Nadine:  
Please see public comments below for 10A NCAC 14J rules.  

Thanks,  
Carey Lang Gurlitz, PE, MSE  
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From: Mace, Dan [mailto:dmace@moseleyarchitects.com]  
Sent: Sunday, February 25, 2018 1:58 PM  
To: Gurlitz, Carey  
Cc: Davis, Todd  
Subject: [External] Comments on proposed draft Jail Rules  

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Carey,  
Todd and I have looked over these proposed changes and we offer the following as concerns that may need to be addressed:

1. Page 2 of 6, 10A NCAC 14J.0101 DEFINITIONS: The last two sentences concern Todd and I as it will require significant change to the size and orientation of housing units designed using podular indirect supervision (which is currently the most often used in new facilities we have undertaken). Perhaps it is intended that from the view “barrier” the officer will have a view to the cell front – not necessarily the “interior”. This could be very difficult to actually accomplish for the officers to see into every cell (24 of them perhaps) interior. I cant think of a layout that would allow this to occur.

2. SECTION .0600 – SUPERVISION, page 2 of 3, line 18-27: Our concern is that this will vastly increase staffing costs to comply. As long as officers make required rounds per standards a, b, and c of this rule, why keep them from other tasks? I think this is the intent for auxiliary tasks not to interfere with the primary supervisory role, but could be construed to mean that they can only supervise inmates and nothing else?
Thanks Carey – Todd – you have any additional comments to add?

Dan Mace, AIA, LEED AP
Vice President

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