

# OMGIVNING

7.12.24

**Subject: Omgivning Chapter 85 recommendations**

References:

Latest LA Citywide ARO per June 2024

<https://planning.lacity.gov/odocument/b3e92bb4-cac0-464e-b08e-055362212b1c/Citywide%20ARO%20-%203rd%20draft%20for%20May%202024%20release.pdf>

## **8501 General**

### **Remove the term “joint live work quarters”**

(this was originally the way to use the alternative building code but if we are creating a revised chapter 85, it should go away to avoid confusion with the regular building code section for live/work)

### **Add “partial change of use”**

“If the portion of the building conversion is under 66% of the building total floor area (including any additional floor area), only that portion of the building’s change of use will require compliance with Chapter 85. Additional RFMs may be allowed on a case by case basis.”

### **8501.2 Application should be revised to be in sync with Planning**

(note: Language should sync up to whatever is allowed by planning for example citywide ARO only allows residential, DTLA (new community plan) can be any use, other areas of current ARO would allow hotel or resi (hollywood/ktown) . Keep the language of applicability to whatever is allowed by Planning - including if it is AR via entitlements, for example CUP may allow in other areas OR allow conversion to hotel)  
revise to include “All adaptive reuse projects allowed by Planning per new zoning, ordinance, or CUP which may include residential and in some locations hotel.”

### **8501.3 Definition of “existing building” should be revised to be in sync with Planning**

(note: Keep the language of “existing” to whatever is allowed by Planning - including if it is AR per a CUP. For example, Citywide ARO is rolling 15 years, DTLA is rolling 10 years, and both allow CUP for less years. It’s also important to note that even with the small roof use/addition, it’s still considered an “existing building” per all the alternative codes noted below)

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“All adaptive reuse projects allowed by Planning per new zoning, ordinance or CUP. This definition includes if the existing building provides an addition or new rooftop use per Planning. The new roof use or addition shall comply with current code but not require full code compliance of the entire existing building.”

## **8502 Alternative Standards**

**8502.3.3 Firefighter’s control panel** revise to be “may be reduced to 100 square feet pending approval of fire department review of layout”

### **8502.4.x Fire protection systems:**

#### **Buildings 75 to 165 feet:**

(note - this is taken from Broadway Bulletin P/BC 2017-125)

“All new fire protection systems including fire sprinkler systems, standpipe systems, pumps and tanks shall meet Division 20 of the Los Angeles Plumbing Code (LAPC). However, buildings that were cited under the High-Rise Retrofit Ordinance Nos. 163836 and 165319 may meet the provisions of the ordinance which include the following:

- Single 750 G.P.M. fire pump (on emergency power or diesel driven, with a four hour fuel supply for the diesel motor).
- On site water storage is not required.
- 750 G.P.M. flow at 65 psi is required at roof and 125 psi@300 gpm at the outlet of any hose valve pressure regulating valve.
- If pressure reducing type hose valves are used, a 3” test drain shall be provided.
- Existing or new sprinkler and standpipe risers shall be connected at the base of the riser system with a minimum of one Fire Department connection for the time being.
- Buildings over 150 feet will be allowed to use the above criteria on a case by case basis, subject to approval by LADBS and LAFD for the time being.
- Note: LADBS and LAFD are pursuing a code revision to allow the design criteria of this section to apply all existing buildings up to 165 feet.
- Existing buildings, 75 to 165 feet, that were not cited under the High-Rise Retrofit Ordinance and are not able to meet current codes may request modification to meet the design criteria stated above. Modifications will be evaluated on a case by case basis by the LADBS and the LAFD.”

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## **Buildings 165 to 275 feet:**

(note - this is taken from Broadway Bulletin P/BC 2017-125)

“All new fire protection systems including fire sprinkler systems, standpipe systems, pumps and tanks shall meet Division 20 of the Los Angeles Plumbing Code (LAPC).

However, buildings that were cited under the High-Rise Retrofit Ordinance Nos. 163836 and 165319 may meet the provisions of the ordinance which include the following:

- Two 750 G.P.M. fire pumps (on emergency power or diesel driven, with a four hour supply for the diesel motors).
- 20,000 gallon water storage tank on site.
- 750 G.P.M. flow at 65 psi is required at roof and 125 psi@300 gpm at the outlet of any hose valve pressure regulating valve.
- If pressure reducing type hose valves are used, a 3” test drain shall be provided.
- Existing or new sprinkler and standpipe risers shall be connected at the base of the riser system, with a minimum of one Fire Department connection.”

## **8502.7 Means of egress - add language about new roof use not triggering full assembly occupancy requirements**

“For new roof use or roof additions that are accessory use to residential units and not open to the public, occupant load factor may be 100 in lieu of 50 for common areas and shall have posted maximum occupancy signs.”

(note - these areas are essentially an extension of the residential tenant’s living room and if resi occupancy load is 200, and office is 100, then 100 occupant load feels fair and not allowing the “public” meaning they can’t rent it out for public parties etc)

## **8502.7 Means of egress - add language about allowing fire escapes**

“Existing fire escapes may be reused on qualified historic buildings per the allowance and requirements of the State Historical Building Code. In the event that a new rooftop use is provided, the common area occupiable area (not including fixed planting) cannot exceed 750sf.”

(note: this goes back to what was always allowed and we have RFMs to allow this including roof use - best to limit the sf and to tie it to the historic code. Or, if you prefer review the vetted language in Broadway Bulletin P/BC 2017-125)

## **8502.7 Means of egress - add language for existing stairs**

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(note - this is taken from Broadway Bulletin P/BC 2017-125)

Existing non-compliant conditions such as stair riser/treads, handrail grip size or height, and/or guardrail height may be maintained if analyzed and approved not to constitute a distinct hazard on a case-by-case basis.

(note - instead of case by case, maybe you want to add language from your current worst case but approved RFMs (note that historic buildings would be allowed more deviance than non-historic)

## **8502.7 Means of egress - add language for NEW stairs**

(note: often when trying to add a new stair, there are existing conditions which are prohibitive, here are recommendations to be specific without requiring a RFM)

“For a new exit stair, the following conditions will be allowed: Exterior stairs for high rise buildings under 165’, reduction in stair distance separation to be  $\frac{1}{3}$  rule and  $\frac{1}{4}$  for high rise buildings, and the use of water curtains at openings in lieu of providing 10’-0” of clear distance from the egress element (stair, fire-escape). “

## **8502.7 Means of egress - add language for elevator lobbies**

(note: Existing buildings often have existing circulation patterns and building floor configurations that prevent the addition of an elevator lobby and usually requires a RFM )

“The use of a 90-minute fire-rated smoke-sealed swing-type door is an acceptable alternative (including highrise buildings) when an elevator lobby cannot provide it due to any of the following conditions:

- 1) existing circulation patterns and building floor configurations that prevent the addition of an elevator lobby.
- 2) when determined that destructive alterations will impact the historical integrity of character-defining historic elements for a Qualified Historic Building. “

## **8502.7 Means of egress - add language for egress courts**

(note: Often, existing egress courts have existing windows and, therefore, are not compliant with current code requirements.)

“Existing egress courts less than 10’-0” to be allowed to have openings when openings are protected with a water curtain.”

## **8502.7.2.B Dead-end corridors**

Revise to be 50’ as is current code or remove as n/a

## **8502.8 Accessibility**

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(Note - it's important to keep in Chapter 85 AND clarify as this keeps getting muddy with plan checkers. The exception is in Chapter 11a and it's for buildings over a certain age, are residential and not open to the general public))

“Existing buildings, or portion thereof, as applicable per Chapter 11A, do not require disabled access within the residential units nor the common areas considered accessory use to the residential units for tenants only. Any common areas open to the public require disabled access per Chapter 11”

## **8502.9.3 Light and Ventilation Court**

(note current section is confusing here is an alternative)

“Existing light courts, regardless of original use, shall be deemed acceptable for natural ventilation and lighting purposes. Altered existing light courts shall be deemed acceptable for natural ventilation and lighting purposes as long as the light court is not altered negatively regarding width and height measurements. New light courts must comply with LABC Section 1206.3. Except a new mechanical ventilation system complying with the Mechanical Code may vent the court in lieu of the horizontal air intake.”

## **8502.11 Energy Conservation - revise to allow for partial modifications to building envelope**

“An existing building need not comply with the Building Envelope requirements of the California Energy Code if the Building envelope is not altered more than 50%”

(note: Sometimes, the only scope of work for an existing curtain wall is to alter the existing curtain to provide natural ventilation to a unit. However, once the curtain wall is altered, the new piece must comply with Title 24 energy envelope calculations. The issue then becomes it may be infeasible to provide a new double pane window piece into a single pane curtain wall system.)

## **8502.13 Electrical**

?

## **8502.14 Mechanical**

Allow Mechanical Engineers to calculate the amount of leakage through the existing building envelope and use it as justification that if designed with a new mechanical exhaust system (i.e., subduct exhaust), mechanical fresh air requirements will be waived.

(note: title 24 and mechanical code have changed - currently we are not allowed to take advantage of operable windows. We have been able to get a mod to eliminate the new

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kitchen mechanical ventilation requirement by arguing leakage of existing windows and also having operable windows in the unit)

## **8502.14 Mechanical**

Allow combining office and residential mechanical systems

(note: Currently office and resi can't be combined - for partial conversions this would be extremely helpful.)

## **8502.15 Elevators**

Add the following for gurney . .

“Upgrade existing freight elevators to be gurney compliant if upgrade does not require modification to the size/extent of the existing elevator. If no existing elevator can be upgraded, then existing non-gurney elevators can be maintained, provided a standard LAFD gurney can fit in a locked seated position and there is signage per LAFD. For buildings converting spaces to occupied areas currently without elevator service such as a roof addition or roof deck for open space, a transfer elevator from the highest existing floor with elevator service to the new spaces will be allowed.”

## **Other items that are not currently in Chapter 85 to add:**

### **Helipad**

Helipad requirements and Elimination of Helipad Requirements do not apply to any existing building.

### **Plumbing - Grey Water**

Exempt AR projects from future grey water requirements

### **Plumbing Vent pipes and Fire Pump Overflow drains**

add, “Allow use of Appendix M in Plumbing code” (?)

(note from April Trafton: LADWP allow but LADBS does not. This is allowed in all other model codes. Also IAPMO who writes the Plumbing Code allows this and has a calculator. The IPC and ASPE allows for much longer vent runs with smaller pipes. The UPC makes us go to 5” and 6” vent pipes after 300 feet with other method we can go to 640’. 5” and 6” pipes mean 8” walls this is very expensive and takes up valuable floor space. In addition, high rise buildings fire water tanks are required. Overflow for these tanks are required. The minimum flow is 250 gpm. At this time the BOE in Los Angeles requires that we count the gallons per day to the sewer for the SCAR report. They now require us to count a pump as

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running 244/7, 7 days a week. This often requires a developer to up size City mains. This VERY expensive and project busting.

## **LID/SUSMP**

Exempt AR projects from LID / SUSMP requirements, unless the building currently complies with LID/SUSMP then existing system must be maintained.

## **PV Solar**

Exempt AR housing projects from PV / Solar requirements.

## **Car Charging**

Exempt EV Car charging station for AR housing projects