Tara Meredith

From: Scott Farmer
Sent: Thursday, September 3, 2026 8:52 AM
To: Tara Meredith; Sandy Harris
Subject: FW: EXTERNAL: suggestions for the application and construction document phases

From: Mike Riley <mriley@martinriley.com>
Sent: Wednesday, September 2, 2026 5:05 PM
To: Scott Farmer <bsfarmer@nchfa.com>
Subject: RE: EXTERNAL: suggestions for the application and construction document phases

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My team and I went through the latest Appendix B and really except for issues regard the type "a" units there isn't a whole lot to request modifications to. Accessibility suggestions will follow in a separate email. Mine are the brief ones. The more thorough ones are Laney's.

II. BUILDING AND UNIT DESIGN PROVISIONS
C. Interior Design and Materials
Item 4 — Carpet Specifications for Type A Units

- Proposed Revision: Clarify allowed carpet and padding specifications to permit high-density, crush-resistant padding specifically engineered for rolling loads in Type A units.
- Suggested Text:

"Carpet and pad must meet FHA minimum standards. Carpets in Type A units must either be glue-down type without padding or installed with a crush-resistant, high-density carpet cushion (such as heavy-density synthetic rubber or high-density polyurethane foam) designed to support concentrated rolling loads without deforming. Maximum carpet pile height allowed is 1/2 inch (13 mm), measured from the backing/pad to the top of the pile."

- RATIONALE: Standard carpet pads allow wheelchair wheels to sink, creating significant physical resistance for residents. High-density rubber or polyurethane cushions provide slight foot-traffic comfort while staying firm under concentrated wheel weight, keeping the surface flat and compliant with accessibility goals.

III.A.4 water heaters not allowed under air handlers. We use a thru wall air handler and even with todays bigger low boy water heaters we have the height to stack them with the 9' ceiling heights we call for. Is there another reason that the agency has for not allowing this configuration?

III.B.1 with the continuing evolution of phone and cable systems it really isn't necessary to provide dedicated boxes for each room. A main connection for each is really all that is required. What we are doing in on our market rate projects is just getting both into the unit and providing USB charging connections in the living or kitchen, and the bedrooms.

III.B.15 We like to put the dehumidifier connection on the same circuit as the refrigerator which can prevent the resident from turning off the dehumidifier. Our electrical engineer's have not objected.

III.C.14 dryer vent runs, although the NC Mechanical Code lists the allowable run to still be only 35' there any, unless they are super old, dryers that cannot well exceed that length and the code has an allowance for that. The code section is at the bottom of this email. In most cases we can meet the dated 35' max run. But in those rare cases where it is not possible/practical we would like to ability to follow 504.8.5 below.

IV. COMMON AREA AND SITE AMENITY PROVISIONS
Required Site Amenities — Senior Housing

- Proposed Revision: Expand the Senior Required Amenity options to include a Picnic Pavilion as an equivalent alternative to a Gazebo or Screened Porch.
- Suggested Text:

"Senior Required Amenities: Gazebo, Screened Porch, or Picnic Pavilion with covered seating."

- RATIONALE: Picnic pavilions provide shade and gathering space that senior residents often use more frequently than a Gazebo.

IV.F.1 I believe the agency is seeing a lot of requests for a lower parking requirement in urban areas. While I think the upcoming (2027) state's elimination of minimum parking restrictions is not really wise, but a reduction in parking requirements for urban projects down to 1.5 spaces per unit should be viable. Then keeping the non-urban areas at 1.75.

There are a couple items that are purely about cost.

Ducting the range hoods. Where allowed I have gone to kitchen area fans vs ducting the hood/micro. The rating requirements are not as difficult. And I never been a fan of fire getting up into the ducts no matter how they are protected.

No duct board allowed for plenums and mixing boxes, metal of course is more expensive and unusual in the multifamily market.

One other general item Laney mentioned, particularly valid if the agency is going to do an overhaul on the Appendix B, would be to provide a draft version showing the changes like is usually done with the QAP itself.

Again really not a lot of items and hopefully not controversial. The next email on accessibility items will be controversial.

Thanks again for this opportunity.
M

Taken from the NC 2018 Mechanical Code

CHAPTER 5 EXHAUST SYSTEMS

504.8.5 Length identification.

Where the exhaust duct equivalent length exceeds 35 feet (10 668 mm), equivalent length of the exhaust duct shall be identified on a permanent label or t The label or tag shall be located within 6 feet (1829 mm) of the exhaust d connection.

1. Labels shall be permanently stenciled, laminated, or commercially availa plastic or metal tags.
2. Labels shall state, at a minimum (fill in the blank):

   Caution: Equivalent length ____ feet. Any installed dryer must be equip with an exhaust system that meets or exceeds this equivalent len requirement.
3. Labels can be attached to wall or vent receptor.

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
Director/CEO
Martin Riley Associates- Architects P. C.
100 Crescent Centre Parkway, Suite 220
Tucker, GA 30084
~~404-373-2800 Ext. 102~~
Cell 404-922-8250
mriley@martinriley.com
www.martinriley.com

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