



June 15, 2026

Bill Beagle, Executive Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive
Columbus, OH 43231

Re: Comments on OHFA's draft Design and Architectural Standards

Dear Mr. Beagle:

On behalf of Homeport, I'm writing to provide comments on OHFA's draft Design and Architectural Standards and the accompanying process manual. We appreciate how OHFA engaged with architects and developers before releasing the draft standards. We also appreciate the staff's thorough review of the current standards. These comments are generally presented in the order they appear in the guidelines:

Accessibility Requirements

- *Additional Features:* We appreciate the idea of the "a la carte menu" for selecting additional features for Section 504 mobility units. It gives developers the option to choose which features work best for them. However, some of these features, including all the features in Column A2, are expensive. The optional Universal Design features from the current "Design and Construction Features" form, which developers have been choosing for at least several years and which more closely align with the details of Column C, have more manageable costs.
- *Important Reminders:* These items are important for accessibility. However, additional clarity would be helpful. For example, "comparable features" is not adequately defined, considering that the noted examples that meet the definition are qualified to be non-exhaustive. Updating the section heading to indicate that these are additional requirements, and not "reminders," may also help provide clarification.

New Construction

- *Site Design:* We recommend the standards be more prescriptive about a property with a stormwater detention pond (N3.1.6). These should have a fence installed around them, for safety.
- *Kitchen and Appliances:* We think there's a typo regarding the dishwasher (N3.6.1.3). If that appliance must be included, then "if provided" should be deleted.



- *Doors*: Item N3.7.1.5 notes that doors within an accessible route must not close faster than 5 seconds from a 90-degree open position. We are familiar with this requirement applying to unit entry doors. However, the provision is nested within the “Interior Door” requirements section. If the standard does apply to both exterior and interior doors, it would help to recategorize the standard or note that an accessible route may include both interior and exterior pathways.
- *Floor Coverings*: It would be helpful to have multiple options to achieve anti-slip stair treads (N3.8.3), such as specialized finishes with aggregates mixed in, anti-slip stair nosing overlays, and rubber or rubber resilient stair tread overlays.
- *Durability*: Noting that “any water source” requires application of moisture-resistant gypsum board implies that list of other water sources noted in the section is not exhaustive (N3.9.2.8.2.). It would help to define “water source.” Perhaps “water line wall penetration” would be more accurate.

We suggest either not allowing carpet tile in corridors of senior and AAL developments or creating a more enforceable maintenance standard at properties that install carpet tile (N3.9.2.7.4). A developer might present a plan for quarterly professional cleaning, but it will be very difficult for OHFA to monitor if that cleaning happens.

It appears the standard for moisture-resistant gypsum board (N3.9.2.8) changes the requirements of OHFA’s memo from May 2023. We support the change. We suggest adding a sentence to confirm that this standard overrides that memo because the memo was issued outside of the formal channel of Design and Architectural Standards.

Rehabilitation

- *Sustainability*: The proposed new standard of recommending – but not requiring – certification – doesn’t save meaningful money. Most of the costs related to sustainability certification are tied to the third-party rater, not the certification fee paid to LEED, Enterprise Green or other programs (in addition to the design details required by the program that exceed the applicable building codes’ requirements). Rehab projects can often pay more to the third-party rater because the construction period of rehabs is more likely to happen in phases, compared to new construction, and across many more buildings. This can increase the rater’s number of site visits and field tests.

In addition, we recommend moving the section “R4 – Sustainability” to the standards’ “General Requirements.” Based on this language and the staff presentation to the Multifamily Committee earlier this month, it seems like the



current proposal applies to all new-construction and rehab projects. If so, it's slightly confusing that sustainability requirements are nestled with the standards' section on rehab projects.

Lastly, we strongly encourage OHFA to remove any sustainability requirements on projects funded only by the Housing Development Assistance Program (HDAP) and not Low Income Housing Tax Credits (LIHTC). HDAP projects are inherently modest in scale. It's hard for these projects to afford the associated hard and soft costs.

- **Site Design:** Please consider requiring a 4-foot width for new sidewalks along the accessible route. OHFA's answers in December 2025 to FAQs say that the 5-foot width isn't required (R4.1.2).

We recommend the standards be more prescriptive about a property with a stormwater detention pond (R4.1.4). These should have a fence installed around them, for safety.

- **Building Design:** Please clarify if a building's elevator can be temporarily out of service for repairs or upgrades as part of the rehab project – as long as accommodations are made for residents (R4.2.2.1).

Process Manual

- *Required Documents – Final Architectural Submission:* We suggest that the final application include a Design Development set, to demonstrate the project's design progress, to be followed by 80% Construction Documents at a later date set by OHFA. In the current process, it's difficult to produce well-coordinated construction documents in a two-to-three-month timeframe. OHFA's staff can still comment on the 80% Construction Documents.
- *Review Process:* Related to the above comment, it would be very helpful to have a set schedule for OHFA's plan comments. In the current process, comments are delivered shortly before a project appears on the Multifamily Committee's agenda. However, that date is often scheduled within about two or three months of the project's financing closing. By that point, the project's design is much further advanced than it was at the final application. OHFA's staff may be reviewing outdated plans, or, if OHFA objects to certain elements of a design, it could be difficult and expensive to change the design at this point.

Alternatively, OHFA could rely on the third-party inspector hired by the project's construction lender and LIHTC equity investor. The inspector could review the project's permit set or 100% Construction Documents also from the perspective of OHFA's design standards.



- *Construction Monitoring:* A set schedule for OHFA inspections would be very helpful. This would allow the design-and-construction team to be adequately prepared for inspections.
- *Construction Completion:* With the current process, there doesn't seem to be a good mechanism for communicating and mutually understanding when the project is "substantially complete" (or almost substantially complete) for the purpose of OHFA's closeout visit. It would be helpful to have the inspection done before the contractual substantial-completion date, so that any corrections required by OHFA can be addressed prior to "letting the contractor go."

Thank you for considering these comments, and I'm glad to discuss them with any of OHFA's staff as you like.

Sincerely,
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