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Subject: 2027 Design & Architectural Standards

TFG Housing Resources (TFHGR) appreciates the Ohio Housing Finance Agency's (OHFA) continued commitment to evaluating and refining its Design and Architectural Standards. We commend OHFA for undertaking a comprehensive review of the DAS and, in particular, for seeking meaningful stakeholder input prior to final adoption. The draft standards reflect a thoughtful effort to balance affordability, durability, accessibility, and quality of life while recognizing the evolving needs of residents across Ohio. As an active affordable housing developer involved in the preservation and development of affordable housing throughout the state, we value OHFA's willingness to engage with industry partners and incorporate practical feedback from those responsible for implementing these requirements in the field.

On behalf of TFG Housing Resources, we respectfully submit the following comments and recommendations for OHFA's consideration. Our comments are intended to support OHFA's mission while identifying opportunities to reduce development costs, improve project feasibility, preserve scarce housing resources, and maximize the number of affordable housing units that can be developed and preserved across Ohio.

New construction 3.3. Unit Sizes

OHFA's proposed minimum unit size requirements exceed what is commonly being delivered in today's market-rate multifamily developments. Under the draft standards, new construction projects must provide a minimum of 550 square feet for one-bedroom units, 750 square feet for two-bedroom units, and 950 square feet for three-bedroom units. In comparison, many successful market-rate developments throughout Ohio and the Midwest are delivering one-bedroom units ranging from 475 to 525 square feet, two-bedroom units ranging from 650 to 725 square feet, and three-bedroom units ranging from 850 to 925 square feet while maintaining strong occupancy levels and resident satisfaction. TFGHR recommends that OHFA consider reducing minimum unit size requirements by approximately 50 square feet per bedroom category or, alternatively, allowing projects flexibility to meet an overall average unit size standard across the development. This approach would provide developers with greater design flexibility while maintaining quality housing for residents. A reduction of just 50 square feet per unit can have a meaningful impact on project feasibility.

N3.4. New Construction Bedroom Sizes

The proposed bedroom size requirements in the new construction standards exceed what is commonly found in market-rate multifamily developments. The draft requires a minimum primary

bedroom size of 120 square feet and secondary bedrooms of 100 square feet. TFG Housing Resources recommends reducing these minimums to 110 square feet for primary bedrooms and 90 square feet for secondary bedrooms, which would remain fully functional and consistent with current market-rate design standards. This modification would provide greater flexibility in unit design, reduce overall building footprints by an estimated 1% to 3%, and generate meaningful construction cost savings without negatively impacting resident livability or quality of life.

N.3.6.3 – New Construction - All kitchen venting must exhaust to the outside of building. This may be by hood, ceiling vent or wall vent.

Many market-rate garden-style and mid-rise developments successfully utilize high-quality Energy Star recirculating range hoods, particularly in situations where direct exterior venting would require extensive wall penetrations, long duct runs, soffits, or complex roof penetrations that add significant construction costs and maintenance concerns. TFG Housing Resources recommends that OHFA permit the use of Energy Star-certified recirculating ventilation systems in circumstances where exterior venting would result in substantial additional construction costs. This approach would provide developers with greater design flexibility while maintaining acceptable indoor air quality standards and reducing unnecessary project costs.

New Construction N3.10.2.4 & Rehabilitation R4.10.2.4. Package Terminal Air Conditioner (PTAC) units are not permitted.

Many successful market-rate developments, particularly workforce and senior housing communities, continue to utilize PTAC, VTAC, and other high-efficiency packaged HVAC systems due to their lower installation costs, ease of maintenance, and proven long-term performance. TFG Housing Resources recommends that OHFA allow high-efficiency PTAC and VTAC systems that meet applicable energy efficiency standards rather than prohibiting their use outright. This flexibility would help reduce construction costs while still achieving OHFA's energy performance objectives.

R4. Sustainability - all OHFA funded projects must meet the requirements of energy efficiency or green building certifications.

OHFA should consider exempting rehabilitation projects from mandatory third-party green building certifications and HERS verification requirements, provided the project complies with the Ohio Building Code and applicable energy code in effect at the time of permitting.

The additional cost associated with HERS raters, blower door testing, documentation, certification fees, and consultant coordination can divert scarce resources away from critical building systems and resident-focused improvements.

Instead, OHFA should require rehabilitation projects to comply with the applicable Ohio Building Code and Ohio Energy Code, while encouraging—but not requiring—green building certifications.

This approach would reduce development costs, preserve additional affordable housing units, and allow owners to prioritize investments in building systems with the greatest impact on long-term asset preservation and resident quality of life.

R4.3 - Rehabilitation Unit Sizes

TFG Housing Resources recommends that OHFA allow existing rehabilitation properties to retain their current unit sizes, even when they do not meet the minimum unit size requirements outlined in the Design and Architectural Standards, provided the property has demonstrated a history of strong occupancy and market acceptance. Many preservation and rehabilitation developments were originally designed and constructed under different standards, and requiring unit expansions can be financially prohibitive, result in the loss of affordable units, and create significant construction challenges within existing building footprints. If a property has consistently maintained strong occupancy levels and successfully served residents with its existing unit configuration, that performance should be recognized as evidence that the unit sizes are functional and meet market demand. Allowing existing units to remain at their current size would preserve affordable housing inventory, reduce unnecessary rehabilitation costs, and support the long-term viability of preservation transactions across Ohio.

R4.4 Rehabilitation Bedroom Sizes

TFG Housing Resources recommends that OHFA allow existing rehabilitation properties to retain their current bedroom sizes, even when they do not meet the minimum bedroom size requirements established in the Design and Architectural Standards, provided the property has demonstrated a history of strong occupancy and successful operation. Many preservation and rehabilitation projects are constrained by existing building layouts, structural systems, and historic preservation requirements, making bedroom expansions costly and often impractical. Requiring larger bedrooms may result in the loss of units, reduced affordability, and significant increases in rehabilitation costs without providing a corresponding benefit to residents. If a property has consistently maintained high occupancy and resident demand with its existing bedroom configurations, that history should be recognized as evidence that the units adequately meet resident needs. Allowing existing bedroom sizes to remain unchanged would preserve affordable housing inventory, improve project feasibility, and enable limited rehabilitation resources to be directed toward critical building systems, accessibility improvements, and resident quality-of-life enhancements.

Implementation for Existing Pipeline and Construction Projects

Once the DAS comments are approved, OHFA should allow projects that are currently in the closing process, under construction, or otherwise moving through the development pipeline to implement any Design and Architectural Standards changes that reduce costs, improve feasibility, or provide additional design flexibility. Given the lengthy development timeline associated with affordable housing projects, many developments spend years in predevelopment, financing, and construction and should not be excluded from beneficial policy changes solely because they were funded under a prior funding cycle.

To facilitate implementation, OHFA should establish a streamlined notification or expedited waiver process that allows developers to adopt revised standards without undergoing a lengthy approval process. Developers could simply notify OHFA of the proposed change and certify that it does not negatively impact resident health, safety, accessibility, or other program requirements.

Allowing voluntary adoption of these changes would help reduce financing gaps, improve project feasibility, and ensure that cost-saving measures can be realized across OHFA's existing portfolio as quickly as possible.

We appreciate OHFA's willingness to solicit feedback from stakeholders and its continued commitment to improving the Design and Architectural Standards. As a developer actively involved in the preservation and creation of affordable housing across Ohio, we share OHFA's goals of delivering high-quality, durable, and accessible housing while maximizing the impact of limited public resources. We respectfully request that OHFA consider the recommendations outlined above as opportunities to reduce development costs, improve project feasibility, and ultimately allow more affordable housing units to be developed and preserved throughout the state. Thank you for your time, consideration, and continued partnership in addressing Ohio's affordable housing needs.

Sincerely,



Brad Carman

President