

Chris Austin

From: Wayne Jones <wayne@wjonesarchitecture.com>
Sent: Wednesday, August 22, 2018 2:14 PM
To: RentalHelp
Subject: Comments on draft of 2019 QAP

Please find my comments.

I. B. C. "site lighting plans" - The site lighting plans are generally prepared by the utility providing the electrical service, and their participation usually lags behind the permitting plan sequence. Would it be possible to allow this as a deferred submittal? Also, it would be useful for the agency to define what criteria should apply, say min. xx footcandles in all parking areas or something similar? I see the ANSI A117.1 signage requirement: that would generally be addressed by lighting on the building lighting plans.

II.C.20 re: 60 inch minimum turning radius in Type A kitchens, my understanding is that this requirement (... in all usable areas of the kitchen...) is in excess of ANSI requirements based on illustrations in ANSI for a galley Type A kitchen. If the intent is for the NCHFA standard to exceed the ANSI standard, it may be useful to state that.

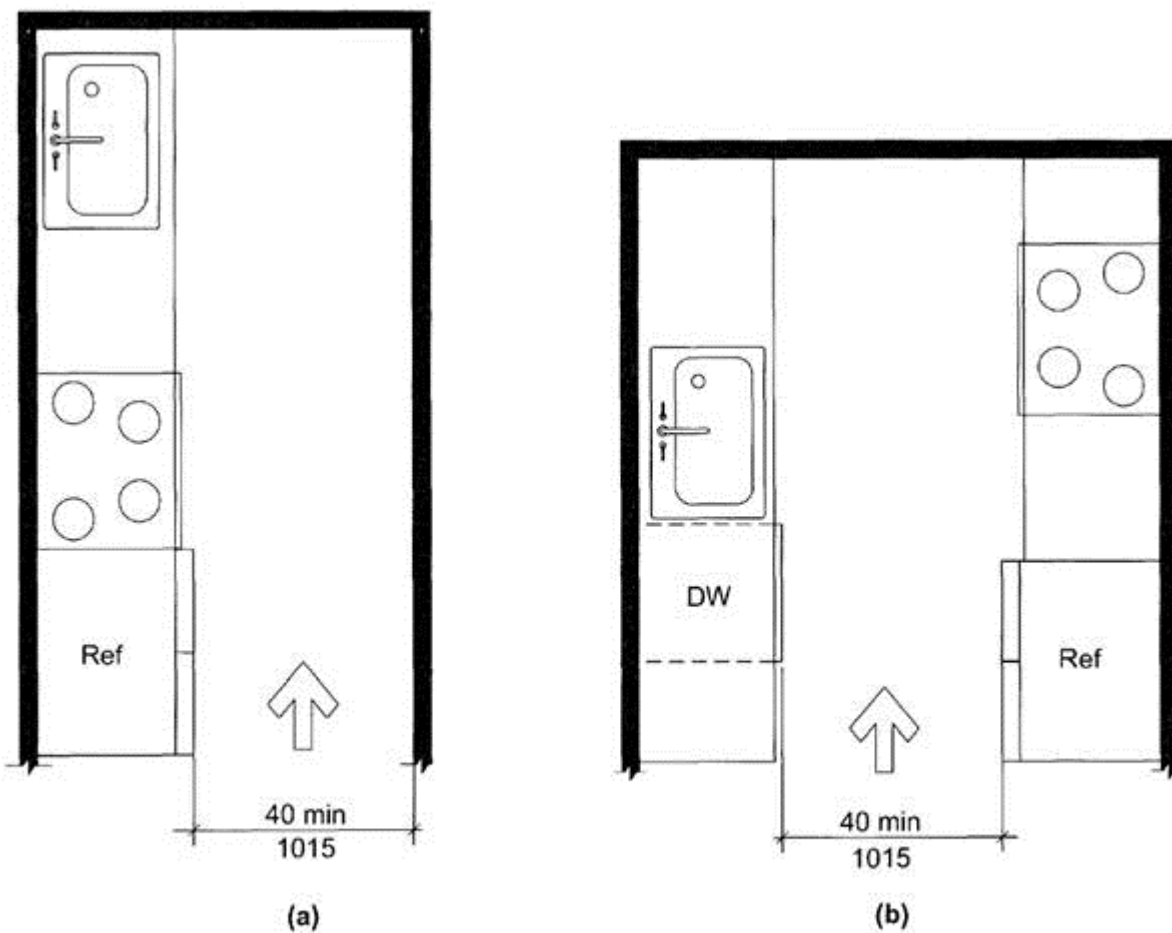


FIG. 1003.12.1.1
MINIMUM KITCHEN CLEARANCE IN TYPE A UNITS

II.C.21 re: “All interior common areas, hallways, and enclosed corridors must be served by heating and cooling systems.” This requirement is implicit in elderly buildings with extensive interior connected circulation areas. However, in the case of a stairwell being enclosed (instead of an open air breezeway, providing a fully weatherproof enclosed stairwell) this appears to put an undue burden of cost and maintenance on a building feature that has already been improved by providing better weather protection. The heating and cooling energy loss from infiltration through an open unit door that normally has been fully wasted with a unconditioned breezeway, is now being used for semi-conditioning of the enclosed stair area. Providing full conditioning to the stair enclosure may be desirable, but may not be the most productive use of construction funds and may inadvertently prove to be an unnecessary cost penalty to projects with such a configuration.

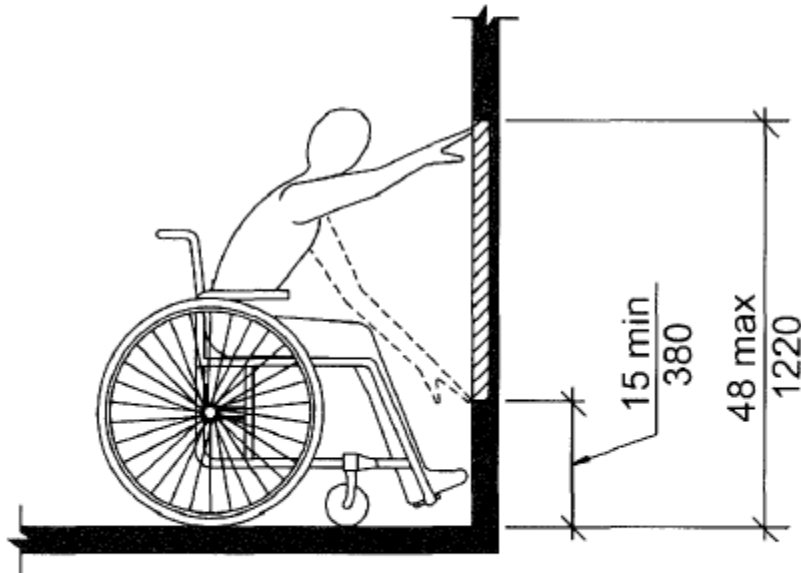
III.F. Radon Ventilation. There is now a published standard regarding radon soil gas control, ANSI/AARST CC-1000 2018. The Agency may consider either referring to that as a standard that may be used for design, or replacing items 1-3 with a reference to the standard.

V.C.4. “Mailboxes may not be installed higher than 48 inches above finished floor and must be centered with a 48-inch clear floor space for a parallel approach.”. The parallel approach component of this requirement appears to be in excess of the forward reach requirement that would appear to apply, allowing a 30” space centered on the mailbox. If the intent is for the NCHFA standard to exceed the ANSI standard, it may be useful to state that.

Also, it may be useful to consider the language of 2017 ANSI A117.1 allowing an unobstructed side reach range of 54” for Type B units. However, in my opinion the lack of control over who assigns mailboxes is in conflict with the 54” range, given that a Type A unit may end up with a mailbox over 48”. My point is that with the exception of the 2017 Type B language, I don’t find anything not allowing a forward reach to apply. My intent will be to certainly keep all mailboxes within 48”, I just think a forward reach is allowed.

308.2 Forward Reach.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor.



**FIG. 308.2.1
UNOBSTRUCTED FORWARD REACH**

Thank you,

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