OHFA Response to Comments received regarding Draft 2020 Design and Architectural Standards

The following is a summary of public comments received regarding the Draft 2020 Design and Architectural Standards. Comments were edited for style, size, and to remove identifying information. Comments that only expressed support for a policy, without providing additional feedback, were not included.

Definitions

Comment: The definition of Common Space is vague and it is difficult to determine when a space is Common Space, Circulation, or Dedicated Program Space. For example, both Circulation and Common Space list Hallways as an example. Elevators are listed as Common Space; however, the sole purpose of an elevator is to move persons from one floor to another, which is a Circulation function.

Response: This definition has been modified to clarify the difference between the spaces.

Comment: Provide more clarity for this definition. For example, OHFA may require these spaces to be closed when not in use for their specific Program use. If this is required, then OHFA should state this in the definition.

Response: No change. The example provided is not a requirement and therefore no change was made.

Comment: Typo in last sentence. Please remove the word “be” after “must”.

Response: Corrected.

OHFA Square Footage Calculation

Comment: Please consider unconditioned spaces that have no utility connections to be outside of OHFA’s Gross Building Area calculation. Picnic shelters-gazebos-covered porches-sheds should not be in the GBA, since they are not conditioned spaces and have limited use during the winter months.

Response: No change. This is standard under BOMA and these are items that are included in the budget.

Comment: Currently, the Standards are slightly unclear because they state multiple methods of obtaining/presenting the square footage calculations. The Interior Requirements sections calls out the Net Rentable Area (that is defined in the Definitions section) should be used, but the OHFA Square Footage Calculation section still calls for the use of the BOMA Gross Method. Could we ask for clarification on which method should be used when? It seems pretty clear that the dwelling units should use the Net Rentable Area, but which spaces (if any) should be using the BOMA Gross Method?

Response: BOMA Gross Method should be used for all square footage calculations. The reference to Net Usable Area for the minimum unit and bedroom sizes has been removed to eliminate confusion. However, OHFA will be exploring changes to all square footage calculations and the use of BOMA for the 2021 Design Standards.

Accessibility

Comment: We would recommend that OHFA increase the requirement for fully accessible mobility units to 25%. 5% generally equals out to one unit in a complex. When there is still an increased need for fully accessible mobility units, a 25% requirement would help meet that unmet need.

Response: No change. OHFA does not currently have the data to justify this increase but is open to revisiting in future versions if data exists.
Comment: The accessibility definitions may be confusing to some as listed. There needs to be a clear delineation between the requirements of the Fair Housing Act (baseline adaptable features, not accessibility) and Accessibility Requirements. For the Fair Housing Act it needs to be clear that the Architect is to select a safe harbor to demonstrate compliance with FHA. For Accessibility, in the case of OHFA, Section 504 would comply for the 5% and 2%. But again, the Architect needs to select a “safe harbor” for how they are demonstrating accessibility.

Response: This section has been modified to provide more guidance and clarity between the different standards.

Comment: Also recommend that ANSI A117.1-2009 be listed as this is the governing accessibility code required by the Ohio Building Code.

Response: Reference has been added.

Comment: Should be clear in the language that UFAS is only required when federal funds are utilized, but I like the addition of the HUD Deeming Notice language.

Response: No change. UFAS is one option to comply with Section 504, which is required by OHFA for all projects receiving funding, not just those with federal funds.

Sustainability
Comment: In reference to the statement, “No major heat transfers through the building envelope are present, verified through FLIR testing.” - The word “major” is subjective. What is major to a developer may not be major to OHFA. How will this be evaluated?

Response: This item has been removed.

Comment: FLIR Testing: Please provide a protocol for this type of testing, (i.e. minimum area of envelop to be tested at each elevation, etc.).

Response: This item has been removed.

Comment: Please clarify when the current version of the green building certifications are locked in. Is it the current version at preliminary app, final app, at permit submission, or other?

Response: The applicant should use whichever version is current/accepted at the time of their project application to that certifying body (for example, Pre-Build Certification for Enterprise). Language added.

Site and Exterior Requirements
Durable Materials - Exterior
Comment: 1.1.2. - Many products have a pro-rated warranty, a full term replacement warranty is not available.

Response: No change. Applicants may request approval of items that are not included in the Standards.

Comment: 1.2. - Recommend if RUL of 50% is less than (7) years then it may be open to Exception Request.

Response: Language added.

Comment: 1.4.2. – Suggest allowing metal panel to be used as there are new products which are compatible in price to fiber cement board.

Response: Laminated metal panels have been added to the Pre-Approved Materials list in 1.4.

Comment: 1.4.3 – The requirement for a 30 year membrane roof will likely render the use of EPDM and TPO not possible. For example a typical warranty for a 60 mil TPO roof is 20 years. Going to a 30 year would have 50% increase assuming that you would have to go to a 120 mil in order to accomplish the request.

Response: Language has been changed from 30 years to 20 years.
**Gutters and Downspouts**

Comment: In response to the statement, "All downspouts shall empty onto concrete splash blocks with a positive slope away from the building or be piped to an appropriate location." - This is determined by local building code; allow the code to dictate the design.

Response: Language has been modified to reference any local code requirements. This is a repeated issue in projects, therefore OHFA is reiterating what may be a local code requirement here.

**Parking**

Comment: In response to the statement, “Parking areas shall be designed to meet the minimum parking space and drive aisle requirements within the local zoning or building codes, including those governing accessibility issues.” - Why include a condition that by its definition is determined by the local code?

Response: This item has been removed.

**Sidewalks**

Response to all below comments regarding Sidewalks: No change. This standard only applies to the accessible route(s) on the property. OHFA recognizes that accessibility standards require a minimum width of three feet for accessible routes. OHFA desires to create spaces where walking alone or side-by-side with others is not discouraged, uncomfortable, or infeasible. In order to achieve this, OHFA is requiring that accessible routes be at least five feet wide.

Projects involving rehabilitation and adaptive reuse are already permitted to submit an exception request for this item. In addition, projects involving new construction that are located on compact sites where site layout is more challenging may also submit an exception request for this item.

Comment: OHFA is now mandating that accessible route sidewalks be 5-foot wide, while the width of an accessible route under The Fair Housing Act as proscribed by ANSI 4.3 is 3 feet. The developer points this out to OHFA to make sure that it is clear that the change adds costs, hard impervious surfaces, and a design challenge for small/compact sites and that OHFA wants to have a higher standard regardless of the intended and unintended consequences. Five-foot wide sidewalks are a standard typically reserved for high trafficked public walkways and not for walkways to private residences.

Comment: Allow the local building code and accessibility requirements determine sidewalk width. There could be a significant cost increase with little value in return.

Comment: The required minimum width of an accessible route sidewalk is excessive – 4’ would be a more reasonable width since the minimum is only 3’.

Comment: The minimum sidewalk width should be reduced to 4-feet. 4-feet is standard for the industry. Also, this requirement should only be applicable to new construction projects. It is not cost effective to replace sidewalks on a rehabilitation project that don’t meet this requirement but are otherwise acceptable.

Comment: Change to: “6.1 All sidewalks along accessible route must comply with accessibility standards.” There will be instances when a 5'-0" walk may not be feasible- ADA & UFAS guidelines have been established based on previous studies and historical data.

Comment: Recommend changing the language to match the referenced accessibility standards. All of these standards allow 3 foot sidewalks given strict adherence to the rules.

Comment: If accessible walks to play areas, trash dumpsters, etc. are placed some distance from the buildings, and are not along head-in parking spaces/lots, the extent of concrete could get unnecessarily excessive. ANSI and UFAS both
have a 36” minimum width for accessible routes, with wider areas every 200 feet or less for passing. Good site design will not only meet the applicable codes, but also integrate adequate passing areas without a more frequent interval without incurring additional costs imposed by the proposed requirement. We suggest advocating for good design and referring to applicable codes rather than blanket 5’ minimum widths along all routes.

**Dumpsters**

**Comment:** Such features are designed to local building code and must meet the criteria of public and private refuse companies who collect the garbage. Therefore, in most locations, requirements exist for such enclosures. Many OHFA staff would be surprised by the time, energy, and money that goes into designing trash dumpsters to adhere to local requirements. OHFA should clarify that its requirements are specifically targeted to locations where there are no prescribed building codes for dumpsters and let developers design to local code requirements in localities where the code exists.

**Response:** In all cases, developers should design to local code requirements. These standards ensure that all projects, regardless of location, include dumpsters with screening and adequate bearing at minimum.

**Comment:** It might make more sense to add: “7.3 Dumpsters shall comply with accessibility standards”, and “8.5 Outdoor recreation facilities shall comply with accessibility standards.” These pieces are often overlooked by designers.

**Response:** All standards in the Exterior and Interior Requirements sections are in addition to all other applicable local and state codes, including those governing accessibility. We have chosen not to restate this for each item, but will be checking for compliance during plan review.

**Outdoor Recreational Features**

**Comment:** Do not dictate where play areas be located on sites, but instead state a preference for central locations or guiding principles such as accessibility to all. Site design is challenging, and site conditions vary, therefore, the requirement of specific locations may not be feasible or useful.

**Response:** Language has been modified to provide more flexibility.

**Comment:** It is often appropriate for the play areas to be near the community building, property office, &/or laundry room.

**Response:** Language has been modified to provide more flexibility.

**Comment:** 8.1. - Recommend making the language more objective.

**Response:** Due to the large variation in project sites, this standard will remain less objective to allow for more flexibility in site design by the development team.

**Comment:** 8.2. - The proposed Design and Architectural Standards require play areas for younger children be centrally located and surrounded by dwelling units. What does this really mean? Do play areas really have to be “surrounded” by dwelling units? This implies having to arrange the building(s) to be a courtyard shape or configured a specific way around the play areas. We recommend further clarity and that the wording be re-phrased to specify a distance or proximity to residential buildings, or perhaps restrict them from areas adjacent to traffic. Since developments are subject to local planning commission approvals and varying requirements of local PUD zoning codes, these types of building arrangements may not be permitted or approved. Small high-density urban infill sites are typically not large enough to support development of a courtyard-like arrangement. Further, many irregular sites better lend themselves to having play areas in secure, gated and fenced areas that may not necessarily be placed central to project for a variety of safety or other neighborhood factors. We would rather advocate that OHFA advocate for safe placements reviewed on a case-by-case basis, with the developer providing details of security, lighting, proximity and path to residential units, etc.

**Response:** Language has been modified to provide more flexibility and to clarify OHFA’s intent.

**Comment:** 8.3. - Recommend changing this language to simply state that play surface shall meet the 2010 ADA standards as this is the governing regulation for these surfaces.
Response: This item has been removed.

**Interior Requirements**

**Durable Materials - Interior**

**Comment:** 1.4.2 – The standard is requiring a plywood frame which would require a HUD Severe Use cabinet. This is a very large cost jump from the MDF frames that have been allowed in the past.

**Response:** No change. This has been a requirement for at least the past two years.

**Comment:** 1.4.2.3 – Cabinet Plywood Frame. Would this exclude composite panel construction?

**Response:** Yes.

**Comment:** 1.4.3 – Sheet vinyl has not been listed as an acceptable floor covering. There would be a 30% increase to go to a vinyl plank as listed and sheet vinyl has been allowed in the past. We have had extremely good success with sheet vinyl products, especially those that require pressure sensitive adhesive. This adhesive makes repairs quite a bit easier.

**Response:** Sheet vinyl has been added as a Pre-Approved Material.

**Comment:** 1.4.4.1 – Statement should say “equivalent must be used on all vertical walls” in lieu of horizontal as indicated.

**Response:** Corrected.

**Major Building Components**

**Comment:** 2.2.3. - PTAC units can be specified to exceed the current energy code requirements AND the green building rating systems. Why is OHFA limiting available design options?

**Response:** No change. This is related to durability and longevity, not necessarily energy efficiency.

**Comment:** 2.2.3. - Is this because of EUL?

**Response:** Yes. This is related to durability and longevity.

**Comment:** 2.2.5. - Stacked units are very space saving and provide more useable space to the tenant. Is OHFA review of the application drawings sufficient for “OHFA approval” or what means is needed to obtain OHFA approval? Waiting until the 80% plans are submitted is way too late in the design process.

**Response:** Language has been modified to allow for use, with caveats related to access.

**Comment:** 2.2.5. - Recommend allowing stacked mechanicals if proper clearance is provided as required by the Authority Having Jurisdiction in lieu of requiring OHFA approval.

**Response:** Language has been modified to allow for use, with caveats related to access.

**Comment:** 2.2.5. - We considered this arrangement at our recent 2019-awarded Montgomery Crossing development to save floor space, but our floor to floor heights did not allow us to vertically fit the equipment. We suggest that this item be stricken however, as we might be able to take advantage of stacking mechanical units in the future under the right circumstances, especially in the case of historic or adaptive reuse developments where the floor-to-ceiling clearances may be higher than average, and where the tenant unit design can benefit from the additional space.

**Response:** Language has been modified to allow for use, with caveats related to access.

**Comment:** 2.3.1. - Redundant with the need to meet a Green certification.

**Response:** This item has been removed.
Comment: 2.3.2. - Light Bulbs are now required to have 18,000-hour life, rather than 10,000-hour life. Green/sustainability standards should guide the type of light bulbs and we ask that OHFA not have a standard life span, or at least maintain the existing 10,000-hour life so that unnecessary cost increases are not incurred.

Response: The standard has been changed back to requiring bulbs with a 10,000-hour minimum life.

Comment: 2.3.4 - This is very subjective. How do you evaluate this?

Response: No change. Developers are encouraged to reach out to the OHFA Architect to discuss this requirement if there is a question of whether or not a panel will be deemed obsolete. This will be also be verified through information in the PCNA and at the preliminary site visit.

Comment: 2.3.4 - Recommend including panels that are deemed dangerous or have or have had Class Action Lawsuits against the manufacturer.

Response: No change.

Comment: 2.3.4 - “Obsolete” seems to be subjectively defined as “panels that contain components that are not readily and commonly available at a reasonable cost.” We seek further clarity in the form of a definition as to what is “readily available” or “reasonable” cost so that this isn’t vague. We believe alternately that OHFA should instead request photo documentation and written narrative from a licensed electrical engineer or licensed electrical contractor engaged to review an existing electrical systems on a case-by-case basis, and when necessary, replaced as required by either 1.) Code necessity -or- 2) A consultant’s certification that parts are no longer available or that components are unserviceable with reason.

Response: No change. Developers are encouraged to reach out to the OHFA Architect to discuss this requirement if there is a question of whether or not a panel will be deemed obsolete. This will be also be verified through information in the PCNA and at the preliminary site visit.

Comment: 2.3.5. - Why? It is labor intensive and therefore costly. What about light switches, cover plates, etc?

Response: This item has been removed. The standard that follows this item is sufficient to meet our goals regarding this issue.

Comment: 2.3.5. - Replacement of all electrical outlets will also require that all existing breakers be replaced with arc fault type breakers. And this is assuming the existing panels can receive these breakers – if not, it would also mandate panel replacement. This should be a recommendation versus a requirement.

Response: This item has been removed. The standard that follows this item is sufficient to meet our goals regarding this issue.

Common Areas

Comment: 3.2.1. - The proposed Design and Architectural Standards state “Dedicated Program Space and Circulation space at residential units is excluded from common area calculation.” What does this really mean? Circulation space makes sense, but Program space would be excluded in the residential units to start with.

Response: The Common Area definition and calculation have been revised, allowing for this sentence to be removed.

Comment: 3.3. - In response to the statement, “Hallways must be a minimum of 42” in width (new construction only).” - This is a local code or accessibility issue. Allow those regulations to govern.

Response: All spaces must comply with any applicable code and accessibility standards. We will reiterate this at the beginning of the Exterior and Interior Requirements sections. This standard is separate from any applicable code or accessibility requirements.

Comment: Add: 3.4 “Hallways must comply with accessibility standards.”
Response: All spaces must comply with any applicable code and accessibility standards. We will reiterate this at the beginning of the Exterior and Interior Requirements sections. This standard is separate from any applicable code or accessibility requirements.

**Indoor Recreational Facilities**

*Response to all below comments regarding Indoor Recreational Facilities:* This item has been removed to eliminate confusion. It was not a requirement, but only applicable to those projects choosing to provide an onsite fitness area and/or those projects seeking competitive points for Onsite Fitness Area in the QAP.

**Comment:** Please add Indoor Recreation Facilities to the definition section to encourage understanding of what OHFA is intending for this term. For example, are fitness rooms included in this term? Is this for spaces where children play?

**Comment:** Do not add specific size requirements, as currently proposed, but instead allow developers to provide amenities based on their experience. Such amenities do not result in competitive points, so it is unclear why OHFA is creating regulations around such spaces.

**Comment:** Is this only referring the Fitness Room? Does this space also include the Community Room as an Indoor Recreational Facility?

**Comment:** Is a fitness room considered an indoor rec facility?

**Comment:** The minimum size requirements for indoor recreational facilities should only be applicable to new construction projects. It is often not feasible to expand or provide new community space to house indoor recreation facilities. Money can be better spent on upgrading the existing structures and facilities.

**Comment:** This new requirement would dictate the size of “recreational facilities.” These facilities would be categorized as common space and under section 3.2 “the maximum common area shall not exceed 10 percent of the total gross building square footage.” Therefore, OHFA is requiring a minimum size for a common space but still limiting the percentage of common space. If a building is designed to serve 20 tenants, for example, and the developer would usually devote 300 square feet to “recreational facilities” this requirement forces developers to eliminate or reduce other common space components to still meet the 10% test. How will OHFA reconcile this?

**Comment:** We request a definition for Indoor Recreational Facilities be added.

**Comment:** Please define further what is meant by Indoor Recreational Facilities.

**Comment:** Indoor recreational facilities is not defined. Is this intended to be the community room, or a Fitness or exercise-type room? The minimum size requirement is new for Ohio, though it is found in many other state QAP’s and defined in terms of what can be counted towards that minimum square footage. As currently proposed, a development with 101 units must have the same amount of recreational space as a development of 300 units. We suggest OHFA add more definition, specifically based upon smaller incremental unit quantities, or like other states, such as Pennsylvania, determine the amount of space in correlation to stipulating provision of “x” amount of square feet on a per unit basis (with a cap), so that it really reflects a proportional amount of space.

**Interior Doors**

**Comment:** 6.1.1. - The 32” minimum door width should not apply to townhomes and the 2nd and 3rd floors of walk-up style buildings where units are exempt from FHA.

**Response:** No change.
Comment: 6.1.1. - Add: “Minimum 32" width for non-accessible units. Minimum door size for accessible units shall be as required by the accessible standards used by the project.”
Response: No change. All spaces must comply with any applicable code and accessibility standards.

Comment: 6.1.1. - The dimension for interior door minimum width is contradictory to the 34” clear width that is mandatory in the Universal Design requirements.
Response: The 32” minimum width is OHFA’s standard for all new construction projects. The 34” clear width referenced is a separate and unrelated requirement applicable only if a developer chooses to seek competitive points for Universal Design through the 9% HTC program. Universal Design components are not required for projects that are not seeking competitive points for this item.

Comment: 6.2.1. - In response to the statement, “Existing doors shall be replaced with solid wood or solid core doors.” - Very costly and unnecessary in a number of situations.
Response: Language has been modified to specify that this only applies if/when existing doors are replaced.

Comment: 6.2.1. - Please clarify if door replacement is a requirement.
Response: Language has been modified to specify that this only applies if/when existing doors are replaced.

Comment: Requiring a minimum width in a rehab project may force the replacement of the door jamb as well. This can be very costly and may reduce the overall SOW in order to accomplish this requirement. Recommend Exception Request in cases where door locations may not need to meet the minimum standard.
Response: No change. The minimum width requirement is only applicable to projects involving new construction.

Floor Coverings
Comment: Please add that in PSH developments, carpet may be allowed in office spaces used by property management and social services. Carpet in these spaces can ‘soften’ these environments for residents and staff will oversee the use of these spaces to ensure that the material will last.
Response: Language has been modified to provide clarification.

Comment: The proposed Design and Architectural Standards state carpet is only permitted in management offices and residential bedrooms. We would like to advocate for rooms like fitness and other recreation spaces. Depending upon the type of equipment provided, carpet may be desirable over a hard surface. Further, carpets are often a greater acoustical control tool and a safer floor surface to use in specialized fitness and activity rooms. We suggest OHFA exclude from fitness and recreation areas if appropriate.
Response: No change.

Storage Space
Comment: Add: 8.3 “....units and comply with accessibility standards.”
Response: No change. All spaces must comply with any applicable code and accessibility standards.

Comment: Do not add specific size requirements for storage, as currently proposed, but instead allow developers to provide amenities such as storage based on their experience. Such amenities do not result in competitive points, so it is unclear why OHFA is creating regulations around such spaces.
Response: This item does result in competitive points (Additional Storage Space under the Design Features competitive point category). OHFA added this standard in order to provide more guidance on our expectations.

Response to the below comments: This item has been removed to eliminate confusion. It was not a requirement, but only applicable to those projects choosing to provide bulk storage space to their tenants and/or those projects seeking competitive points for Additional Storage Space in the QAP.
Comment: Please clarify that all closet spaces (kitchen, living room, bedroom, bathroom) can be utilized cumulatively to meet the established minimum volume of bulk storage.

Comment: Please clarify if exterior bike storage facilities count toward required tenant storage.

Comment: Are these size requirements in addition to regular closet space?

Comment: These storage areas are excessive, particularly for certain user populations such as PSH.

Comment: Storage space requirements should only be applicable to new construction projects. In many cases it is not feasible to add additional storage to an already existing apartment project.

Comment: The addition of bulk storage areas for units is both an increase in space for the building and an increase in cost. By the addition of this requirements it will reduce the amount of units that will be able to be provided.

Comment: We discourage OHFA from proposing and adding bulk storage space requirements in the proposed Design and Architectural Standards. We suggest OHFA not mandate this, but rather let developers make decisions about whether to include bulk storage space in their developments, and to the extent and quantity necessary. Not only do developers know the marketability of such amenities, they also all-too-often manage the operational issues (bed bugs and other pests) and challenges created by abandoned tenant personal property left behind in such storage spaces.

Unit Sizes

Comment: With change to Net Useable Area standard, bedroom sizes were not recalculated uniformly. We request that with the change away from BOMA, OHFA reduces the required Net Useable Area for all unit types so that the resulting NUA standard is equivalent to the previous BOMA standard.

Response: Unit and bedroom size calculations have been changed back to BOMA Gross Area to eliminate confusion.

Comment: Unit size minimums should only be applicable to new construction projects. A developer should not be expected to expand the size of units that were built decades ago to comply with the listed minimum square footage requirement standards. It is unreasonable to expect developers/owners to expand the footprint of buildings to gain the additional square footage required to exceed the stated minimums.

Response: OHFA agrees and allows projects involving rehabilitation or adaptive reuse to submit an exception request for this item. Additionally, for both unit and bedroom sizes, OHFA is allowing projects that seek an exception to submit those requests with the application, as opposed to prior to application.

Bedroom Sizes

Comment: Moving walls or reconfiguring units to meet minimum bedroom size requirements in rehabilitation projects is unreasonable. The minimum bedroom size requirements should only be applicable to new construction projects.

Response: OHFA agrees and allows projects involving rehabilitation or adaptive reuse to submit an exception request for this item. Additionally, for both unit and bedroom sizes, OHFA is allowing projects that seek an exception to submit those requests with the application, as opposed to prior to application.

Comment: Add “10.1 All affordable unit bedrooms shall comply with local building codes and shall meet the following....”

Response: No change. All spaces must comply with any applicable code and accessibility standards in addition to the OHFA standards.
**Bathrooms**

Comment: 11.3. - Why are floor-mounted braces required when wall mount braces are adequate and are much more conducive to Universal Design?
   
   Response: Language has been modified to provide clarification.

Comment: 11.3. - There are adequate alternatives to wall hung sinks with floor braces. OHFA should allow wall-hung sinks that are stud braced only.
   
   Response: Language has been modified to provide clarification.

Comment: 11.4 - This should be covered under the Fair Housing Guidelines.
   
   Response: The Fair Housing Act does not cover multistory townhomes without an elevator. OHFA would like to ensure that multistory townhomes have, at minimum, an accessible half-bath on the accessible floor.

Comment: 11.5 - OHFA is requiring that all accessible units' bathrooms have a roll-in shower. This is not required by 504 and is a case of OHFA defining the standard beyond what is required by federal regulations. We find that roll-in showers are impractical on any floors above the first floor since having nonambulatory residents on upper floors is dangerous in the event of a fire or drills in preparation of such emergencies.
   
   Response: Language has been modified to specify that at least 50% of the 504 mobility units provided must have a roll-in shower.

Comment: 11.5 - Allow the accessibility standards determine the style. Some disabled residents may prefer an accessible tub/shower combination.
   
   Response: Language has been modified to specify that at least 50% of the 504 mobility units provided must have a roll-in shower.

Comment: 11.5 - Not all disabled people like the roll-in shower; some find them hard to use. If you have only 1 bath for an accessible unit then all must have the roll-in showers; some tubs maybe preferred.
   
   Response: Language has been modified to specify that at least 50% of the 504 mobility units provided must have a roll-in shower.

Comment: 11.5 - Allow the accessibility standards determine the style.
   
   Response: Language has been modified to specify that at least 50% of the 504 mobility units provided must have a roll-in shower.

**Kitchen & Appliances**

Comment: The UFAS, ADA & ANSI A117 standards dictate where roll-under spaces shall be and how large- these will confuse designers. Just say Kitchens in accessible units must comply with the accessibility guidelines.
   
   Response: Kitchens in accessible units do have to comply with any applicable codes, including those governing accessibility. OHFA did not include requirements for where roll-under spaces should be and how large.

Comment: 12.1.2. - Energy Star certified refrigerators (under counter and compact not accepted) are stipulated under the proposed Design and Architectural Standards. It would be beneficial to have a minimum cubic feet size defined in terms of what is/is not compact to remove vagueness.
   
   Response: The reference to compact refrigerators has been removed.

Comment: 12.3 - Kitchens in accessible units must have 12”x15” appliance free countertop space adjacent to all appliances based on the proposed Design and Architectural Standards. This means we would have to increase the size of counter and cabinet areas in accessible kitchens. As such, we suggest OHFA remove this requirement in accessible kitchens.
Response: No change. This is not a new requirement, but has been in the Design Standards since 2018. Please provide additional information to clarify the hardship that can be considered in next year's updates.

Comment: 12.5 - The proposed Design and Architectural Standards require accessible units must have work surface that do not exceed 34” height, including at stoves. This is a new requirement and does not allow us the benefit of using the same rear cabinet layout in accessible and non-accessible galley kitchens which we have found residents often enjoy.
Response: No change. This is not a new requirement, but has been in the Design Standards since 2018. Please provide additional information to clarify the hardship that can be considered in next year's updates.

Laundry Facilities
Comment: 13.2. Are all community washers and dryers required to be Energy Star certified? What happens if the laundry leasing company that has a contract on a rehabilitation project does not provide Energy Star certified equipment? Often laundry leases can be locked in for multiple years and not all leasing companies will provide Energy Star equipment, especially to small rural projects.
Response: No. This language has been modified to provide clarification around its applicability.

Comment: The Energy Star requirement for dryers will force the cost to be around double the cost of the currently allowed dryers. Energy Star certified dryers are the top of the line for energy efficiency in the market and come with it a very high cost $1400 or more.
Response: This language has been modified to provide clarification around its applicability.

Comment: 13.1 & 13.2 state “all clothes washer and dryers shall be Energy Star certified” and that “All affordable units must include washer and dryer hookup unless laundry facilities are provided on-site.” If residents are providing own washers/dryers, we cannot require which machines they own/purchase. OHFA should define if this requirement is only for landlord provided machines in residential units or is this for common area laundries.
Response: This language has been modified to provide clarification around its applicability. The requirement is only for landlord-provided machines in residential units.

Architectural Submission and Review Process
Required Documents - Preliminary Architectural Submission
Comment: Requirement for schematic HVAC, plumbing and electrical drawings - this requirement is way over the top for this phase of the project and may ultimately cost the developer / designer unnecessary money.
Response: Language has been modified to provide clarification.

Comment: Under preliminary drawings it now requires schematic drawings AND specifications. Recommend that this be an “and/or” because having drawings will require additional cost to hire MEP consultant at the application level and will increase the upfront deal cost to developers.
Response: Language has been modified to provide clarification.

Comment: In response to the statement, “The DCF tab of the proposal AHFA/GFA, completed and submitted as a pdf.” - When there is more text than the visible size of the excel cell, the pdf only picks up the visible portion. While we support this condition; saving excel into a pdf format hinders the transfer of information to the plans.
Response: OHFA will take this into consideration when developing the new DCF tab.

Comment: “Upon request only…” This is confusing, above it says all formats, here this is request only, please clarify.
Response: Language has been modified to provide clarification.

Required Documents - Final Architectural Submission
Comment: Please clarify the process that Developers can use to provide “verification that the drawings comply with any and all accessibility, energy efficiency, universal design, and/or green building requirements for the development or committed to in the application for funding.” Is this in the form of a letter from the developer, the architect, and the general contractor? Is this a certification in the DCF? How is this done?

Response: Verification will be requested and evidenced through signatures on the DCF form or similar document provided by OHFA.

Comment: Mechanical plans- The extra work and redundancy of providing a dimensioned plumbing is not reducing the number of times the plumbing rough-in is laid out, outside of the framed wall. It only leads to layout confusion.

Response: No change. Please provide information on alternative solutions that can be considered in next year’s updates.

Monitoring and Compliance

Comment: “The development shall notify OHFA of any substantial changes…” - Recommend providing the protocol for making this notification. There seemed to be some confusion in the past as to how and whom needs to be notified and what constitutes a completed service of notification.

Response: Language added to provide more guidance on protocol for making changes. Additional detail on this process will be forthcoming and shared through the OHFA Development email newsletter.

Comment: Please clarify the process that Developers can use to provide “verification that the architectural/design requirements that were committed to as part of the Competitive HTC process have been completed.”

Response: OHFA will provide detail on this as projects funded in 2020 approach the end of construction. It will likely take the form of a document with statements of certification and signatures.

Comment: Please clarify the process that Developers can use to provide “verification that any unresolved site-specific mitigations as specified in the project’s environmental review clearance letter from OHFA have been completed.”

Response: Requirements of what must be submitted to evidence completion of these items are stated in each individual project’s Environmental Review Clearance Letter and associated environmental review report.

Appendix A: Exception Requests

Comment: We recommend that historic buildings, rehabilitation projects, and adaptive use projects only be granted exceptions to accessibility and universal design elements where technically infeasible.

Response: OHFA agrees. To receive an exception, rehabilitation and adaptive reuse projects must prove that compliance is technically infeasible.

Comment: While all new construction has to comply with Fair Housing Act guidelines, which provide a minimum standard of accessible design that at least allows people with disabilities to get into and through units, most housing found in Ohio cities is existing construction that is not accessible. There is a significant need to rehab old, existing housing to make it accessible, or to at least provide an accessible entrance that would allow someone to enter the building. It is important that OHFA pressure rehabs to meet accessibility guidelines to the maximum extent feasible.

Response: OHFA agrees.

Appendix B: Universal Design Components

Comment: Requirements now state which items are mandatory for taking points and indicates that there are optional required items needed to get the points. It does not say how many optional points. This needs to be defined.
Response: The language and requirements are identical to what was stated and approved in the 2020 QAP. Applicants must refer to the QAP for specific requirements pertaining to competitive point values.

Comment: (UD Section, p.7) Please clarify that the requirement to identify universal design criteria in drawings and providing evidence of Universal Design at 8609 is only for those projects seeking points.
Response: Correct.

Comment: (UD Section, p.7) Please allow architects to submit letters certifying that the Universal Design components of a development were installed as committed to in the DCFA as documentation required, in lieu of specific call outs in the architectural drawings. Architectural drawings have a complexity and this developer fears that adding to the complexity by requiring architects to identify the specific Universal Design features will increase fees, due to the additional time needed for complying with this requirement.
Response: Architects will be permitted to provide universal plan notes on the drawings in lieu of specific call outs to denote Universal Design components. In either case, OHFA must be able to clearly identify and locate the features being provided within the drawings.

Bathrooms:
Comment: “Adjustable-height showerhead or hand-held showerhead with flexible hose and easily operable controls” - Not in a family project where kids would be pointing the hand-held shower out of the shower area, causing wet floor issues.
Response: This mandatory component is only required if the project is seeking competitive points for Universal Design in the 9% round. Adjustable-height showerheads without hoses or hand-held components are also allowable.

Comment: Please define / clarify what exactly is meant by “Countertop with beveled edges”.
Response: Countertops in bathrooms should not have sharp, pointed corners, but instead have beveled or radiused corners.

Comment: The mandatory requirement is for hand-held showers at all units. This is an additional cost to what has been previously approved and will cause an additional maintenance burden due to the hoses on the hand-held showers.
Response: This mandatory component is only required if the project is seeking competitive points for Universal Design in the 9% round. Adjustable-height showerheads without hoses or hand-held components are also allowable.

Comment: OHFA requests bathroom countertops to have beveled edges. Is that meant to be the exposed corners, or all edges that are exposed (i.e. not against a wall or other obstruction)? We seek further clarification.
Response: This is intended to apply to exposed corners. Language has been modified to provide clarification.

Kitchen:
Comment: “At least 15” clear space on each side of stove, sink, and one side of fridge” – Often space is not available in a rehab; change to new construction only, and optional for rehabs.
Response: No change. Projects involving rehabilitation may seek an exception for this item and all mandatory items in the Universal Design components list.

Comment: Please clarify what is meant by non-glare lighting at the vanities and for the task lighting in the kitchen.
Response: Non-glare lighting includes techniques or products that minimize or eliminate the glare that is caused by the light source and/or reflecting surface. Examples of non-glare lighting include but are not limited to dimmable lights, lower-wattage bulbs, silver bowl light bulbs, and the use of lens covers or light shades.

Comment: Requiring task lighting throughout the kitchen will increase cost over just the use of general illumination.
Response: No change at this time.
Electrical:
Comment: Specifies extra electrical outlets be placed near the bed for medical and rechargeable items. Bed location is dependent upon resident and is not always placed in the same location. Thus, OHFA should require two locations for extra outlets.
Response: Language has been modified to remove reference to bed location.

Appendix C: OHFA EUL Table
Comment: I did not see Cementitious Siding listed as an acceptable exterior material.
Response: It is listed in the Pre-Approved Materials, section 1.4 (Fiber cement board).

Comment: Windows (Frames and Glazing): The industry standard for thermal pane window seals is 10-years. Does this mean new windows must now carry a 30-year warranty?
Response: This item has not changed from previous years. If the new windows being considered do not carry a 30-year warranty, the applicant must request approval from the OHFA architect.

Comment: May want to revisit the EUL years for Exterior Stairs as wood is listed at 30 years and concrete and steel stairs are listed at 25 and 20 years. This seems backwards.
Response: Item is correct as written. No change.

Other General Comments
Comment: Recommend that the Phase I identify the EPA Radon Zone in the report and recommend radon testing per the applicable code requirements. This will help simplify and standardize the process so there is no more ambiguity and confusion.
Response: OHFA agrees and has added the requirement that ASTM non-scope items, including Radon, be included in the Phase I Environmental Site Assessment to the HTC Document Submission Requirements within the QAP.

Comment: If radon mitigation is required, Standards should provide guidance relating to work being performed pursuant to the 3701-69-08 Appendix to the Ohio Revised Code – Ohio Radon Mitigation Standard (ORMS).
Response: OHFA agrees and will begin to include this information in the Environmental Clearance Letter when it applies.