sidewalks.

Solutions:

AIA LA encourages LADWP to review and implement the best-practices of other regional utility providers. AIA LA also notes the following recommendations regarding the placement of transformers:

A. Utility infrastructure belongs in the back and rear of projects, not the front.
B. Placing the staging area for a transformer at the front of a project should always be the last location considered. Transformers should only be located on the front/street side of parcels where there is no alley access.
C. Transformers MUST be located along existing alleys when present. New developments are already required to widen the width if substandard, so eventually all city alleys will be 20-feet wide and accommodate service vehicles.

When staging areas and transformers potentially impact parkways and street trees, AIA recommends the following:

D. LADWP should revise protocols and allow existing trees to remain and to allow for the placement of future trees as well as street trees at parkways, sidewalks, and along curbs.. When necessary, LADWP can require the placement of street trees such that craning can occur from within the street and between street trees, and/or place the equipment with forklifts or other mechanisms.
E. LADWP often requires the surface around the transformer and other equipment to be concrete paving. Alternatives including decomposed granite (DG) should be allowed. Or, betterLADWP should allow ground cover around equipment pads.
F. When gates are used to secure or screen equipment, allow for gates to swing over sidewalks as long as the arc of the swing does not reduce the width of the sidewalk by more than one-half when in the fully open position.
G. Clarify when equipment is required to be placed within a locked enclosure. Architects are rarely required to implement this in residential zones, but are often asked for it in more commercial and downtown locations.

II. IMPROVE SERVICE PLANNING DESIGN PROCEDURES

Challenges:

1. It's often difficult to arrange a pre-submittal courtesy meeting and/or review of proposed utility yard.
2. A LADWP planner is only assigned when full submittal requirements are met.
3. Each project has substantial staging area and accessibility challenges.
4. There is an extensive need to coordinate approvals from other City of LA departments to allow staging area in the public right of way.

Solutions:

At present, the architect must complete the submission prior to the planner being assigned. No feedback regarding the utility yard. Our recommendations is to allow applicants to submit a utility yard submittal for review by the planner and provide conceptual sign off.

With regards to staging area and accessibility challenges, allow architects to review with planner along with early utility yard submittal.

With regards to city department approvals and waivers to allow for staging area, allow architects to provide a letter to City department(s) stating the need for staging area at specific location in the public right of way.

With regards to utility yard and Staging Area Design, allow architects more creative options with utility yards and proposed staging. Allow for creative design options that allow installation given need to seldom maintain DWP equipment. Allow 3rd party rigging and craning contractors to install DWP equipment.

III. ADDRESS OVERHEAD POWER LINES EARLIER:

Challenges:

1. Outdated and unclear diagrams do not clearly outline standards for building design in proximity to high voltage power lines.
2. Current encroachment response timelines for LADWP require approximately 3 - 4 months of wait time before assignment for pole spotting. Each subsequent revision goes to the back of the queue.
3. As it relates to planning & processing Issue, conflicts between discretionary and lengthy case-by-case reviews by the City including public meetings, hearings, and sign-offs by multiple departments and the limitations of initial service plans, or "draft designs", issued by LADWP, usually including a note that the service plan is only valid for 6 months. Applicants too often obtain additional design requirements with "final" LADWP plans that cause significant additional delays while these evolved and new requirements are implemented, causing re-review of evolved project designs by other City departments.
4. At present, there are very limited options to discuss projects with pole spotters or overhead designers early in the planning phase prior to full encroachment submittal. In this regard the standard encroachment application form is outdated:
    a) The standardized application form does not allow one to explain requests in detail.
    b) Large scale construction projects with complex requests utilize the same one-page standard form as small, simpler ones, such as those from single-family homeowners.
    c) Construction projects with multifaceted conflicts lack the option to address each conflict individually.
    d) The selection to request, "relocate the LADWP's _____ near /within the above-described lot(s)", only provides space to write in 1-2 words maximum.
    e) Checking the box, "field meet is required", does not guarantee a field visit, call, or email.
5. Pole spotters not allowing relocations for "customer convenience" while LADWP's tagline is "customers first".
6. Lack of options to relocate overhead facilities, as requested in the encroachment application.
7. Consistency of options presented to applicants across all service districts to address project requirements while minimizing building square footage reductions.
8. Redundancy in encroachment application and rejection process.
9. New overhead design cannot begin until all conflicts are satisfied. (often with dramatic negative impacts on schedule and cost) One small portion requiring a long review process impacts the entire project.

Solutions:

Identifying Overhead Conflicts and Standards:

A. At present, the architect must submit an encroachment application and then the pole spotter reviews and/or rejects and/or provides options. Our recommendations is to allow architects to provide clear and fully noted diagrams and to arrange for applicants to meet directly with LADWP overhead spotter in-field to determine safe and feasible options given project and context.

B. At present, there is a one page application form with no option to explain requests. Our recommendation is to update the standard and utilize a web-based application form to allow applicants to proactively list conflicts and requested solutions.

C. At present, there are limited opportunities to pursue a relocation of existing overhead facilities for customer convenience. Our recommendation is to facilitate relocation of overhead facilities as feasible to reduce Sq. Ft./DU reductions.

D. At present, alley or street arms are not being allowed/utilized to relocate primary lines away from the proposed building. Our recommendation is to facilitate an opportunity for an architect to design and provide anchors to assist in additional strain to reduce Sq. Ft./DU reductions.

IV. REFORM BREAK EVEN DETERMINATION AND VOLTAGE CLASSIFICATION:

Challenges:

1. There are no options to order LADWP records to understand existing infrastructure and potential tie-in points for projects.

2. There is not a consistent “rule of thumb” criteria for 4.8kV and/or 34.5kV classifications and a current lack of access to Break Even Group; no Break Even submittals only with limited requirements for submissions.

Solutions:

A. At present, 34.5kV (Hi Line) LADWP records are not available. Our recommendation is to allow architects to obtain 34.5kV circuit records to make knowledgeable assumptions regarding the closest available circuit.

B. At present, there is a lack of Break Even Group accessibility. Our recommendation is to allow architects to have a point of contact with the Break Even Group during the entitlement phase. This will allow for proper planning and cost analysis.

C. At present, there is a Break Even study requested by service planners after full submission. Our recommendation is to allow architects to submit to the Break Even Group directly to get project determination earlier.

V. ENCOURAGE ADAPTIVE REUSE

In addition to the important efforts to construct new housing, the adaptive reuse of existing buildings should also be prioritized as a key component to sustainable / resilient city development. Adaptive reuse of existing buildings is a powerful tool to address urgent regional challenges including the climate crisis and housing shortages. Adaptive reuse projects are often the first of their kind in a neighborhood redevelopment trajectory and represent a link to the shared history of the community; the success of the project can be a predictor of future economic success in the neighborhood.

As a community, we must find creative ways to encourage the reuse of buildings in an economically manageable manner. Unfortunately, electrical infrastructure upgrades associated with building reuse often create an obstruction to project feasibility and thus stunt the potential of entire communities. We would appreciate the opportunity to continue conversations with LADWP to a) identify key electrical challenges associated with building reuse and b) discuss creative solutions to these challenges.

Below are key challenges faced when considering building reuse and potential solutions:

Challenge:
The economic burden associated with electrical upgrades of existing buildings is often misaligned with project economic realities. Also, the cost of upgrading the electrical service to an existing building, especially when a customer service station is required, often becomes a ‘deal breaker’, resulting in existing buildings languishing, unoccupied and not upgraded. Therefore, existing buildings that are unable to economically compete are often subject to full demolition, which results in irretrievable loss to a neighborhood.

Solution:
LADWP to partner with LADBS and the Office of Historic Resources to develop an existing building rebate system that encourages building reuse and electrical upgrade via a financial rebate system. Rather than viewing existing buildings as an obsolete vestige, these buildings should be viewed as a resource worth protecting. Existing buildings that incorporate sustainability upgrades may be eligible for higher rebates, thus incentivizing building efficiency upgrades and onsite renewable energy. City departments, building owners and designers can collaborate to modernize these buildings as a partnership with lasting benefits to the community.

Challenge:
The LADWP requirement to extend infrastructure upgrades to an existing building and place the economic burden of that extension on one property owner is economically imbalanced.

Solution:
Consider the implementation of shared utility upgrade funds. In this scenario, a building owner might pay into a local utility fund, allowing the sharing of common utility line upgrade costs amongst multiple land owners, as each owner improves their property.

Challenge:
Customer service stations, when designed to modern LADWP standards, often dominate the public frontage of medium size existing and historic buildings. LADWP and the design community should endeavor to minimize the physical impact of the customer service station as a means of maximizing the viability of ground floor commercial spaces, and in turn the building as a whole.

Solution:
LADWP to continue their current practice of upgrading existing customer service stations while working within the substandard sizes available to historic buildings. Limited headroom in basement customer service stations, as well as sidewalk equipment access hatches have proven to be effective solutions in historic buildings; these same strategies should be recognized as the preferred solution for all existing buildings. Where customer service stations cannot be located in a basement, ground floor customer service stations should encourage the use of overhead door decorative screening elements to minimize the visual impact of the customer service station.

Challenge:
Electrical equipment roll-in paths within existing buildings are often structurally undersized to accommodate the weight of new equipment. LADWP does not accept temporary shoring as a means to support roll-in paths during equipment placement (and replacement). By requiring an existing building to upgrade the structural system along the entire length of the equipment journey (as opposed to only at customer service stations), LADWP is greatly expanding the scope of structural upgrades associated with new electrical service.

Solution:
LADWP to allow temporary shoring of equipment roll-in paths within existing buildings. Temporary shoring at roll-in path placed prior to equipment placement, removed and placed again only in the rare occasion the equipment is replaced would greatly reduce the costs associated with structural upgrades outside of the customer service stations.

VI. IMPROVE DEVELOPMENT SERVICES

Over the course of the last year of outreach to the architecture community, AIA Los Angeles has become more confident in learning about what LADWP personnel are doing, and what they are not doing.

As it relates to improving development services in general, we have the following recommendations:

1. LADWP's best and required practice diagrams need to be better drawn and referenced with clearer notes and processes.
2. LADWP needs to break down their engineering design silos.
3. LADWP needs to establish better project and process flow diagrams.
4. LADWP needs to establish clear performance schedules.
5. LADWP needs to comment and commit much sooner in the design approval process; preliminary plans subject to change because they are not approved by supervisors cannot be the norm.

Although LADWP may feel that they have put into place parameters for much of the above, they are not well communicated to the design and engineering communities. Therefore, LADWP needs to develop a robust "how-to" campaign for the design and engineering community. Their current quarterly "Service Planning Design Process" outreach workshops are not well communicated nor effective to date.

To emphasize: we have witnessed frustration and anger within the design, engineering, and development communities due to the lack of clarity or missed opportunities in LADWP processes and procedures. Their outreach to date is helpful but not yet effective. In general, consensus with the architecture community is that everyone learns how to deal with LADWP through "hard knocks". This suggests LADWP needs to adopt a concierge approach to delivery of design and engineering services for projects.

AIA LA is confident that LADWP will measure strong improvements with customer service and development services with better communications, more direct and robust outreach, and technological improvements in the ways they interface with the design and engineering community early in the design process.

END OF COVER LETTER and RECOMMENDATIONS

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