



September 26, 2022

Attention: Tara Hall  
North Carolina Housing Finance Agency  
3508 Bush Street  
Raleigh, NC 27609

Re: 2023 QAP First Draft Comments

Dear Ms. Hall,

After review of the proposed 2023 QAP first draft, we at Housing Studio would like to offer some comments for your consideration. We would propose that several areas be reconsidered or modified as suggested below. Thanks to NCHFA for giving us the opportunity to provide feedback during this process.

**Appendix B Section II.A.10 – Cane Detection Rails at Stairs** It would be helpful if more clarity was provided as to where these cane detection rails are being required and what they are intended for. We are unsure of the location these are intended for or the reasoning for adding them. Is this along the length of the stair parallel with the nosing line? What sort of profile should it have? A diagram would be helpful.

**Appendix B Section II.C.25 & Section III.A.5 – Water heater Installation Location** We understand the intent of this is likely to make sure that water heaters can be easily provided that meet the actual, not nominal, requirements for 50 gallon capacity in 3 bedroom units. However, we propose that this rule only be implemented in 3 bedroom units if this is a true concern. Disallowing stacked water heaters under air handlers continues a trend of requirements that make it more and more difficult to provide quality and attractive units that are not hampered by strange relationships within the space. The requirements that air handlers have ducted returns, that long throw vented dryers not be allowed and that only side-by-side washers and dryers be used, in addition to more restrictive floor space requirements than are required by ANSI A1171.1, while all well intentioned, in the aggregate are creating often competing elements within the unit design that limit or eliminate design flexibility. If we can limit the requirement to disallow stacked water heater and air handler to just 3 bedroom units, we can minimize the additional impact this has on unit layout while addressing the primary area of concern.

**Appendix B Section II.C.26 – 2% Maximum Slope in Breezeways or Corridors** We request this change be removed or adjusted in scope. In areas with significant grade change, we can often provide savings to the project and make affordable housing more so when we have the ability to step the slab to follow site grade. This is especially important in the mountain counties and some Piedmont counties as well. Corridors inside buildings of this nature still comply with federal and state accessibility guidelines and don't unnecessarily discriminate against mobility impaired users. We recommend changing this scope to a maximum ramp that does not require handrails (up to 5%) and requiring a color change at the top and bottom of the ramp to help identify the change in plane.

**Appendix B Section III.E.10 – Retaining Wall 25 Foot Minimum Distance from Building** This rule restricts creative solutions in areas that have inherent high grade change and force greater



cost, construction time and potential environmental impact on many central and western county sites. We recommend removing this requirement completely or at least deferring it until QAP 2024 so that the change can be discussed with industry professionals regarding impact on site design and layout.

Thank you for your consideration. Please feel free to reach out if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chad Askew', with a long horizontal line extending to the right.

Chad Askew, AIA, LEED AP  
Senior Associate  
Housing Studio, PA