



American Council of Engineering Companies of New York

Comments
Residential Tower Mechanical Voids Amendment 2
Central Business Districts – April 2020

Submitted to NYC Department of City Planning- June 3, 2020

The American Council of Engineering Companies of New York (ACEC New York) very much appreciates that the NYC Department of City Planning has recognized the need for larger mechanical spaces in buildings located within CBD's. The proposed modifications to the previously adopted rules regulating mechanical spaces in residential buildings are necessary to allow creativity, functionality, and efficiency in building design.

The ACEC New York Mechanical Code Committee respectfully submits the comments below regarding the proposed Amendment 2 modifications for buildings within CBDs:

- It is unclear how to determine the applicable floor area if the mechanical floor/space is serving both residential and commercial occupancies when commercial space takes up more than 25% of the building floor area.
- Roof "penthouse" mechanical floors should not be subject to the noted floor height restrictions. This assumes, of course, that there are no occupied floors above these mechanical floors. Page 9 of the Amendment 2 presentation appears to recognize this; however, the exception should be specifically noted in the Amendment.
- To determine the height of each floor, measurement should be taken from the top of the structural floor slab up to the underside of the deepest structural element – *not* to the bottom of the floor directly above. In some cases, structural elements (i.e. beams, joists, etc.) extending down into mechanical floors are required to be quite large and the space in between these elements cannot be efficiently utilized by the mechanical systems, thus reducing the usable height of the mechanical floor. We have attached a previously submitted annotated sketch depicting the intent of this comment.

It is also noted that the above comments also apply to the previously adopted citywide rules (May 2019) with regard to residential buildings and residential portions of mixed-use buildings in R9 and R10 Residence Districts and their equivalent Commercial Districts.

We thank you for the opportunity to provide these comments and welcome any questions you may have regarding this issue.

For further information please contact:

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Item 5 ZR 23-16(a)(2), interpretation of “...the height of such floor space shall be measured from the top of a structural floor to the bottom of a structural floor directly above such space.”

To determine the height of each floor, measurement should be taken from the top of the structural floor to the bottom of the structural floor slab next above. Measurements of floor height are not to be taken from the finished floor to the bottom of a drop ceiling above. In the case of a structural coffered ceiling (e.g. waffle slab or space frames), measurement shall be taken from the top of the structural floor to the bottom of the structural floor slab. Figure 3 indicates how floor height should be measured.

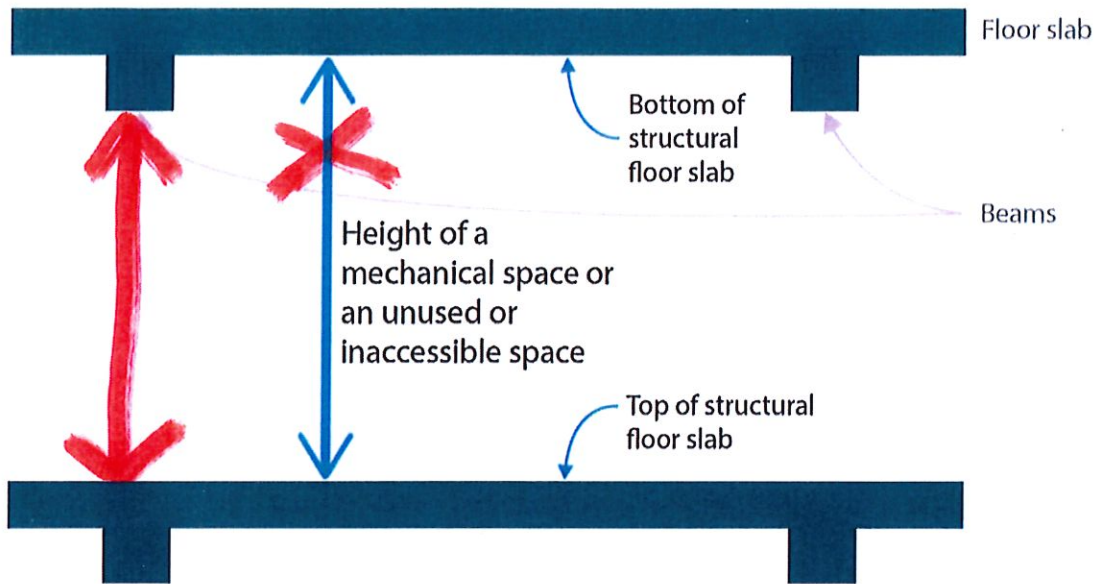


Figure 3. Measurement from the top of a structural floor to the bottom of a structural floor slab