

## **EXHIBIT AA**

### **SC Housing Accessibility Consultant Qualifications and Requirements**

A Qualified Accessibility Consultant is any individual who possess the required knowledge to inspect multifamily properties for compliance with all federal, state and agency accessibility requirements and meets the following experience requirements and qualifications:

1. The Consultant will perform tasks necessary to review LIHTC and/or other SC Housing federally funded properties for compliance with federal, state, and agency accessibility laws and requirements, including, but not limited to:
  - a. Title II and III of the Americans with Disabilities Act and all applicable compliance standards.
  - b. Section 504 of the Rehabilitation Act of 1973 and all applicable compliance standards.
  - c. The Fair Housing Act and all applicable compliance standards.
  - d. The requirements of the SC Housing Qualified Allocation Plan (QAP) applicable to the Project and the SC Housing Appendix B Development Design Criteria.
  - e. Any other accessibility laws and regulations applicable to the project.
2. Consultant cannot be a member of the Project Team nor have an Identity of Interest with any member of the Project Team.
3. Consultant has the capacity to render a high quality report in accordance with the instructions and requirements set forth in the SC Housing Certification of Minimum Scope and Reporting Standards.
4. Consultant has no less than five (5) years of experience performing accessibility compliance assessments for affordable rental housing projects.
5. Consultant is not presently debarred, suspended, proposed for debarment or suspension, declared ineligible or excluded from participation by any state or federal department, agency, or program.
6. Consultant agrees to comply with all applicable laws, including, but not, limited to federal, state and local laws, codes, regulations, ordinances, rules and orders, including all laws concerning fair housing and equal opportunity that protect individuals and groups against discrimination on the basis of race, color, national origin, religion, disability, familial status, or sex.
7. Consultant agrees to comply with the SC Illegal Immigration Reform Act, Title 8, Chapter 14 of the S.C. Code, and any other applicable state or federal immigration laws. Consultant must be registered with and using E-Verify.
8. Consultant agrees to comply with Drug Free Workplace requirements:
  - a. If Consultant is an individual, he or she must not engage in the unlawful manufacture, sale distribution, dispensation, possession or use of controlled substance or marijuana during the performance of accessibility compliance services.
  - b. If Consultant is an entity other than an individual, the entity certifies that a drug-free workplace will be provided for the Consultant's employees during the performance of accessibility compliance services.
9. Consultant shall carry the minimum insurance coverage as required by current industry standards. The developer who contracts with Consultant will bear the responsibility of verifying the insurance coverage and determining its adequacy.

#### **Qualification Package**

The following information must be included with this certification in the order shown and numbered as follows (please scan each document separately):

1. Cover Letter: A cover letter which provides the company name, mailing address, contact name, telephone number, and email address of the individual to whom SC Housing may communicate regarding the Qualifications Package.

2. References: Three current customer references for accessibility reviews must be included. Of special interest to SC Housing are any customer references from multi-family housing developers, state or local housing agencies and/or financial institutions. Please provide the customer reference contact person's name and telephone number.
3. Resumes: Copies of resumes for all proposed individuals who will be working directly on the inspections. (Resumes should include any and all trainings and certifications related to accessibility).
4. Report Samples: At least two samples of accessibility reports (one for new construction, one for substantial rehabilitation) that your firm recently completed for a multi-family housing development.
5. Project List: A listing of multi-family rental housing projects on which the Consultant has performed accessibility reviews. This listing should indicate the project name, number of units, proposed tenancy (senior, family or 'other'), source of financing and whether the project was assisted with government funding.

### **Minimum Scope and Reporting Standards**

The following identifies the minimum accessibility work scope and reporting standards:

#### Plans and Specification Review Report

Scope: A pre-construction plan and specification review to determine that the proposed construction documents will meet all accessibility requirements.

Reporting: Include the following minimum standards in the report:

1. Identify all applicable federal, state, and agency accessibility laws and requirements.
2. Include the documents reviewed.
3. The review comments from the Consultant, all documents related to resolution of identified accessibility issues.
4. Certification from the Consultant that the plan/spec review comments have been incorporated in the construction documents.

#### Framing Inspection (and additional needed interim inspections) Report

Scope: An inspection of the construction site after framing is completed to determine that the property is following the approved plans and specifications as to accessibility.

Reporting: Include the following minimum standards in the report:

1. Identify all applicable federal, state, and agency accessibility laws and requirements.
2. Description of the general progress of construction activities.
3. Description of the level of compliance with accessibility achieved to date.
4. Details on all areas of inconsistencies, including areas where the project is out of compliance with federal and state laws and regulations.
5. Recommendations that would bring the project in compliance with accessibility regulations
6. Photographs representative of situations that must be addressed.

## Final Inspection Report

Scope: A final inspection of the property after completion of construction to determine that the property has been constructed in accordance with all accessibility requirements. This will include inspection of:

1. All units designated equipped for the mobility impaired (5% of the project unit count).
2. All units designated equipped for the audio/visual impaired (2% of the project unit count).
3. Where applicable, a random sample of 5% of the units required to comply with the Federal Fair Housing Amendments Act.
4. Overall review of the site for accessibility.

Reporting: Include the following minimum standards in the report:

1. Identify all applicable federal, state, and agency accessibility laws and requirements.
2. Information outlined in the Exhibit DD SC Housing Final Accessibility Inspection Checklist.
3. Details on all areas of inconsistencies, including areas where the project is out of compliance with federal and state laws and regulations.
4. Recommendations that would bring the project in compliance with SC Housing, state, federal and industry standards.
5. Photographs representative of situations that must be addressed.

## Certificate of Accessibility Compliance

Scope: Following the final report after the general contractor and/or developer has had a reasonable opportunity to correct deficiencies; the Qualified Consultant will confirm that the corrections were executed properly.

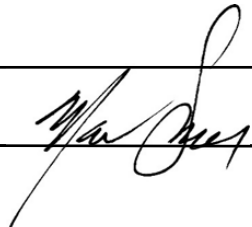
Reporting: The consultant must sign Exhibit EE SC Housing Consultant Accessibility Certification and return to the SC Housing Tax Credit Manager at Placed in Service.

NOTE: It is incumbent upon the Qualified Consultant to arrange enough visits with his client, the LIHTC Developer, to observe all areas of accessibility and to verify completion of recommended corrections.

Certification Statement: Consultant agrees to comply with all requirements as stated above.

Company Name: LCM Architects, LLC

Consultant Name: Mark Small Phone: 312-995-5328

Signature:  Date: 4-30-2025

# MCMILLAN PAZDAN SMITH ARCHITECTURE

## SOUTHERNSIDE WEST SC HOUSING ACCESSIBILITY CONSULTANT QUALIFICATIONS

May 1, 2025

### PRESENTED TO:

Rob Couch, Architect  
McMillan Pazdan Smith Architecture  
rcouch@mcmillanpazdansmith.com

### POINT OF CONTACT

Mark Small, Partner  
LCM Architects  
819 S. Wabash Ave.  
Fifth Floor  
Chicago, IL 60605  
312.995.5328  
msmall@lcmarchitects.com



LCM ARCHITECTS  
QUALIFICATIONS

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819 SOUTH WABASH AVE  
CHICAGO, ILLINOIS 60605 - 2153

312.913.1717 TEL  
312.913.1727 FAX  
WWW.LCMARCHITECTS.COM



May 1, 2025

Re: McMillan Pazdan Smith Architecture, Southernside West,  
SC Housing Accessibility Consultant Qualifications

To Mr. Couch,

Established in 1996 to provide accessibility consulting and traditional architectural services, LCM has a staff of 58 people, which includes licensed architects, project managers, and business professionals. Over 60 percent of our staff has an interest in and dedication to accessibility services, helping clients to navigate the complexities of federal, state, and local accessibility regulations. Because of our size, experience, and diversity, we are able to perform a broad range of accessibility work, from serving as expert witnesses, to the management of nationwide accessibility consulting projects involving thousands of sites. LCM has been honored to serve as an accessibility consultant for owners, developers, and architects and we are eager for the opportunity to put our experience and skills to work with McMillan Pazdan Smith Architecture on the Southernside West project.

Should you have any questions regarding our accessibility services please do not hesitate to contact me directly at 312.995.5328 or by email at msmall@lcmarchitects.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Small", written over a light blue horizontal line.

Mark Small  
Partner

ARCHITECTURE  
ACCESSIBILITY CONSULTING  
INTERIOR ARCHITECTURE  
PLANNING

## REFERENCES

### **HINES**

Chuck McNabney  
Vice President of Construction  
312.419.4932

*Services Provided:* plan/construction reviews, compliance letter services, and due diligence surveys.

### **FAIRFIELD PROPERTIES**

Mark Stewart  
Vice President - Design  
858.626.8343

*Services Provided:* Plan/construction reviews, and compliance letter services

### **CHARLAN BROCK & ASSOCIATES**

Mary Moltzan  
Principal  
312.513.2159

*Services Provided:* Plan reviews, and compliance letter services

## RESUMES

LCM has experienced professionals specializing in accessibility regulations in a range of facilities. Over 60% of our staff solely focuses on accessibility consulting

On the following pages you will find resumes for the FHA accessibility specialist staff assigned to this project. LCM has a bench of staff that can become involved based on schedule and priorities.

### PARTNER IN CHARGE

As **Partner in Charge, Mark Small** will provide project leadership to oversee the contractual and staffing needs to ensure project success while adhering to scope and budget. He will draw on his experience leading LCM's FHA team and his extensive knowledge of federal, state, and local accessibility standards, guidelines, and codes.

### ACCESSIBILITY SPECIALIST

An **Accessibility Specialist** provides **pre-construction and construction services** to owners, architects, and developers to assess for accessibility compliance with federal regulations along with the applicable state and local building codes. Responsibilities include review of plans, details, specifications, and product submittals to ensure regulatory compliance. At the client's request, accessibility specialists are available to conduct site visits and prepare reports during and after construction to verify compliance.





**Mark Small**  
Partner in Charge

#### PROFESSIONAL EXPERIENCE

Mark is the pillar of LCM's team specializing in Fair Housing Act (FHA) design and construction regulations. Under his leadership the FHA group has quadrupled in size since he joined LCM Architects in 2006. Drawing on his extensive knowledge of federal, state, and local accessibility standards, guidelines, and codes, Mark guides developers, architects, and contractors through the process and complexities of FHA accessibility requirements to help mitigate damaging and costly consequences of noncompliance. Delivering on a commitment to excellence and timely performance, Mark has secured a base of repeat and new clients that turn to LCM for guidance on accessibility issues for multifamily residential and hospitality projects throughout the U.S..

#### YEARS WITH LCM

18 years

#### EDUCATION

Limestone College, Bachelor of Studio Art

Kansas State University, Architecture Program

#### RELEVANT PROJECTS

**Hines** | AZ, CA, CO, CT, DC, FL, IL, MA, MD, MN, NY, OH, PA, TX, VA  
Accessibility consulting for 75+ multifamily developments since 2013.

**Greystar** | IL, NC, SC

Accessibility consulting services for multiple multifamily residential properties for leader in multifamily, active adult, and short-stay apartment development.

**Dinerstein** | AZ, CA, CO, FL, NC, SC, TN, TX

Accessibility consulting since 2019 for one of the nation's largest multifamily developers.

**Thompson Thrift (Watermark)** | AZ, CO, FL, ID, IN, MI, MO, NC, PA, SC, TN, TX

Accessibility consulting for 50+ projects since 2018, accessibility virtual and in-person training sessions.

**Charlan Brock Associates** | AL, AR, FL, KY, NC, OH, SC, TN, TX, VA

Since 2017 LCM has provided accessibility consulting for 100+ projects by firm specializing in mixed-use development design.

**Quarterra** | AZ, CA, FL, GA, IL, MN, SC

Accessibility consulting for 40+ multifamily residential properties over 10+ years.

**Fairfield Residential** | AZ, CA, CO, FL, GA, MD, OR, TX, VA, WA

LCM has completed plan and construction site reviews for 75+ new construction and renovation projects for Fairfield, a U.S. leader in residential development.

**Crescent Communities** | AZ, CO, FL, GA, NC, TN, TX, VA, Washington DC

Eighteen years providing FHA consulting through all phases of 90+ multifamily housing development projects.

**Morgan Group** | CO, FL, NC, TX

Accessibility consulting on 70+ projects since 2009 for developer of diverse housing portfolio.

#### SELECT ARCHITECTS

906 Studio  
Antunovich Associates  
Architects Orange  
BDE Architecture  
bKL  
Davis Carter Scott  
Dwell Design  
DLR Group  
FitzGerald Associates  
Gensler  
Goettsch Partners  
GREC  
Gresham Smith  
Hord Coplan Macht  
Hartshorne Plunkard  
Hickok Cole  
McMillan Pazdan Smith  
SCB  
Smith Gee Studio  
Studio 222 Architects



## Steven Montgomery AIA, RAS, LEED AP

Senior Associate  
Accessibility Specialist

### PROFESSIONAL EXPERIENCE

Steve's career of more than 30 years as an architect has concentrated on multifamily housing and residential senior care settings, fostering a deep appreciation for the social equity aspects of inclusive housing. A design background and exposure to a broad range of issues related to accessibility and inclusive design support Steve's recommendations for reasonable and appropriate solutions to issues as he reviews multifamily housing plans and construction sites for compliance with FHA regulations.

### RELEVANT PROJECTS

#### **Beach Company | SC**

Accessibility plan and construction site review for multiple multifamily residential properties.

#### **McMillan Pazdan Smith | SC**

Accessibility construction site reviews for multiple mid-rise, multifamily residential projects for Southeast regional housing architect.

#### **The John Buck Company | SC**

Accessibility compliance plan reviews and site reviews for multifamily properties for developer of residential, mixed-use, and commercial urban properties.

#### **Hines | CT, DC, TX**

Accessibility compliance plan reviews and site reviews for multiple multifamily residential properties; LCM has consulted on 75+ projects since 2013.

#### **Dinerstein | CO**

Accessibility compliance plan review for multiple multifamily residential projects; LCM has consulted with Dinerstein since 2019 on all phases of development.

#### **Crescent Communities | FL, GA, TN, TX**

Accessibility compliance plan reviews and site review for multifamily residential properties; LCM has worked with Crescent for 18 years on 90+ projects.

#### **SCB Architects | PA**

Accessibility compliance plan reviews for multifamily residential projects; LCM has consulted on 20+ multifamily projects by this high-density residential designer.

#### **bKL Architecture | FL**

Accessibility compliance plan review for multiple high- and mid-rise multifamily residential and mixed-use projects.

#### **Antunovich Associates | FL, IL, MD**

Accessibility compliance plan review for multifamily residential and mixed-use projects; LCM has consulted on over 25 projects for this Chicago-based architecture firm.

### YEARS WITH LCM

8 years

### EDUCATION

Ball State University, Bachelor of  
Architecture

### REGISTRATIONS

Licensed Architect, Illinois

Texas Registered Accessibility  
Specialist

LEED Accredited Professional

### AFFILIATIONS

American Institute of Architects

Pioneer Network Education Committee,  
2017 to present



**Teresita Pineda** ASSOCIATE AIA  
ICC Accessibility Inspector/Plan Examiner  
Associate | Accessibility Specialist

**PROFESSIONAL EXPERIENCE**

Teresita brings to LCM's FHA consulting group a multi-faceted building industry perspective. As an Accessibility Specialist she examines design and construction plans for accessibility compliance, provides guidance for corrective measures, produces field reports, and conducts site reviews to verify projects are being built according to compliant plans. With a degree in architecture, Teresita's prior experience with all aspects of multifamily residential development, design, and construction sparked her interest in the application of accessibility standards and codes to multifamily properties. Teresita is fluent in English and Spanish.

**RELEVANT PROJECTS**

**Beach Company | SC**

Accessibility plan and construction site review for multiple multifamily residential properties.

**Hines | AZ, CO, MD, NC, NE, OK, TX, Washington DC**

Accessibility compliance plan reviews and site reviews for multiple multifamily residential properties; LCM has consulted on 75+ projects since 2013.

**Crescent Communities | CO, FL, GA, NC, TN**

Accessibility plan and site reviews for multifamily properties for nationally recognized, mixed-use community developer, operator, and investor.

**McMillan Pazdan Smith | TN**

Accessibility plan and construction site reviews for mid-rise, multifamily residential projects for Southeast regional housing architect.

**Dinerstein | CO, TN, TX**

Accessibility plan reviews and site reviews for projects; LCM has consulted with Dinerstein since 2019 on all phases of development.

**Fairfield Residential | CA, FL, GA, TX, VA, WA**

Accessibility plan and site reviews for multifamily properties; LCM has completed over 75+ projects with Fairfield in new construction and renovation.

**Continental Properties | AZ, CO, MI**

Accessibility plan and site reviews for multiple projects; LCM has consulted on 90+ projects across the U.S. since 2018.

**Thompson Thrift Residential | CO, FL, MI, TX**

Accessibility compliance plan and construction site reviews for apartment and luxury leased homes developer; since 2019 LCM has consulted on 50+ projects.

**Dwell Design Studio | FL, GA, NE, OK, VA**

Accessibility compliance plan reviews for multiple residential projects; LCM has consulted on 30+ projects for this architect's multifamily portfolio.

**YEARS WITH LCM**

6 years

**EDUCATION**

Illinois Institute of Technology, Bachelor of Architecture

**CERTIFICATIONS & AFFILIATIONS**

International Code Council, Certified Accessibility Inspector/Plan Examiner

American Institute of Architects (AIA), Associate Member

## REPORT SAMPLES

On the following pages you will find two sample reports:

- New Construction Sample Report
- Substantial Rehabilitation Sample Report

SAMPLE REPORT  
NEW CONSTRUCTION

## FIELD REPORT

[illegible]

## Report Overview

This report documents LCM's observations of this project. LCM reviewed public areas, common-use areas, and dwelling units in various stages of construction. Requirements and violations are listed in standard text, and interpretations and recommendations, if noted, are listed in italicized text.

### **FHA Safe Harbor and Local Requirements**

This field survey report has been formatted to complement the Fair Housing Act Safe Harbor of the International Building Code 2015 with ANSI A117.1 2009, as well as the 2010 ADA Standards for Accessible Design.

This report has additionally been formatted to complement the local 2018 North Carolina Building Code Accessibility Requirements and Amendments to the International Building Code 2015, with ANSI A117.1 2009.

State and local building codes and accessibility codes provide additional accessibility requirements beyond the federal requirements of the FHA. State and local codes require that a portion of the dwelling units provided on the site be designed and constructed as ANSI Type A Dwelling Units, and that another portion be designed and constructed as ANSI Type B Dwelling Units. ANSI contains requirements that extend above and beyond the federal FHA requirements. It is important to note that jurisdiction (including interpretation and enforcement) of these local and state requirements rests with the local governing authority and not with the FHA.

Compliance to the local accessibility and building code requirements for the Type A and Type B Dwelling Units is generally reviewed by the local building department prior to issuance of a building permit, and again at near completion of construction for occupancy. Upon inspection for building occupancy, the local building inspector may provide additional requirements, interpretations, and exceptions for compliance to the local building/accessibility code. LCM recommends verifying with the Architect of Record if additional requirements, interpretations, or exceptions are provided by the local governing authority for ANSI Type A and Type B Dwelling Units.

#### **Fair Housing Act Applicability**

Since these buildings are elevator served, all units in all buildings are considered Covered Dwelling Units by the FHA. Additionally, all common-use areas for tenants and guests of tenants are covered by the FHA.

#### **Common Area and Public Area Overview**

During this field review, LCM observed and reviewed all available interior and exterior common-use areas and public areas, including the: Lobby, Mail Room, Micro Offices, Demonstration Kitchen, Toilet Rooms, Stretch and Spin Room, Fitness Room, Game Area, and the 4th floor Cocktail Lounge and related Covered Terrace. Sidewalks and Site Routes were reviewed where completed; primarily at Buildings 1, 2, and 3 and the pool deck.

The following areas were unavailable for review due to being not yet constructed or under active construction at the time of review: Pool and related amenities, Parking, and Tenant Storage, Sidewalks, and Site Routes.






### Dwelling Unit Overview

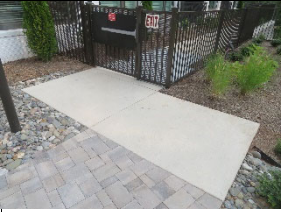



During this field review, LCM reviewed at least one of each unique type of covered dwelling unit type available within the project site for FHA accessibility compliance and local accessibility code requirements, if noted above. Even though only some of each unit type available were surveyed, all of the covered dwelling units for each of these unit types on the site must be checked for accessibility compliance for the deficient elements observed. Deficient elements shall be corrected to meet the FHA Safe Harbor and any local accessibility requirements for this project as noted above. Also, see section titled General Comments for typical issues or comments affecting multiple dwelling unit types.




Note: where "M" variations of a unit are noted below, they are considered to be the same unit plan as the base unit type for purposes of FHA compliance. Where available they were surveyed, but if not they are covered under the base unit type.








Unit Type	Unit Count	Min. Quantity to Survey Over Project Span	Actual Quantity Surveyed to Date	9-Feb-22	27-May-22	14-Dec-22	08.03.2023	<enter date of review>	<enter date of review>	<enter date of review>
S1	5	1	1	0	0	1	0			
S2	18	1	4	2	1	1	0			
S3	6	1	2	1	0	1	0			
A1,	77	5	7	1	1	3	2			
A1 TYPE A	3	1	2	0	1	1	0			
A1 M1	6	1	2	0	1	1	0			
A1 M2	4	1	2	0	1	1	0			
A1 M3	8	1	2	1	1	0	0			
A2	29	2	5	0	2	2	1			
A2 M1	3	1	0	0	0	0	0			
A2 M2	4	1	1	0	1	0	0			
A3	32	2	5	2	1	1	1			
A3 TYPE A	2	1	3	0	1	1	1			
A3 M1	2	1	1	1	0	0	0			
A3 M1 TYPE A	1									
A4	3	1	3	1	1	1	0			
A5	1	1	2	0	0	1	1			
B1	10	1	3	0	0	2	1			
B1 TYPE A	2	1	2	0	0	1	1			
B1 M1	19	1								
B1 M1 TYPE A	1	1								
B2	5	1	4	0	0	3	1			
B2 M1	13	1	1	0	0	0	1			
B2 M2	4	1	3	1	1	1	0			
B2 M3	34	2	4	0	2	2	0			
B2 M4	3	1								
B2 M5	1	1	1	1	0	0	0			
B2 M6	1	1	1	1	0	0	0			
TH2	4	1	0	0	0	NA	NA			
C1	3	1	3	1	1	1	0			
C1 TYPE A	1	1	2	1	1	0	0			
C2	9	1	2	0	0	1	1			
C2 M1	4	1								
C3	1	1	2	1	1	0	0			
C3 M1	1	1	2	1	1	0	0			
		0								
<b>Total:</b>	<b>320</b>	<b>41</b>	<b>72</b>	<b>16</b>	<b>19</b>	<b>26</b>	<b>11</b>			







#	Item	Field Condition	Photos	Requirement
<b>EV Charging Station</b>				
1	EV Charging Station	Verify that the screen (provided on the standard side of the station) is not required for the operation of the accessible charging station. If required and the screen is a touch-screen function, it must be located within an accessible reach range not exceeding 48" AFF.	 	ANSI 308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.
2	EV Charging Station Access Aisle	Cross slope at access aisle is greater than 2%.	 	ANSI 502.5 Parking spaces and access aisles shall comply with Section 302 and have surface slopes not steeper than 1:48. Access aisles shall be at the same level as the parking spaces they serve.
<b>Site Route and Amenities</b>				
3	Pet Waste Station	The bottom of the bag dispenser opening is located at 49 3/4" AFF.		ANSI 308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.

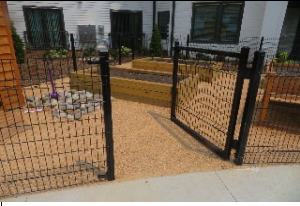
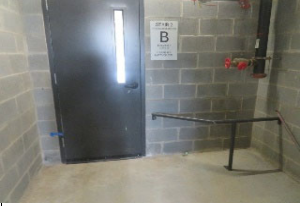



#	Item	Field Condition	Photos		Requirement
4	Pool Access Gate	The gate does not provide a smooth surface across the full width of the push side of the gate located 10" min. AFF.			ANSI 404.2.9 Door surfaces within 10 inches of the floor, measured vertically, shall be a smooth surface on the push side extending the full width of the door. Parts creating horizontal or vertical joints in such surface shall be within 1/16 inch of the same plane as the other. Cavities created by added kick plates shall be capped.
5	Hammock Location on Accessible Route	At least one hammock must be located on an accessible route.			ANSI 403.2 Floor surfaces shall comply with Section 302. ANSI 302.1 Floor surfaces shall be stable, firm, and slip resistant, and shall comply with Section 302. Changes in level in floor surfaces shall comply with Section 303.
6	Fire Pit Controls	Verify if fire pits are controlled by maintenance staff or tenants. If tenants are able to control the operation, all controls must be located within an accessible reach range. Of 15" min. t 48" max. AFF.			ANSI 308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.






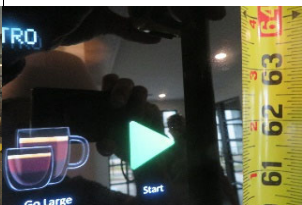
#	Item	Field Condition	Photos	Requirement
7	Pet Waste Station	Pet waste station is not located on an accessible route and the mounting height is too high at 49 1/4" to the bottom of the bag dispenser opening.		ANSI 308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.
8	Vertical Change in Level	The vertical change in level at the walk between Buildings 1 and 2 along King Closer drive is greater than 1/4" vertical and is not beveled.		ANSI 308.2.1 Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum above the floor.
9	Pet Waste Station	Pet waste station is not located on an accessible route and the mounting height is too high at 50 1/4" to the bottom of the bag dispenser opening.		ANSI 308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.

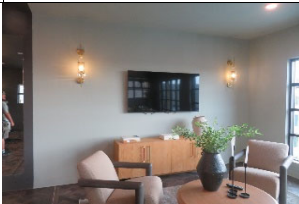

#	Item	Field Condition	Photos		Requirement
10	Door Maneuvering Clearance	Door at Building 2 (lower level) does not provide sufficient maneuvering clearance at the latch pull side. 14 1/2" is provided.			ANSI 404.2.3 Minimum maneuvering clearances at doors shall comply with Section 404.2.3 and shall include the full clear opening width of the doorway (60" min. perpendicular to the door and 18" min. beyond the latch side of the door). Required door maneuvering clearances shall not include knee and toe clearance.
11	Walking Trail	A portion of the walking trail should be made accessible (i.e. - paved to provide a stable, firm, and slip resistant surface).			IBC 2015 1110.2.3 In Group R-2 occupancies on a single site where multiple buildings containing Type A units or Type B units are served by recreational facilities, 25%, but not less than one, of each type of recreational facility serving each building shall be accessible.
12	Accessible Pedestrian Route to Trash Collection Area	Advisory: the trash/recycling collection area appears to be available for access by tenants and as such is required to be accessible by means of an accessible pedestrian route. If the collection area is locked/controlled by property management then this requirement would not apply.			IBC 2015 1104.2 At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site. Clear width of the exterior path of travel to be 48" min.
12	Accessible Garage Parking at Carriage Houses	Advisory: if parking in the garages located beneath the carriage house units is made available to any tenant on the site (rather than only tenants of the carriage units), then one of the garages must be accessible. Accessible garage parking must			IBC 2015 1106.2 Where parking is provided within or beneath a building, accessible parking spaces shall also be provided within or beneath the building,



#	Item	Field Condition	Photos	Requirement
		Area drain grates located in access aisles at the accessible parking are non-compliant. The openings are too large (1/2" max. is allowed) and because the access aisles are non-directional, the 1/2" limit applies in both directions.		ANSI 302.3 Openings in floor surfaces shall be of a size that does not permit the passage of a 1/2 inch diameter sphere. Elongated openings shall be placed so that the long dimension is perpendicular to the predominant direction of travel.
	Gate Surface	The gate does not provide a smooth surface across the full width of the push side of the gate located 10" min. AFF.		404.2.9 Door/gate surfaces within 10 inches of the floor, measured vertically, shall be a smooth surface on the push side extending the full width of the door. Parts creating horizontal or vertical joints in such surface shall be within 1/16 inch of the same plane as the other. Cavities created by added kick plates shall be capped.
	Accessible Route	Accessible maneuvering space is not provided at the door into the garden shed.		IBC 2015 1104.2 At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site. Clear width of the exterior path of travel to be 48" min.
	Accessible Route	An accessible route is not provided to the water spigot.		IBC 2015 1104.2 At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site. Clear width of the exterior path of travel to be 48" min.

#	Item	Field Condition	Photos	Requirement
	Accessible Route	Decomposed granite is not considered to be an accessible paving surface. An accessible route must be provided to at least one of each of the elements within the garden area (shed, water spigot, raised planting bed, etc.)		IBC 2015 1104.2 At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site. Clear width of the exterior path of travel to be 48" min.
<b>Interior Amenities and Spaces</b>				
	Ground Level Stairs	Stairs at the buildings include standpipe guards that overlap into the door maneuvering clearance. This is an issue only at pass through levels that can serve as an accessible route to the corridor of the entry level floor, since stairs to the upper floors are not considered accessible routes. The detectable guards need to be reduced so as to provide 12" min. clearance at the latch, push side of the door, extending back 48" from the face of the door or 18" on the latch, push side of the door, extending back 60" from the face of the door, as applicable.	 	ANSI 404.2.3 Minimum maneuvering clearances at doors shall comply with Section 404.2.3 and shall include the full clear opening width of the doorway (60" min. perpendicular to the door and 18" min. beyond the latch side of the door at the pull side and 48" min. perpendicular to the door and 12" min. beyond the latch at the push side of the door). Required door maneuvering clearances shall not include knee and toe clearance.
	Tenant Storage Rooms	Tenant storage locker rooms are to be accessible where the room provides accessible lockers.	 	IBC 1108.3 Self-service storage facilities shall provide accessible individual self-storage spaces in accordance with Table 1108.3: 1 to 200: 5% but not less than 1, over 200: 10, plus 2% of total number of units over 200. Accessible storage rooms must provide accessible routes into and out of the room, including a turning space and maneuvering clearances at the door. At least one accessible storage room should be provided in each building.

#	Item	Field Condition	Photos		Requirement
	Lobby Pendant Fixtures	Pendant fixtures extend beyond the table edge by more than 4" and are suspended at less than 80" AFF.			ANSI 307.2 Objects with leading edges more than 27 inches and not more than 80 inches above the floor shall protrude 4 inches maximum horizontally into the circulation path.
	Banquette Seating Outlets	Outlets are not within an accessible reach range. At least one banquette should provide an accessible outlet located at an end panel or adjacent wing wall.			308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.
	Banquette Table Access	The base of the table does not provide compliant knee and toe clearance to permit a forward approach.			306.2.3 Where toe clearance is required at an element as part of a clear floor space complying with Section 305, the toe clearance shall extend 17 inches minimum beneath the element.
	Coffee Machine	Operable parts of the touch screen exceed an accessible reach range.			308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.

#	Item	Field Condition	Photos		Requirement
	Wall Sconces	Sconces are protruding objects and do not provide a cane detectable surface below.			308.3.1 Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches maximum from the element, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the floor.
Refer to separate document (2023.08.17 LCM Response to Report 3 Correction Photos 4.12.23) for additional issues and responses pertaining to the status of deficiencies cited in FHA Field Report #3.					





# Dwelling Unit

Building 4


Unit # 117

Unit Type A1

Status Final Finishes

Notes \_\_\_\_\_

<b>FHA Safe Harbor</b> IBC 2015 with ANSI A117.1 2009 (Type B)
<b>Local Code(s)</b> NCBC 2018 with ANSI A117.1 2009 (Type B)

Unit Status		Key
No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.		<b>Advisory</b> - Potential non-compliance alert

# Dwelling Unit

Building 4

Unit # 121

Unit Type A1

Status Final Finishes

Notes \_\_\_\_\_

## FHA Safe Harbor

IBC 2015 with ANSI A117.1 2009 (Type B)

## Local Code(s)


NCBC 2018 with ANSI A117.1 2009 (Type B)

## Unit Status

## Key

No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.	◀	<b>Advisory</b> - Potential non-compliance alert

## ▼ Bathroom

Item #	Con- dition	Observation	Photos	Requirement
<b>Shower:</b> Size (36"x36" Minimum)				ANSI 2009: 1004.11.3.1.3.3
121-1	Not OK	Finished shower depth measures 35".		When a shower is the only bathing fixture in the dwelling unit, then it shall have the finished dimensions of 36" minimum in width and 36" minimum in depth.



# Dwelling Unit

Building 4


Unit # 212

Unit Type A2

Status Final Finishes

Notes \_\_\_\_\_

<b><u>FHA Safe Harbor</u></b> IBC 2015 with ANSI A117.1 2009 (Type B)
<b><u>Local Code(s)</u></b> NCBC 2018 with ANSI A117.1 2009 (Type B)

Unit Status		Key
No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.		<b>Advisory</b> - Potential non-compliance alert

# Dwelling Unit

Building 4

Unit # 5

Unit Type A3, TYPE A

Status Final Finishes

Notes \_\_\_\_\_

## FHA Safe Harbor

IBC 2015 with ANSI A117.1 2009 (Type B)

## Local Code(s)

NCBC 2018 with ANSI A117.1 2009 (Type A)

## Unit Status

No issues observed in covered unit at time of review.

Not all requirements appear to have been met in the covered unit at time of review.

## Key

**Not OK** - Does not comply with Required Standard



**Advisory** - Potential non-compliance alert



## ▼ Controls

Item #	Con- dition	Observation	Photos	Requirement
Switch Heights				
ANSI 2009: 1003.9, 309.2, 309.3, 308				
5-1	Not OK	The switch located inside the laundry closet is not provided with an adjacent clear floor space and the height of the appliance exceeds the 34" limit for a compliant side reach range.		Light switches and electrical switches shall be positioned within an accessible reach range. When a clear floor space is unobstructed and positioned for a forward or parallel approach, the switch shall be positioned 15" minimum to 48" maximum above the finish floor. ANSI 2009 measures this to the operable parts of the switch.

## ▼ Windows, Laundry, and Storage


Item #	Con- dition	Observation	Photos	Requirement
Storage Facilities: In Accessible Reach Range				
ANSI 2009: 1003.14, 905.3				
5-2	Not OK	The lowest rod and shelf are located higher than 48" AFF.		ANSI Type A Requirements: ■ Where storage facilities are provided, at least one of each type shall provide storage elements within an accessible reach range of 15" to 48" above the finish floor when provided with an unobstructed approach.

## ▼ Type A Bathroom


Item #	Con- dition	Observation	Photos	Requirement
<b>Lavatory:</b> Removable Base Cabinet				ANSI 2009: 1003.11.2.2 Exception
5-3	Not OK	A removable base cabinet is not provided. Only the doors are removable, which leaves a side panel that does not provide knee and toe clearances where it overlaps the required maneuvering space at the water closet. Pipe protection and finished flooring is not provided.		Cabinetry shall be permitted under the lavatory, provided the cabinetry can be removed without removal or replacement of the lavatory, the floor finish extends under the cabinetry, and the walls behind and surrounding the cabinetry are finished. Any supporting bracket that remains following removal of the base cabinet must comply with knee and toe clearance profiles defined in ANSI 306.
<b>Water Closet:</b> Flush Controls				ANSI 2009: 1003.11.2.4.6, 309, 308
5-4	Not OK	The flush valve is located on the wrong (far) side of the fixture.		<p>ANSI Type A Requirements:</p> <ul style="list-style-type: none"> <li>■ Flush controls shall be hand-operated or automatic.</li> <li>■ Hand operated flush controls shall be provided with a clear floor space, and shall be positioned within an accessible reach range.</li> <li>■ Operable parts of controls shall be operable with one hand, and shall not require tight grasping, pinching, or twisting of the wrist.</li> <li>■ The force required to operate flush hardware shall be 5 pounds maximum.</li> <li>■ Hand-operated flush controls shall be located on the open side of the water closet.</li> </ul>



## Bathtub: Hand Shower

ANSI 2009: 1003.11.2.5.1, 607.6

5-5	Not OK	A hand shower is not provided.		<p>ANSI Type A Requirements:</p> <ul style="list-style-type: none"> <li>■ A hand shower with a hose 59" minimum in length, that can be used as both a fixed shower head and as a hand shower, shall be provided.</li> <li>■ The hand shower shall have a control with a nonpositive shut-off feature.</li> <li>■ Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as not to obstruct the use of grab bars.</li> <li>■ The hand shower shall be positioned within an accessible reach range - for example, between 15" and 46" above the finish floor when positioned between 10" and 24" horizontally from the bathtub clearance.</li> </ul>
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## ▼ Kitchen

Item #	Con- dition	Observation	Photos	Requirement
		<b>Receptacle: Accessible Reach Range</b>		ANSI 2009: 1003.9, 309, 308
5-6	Ad- visory	Countertop is 25" deep. Local building code issue.		<p>Accessible electrical outlets shall be positioned within an accessible reach range. When an obstructed clear floor space is positioned for a parallel approach beside an obstruction (such as a base cabinet and countertop) measuring 24" maximum deep and 34" maximum in height, the receptacle shall be positioned maximum 46" above the finish floor, measured to the highest operable part.</p> <p>If a receptacle is positioned within a "dead corner" (the intersecting section of countertops in a kitchen corner), that receptacle is not in an accessible reach range.</p>

Switches: Accessible Reach Range			ANSI 2009: 1003.9, 309, 308		
5-7	Advisory	Countertop is 25" deep. Local building code issue.			<p>Switches shall be positioned within an accessible reach range. When an obstructed clear floor space is positioned for a parallel approach beside an obstruction (such as a base cabinet and countertop) measuring 24" maximum deep and 34" maximum in height, the switch shall be positioned maximum 46" above the finish floor, measured to the highest operable part.</p> <p>If a switch is positioned within a "dead corner" (the intersecting section of countertops in a kitchen corner), that switch is not in an accessible reach range.</p>

Building 4

Unit # 123

Unit Type A3

Status Final Finishes

Notes \_\_\_\_\_

**FHA Safe Harbor**

IBC 2015 with ANSI A117.1 2009 (Type B)

**Local Code(s)**

NCBC 2018 with ANSI A117.1 2009 (Type B)

**Unit Status**

**Key**

No issues observed in covered unit at time of review.


**Not OK** - Does not comply with Required Standard

Not all requirements appear to have been met in the covered unit at time of review.



**Advisory** - Potential non-compliance alert

## ▼ Bathroom

Item #	Con- dition	Observation	Photos	Requirement
<b>Shower:</b> Size (36"x36" Minimum)				ANSI 2009: 1004.11.3.1.3.3
123-1	Not OK	Finished shower depth measures 35".		When a shower is the only bathing fixture in the dwelling unit, then it shall have the finished dimensions of 36" minimum in width and 36" minimum in depth.





# Dwelling Unit

Building 4


Unit # 130

Unit Type A5

Status Final Finishes

Notes \_\_\_\_\_

<b><u>FHA Safe Harbor</u></b> IBC 2015 with ANSI A117.1 2009 (Type B)
<b><u>Local Code(s)</u></b> NCBC 2018 with ANSI A117.1 2009 (Type B)

Unit Status		Key
No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.		<b>Advisory</b> - Potential non-compliance alert

# Dwelling Unit

Building N/A

Unit # 214

Unit Type B1-TYPE A

Status Final Finishes

Notes \_\_\_\_\_

## FHA Safe Harbor

IBC 2015 with ANSI A117.1 2009 (Type B)

## Local Code(s)



NCBC 2018 with ANSI A117.1 2009 (Type A)

## Unit Status


## Key

No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.	◀	<b>Advisory</b> - Potential non-compliance alert


## ▼ Accessible Doors and Interior Route

Item #	Con- dition	Observation	Photos	Requirement
<b>User Passage Doors: Maneuvering Clearance</b>				ANSI 2009: 1003.5, 404.2.3
214-1	Not OK	The Hall Bathroom door does not provide maneuvering clearance at the hall side (door swing was reversed from the original floor plan). Clearance is not required at the bathroom side due to an exception for non-spec bathrooms.		ANSI Type A Requirements: Door maneuvering clearance shall be provided on both sides of dwelling unit interior user passage doors. The pull-side front-approach clearance shall include the width of the door, plus 18" minimum parallel to the door beyond the latch, and shall extend 60" minimum back, perpendicular to the door.
<b>Balcony/Patio Doors: Hardware</b>				ANSI 2009: 1003.5, 404.2.6
214-2	Not OK	The lock is a thumb turn style which is not compliant because it requires pinching and twisting to operate. A push button or off-set pivot dead bolt or similar is recommended.		ANSI Type A Requirements: ■ Handles, pulls, latches, locks, and other operable parts on accessible doors shall have a shape that is easy to grasp with one hand, and does not require tight grasping, pinching, or twisting of the wrist to operate. Operable parts of such hardware shall be positioned 34" minimum to 48" maximum above the finish floor.

## ▼ Windows, Laundry, and Storage

Item #	Con- dition	Observation	Photos	Requirement
<b>Storage Facilities:</b> In Accessible Reach Range			ANSI 2009: 1003.14, 905.3	
214-3	Not OK	The lowest rod and shelf are located higher than 48" AFF at 49 7/8" to top of shelf.		<p>ANSI Type A Requirements:</p> <ul style="list-style-type: none"> <li>Where storage facilities are provided, at least one of each type shall provide storage elements within an accessible reach range of 15" to 48" above the finish floor when provided with an unobstructed approach.</li> </ul>

## ▼ Type A Master Bathroom


Item #	Con- dition	Observation	Photos	Requirement
<b>Lavatory:</b> Forward Approach Clear Floor Space with Knee and Toe Clearance			ANSI 2009: 1003.11.2.2, 606.2	
214-4	Not OK	Protection panel only provides 5 3/4" depth at 27" AFF and 9 3/4" depth at 9" AFF.		<p>ANSI Type A Requirements:</p> <ul style="list-style-type: none"> <li>At least one lavatory shall be provided with a minimum 30"x48" clear floor space, positioned for a forward approach.</li> </ul> <p>A forward approach clear floor space requires that accessible knee and toe clearance be provided beneath the lavatory. Toe clearance shall extend a minimum of 17" horizontally beneath the sink, and between the floor and 9" above the floor vertically. Knee clearance shall extend 11" minimum in depth at 9" above the floor, and 8" minimum in depth 27" above the floor. Knee clearance shall be 30" minimum in width.</p>

## Lavatory: Removable Base Cabinet

ANSI 2009: 1003.11.2.2 Exception


214-5	Not OK	A removable base cabinet is not provided. Only the doors are removable, which leaves a side panel that does not provide knee and toe clearances where it overlaps the required maneuvering space at the water closet.		Cabinetry shall be permitted under the lavatory, provided the cabinetry can be removed without removal or replacement of the lavatory, the floor finish extends under the cabinetry, and the walls behind and surrounding the cabinetry are finished. Any supporting bracket that remains following removal of the base cabinet must comply with knee and toe clearance profiles defined in ANSI 306.
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## ▼ Kitchen

Item #	Con- dition	Observation	Photos	Requirement
<b>Sink: Knee and Toe Clearance</b>				ANSI 2009: 1003.12.4.1, 306
214-6	Not OK	Vertical toe clearance is 7 3/8" AFF at the bottom of the protection panel. 9" min. is required.		<ul style="list-style-type: none"> <li>■ When a forward approach clear floor space is provided, an accessible knee and toe clearance is required.</li> <li>■ Toe clearance shall extend a minimum of 17" horizontally beneath the sink, between the floor and 9" above the floor vertically.</li> <li>■ Knee clearance shall extend 11" minimum in depth at 9" above the floor, and 8" minimum in depth to 27" above the floor.</li> <li>■ Knee and toe clearance shall be 30" minimum in width.</li> </ul>


**Receptacle: Accessible Reach Range**

ANSI 2009: 1003.9, 309, 308

214-7	Advisory	Countertop is 25 1/4" deep. Local building code issue.		<p>Accessible electrical outlets shall be positioned within an accessible reach range. When an obstructed clear floor space is positioned for a parallel approach beside an obstruction (such as a base cabinet and countertop) measuring 24" maximum deep and 34" maximum in height, the receptacle shall be positioned maximum 46" above the finish floor, measured to the highest operable part.</p> <p>If a receptacle is positioned within a "dead corner" (the intersecting section of countertops in a kitchen corner), that receptacle is not in an accessible reach range.</p>
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**Switches: Accessible Reach Range**

ANSI 2009: 1003.9, 309, 308

214-8	Advisory	Countertop is 25 1/4" deep. Local building code issue.		<p>Switches shall be positioned within an accessible reach range. When an obstructed clear floor space is positioned for a parallel approach beside an obstruction (such as a base cabinet and countertop) measuring 24" maximum deep and 34" maximum in height, the switch shall be positioned maximum 46" above the finish floor, measured to the highest operable part.</p> <p>If a switch is positioned within a "dead corner" (the intersecting section of countertops in a kitchen corner), that switch is not in an accessible reach range.</p>
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# Dwelling Unit

Building 4

Unit # 118

Unit Type B1

Status Final Finishes

Notes \_\_\_\_\_

## FHA Safe Harbor

IBC 2015 with ANSI A117.1 2009 (Type B)

## Local Code(s)

NCBC 2018 with ANSI A117.1 2009 (Type B)

## Unit Status

No issues observed in covered unit at time of review.

Not all requirements appear to have been met in the covered unit at time of review.


## Key

**Not OK** - Does not comply with Required Standard

**Advisory** - Potential non-compliance alert



## ▼ Kitchen

Item #	Con- dition	Observation	Photos	Requirement
<b>Kitchen Clearance:</b> 40" Minimum				ANSI 2009: 1004.12.1.1
118-1	Not OK	Opposing clearance measures 37 1/2" between the range and the island.		A clearance of at least 40" shall be provided between all opposing base cabinets, countertops, appliances, and walls.



# Dwelling Unit

Building 4


Unit # 208

Unit Type B2

Status Final Finishes

Notes \_\_\_\_\_

<b><u>FHA Safe Harbor</u></b> IBC 2015 with ANSI A117.1 2009 (Type B)
<b><u>Local Code(s)</u></b> NCBC 2018 with ANSI A117.1 2009 (Type B)

Unit Status		Key
No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.		<b>Advisory</b> - Potential non-compliance alert



# Dwelling Unit

Building 4


Unit # 209

Unit Type B2M1

Status Final Finishes

Notes \_\_\_\_\_

<b><u>FHA Safe Harbor</u></b> IBC 2015 with ANSI A117.1 2009 (Type B)
<b><u>Local Code(s)</u></b> NCBC 2018 with ANSI A117.1 2009 (Type B)

Unit Status		Key
No issues observed in covered unit at time of review.		<b>Not OK</b> - Does not comply with Required Standard
Not all requirements appear to have been met in the covered unit at time of review.		<b>Advisory</b> - Potential non-compliance alert



SAMPLE REPORT

SUBSTANTIAL  
REHABILITATION

## FIELD REPORT



Report Date:	06.11.2018
Site Visit Date(s):	05.29.2018 and 05.30.2018
Project:	[REDACTED] <b>Field Review #3</b> [REDACTED] 0265.0001.12
Location:	[REDACTED] [REDACTED]
Site Reviewed By:	Michael Grochola, LCM Architects
Report Prepared By:	Michael Grochola, LCM Architects
Copy to:	[REDACTED] [REDACTED] [REDACTED]

On May 29 and 30th, 2018, LCM Architects completed the third FHA Field Review of the [REDACTED] [REDACTED] Conversion, also known as the [REDACTED], in Chicago, IL. LCM surveyed the Dwelling Units in the finish stages of construction on the 1st, 2nd, and 3rd floors of the building, the pre-cabinet installation phase on the 4th floor, and the fixture installation phase on the 5th floor. Since this building will be elevator served, all of the units on all of the floors are considered covered dwelling units per the Chicago Building Code. This was the third site visit to this project, during which 35 dwelling units were surveyed, totaling 35 different unit types. Twenty-eight units were in the finish stage of construction, one in the pre-cabinet installation stage, and six units were in the fixture installation phase. Two units were occupied at the time of our review, these units will be reviewed at a future date.

Common and public areas of the building including the parking garage, leasing office, leasing office restroom, common use building corridors, and roof-top deck are either in the finish stages of construction or nearing completion. The main entrance, leasing center (employee) restroom, leasing center, mailbox area, corridors, bike room, and 5th floor amenity deck were reviewed at this time. In addition the surrounding exterior of the site including parking, site routes, and accessible entrances are in the finish stages of construction and were reviewed as well. Any remaining areas shall be reviewed in greater detail during the next field review.

#### Dwelling Unit Summary

During the field review site survey conducted by LCM on May 29 and 30, 2018, the majority of the covered dwelling unit types available within this residential project have been reviewed. Even though only one of each of the unit types available have been reviewed, all of the covered dwelling units for each of these unit types on the site shall be checked for accessibility compliance for the non-compliant elements observed. Non-compliant elements that are noted in this Field Report shall be corrected to meet the applicable accessibility codes.

Following is a list of the dwelling units surveyed:

Unit Type	Unit Count	Total # to Survey	Number Surveyed	06.28.2017	02.01-05.2018	05.29-30.2018
100/101 Type A	2	1	2		100, 101	100, 101
102 Type A	1	1	1		102	102
103 Type A	1	1	1		103	103
104 Type A	1	1	1		104	104
105 Type A	1	1	1		105	105
106 Type A	1	1	1		106	106
107 Type A	1	1	1		107	107
108 Type A	1	1			108	n/a
T01 Type A	2	1	1		301	301
T02	3	1	1		202	202
T03	2	1	1		203	203
T04	3	1	1	204	204	204
T05	3	1	1		305	205
T06	3	1	1	206	206	306
T07	1	1	1		n/a	307
T08	3	1	1	208	208	208
T09	3	1	1	209	209	209
T10	2	1	1	210	210	210
T11	3	1	1	211	211	311
T12	1	1	1		312	412
T13/T14	6	1	2		213, 214	213, 214
T15	3	1	1		215	215
T16	1	1	1		316	316
501	1	1	1		501	501
502 Type A	1	1	1		502	502
503	1	1	1		503	503
504	1	1	1		504	504
505	1	1	1		505	505
506	1	1	1		506	506
200/201	2	2	1		200, 201	200
207/407 Type A	2	1	1	207	207	207
212/312 Type A	2	1	1		212	212
216/416 Type A	2	1	1	216	216	216
310 Type A	1	1	1		310	310
403	1	1			403	Similar to Unit T03
<b>Total:</b>	<b>64</b>	<b>36</b>	<b>35</b>	<b>8</b>	<b>37</b>	<b>35</b>

The following field survey report has been reviewed to the local building code requirements for accessibility per the 2010 ADA Standards and Chicago Building Code Chapter 18-11 with ANSI A117.1-2003. In addition, the covered dwelling units, including Type A and Type B units have been reviewed for compliance with ANSI 2003, Sections 1003 and 1004. Photos of non-compliant elements cited during this review are available upon request.

#	Item	Comment	Photo #	Reference Standard
<b>General Statement on Code Requirements for Dwelling Units</b>				
	Statement on Local Building Code and Accessibility Code Requirements	<p>All covered dwelling units shall comply with the Chicago Building Code Chapter 18-11 with ANSI A117.1-2003, Sections 1003 and 1004. State and local codes require that a portion of the dwelling units provided on the site be designed and constructed as CBC/ANSI 2003 Type A Dwelling Units, and that another portion be designed and constructed as CBC/ANSI 2003 Type B Dwelling Units. Since the first occupancy of this building precedes the effective date of March 13, 1991, for FHA compliance this project is not covered by the Fair Housing Act (FHA). It is important to note that jurisdiction (including interpretation and enforcement) of the CBC/ANSI 2003 requirements rests with the local governing authority and not with the FHA.</p> <p>Compliance to the local accessibility and building code requirements for the Type A and Type B Dwelling Units is generally reviewed by the local building department prior to issuance of a building permit, and again at near completion of construction for occupancy. Upon inspection for building occupancy, the local building inspector may provide additional requirements, interpretations, and exceptions for compliance to the local building/accessibility codes. LCM recommends verifying with the Architect of Record if additional requirements, interpretations, or exceptions are provided by the local governing authority for ANSI Type A and Type B Dwelling Units.</p>		
<b>General Statement on Structural Impracticability and Technical Infeasibility</b>				
	Structural Impracticability & Infeasibility with Regards to Accessibility Code Requirements	<p>The first occupancy of this building precedes the effective date of March 13, 1991, for FHA compliance this project is not covered by the Fair Housing Act (FHA). Jurisdiction (including interpretation and enforcement) of the CBC/ANSI 2003 requirements for dwelling units and tenant common use spaces, for example, hallways to dwelling units, rests with the local governing authority and not with the FHA.</p> <p>Technical infeasibility is addressed within the Chicago Building Code Chapter 18-11, as an exception to the requirements of the accessibility code. LCM can not make the distinction regarding what is and is not technically infeasible on this project, LCM defers to the Architect of Record and Civil Engineer to determine infeasibility.</p>		
<b>Type A Unit Accessible Windows</b>				
	Accessible Windows: Operable Parts & Reach Range	<p>The operable parts on the newer windows and on the older windows require both hands to operate, and on the newer windows the mechanism for unlocking requires pinching to operate. At each window required to have operable parts, the operable parts shall be operable with one hand, and shall not require tight grasping, pinching, or twisting of the wrist. The force required to operate window hardware shall be 5 pounds maximum. The operable parts being installed on the newer windows and on the older windows require both hands to operate along with pinching to unlock.</p> <p>At each window required to have operable parts, the operable parts of the window hardware shall be positioned 15" minimum and 48" maximum above the finish floor height when accessed from an unobstructed clear floor space. When a clear floor space is positioned for a parallel approach beside an obstruction measuring 24" maximum deep and 34" maximum in height, then the operable part shall be positioned maximum 46" above the finish floor.</p> <p>This comment applies to all Type A dwelling units on this project. Please refer to comment above regarding structural impracticability &amp; technical infeasibility.</p>		CBC/ANSI 2003: 1003.13, 1003.9, 309

#	Item	Comment	Photo #	Reference Standard
<b>Type A Unit Kitchens</b>				
G1	Accessible Work Surface: Clear Floor Space	The CBC/ANSI Type A requirement states that a 30" x 48" min clear floor space shall be positioned for a forward approach at the work surface. The clear floor space at the work surface measured less than 30" min in clear width, with the work surface width typically measuring 28 1/2" wide in between the cabinet panels, in some cases 22 1/2". In order to be accessible, 30" min clear width shall be provided for a forward approach.		CBC/ANSI 2003: 1003.12.3.1
<b>Type A Unit Accessible Bathrooms</b>				
G2	Lavatory Exposed Pipes and Surfaces	No insulation or pipe protection was provided underneath the lavatory. The water supply and drainpipes under the lavatory within the accessible Type A bathroom shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.		CBC/ANSI 2003: 1003.11.5
G3	Tub Handshower: Non-Positive Shut Off	A hand shower with a hose 59" minimum in length that can be used as both a fixed shower head and as a hand shower, shall be provided. The hand shower shall have a control with a non-positive shut-off feature, this is any control that can turn off the flow of water.		CBC/ANSI 2003: 1003.11.8, 607.6

#	Item	Field Condition	Requirement	Photo #	Reference Standard
<b>General Statement on Technical Infeasibility in Existing Buildings</b>					
	Technical Infeasibility with Regards to 2010 ADA Standards	Technical infeasibility is addressed within the 2010 ADA Standards, Chapter 2 Scoping Requirements. Per Section 202.3, Existing Buildings and Facilities Alterations, it reads that "in alterations, where compliance with applicable requirements is technically infeasible, the alteration shall comply with the requirements to the maximum extent feasible." LCM recommends verifying with the Architect of Record on whether or not an item is technically infeasible to meet accessibility requirements.			
<b>Accessible Site Routes</b>					
	Floor Surface at Expansion Joints in Sidewalk	<p>At the sidewalk located in front of the west side of the building, leading from Kenmore Avenue to Sunnyside Avenue, there are numerous expansion joints between the sidewalk slabs that are filled with a gravel, dirt, and rock fill.</p> <p>At the time of our review this fill between joints was relatively stable. However the material appears to be one that can erode or wash away. If that were to occur the route would no longer be a stable, firm, slip-resistant surface. If this material were to wash away, these joints between slabs would be greater than 1/2" in width and not be accessible.</p>	<p>Floor and ground surfaces shall be stable, firm, and slip-resistant. Materials like loose gravel and natural grass are not accessible floor surfaces.</p> <p>Openings in floor or ground surfaces shall not allow the passage of a sphere more than 1/2" in diameter.</p>		ADA 2010: 302.1, 302.3
<b>Accessible Parking - Tenant Parking</b>					
	Slope at Accessible Parking	The accessible parking spaces and access aisles provided in the parking lot were measured as having a surface running slope between 3.2% and 6%, which is not accessible.	Accessible parking spaces and access aisles shall have a surface slope no steeper than 1:48.		ANSI 2003: 502.5, 503.4
<b>Accessible Parking - Leasing Center Parking</b>					
<p>It was discussed in the field that a total of 3 spaces will be provided for leasing center guests and visitors within the parking lot. Based on this number, a total of 1 van accessible space and access aisle is required to be provided on the shortest accessible route to the building entrance. Either space #18 or #19 within the parking lot adjacent to the entrance walkway would be on the shortest accessible route, depending on which space is chosen, it shall meet the following accessibility comments for public parking.</p>					
	Slope at Accessible Parking	The accessible parking spaces and access aisles provided were measured as having a surface running slope between 3.2% and 6%, which is not accessible.	Accessible parking spaces and access aisles shall have a surface slope no steeper than 1:48.		ADA 2010: 502.4
	Van Accessible Parking Signage	No signage was provided designating the van accessible parking space.	The van accessible parking space shall have signage containing the designation "van accessible". Signs shall be 60" minimum above the finish floor of the parking space, measured to the bottom of the sign.		ADA 2010: 502.6

#	Item	Field Condition	Requirement	Photo #	Reference Standard
	Van Accessible Space and Access Aisle Width	Advisory: The accessible parking currently striped within the parking lot was measured at 132" in width for the spaces and 60" in width for the access aisles. This would meet van accessible parking requirements. If parking is re-striped, it would still need to meet these accessibility requirements.	Van accessible parking spaces shall be 132" minimum in width. Access aisles shall be 60" minimum in width.		ADA 2010: 502.2, 502.3
<b>North Entrance (Accessible Entrance)</b>					
	Door Vision Lights: Entrance Door	<p>The glazing panel (vision lite) at the north entrance exterior door was measured at 44 5/8" above the exterior finish floor to the bottom of the glazing panel. The bottom of the glazing panel per applicable accessibility code is required to be 43" maximum above the finish floor surface on both sides of the door.</p> <p>This comment is only applicable to the door with door hardware provided on both sides of the door. The other two doors do not need to meet this requirement.</p>	Doors that contain glazing panels (vision lite) that permit viewing through the panel shall have the bottom of the panel measure 43" maximum above finish floor.		ADA 2010: 404.2.11
	Threshold: Entrance Door	<p>The threshold at the entrance door measures 3/4" in height, from the interior vestibule finish floor to the top of the threshold. This is greater than an accessible 1/2" threshold.</p> <p>This comment is only applicable to the door with door hardware provided on both sides of the door. The other two doors do not need to meet this requirement.</p>	Thresholds at doorways shall be 1/2" maximum in height. Thresholds greater than 1/4", and not more than 1/2" maximum in height shall be beveled with a slope not steeper than 1:2. Changes in level at doorways shall be 1/2" maximum in height. Changes in level greater than 1/4", and not more than 1/2" maximum in height shall be beveled with a slope not steeper than 1:2.		ADA 2010: 303
	Light Sconces: Protruding Object	<p>The bottom of the two wall sconces installed within the entry vestibule are 66 5/8" above finish floor, and extend 5" horizontally from the wall. Which makes them a protruding object.</p> <p>A possible option for addressing this may be to add a tap surface under the two wall sconces or to reposition the lights so that they measure 4" max horizontally from the wall.</p>	Objects with leading edges more than 27" and not more than 80" above finish floor shall protrude 4" maximum horizontally into the circulation path.		ADA 2010: 307.2
	Floor Mats	<p>The floor mat located in the vestibule and near the stairs is not securely attached to the finish floor surface.</p> <p>Without securely attaching the floor mat to the floor surface or without providing the mat with a rigid backing that does not roll up upon itself, a tripping hazard can be created along the accessible route. Typical all floor mats and rugs.</p>	Carpet, carpet tile, floor mats, and rugs on a ground or floor surface, shall be securely attached. Exposed edges shall be securely fastened to floor surfaces.		ADA 2010: 302.2

#	Item	Field Condition	Requirement	Photo #	Reference Standard
<b>1st Floor Hallway</b>					
	North Stairs: Hallway Door Closing Speed	<p>Closing speed at the door to the "North Stairs" (at the bottom of the lift) was measured at 4 seconds, 5 seconds minimum is accessible.</p> <p>A possible option for addressing this might be to adjust the closer.</p>	When a closer is provided, closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to an open position of 12 degrees is 5 seconds minimum.		ADA 2010: 404.2.8
	North Stairs: Signage Height	<p>The "North Stair" sign located in the 1st Floor Hallway has the baseline of the highest tactile character, measuring 62 1/2" above finish floor.</p> <p>A possible option for addressing this would be to re-position the sign so that the baseline of the highest character is 60" maximum above finish floor. Typical to all floors.</p>	Signs identifying permanent spaces shall comply with tactile character requirements. Both the raised characters and braille shall be located 48" minimum above finish floor, measured from the baseline of the lowest character and 60" maximum above finish floor measured from the baseline of the highest character.		ADA 210: 216, 703
	South Stairs: Signage Height	<p>The "South Stair" sign located in the 1st Floor Hallway near the top landing of the ramp has the baseline of the highest tactile character, measuring 62" above finish floor.</p> <p>A possible option for addressing this would be to re-position the sign so that the baseline of the highest character is 60" maximum above finish floor. Typical to all floors.</p>	Signs identifying permanent spaces shall comply with tactile character requirements. Both the raised characters and braille shall be located 48" minimum above finish floor, measured from the baseline of the lowest character and 60" maximum above finish floor measured from the baseline of the highest character.		ANSI 2003: 703
<b>Package Closet</b>					
	Package Closet: Door Closing Speed	<p>Closing speed at the door to the package closet was measured at 3 seconds, 5 seconds minimum is accessible.</p> <p>A possible option for addressing this might be to adjust the closer.</p>	When a closer is provided, closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to an open position of 12 degrees is 5 seconds minimum.		ADA 2010: 404.2.8



#	Item	Field Condition	Requirement	Photo #	Reference Standard
	Package Closet: Recessed Door	<p>The package closet entry door is recessed 17 1/2" from the interior closet side of the wall, measured from the face of the door to the finish face of the wall. Due to the closer on the door, the maneuvering clearance shall extend 12" parallel to the door beyond the latch side. When a wall is within this clearance, the door can be recessed 8" max from the finish face of the wall, 10" as measured would not be accessible.</p> <p>This is a fire rated door, therefore a mechanical closer may be required by the fire code. If the mechanical closer can be replaced with spring hinges, which are not considered a closer per LCM's interpretation, the clearance of 12" parallel to the door beyond the latch side and the 8" maximum door recess requirement would not apply. Verify with the life safety/egress code if this is an option.</p>	<p>The push-side front-approach maneuvering clearance shall include the width of the door, and shall extend 48" minimum back perpendicular to the door. If the door is provided with a closer and latch, then the clearance shall also include 12" minimum, parallel to the door beyond the latch side.</p> <p>A door can be recessed up to 8" max into a doorway, measured perpendicular to the face of the door, before the wall becomes an obstruction within the door maneuvering clearance. If the obstruction is more than 8" maximum in depth then the maneuvering clearance will not be accessible.</p>		ADA 2010: 203.9, 207, 404.2.4.3
<b>Vestibule to Parking Garage</b>					
	Door Maneuvering Clearance: Door from Vestibule into Garage	51 3/8" clear was provided perpendicular from the face of the door to the finish face of the opposing wall. 54" min clear is required for an accessible maneuvering clearance when a closer is provided.	The pull-side latch-approach maneuvering clearance shall include the width of the door, plus 24" minimum parallel to the door beyond the latch side and shall extend 48" minimum perpendicular to the door, 54" minimum when a closer is provided.		ANSI 2003: 404.2.3
	Turning Space within Vestibule	The vestibule measures 50 1/2" in depth, from the face of one wall to the opposing wall. 60" minimum clear would be required for an accessible turning space.	Turning space shall be provide within the vestibule. Turning space shall either be a 60" diameter turning circle or a T-shaped turning space.		ANSI 2003: 304
<b>Parking Garage</b>					
	Maneuvering Clearance Slope: Door to Elevator Vestibule	At the pull side of the door into the elevator vestibule, the running slope measures 7.4% within the maneuvering clearance. Surface slope shall not exceed 2% in all directions within the maneuvering clearance.	<p>Floor surface within the maneuvering clearance at the gate shall be 1:48 (2%) level in all directions.</p> <p>The pull-side front approach maneuvering clearance shall include the width of the door, plus 18" minimum parallel to the door beyond the latch side and shall extend 60" minimum perpendicular to the door.</p>		ANSI 2003: 404.2.3.5, 404.2.3
<b>Bike Storage</b>					
	Bike Storage: Door Closing Speed	<p>Closing speed at the door to the bike storage room was measured at 4 seconds, 5 seconds minimum is accessible.</p> <p>A possible option for addressing this might be to adjust the closer.</p>	When a closer is provided, closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to an open position of 12 degrees is 5 seconds minimum.		ANSI 2003: 404.2.7


#	Item	Field Condition	Requirement	Photo #	Reference Standard
	Bike Storage: Recessed Door	<p>The bike storage room entry door is recessed 18" from the interior side of the wall, measured from the face of the door to the finish face of the wall. Due to the closer on the door, the maneuvering clearance shall extend 12" parallel to the door beyond the latch side. When a wall is within this clearance, the door can be recessed 8" max from the finish face of the wall, 10" as measured would not be accessible.</p> <p>This is a fire rated door, therefore a mechanical closer may be required by the fire code. If the mechanical closer can be replaced with spring hinges, which are not considered a closer per LCM's interpretation, the clearance of 12" parallel to the door beyond the latch side and the 8" maximum door recess requirement would not apply. Verify with the life safety/egress code if this is an option.</p>	<p>The push-side front-approach maneuvering clearance shall include the width of the door, and shall extend 48" minimum back perpendicular to the door. If the door is provided with a closer <u>and</u> latch, then the clearance shall also include 12" minimum, parallel to the door beyond the latch side.</p> <p>A door can be recessed up to 8" max into a doorway, measured perpendicular to the face of the door, before the wall becomes an obstruction within the door maneuvering clearance. If the obstruction is more than 8" maximum in depth then the maneuvering clearance will not be accessible.</p>		ANSI 2003: 404.2.3.4
<b>Leasing Office Restroom</b>					
	Restroom Door: Clear Opening Width	<p>The restroom door provides a 31" opening width, in order to be accessible the door shall provide a 32" min clear opening width. Typically a 36" wide door would need to be provided in order to meet this clear opening width requirement.</p> <p>While the other restroom accessibility issues can be accommodated at a later time once this is made into an employee only restroom. The clear opening width of the door <u>can not</u> be accommodated or modified later.</p>	<p>The restroom door shall be provided with a clear opening width of 32" minimum. The clear opening width shall be measured from the face of the door to the door stop, with the door open 90 degrees.</p>		ADA 2010: 404.2.3
		<p>ADA allows employee work areas to be modified upon employee request as part of a reasonable accommodation. If not made accessible at the outset of construction, an employee can request an item be made accessible at a later time. However the employee work areas are still required to be accessible with regards to approach, entering, and exiting. This can not be modified or accommodated at a later time.</p> <p>In the field it was discussed that the leasing office restroom would not be for public use, visitors and guests to the leasing office would not be able to use the restroom. The restroom would be for employee use only. LCM will be flagging the issues within this restroom as accessibility issues until we see signage in the field clearly distinguishing it as an employee only restroom.</p> <p><i>The items that can be requested by employees as reasonable accommodations at a later time are flagged in gray.</i></p>			ADA 2010: 203.9

#	Item	Field Condition	Requirement	Photo #	Reference Standard
	Receptacle: Outlet Vertical Height	The receptacle located adjacent to the lavatory fixture, measures 46 7/8" above finish floor to the centerline of the highest outlet in the receptacle.	Electrical outlets shall be positioned within an accessible reach range. When a clear floor space is positioned for a parallel approach beside an obstruction measuring 24" maximum deep and 34" maximum in height, then the receptacle shall be positioned maximum 46" above the finish floor, measured to the centerline of the highest outlet for the 46" dimension.		ADA 2010: 308.3.2
	Water Closet: Flush Controls	Toilet flush controls are located adjacent to the sidewall, and not on the open (transfer side) of the toilet fixture.	Hand-operated flush controls shall be accessible, and operable parts shall be located on the open side of the water closet.		ADA 2010: 604.6
	Water Closet: Rear Wall Grab Bar Length	The grab bar installed at the rear wall is 24" in length, instead of a 36" minimum in length grab bar.	The rear wall grab bar shall be 36" minimum in length and extend from the centerline of the water closet 12" minimum on one side and 24" minimum on the other side.		ADA 2010: 604.5.2
	Water Closet: Rear Wall Grab Bar Height	The top of the rear wall grab bar gripping surface was measured at 36 3/4" above finish floor.	Grab bars shall be installed in a horizontal position, 33" minimum to 36" maximum above finish floor, measured to the top of the grab bar gripping surface.		ADA 2010: 604.5, 609.4
	Water Closet: Side Wall Grab Bar Length	The side wall grab bar is located greater than 12" maximum from the rear wall, measured at 13" to the centerline of the grab bar.	The horizontal side wall grab bar shall be 42" minimum in length, located 12" maximum from the rear wall and extend 54" minimum from the rear wall.		ADA 2010: 604.5.1
	Water Closet: Side Wall Grab Bar Height	The top of the side wall grab bar gripping surface was measured at 37 1/8" above finish floor.	Grab bars shall be installed in a horizontal position, 33" minimum to 36" maximum above finish floor, measured to the top of the grab bar gripping surface.		ADA 2010: 604.5, 609.4
	Water Closet Clearance Overlap	The lavatory fixture is located 53 3/4" from the finished side wall of the WC, therefore it is an obstruction within the WC clearance that is required to be 60" minimum clear perpendicular to the side wall.	Clearance around the WC shall be 60" min measured perpendicular from the side wall and 56" min measured perpendicular from the rear wall. The only items allowed to overlap this clearance includes grab bars, dispensers, shelves, and coat hooks. No other fixtures or obstructions shall be located within the WC clearance.		ADA 2010: 203.9, 604.3, 604.3.2

#	Item	Field Condition	Requirement	Photo #	Reference Standard
<b>5th Floor Hallway</b>					
		<p>The fifth floor of this building was added into the original volume of the building and the existing structure was not changed or modified. Due to design of the fifth floor the structure effects the accessible route to the dwelling units and to the tenant amenity spaces on this floor as is listed.</p> <p>1) In the main hallway on the 5th floor near the North Attic and Maintenance Water Closet a structural support spans across the hallway. The structural support limits overall head clearance to be below 80" min for part of the hallway width. 80" min is the required head height clearance, any obstruction below 80" min on a circulation path is a protruding object.</p> <p>2) At the door from the hallway to the elevator vestibule, a structural support is located within the pull side door maneuvering clearance. 18" min is required parallel to the door beyond the latch side for an accessible forward approach, the structural support limits the clearance to 16 1/2".</p> <p>3) At the door to Unit 506, there is a structural support that spans across part of the entry door to the unit. The structural support limits overall head clearance to be below 80" min at 77" clear. 80" min is the required head height clearance, any obstruction below 80" min on a circulation path is a protruding object.</p> <p>The existing structure does not appear to have been modified nor is the intention to modify the structure in the future. Conformance with the accessibility code requirements did not appear to be possible given the existing structure, however LCM can not make the distinction regarding what is and is not technically infeasible on this project, LCM defers to the Architect of Record and Civil Engineer to determine infeasibility.</p>			
	South Attic: Door Maneuvering Clearance	<p>Advisory: If the South Attic is intended for tenant use, the following comment is applicable.</p> <p>56 3/4" clearance was provided perpendicular to the pull side of the South Attic door. 60" min clear is required for an accessible pull side maneuvering clearance.</p>	<p>The pull-side front approach maneuvering clearance shall include the width of the door, plus 18" minimum parallel to the door beyond the latch side and shall extend 60" minimum perpendicular to the door.</p>		ANSI 2003: 404.2.3
<b>5th Floor Amenity Deck</b>					
	Amenity Deck Door: Closing Speed & Opening Force	<p>Closing speed at the door leading to the outdoor amenity space was measured at 3 seconds, 5 seconds minimum is accessible.</p> <p>Opening force for the door was measured at 15 pounds, 5 pounds maximum is accessible.</p> <p>A possible option for addressing this might be to adjust the closer.</p>	<p>When a closer is provided, closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to an open position of 12 degrees is 5 seconds minimum.</p> <p>The force for pushing or pulling open doors, other than fire rated doors, shall be 5 pounds maximum for interior hinged doors.</p>		ANSI 2003: 404.2.8, 404.2.9

# Dwelling Unit



Project	[REDACTED]	<b><u>FHA Safe Harbor</u></b> Note: FHA is not applicable, this is not an FHA covered dwelling unit.	
Review #	Field Review #3		
Report Date	06.11.2018	<b><u>Local Code(s)</u></b> Chicago Building Code and ANSI A117.1 2003 (Type B)	
Site Visit Date	05.29.2018 and 05.30.2018		
Reviewer	Michael Grochola, LCM Architects	<b>Unit Status</b> No issues observed in covered unit at time of review.	
Building	N/A	Not all requirements appear to have been met in the covered unit at time of review. See below for issues.	
Unit #	200		
Unit Type	200- Type B	<b>Key</b> Does not comply with Required Standard	
Status	Final Finishes	Potential non-compliance alert	
Notes		<b>Not OK</b> <b>Advisory</b>	

## ▼ Kitchen

Item #	Con- dition	Observation	Requirement	Photo #
<b>Sink: Clear Floor Space</b>			ANSI 2003: 1004.12.2.1, Exception	
200-1	Not OK	<p>30 x 48" minimum clear floor space centered parallel at the sink is impeded by the refrigerator, that extends 2 3/8" beyond the leading edge of the countertop. When measuring from the centerline of the sink the clear floor space overlaps the refrigerator by 9".</p> <p>LCM believes that the sink clear floor space would be considered accessible, if the face of the refrigerator door extended 1" max past the leading edge of the countertop.</p>	A minimum 30"x48" clear floor space shall be provided at sinks, positioned for a forward or parallel approach. When the clear floor space is positioned for a parallel approach, it shall be centered on the bowl.	
<b>Kitchen Clearance: 40" Minimum</b>			ANSI 2003: 1004.12.1.1	
200-2	Not OK	34 1/2" clear is provided between the face of refrigerator door and the opposing wall. The kitchen is no longer designed as an L-shaped kitchen, as was drawn in the plans.	A clearance of at least 40" shall be provided between all opposing base cabinets, countertops, appliances, and walls.	

# Dwelling Unit



Project	[REDACTED]	<b>FHA Safe Harbor</b> Note: FHA is not applicable, this is not an FHA covered dwelling unit.	
Review #	Field Review #3		
Report Date	06.11.2018	<b>Local Code(s)</b> Chicago Building Code and ANSI A117.1 2003 (Type B)	
Site Visit Date	05.29.2018 and 05.30.2018		
Reviewer	Michael Grochola, LCM Architects	<b>Unit Status</b>	
Building	N/A	No issues observed in covered unit at time of review.	
Unit #	202	Not all requirements appear to have been met in the covered unit at time of review. See below for issues.	
Unit Type	T02	<b>Key</b>	
Status	Final Finishes	Does not comply with Required Standard	Not OK
Notes		Potential non-compliance alert	Advisory

## ▼ Interior Route

Item #	Con- dition	Observation	Requirement	Photo #
Material Transitions			ANSI 2003: 1004.4.2, 303, 302	
202-1	Not OK	1) The threshold at the door between the entry foyer and the kitchen was measured at 7/8" in height. 2) The threshold at the master bathroom door was measured at 3/4" in height.	Changes in height of floor surfaces of 1/4" maximum are permitted to be vertical. Changes in level greater than 1/4" in height and not more than 1/2" maximum shall be beveled with a slope no steeper than 1:2.	

## ▼ Master Bathroom (w/Bathtub)

Item #	Con- dition	Observation	Requirement	Photo #
<b>Lavatory:</b> Height (Option B Bathrooms)			ANSI 2003: 1004.11.3.2.1.3	
202-2	Not OK	The height of the lavatory countertop was measured at 35" max AFF.	In Option B bathrooms, at least one lavatory shall be provided at 34" maximum above the finish floor, measured to the higher of the top of the counter or fixture rim.	
<b>Water Closet:</b> Centerline / Location			ANSI 2003: 1004.11.3.1.2	
202-3	Not OK	Water closet fixture centerline measures 19" from the finish face of the sidewall, which is greater than 18" absolute from the sidewall. The use of an adjustable flange may be necessary.	The water closet fixture centerline shall be positioned 18" (hold dimension) from an adjacent finished side wall that is at least 36" in length.  Also, the water closet fixture centerline shall be positioned 15" minimum on its other side to an adjacent lavatory fixture, cabinet, or wing wall.	




# Dwelling Unit

## ▼ Laundry

Item #	Con- dition	Observation	Requirement	Photo #
<b>Laundry:</b> Clear Floor Space			ANSI 2003: 1004.10.1	
202-4	Not OK	<p>The washer can not have an accessible clear floors space due to the closet door not being able to open 180 degrees due to the wall in which the bedroom door is located.</p> <p>A possible option for addressing this would be to provide a combination washer/dryer appliance in lieu of the dryer, the dryer's location would allow an accessible clear floor space to be provided. In addition, the closet door stops would need to be removed.</p>	<p>A minimum 30"x48" clear floor space shall be provided at washing machines and clothes dryers, positioned for a parallel approach, and centered on the appliance.</p>	

# Dwelling Unit



Project	[REDACTED]	<b><u>FHA Safe Harbor</u></b> Note: FHA is not applicable, this is not an FHA covered dwelling unit.	
Review #	Field Review #3		
Report Date	06.11.2018	<b><u>Local Code(s)</u></b> Chicago Building Code and ANSI A117.1 2003 (Type B)	
Site Visit Date	05.29.2018 and 05.30.2018		
Reviewer	Michael Grochola, LCM Architects	<b>Unit Status</b> No issues observed in covered unit at time of review.	
Building	N/A	Not all requirements appear to have been met in the covered unit at time of review. See below for issues.	
Unit #	203		
Unit Type	T03	<b>Key</b> Does not comply with Required Standard	
Status	Final Finishes	Potential non-compliance alert	
Notes		<b>Not OK</b> <b>Advisory</b>	

## ▼ Unit Entry Door

Item #	Con- dition	Observation	Requirement	Photo #
<b>Entry Door:</b> Threshold / Change-in-Level			ANSI 2003: 1004.5.1, 404.2.4, 302, 303	
203-1	Not OK	The entry door threshold when measured on the exterior (hallway) side of the door, measures 3/4" in height above finish floor.	Thresholds at doorways shall be 1/2" maximum in height. Thresholds greater than 1/4", and not more than 1/2" maximum in height shall be beveled with a slope not steeper than 1:2. Changes in level at doorways shall be 1/2" maximum in height. Changes in level greater than 1/4", and not more than 1/2" maximum in height shall be beveled with a slope not steeper than 1:2.	

## ▼ Interior Route

Item #	Con- dition	Observation	Requirement	Photo #
<b>Reach-In Closets</b>			ANSI 2003: 1004.5.2.1	
203-2	Not OK	The shelf and rod within the entry closet are positioned 15 3/4" back from the front of the closet. It is LCM's position that the shelving and hangar rod shall be installed no further than 14" back from the front inside wall face of the closet, in which the door is located.	Closet doors providing less than 31-3/4" clear door opening width for user passage through the doorway require that any hanger rods and shelves be accessed from outside the closet.  The hanger rod and shelf shall be installed no further than 14" back from the front inside wall face of the closet in which the door is located.	

## ▼ Master Bathroom

Item #	Con- dition	Observation	Requirement	Photo #
<b>Lavatory:</b> Height (Option B Bathrooms)			ANSI 2003: 1004.11.3.2.1.3	
203-3	Not OK	The lavatory countertop measures 35 1/2" AFF. In order to be an accessible Option B bathroom, countertop shall be 34" max FF.	In Option B bathrooms, at least one lavatory shall be provided at 34" maximum above the finish floor, measured to the higher of the top of the counter or fixture rim.	




Water Closet: Centerline / Location			ANSI 2003: 1004.11.3.1.2		
203-4	Not OK	Water closet fixture centerline measures 17" from the finish face of the sidewall, which is less than 18" absolute from the sidewall. The use of an adjustable flange may be necessary.	The water closet fixture centerline shall be positioned 18" (hold dimension) from an adjacent finished side wall that is at least 36" in length.  Also, the water closet fixture centerline shall be positioned 15" minimum on its other side to an adjacent lavatory fixture, cabinet, or wing wall.		

## ▼ Laundry

Item #	Con- dition	Observation	Requirement	Photo #
Laundry: Clear Floor Space			ANSI 2003: 1004.10.1	
203-5	Not OK	<p>The washer can not have an accessible clear floors space due to the closet door not being able to open 180 degrees due to the wall in which the bedroom door is located.</p> <p>A possible option for addressing this would be to provide a combination washer/dryer appliance in lieu of the dryer, the dryer's location would allow an accessible clear floor space to be provided. In addition, the closet door stops would need to be removed.</p>	<p>A minimum 30"x48" clear floor space shall be provided at washing machines and clothes dryers, positioned for a parallel approach, and centered on the appliance.</p>	

# Dwelling Unit



Project	[REDACTED]	<b><u>FHA Safe Harbor</u></b> Note: FHA is not applicable, this is not an FHA covered dwelling unit.	
Review #	Field Review #3		
Report Date	06.11.2018	<b><u>Local Code(s)</u></b> Chicago Building Code and ANSI A117.1 2003 (Type B)	
Site Visit Date	05.29.2018 and 05.30.2018		
Reviewer	Michael Grochola, LCM Architects	<b>Unit Status</b> No issues observed in covered unit at time of review.	
Building	N/A	Not all requirements appear to have been met in the covered unit at time of review. See below for issues.	
Unit #	204		
Unit Type	T04	<b>Key</b> Does not comply with Required Standard	
Status	Final Finishes	Potential non-compliance alert	
Notes		<b>Not OK</b> <b>Advisory</b>	

## ▼ Interior Route

Item #	Con- dition	Observation	Requirement	Photo #
Material Transitions			ANSI 2003: 1004.4.2, 303, 302	
204-1	Not OK	Threshold between the hall bathroom and the kitchen hallway measures 3/4" in height above the hallway finish floor.	Changes in height of floor surfaces of 1/4" maximum are permitted to be vertical. Changes in level greater than 1/4" in height and not more than 1/2" maximum shall be beveled with a slope no steeper than 1:2.	

## ▼ Master Bathroom

Item #	Con- dition	Observation	Requirement	Photo #
Lavatory: Height (Option B Bathrooms)			ANSI 2003: 1004.11.3.2.1.3	
204-2	Not OK	The lavatory countertop measures 34 7/8" AFF. In order to be an accessible Option B bathroom, countertop shall be 34" max FF.	In Option B bathrooms, at least one lavatory shall be provided at 34" maximum above the finish floor, measured to the higher of the top of the counter or fixture rim.	

## ▼ Laundry

Item #	Con- dition	Observation	Requirement	Photo #
Laundry: Clear Floor Space			ANSI 2003: 1004.10.1	
204-3	Not OK	<p>The dryer only provides a clearance measuring 20 1/4" from the centerline of the machine to the sidewall. 24" min is required in order to have clearance for a 30" x 48" clear floor space.</p> <p>A possible option for addressing this would be to move both machines over 2 1/2" to the left, and put the machines as close as possible together. This may be able to provide a clearance of 24" minimum measured from the centerline of each machine before being impeded by the walls.</p>	<p>A minimum 30"x48" clear floor space shall be provided at washing machines and clothes dryers, positioned for a parallel approach, and centered on the appliance.</p>	

# Dwelling Unit



Project	[REDACTED]	<b>FHA Safe Harbor</b> Note: FHA is not applicable, this is not an FHA covered dwelling unit.	
Review #	Field Review #3		
Report Date	06.11.2018	<b>Local Code(s)</b> Chicago Building Code and ANSI A117.1 2003 (Type B)	
Site Visit Date	05.29.2018 and 05.30.2018		
Reviewer	Michael Grochola, LCM Architects	<b>Unit Status</b>	
Building	N/A	No issues observed in covered unit at time of review.	
Unit #	205	Not all requirements appear to have been met in the covered unit at time of review. See below for issues.	
Unit Type	T05	<b>Key</b>	
Status	Final Finishes	Does not comply with Required Standard	Not OK
Notes		Potential non-compliance alert	Advisory

## ▼ Interior Route

Item #	Con- dition	Observation	Requirement	Photo #
Material Transitions			ANSI 2003: 1004.4.2, 303, 302	
205-1	Not OK	Threshold between the entry foyer and the kitchen measures 3/4" in height above the wood finish floor.	Changes in height of floor surfaces of 1/4" maximum are permitted to be vertical. Changes in level greater than 1/4" in height and not more than 1/2" maximum shall be beveled with a slope no steeper than 1:2.	

## ▼ Master Bathroom

Item #	Con- dition	Observation	Requirement	Photo #
Water Closet: Centerline / Location			ANSI 2003: 1004.11.3.1.2	
205-2	Not OK	Water closet fixture centerline measures 24" from the finish face of the sidewall, which is greater than 18" absolute from the sidewall.	The water closet fixture centerline shall be positioned 18" (hold dimension) from an adjacent finished side wall that is at least 36" in length.  Also, the water closet fixture centerline shall be positioned 15" minimum on its other side to an adjacent lavatory fixture, cabinet, or wing wall.	

## ▼ Kitchen

Item #	Con- dition	Observation	Requirement	Photo #
Sink: Clear Floor Space			ANSI 2003: 1004.12.2.1, Exception	
205-3	Not OK	The centerline of the kitchen sink was measured at 19" from the leading edge of the corner countertop. For an accessible parallel approach, 24" min shall be provided from the centerline of the sink fixture to the face of the base cabinets.	A minimum 30"x48" clear floor space shall be provided at sinks, positioned for a forward or parallel approach. When the clear floor space is positioned for a parallel approach, it shall be centered on the bowl.	

## ▼ Laundry

Item #	Con- dition	Observation	Requirement	Photo #
<b>Laundry:</b> Clear Floor Space			ANSI 2003: 1004.10.1	
205-4	Not OK	<p>The washer can not have an accessible clear floors space due to the closet door not being able to open 180 degrees due to the wall in which the bedroom door is located.</p> <p>A possible option for addressing this would be to provide a combination washer/dryer appliance in lieu of the dryer, the dryer's location would allow an accessible clear floor space to be provided. In addition, the closet door stops would need to be removed.</p>	A minimum 30"x48" clear floor space shall be provided at washing machines and clothes dryers, positioned for a parallel approach, and centered on the appliance.	

## PROJECT LIST

LCM's FHA accessibility specialists have reviewed over 225,000 units. Below is a list of some of our recent projects in the region.

**Beach Company | The Cardinal** South Carolina

256 units

New construction; privately developed

**MPS Architects | Judson Mill** South Carolina

197 units

Renovation, two buildings; public funding with a HUD Loan.

**Beach Company | Canalside III** South Carolina

344 Units

New construction; privately developed

**Hines | The Fenton,** North Carolina

357 Units

New construction; privately developed.

**Crescent | Atherton** North Carolina

196 Units

New construction; public housing, developed with Asheville Housing Authority

**MPS Architects | Lee Walker Heights** North Carolina

210 Units

New construction; public housing, developed with Asheville Housing Authority

**Thompson Thrift | Watermark at Taylor Farms** North Carolina

276 Units

New construction; privately developed

**Crescent | Village at Research Park** North Carolina

103 units

New construction; privately developed

**TWG | Silver Oak** Georgia

21 units

Expansion; publicly funded, developed with Georgia Department of Community Affairs

