

Template for
 Delivery of Comments
 On Proposed Construction Codes of the District of Columbia 2013

List of

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2013 Code Reviewed: 12 DCMR A, IBC - Chap. 32 -- Encroachments into Public Right
 of Way

Date: January 25, 2013

Section Reference	Title/Subject	Comment
3202.6	Streets on which projections are prohibited	The term "building line" creates ambiguity in the implementation of this provision since there are no known "building lines" on any of the streets indicated; suggest the reference be changed to refer to a "public way", a term clearly defined in the IBC, or "street".
3202.11.3	Steps and Ramps	This will need to be coordinated with ADA, which is a federal requirement. Due to individual site conditions, this may not always be feasible.
Generally Chapter 32		Use of the terms "street" and "alley" versus use of the term "public way" needs to be carefully analyzed. See Sec. 3202.7.1 and 3203.7.2 as examples. While terminology in the DC Supplement may not consistent with IBC terminology, the District present special concerns that have to careful evaluated. A

		blanket substitution of "public way" for more specific terminology could cause issues for implementation of the DC Supplement.
3202.9.2.2.3	Use of vault space	The term 'code official' is not <i>italicized</i> here as at other locations in the Chapter.
3202.10.1	General Restrictions	Reference to Section 3202.10.1.2 is made, but no subsection exists.
3202.11.4	Projecting doors and windows	Reference to Section 3202.11.5 is made, but this may be an error and presumably should be a reference to 3202.11.4.2.
3202.12.1.1	Projecting Awnings....	Reference to Section 3202.12.6 is made, but there are only 4 subsections; presumably the reference should be to 3202.12.1.04.
3202.12.2.1	Restrictions based on zoning districts	What is the basis of the restriction to C, C-M and M Districts, as distinct from other Districts such as SP, CR, W, etc. where significant amount of commercial uses are permitted? This provision should be reviewed with the Zoning Administrator.
3202.12.2.1	Restrictions based on zoning districts	The sentence should read "Canopies approved pursuant to Section 3202.12.2.5 shall not be restricted"
3202.12.3.3	Marquees	Reference is made to "public space" as distinct from "public way", etc. What is the distinction being made?