

**CWS ARCHITECTS**  
ARCHITECTURE | INTERIOR DESIGN

July 19, 2016

City of Portland  
Building Inspections Division  
389 Congress Street  
Portland, ME 04101

Re: Plan Review  
Mougalian Rugs Fit-up  
Portland, Maine

Randall Mougalian  
300 Roundwood Drive  
Scarborough, ME 04074

To whom it may concern,

I'm transmitting the included documents for a change-of-use tenant fit-up project in Portland. The building is currently occupied by BH Milliken Electric and used as office and warehouse space. The new tenant will remove several walls to make the first floor a public showroom. The second level will be slightly reconfigured and will continue to be used as support office areas. You will note in the code study that there are three items highlighted by red text:

- 1) There is an existing 'incidental' storage area under the unenclosed stair which was added by the current tenant. IBC requires this space to be fire rated. Due to the fact that the stair is an open stair, we would ask if this area may not need to be rated.
- 2) The building was constructed under 1993 BOCA and the two exits were sufficiently remote at that time. Current codes would require an additional door to increase remoteness for a non-sprinklered building. NFPA 101 has a clause which allows the existing door configuration, but IBC does not. Plans show a pass door in the furthest overhead door, which we know is available. We've also identified a location where we could install an insulated steel door in the existing wall, if it were to be more economical, though that is not likely. We would ask if the known low occupancy rate of this business might allow for the existing condition to be accepted by IBC.
- 3) For new occupancies, tactile exit signage is required. I've flagged this requirement to highlight our intent to add them, since there is no specification for the project. We will work with the Owner and City to ensure all such requirements are met prior to occupancy inspection.

The Maine State Plumbing Code appears to require "Office or Public Buildings" to provide a total of five fixtures for this showroom space. The International Plumbing Code calls for a far more realistic two fixtures for a "Mercantile" occupancy, without need for division by sex. We would propose that the single unisex restroom at the showroom and single unisex restroom at staff areas is adequate for this tenant. Please see the attached comparison of Codes and letter of use by the Owner.