



Greater Dayton Premier Management

Enhancing Neighborhoods • Strengthening Communities • Changing Lives

August 27, 2026

Barbara Richards
Multifamily Housing Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Ms. Richards,

Greater Dayton Premier Management (GDPM), the public housing authority serving Montgomery County (PHA Code OH005), appreciates the opportunity to comment on the draft Program Year 2026 4% LIHTC with Bond Gap Financing Guidelines. GDPM is actively engaged in the redevelopment of aging public housing stock, including the redevelopment of DeSoto Bass Courts. We offer the following comments with that redevelopment and the competitiveness of public housing authorities generally in mind.

Community Revitalization Plan Scoring – Recognition of PHA Planning Documents

The Community Revitalization Plan criterion represents 20 of the 40 available points in the NHTF RAD pool. As drafted, the qualifying plan standards risk excluding the very PHA-led redevelopment efforts this pool is intended to serve. Many public housing authorities undertake extensive, publicly-vetted planning, including Choice Neighborhoods Transformation Plans and comparable adopted PHA redevelopment and revitalization plans that embody the public process and governmental endorsement this criterion seeks to reward.

We therefore ask OHFA to recognize Choice Neighborhoods Transformation Plans and comparable PHA planning documents as qualifying “concerted community revitalization plans” for purposes of this criterion. Without such recognition, a PHA advancing the most mission-aligned preservation and redevelopment deal in the pool could score zero on half of the available points, potentially undermining the pool’s stated purpose.

Readiness to Proceed – HUD-Controlled RAD Timelines

GDPM appreciates the inclusion of the “Readiness to Proceed” category; however, RAD transaction closings are HUD-controlled. Specifically, the Readiness to Proceed scoring table awards full points only for a September 2027 closing and declines to zero points by April 2028. A PHA that meets every OHFA deadline may nonetheless receive zero of these ten points due solely to federal processing timelines outside its control. We ask OHFA to either provide an alternative readiness demonstration for RAD and PBV conversions, such as evidence of timely submissions and completion of PHA-controlled milestones, or adjust the scoring curve so that closing dates reflect realistic HUD controlled timelines.

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Application to the Redevelopment of DeSoto Bass Courts

GDPM offers DeSoto Bass Courts as a concrete illustration of how these two provisions will affect a real redevelopment. DeSoto Bass Courts is among the oldest public housing stock in the Dayton region, and its redevelopment is guided by an adopted Choice Neighborhoods Transformation Plan reflecting years of planning, resident engagement, and coordination with public and private partners. GDPM successfully secured two competitive 9% LIHTC awards that ignited the redevelopment of this legacy site. However, with the LIHTC program's recent focus on areas of opportunity, the redevelopment of DeSoto Bass has stalled for the past two years. Redesigning the BGF program to recognize plans and efforts like ours provides access to resources that PHAs have effectively been locked out of, allowing GDPM to continue the DeSoto Bass redevelopment and preservation momentum. GDPM has not yet finalized which BGF funding path the redevelopment will pursue, and the design of these Guidelines will directly influence that decision.

On the Community Revitalization Plan criterion, the redevelopment of DeSoto Bass Courts is guided by an adopted Choice Neighborhoods Transformation Plan. If OHFA recognizes adopted Choice Neighborhoods Transformation Plans as qualifying, GDPM can compete for the full 20 points on the strength of planning already completed and adopted. If such plans are not recognized, GDPM risks forfeiting half of the available competitive points despite having undertaken the very planning the criterion is designed to credit.

On Readiness to Proceed, the DeSoto Bass redevelopment depends on HUD-controlled milestones including RAD conversion approvals and, where applicable, Section 18 disposition and demolition approvals whose timing GDPM cannot control. Under the current scoring table, GDPM could lose all ten Readiness points solely because HUD's approval and conversion timeline extends past September 2027. An alternative readiness demonstration, or a scoring curve aligned to realistic HUD-controlled timelines, would allow the DeSoto Bass redevelopment to be scored on GDPM's actual readiness rather than on federal processing times.

Thank you for the opportunity to provide feedback and for OHFA's continued engagement with stakeholders. GDPM looks forward to continuing our discussions with you about OHFA policy and stands ready to provide any additional detail that would be helpful.

Sincerely,

Kiya Patrick
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