Tara Meredith

From: Scott Farmer
Sent: Thursday, September 24, 2026 4:11 PM
To: Sandy Harris; Tara Meredith
Subject: FW: EXTERNAL: accessibilty
Attachments: THE 350_BLDG100_FIRST FLOOR PLAN.pdf; NC - Kitchen ANSI.pdf

more comment from Mike Riley

From: Mike Riley <mriley@martinriley.com>
Sent: Thursday, September 24, 2026 2:57 PM
To: Scott Farmer <bsfarmer@nchfa.com>
Subject: EXTERNAL: accessibilty

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I want to preface this discussion with stating that both of my parents ended up in wheelchairs in their last years of their lives. My sister has an auto immune system issue putting her on disability and also has to utilize a wheelchair at times. So, I am fully aware of the challenges folks with disabilities face in their homes.

But with that said I believe that extra 5% of accessible units that NCHFA have required for years is excessive. A case could be made for our senior projects and the 10%. But in the family projects I think that extra 5% is not necessary and creates a burden on mgmt since of course those units are undesirable to the general public. Similarly, I believe putting the A/V units inside a type A unit seems be expecting a wheelchair bound deaf and maybe blind person in the unit. Odds are not good that a person with that many disabilities would be able to live independently in an apartment. I would recommend that the agency go back to the State's 5% requirement with 2% of the type B units then being equipped for the hearing and/or visually impaired. The agency may want to reach out to some of the management companies to get their feedback on this. I know when I have in the past the amount of fully equipped units was a burden to them.

Beyond that much of the extra requirements that NCHFA has added on top of the various accessibility codes, ANSI117.1, ADA (when applicable), and depending on the financing still, UFAS, creates difficulties in construction and in some cases inadvertently make some units less livable. The State of North Carolina itself actually behind most of our other states in code adoption. The 2024 NC code package has been delayed at the legislative level, and they are still operating under the 2018 code package with utilizes the 2009 ANSI 117.1. In the agency's Appendix B, your team has added items from the 2017

(latest version) of ANSI 117.1. Which I think is prudent, but then some items go well beyond what would be required to meet the latest version of ANSI.

II.A.18 Max 2% running slope in breezeways. This presents at least two issues. We need to slope the breezeways from the entry doors out to the exterior edges to make sure that rain water is not standing or sloping into the breezeway. 4.99% slope would be allowable by ANSI. Also, as sites have gotten harder and more expensive, the building types necessary to make these sites work often would benefit from running slopes along the longitudinal spine of the larger compressed buildings that we are using more of. See the attached example from one our projects that is about to break ground on ATL Beltline land. This also holds true for II.C.26.

III.C20 The new/current ANSI 117.1 requires a 67" diameter turning circle in rooms including the accessible bathroom, large walk-in closets, and elsewhere. But ANSI specifically does not require it in kitchens. See the graphics also attached. The unnecessary extra 25" added between faces of galley kitchens simply means 25" by roughly 8' or over 22SF is lost in the rest of the unit. The result is even more devasting in an L shaped kitchen or ones with pass through around an island. The latest ANSI makes it quite clear that only 42" is necessary in these types of kitchens again per the attached. If the agency wants to go further perhaps there is some compromise that satisfies the extra accessibility desired while not have such a profound impact on the livability of the unit for all residents.

III.G.4 Centering clear floor space on a dryer. This is true for both type A and B units. Since dryers are front load with a door swinging out centering the clear floor space with the door essentially in the middle of it really doesn't accomplish the goal of making the dryer accessible. The clear floor space should be offset from the face of the door opened 90 degrees. This also holds true for IV.D.9.

I think some of these suggestions may require further discussion and you mentioned me coming up to your offices to meet with your team. That is something I am willing to do.

Finally, there are a few other items that I am sure my clients would like me to tilt the windmill against like the stringent lineal feet of countertop now that we have lost the ability to utilize properly sized bar tops in the calculations and the full blown EnergyStar Multifamily New Construction Program v1.2 which has little return for the extra amount of money spent to achieve the certification. But I will leave that to others to debate.

Thanks for this opportunity and look forward to further discussions.

Respectfully submitted,

Michael (Mike) T Riley
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II.A.18 slopes in breezeways. We understand that the breezeways at ground level, and upper levels in elevator buildings,

Codes / I-Codes / 2017 ICC A117.1 with Supplement 1 Accessible and Usable E

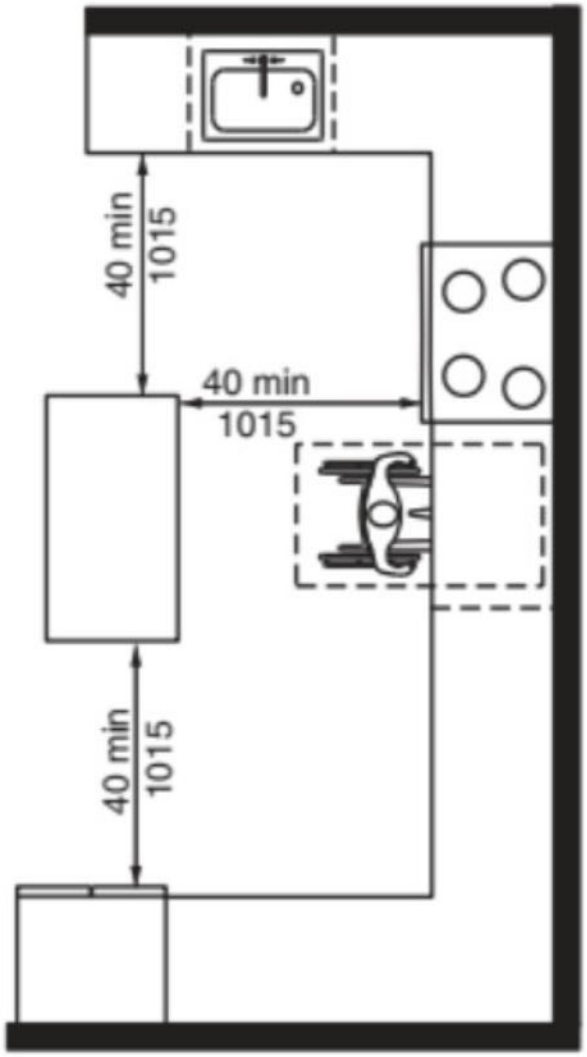


FIGURE 804.2.2(C) U-SHAPED KITCHEN CLEARANC

From: Scott Farmer <bsfarmer@nchfa.com>
Sent: Monday, August 31, 2026 12:38 PM
To: Mike Riley <mriley@martinriley.com>
Subject: RE: EXTERNAL: suggestions for the application and construction document phases

Thanks Mike! I will share these with Sandy, Tara and the development team, and please forward any additional comments on Appendix B.

Thanks,
Scott

From: Mike Riley <mriley@martinriley.com>
Sent: Monday, August 31, 2026 11:39 AM
To: Scott Farmer <bsfarmer@nchfa.com>
Subject: EXTERNAL: suggestions for the application and construction document phases

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This is what I planned on sending last Wed.

Scott, good to see you again the other month at the Rocky River Groundbreaking and maybe will see you at the Villas at Elmsley Ribbon Cutting event later this week.

As I mentioned at the groundbreaking, I would like to provide some input on the application and the following construction doc submission phase for those lucky enough to have projects awarded credits.

In the first round of the application process NCHFA requires a fairly detailed package that requires a good number of drawings that are not particularly germane to the site scoring that is the basis for projects determining whether to move forward to round 2. I am sure you aware that most if not all the architects participating in round 1, and also in round 2, are doing the work pro bono. Actually, at least for us, usually waiting until the construction loan closing before receiving any compensation. Round 1 of course is bit of an exercise of throwing everything up against the wall to see which projects might stick. So, I believe the architects participating in the NCHFA have to exert much more effort in this round than is truly necessary. If the applications in round 1 are judged based on purely the viability of the site conditions and initial layouts then requiring extensive back up building & unit plans as well as elevations should not be necessary. And as far as benefit to the agency I have to admit, and sure it is true of my competitors, we have to homogenize our submittal packages simply to get them all turned in on time. So, the individual project packages submitted will often be not the truly customized design that could be possible between rounds 1 and 2 where the number of packages required have been winnowed down to a manageable number. I believe further limiting what is required in round 1 would result in individual superior round 2 applications.

I don't have any issues with the documentation required in round 2 although it is significantly higher that some other adjacent states. Though in fairness it is less than some over the top requirements in other adjacent states.

My concerns re the construction document submittal phase relate more to some of the third-party design documents that are still being required. In the construction industry

overall and still true of most municipalities in NC items such as PT slab shops, truss drawings, sprinkler, and fire alarm docs have traditionally considered to be deferred submittals and are not required to start construction. Since these drawings/submittals are traditionally prepared by the GC's sub-contractors, not under the umbrella of the project's design professionals, having them required prior to allowing the construction process to proceed presents some undesirable issues.

One having these drawings provided prior to construction requires the GC to commit to a sub without necessarily securing the best price and most desirable subcontractor. Secondly, in our current times even with the construction crunch somewhat abated, many subs will not commit to providing these premature packages well ahead of the opportunity of drawing down real payments at the appropriate time in the process results in many not pricing the project at all or those that do may pad their numbers to carry that long lead time.

Another issue with submitting these deferred submittals ahead of the normal construction and document submittal process is that our owners, to keep a reasonable construction review process, must direct the GC to have the subs prepare the deferred submittal docs utilizing overall plans that have not been through the other review processes meaning likely they may need revisions yielding more delays and additional cost.

Overall these deferred submittals being required prior to NCHFA will complete their review, because of the items mentioned above will drag out the whole process of getting jobs closed and under construction.

My last comment on this may not go over well with your team of reviewers but does NCHFA really need to take on any responsibility for reviewing, and indirectly approving, these types of documents?

One positive comment I need to throw in is the new ability for the architect to upload the construction document packages directly to the NCHFA portal. MRA has to better with our submissions, but often we find that NCHFA is reviewing earlier or incomplete preliminary docs. The ability to make the submissions directly will save Toby's and your team's time as well as save MRA and other architect's unnecessary embarrassment. We do enough to embarrass ourselves without that additional "help".

8/31 One more item I thought to add to this discussion, is that is if the agency is concerned about having these deferred submittals there is no reason, like we do for most municipalities, we can't have them submitted to the agency parallel with the municipalities, when they have been reviewed during the regular shop drawing process.

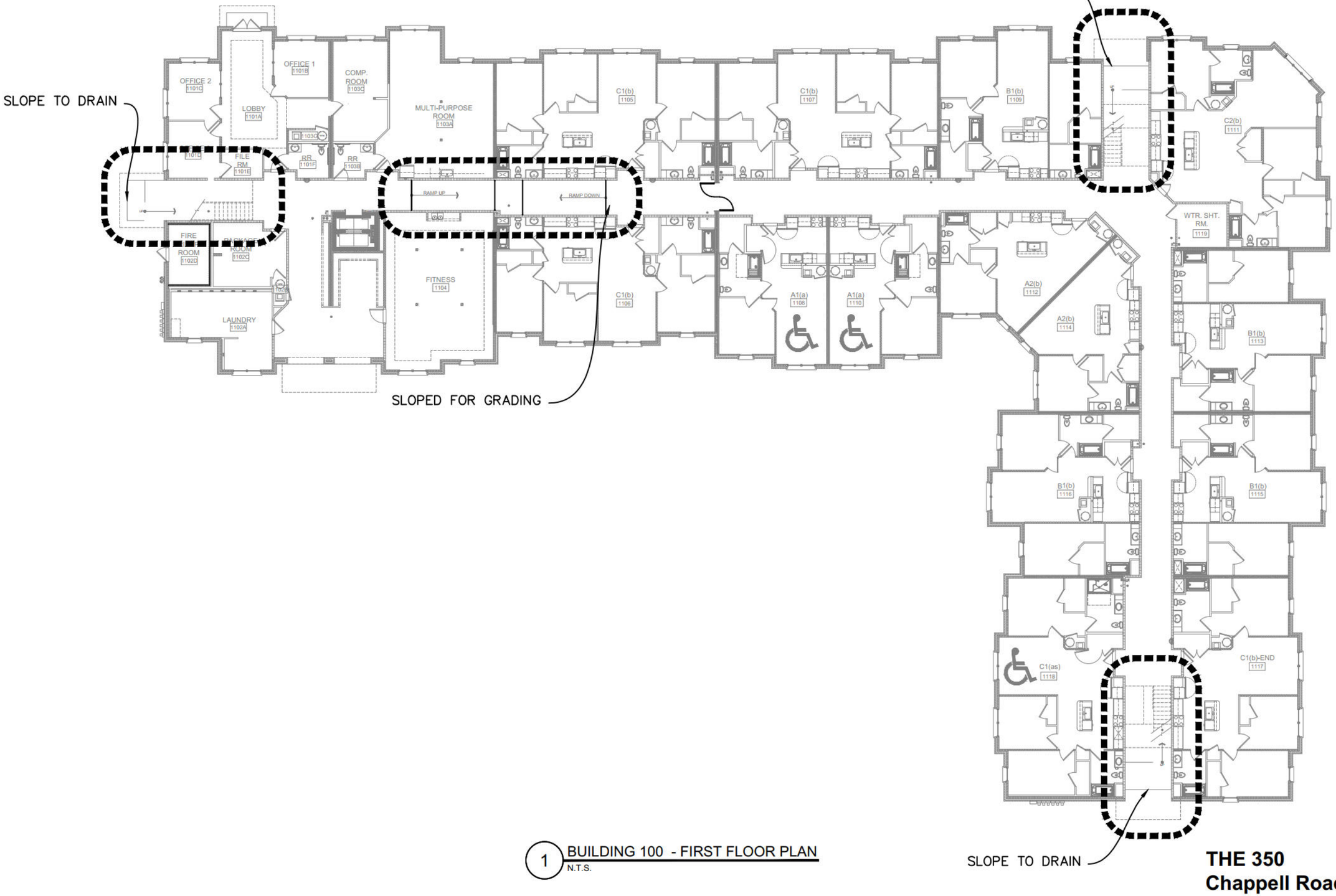
I appreciate the opportunity to make these comments. And if I can be so brave I would like to follow up with some hopefully constructive comments on the current Appendix B. *And per our conversation, I will get those out to you early this week*.

Thanks,

Michael (Mike) T Riley
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1 BUILDING 100 - FIRST FLOOR PLAN
N.T.S.

THE 350
Chappell Road, Atlanta, GA

MARTIN RILEY ASSOCIATES - ARCHITECTS, P.C.

PLOTTED: 9/22/2026 3:52:28 PM - DRAWING: C:\USERS\IPARK\DOWNLOADS\PRESENTATION-BORDER 11-17.DWG - PLOTTED BY: IEON PARK - COPYRIGHT 2026

ACCESSIBLE, TYPE A, TYPE B, AND TYPE C UNITS
U-SHAPED KITCHENS AND KITCHENETTES

ALL U-KITCHENS
Clearance between all opposing cabinets, counter tops, appliances, or walls within kitchen work areas shall be 60" min.

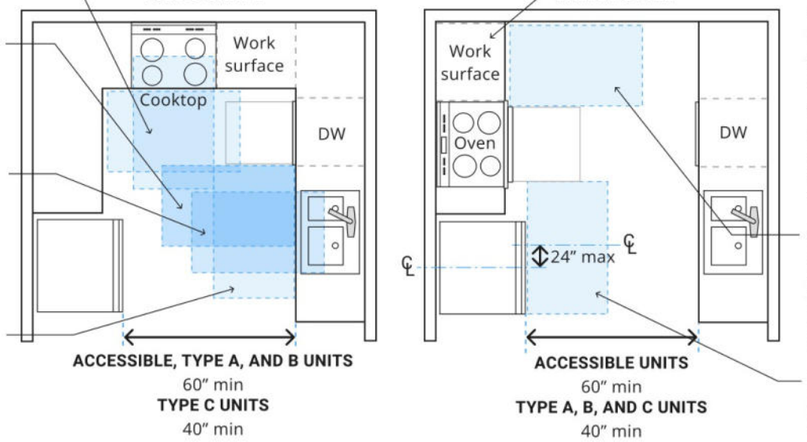
TYPE A, B, AND C UNITS
If counters, appliances, or cabinets are not placed on all three contiguous sides, clearance between elements can be 40" min

ACCESSIBLE, TYPE A, & TYPE B UNITS
A clear floor space, positioned for parallel or forward approach to the cooktop, shall be provided.

ACCESSIBLE, TYPE A, & TYPE B UNITS
Dishwasher door in the open position shall not obstruct the clear floor space for dishwasher or adjacent sink.

ACCESSIBLE AND TYPE A UNITS
A clear floor space, positioned for forward approach to the sink, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

TYPE B UNITS
A clear floor space, positioned for a parallel approach to the sink, shall be provided. The clear floor space shall be centered on the sink bowl.
EXCEPTION: A sink with a forward approach complying with Section 1003.12.4.1



ACCESSIBLE AND TYPE A UNITS
At least one section of counter shall provide a work surface 30" min in length with a forward approach clear floor space if cooktop or range is provided.

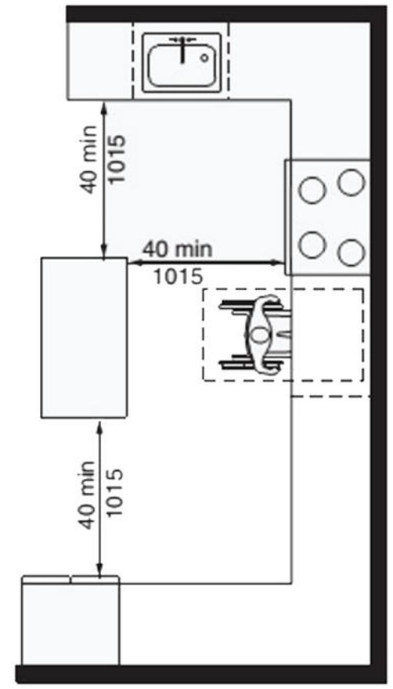
ACCESSIBLE UNITS
Work surface shall be 28" min and 34" max in height above the floor

TYPE A UNITS
Work surface shall be 34" max above the floor. A counter that is adjustable between 29" and 36" or that can be relocated without damage is permitted. Cabinetry shall be permitted below the work surface if criteria is met per Section 1003.12.3.1 Exception.

ACCESSIBLE, TYPE A AND TYPE B UNITS
A clear floor space shall be provided. The oven door in the open position shall not obstruct the clear floor space for the oven.

TYPE B UNITS
A clear floor space, positioned for a parallel approach to the refrigerator/ freezer, shall be provided. The centerline of the clear floor space shall be offset 24" maximum from the centerline of the appliance.

ACCESSIBLE AND TYPE A UNITS
A clear floor space complying with Section 305 shall be provided at each kitchen appliance. All appliance controls shall comply with Section 309.



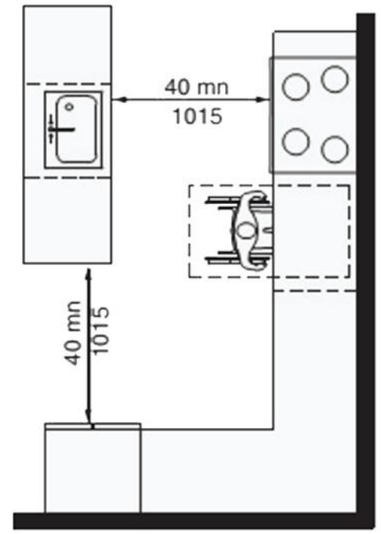
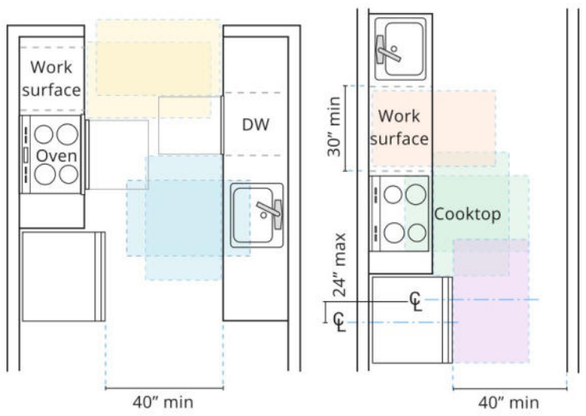


FIGURE 804.2.2(C)
U-SHAPED KITCHEN CLEARANCE - EXCEPTION

ACCESSIBLE, TYPE A, TYPE B, AND TYPE C UNITS
PASSTHROUGH KITCHENS AND KITCHENETTES



PASSTHROUGH KITCHENS - ALL UNITS
Clearance between all opposing cabinets, counter tops, appliances, or walls within kitchen work areas shall be 40" min.
Type C units may provide a clearance of 36" min if a cooktop or conventional range is not provided.

	Accessible	Type A	Type B
Oven/Dishwasher	Doors in the open position shall not obstruct the CFS of appliance or adjacent fixtures	Doors in the open position shall not obstruct the CFS of appliance or adjacent fixtures	Doors in the open position shall not obstruct the CFS of appliance
Cooktop	A parallel or forward approach CFS shall be provided. Controls for ovens and cooktops shall not require reaching across burners.	A parallel or forward approach CFS shall be provided. Controls for ovens and cooktops shall not require reaching across burners.	A parallel or forward approach CFS shall be provided.
Sink	A forward approach CFS with knee and toe clearance shall be provided. Sink height shall be 34" max above the floor	A forward approach CFS with knee and toe clearance shall be provided. Sink height shall be 34" max above the floor	A parallel approach CFS centered on sink shall be provided
Work Surface	30" min length at 28" min and 34" max height with a forward approach CFS if cooktop or range is provided	30" min length at 34" max height with a forward approach CFS or adjustable counter if cooktop or range is provided. Cabinetry is permitted below if requirements are met	Not Required
Refrigerator/ Freezer	CFS complying with §305	CFS complying with §305	A parallel approach CFS shall be provided. The center of the CFS can be offset 24" max from the center of the appliance.

ACCESSIBLE AND TYPE A UNITS
A clear floor space complying with Section 305 shall be provided at each kitchen appliance. All appliance controls shall comply with Section 309.

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ACCESSIBLE, TYPE A, TYPE B, AND TYPE C UNITS
U-SHAPED KITCHENS AND KITCHENETTES

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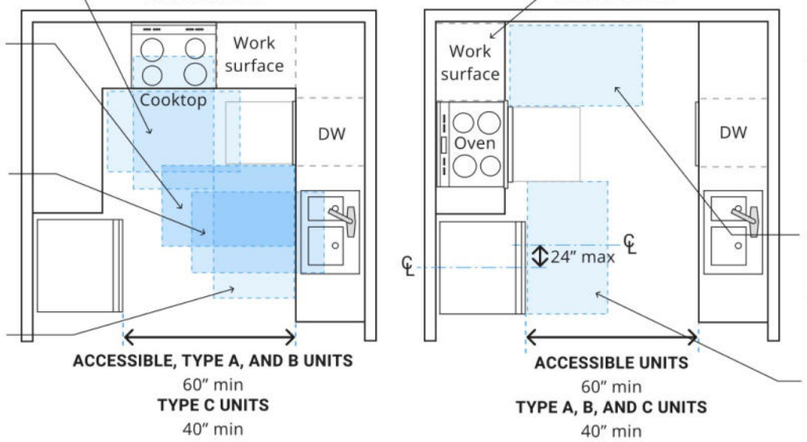
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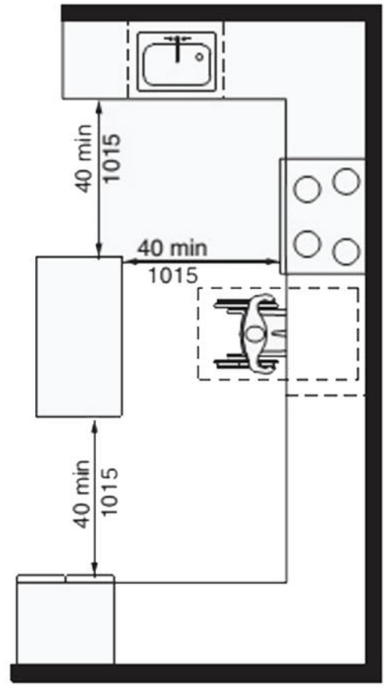
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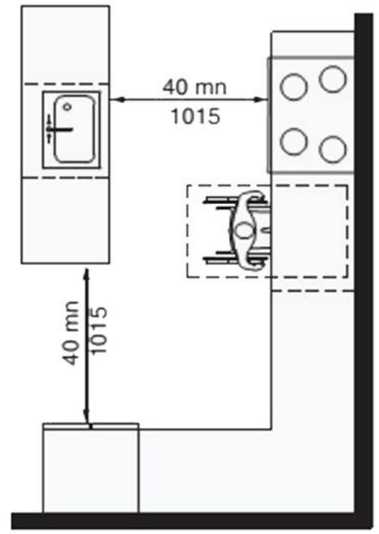
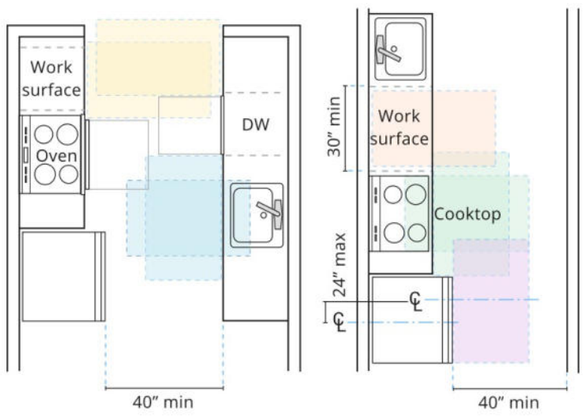


FIGURE 804.2.2(C)
U-SHAPED KITCHEN CLEARANCE - EXCEPTION

ACCESSIBLE, TYPE A, TYPE B, AND TYPE C UNITS
PASSTHROUGH KITCHENS AND KITCHENETTES



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