

June 22, 2026

Ohio Housing Finance Agency
2600 Corporate Exchange Dr.
Suite 300
Columbus, OH 43231

RE: 2027 Design and Architectural Standards

Ms. Cahill,

Thank you for the opportunity to review and comment on the updated 2027 Design and Architectural Standards and new Process Manual. As always, we appreciate OHFA's willingness to solicit feedback from the development community. Our continued collaboration will only strengthen the Agency's funding programs. Your presentation during the June Multifamily Meeting was a breath of fresh air; recognition that previous Standards have been imperfect is a welcome sign of partnership. We are optimistic that your leadership will usher in an era of enhanced trust between developers and OHFA.

There are a number of favorable changes and this represents a very good first draft. We do still have some concerns, however, and are asking for additional clarity in other areas. The length of this document might be cause for concern, but a good portion is simply direct text from the Standards and Manual for easy reference [in green]. Again, we appreciate the opportunity to communicate with OHFA in a collaborative way.

Process Manual

- **General**
 - This document and all other Design/Architectural documents should seek to eliminate subjectivity; the words "may", "can", "should", and "could" need to appear as few times as possible. Specificity, consistency, and decisiveness should carry through.
 - A best practice is relying upon specifics within existing, proven Standards. Arbitrary requirements and "catch-all" statements are driving costs up without evidence of measurable benefits; the law of diminishing returns has started to become more apparent.
 - This document follows a similar pattern of language that we've seen in prior years: developers must meet strict requirements, deliverables, and

deadlines, but OHFA doesn't commit to equitable, specific, and timely responses in return.

- This document doesn't read like a framework within which developers can autonomously work, but rather a list of rules that OHFA is looking to catch developers breaking. If there are bad actors that are leading OHFA to feel like they need to use a microscope, they should address those specific bad actors, not put the whole development community through onerous and unnecessary review processes.
- "Perfection is the enemy of good"- let's not lose sight, too, in the pursuit of more enhancements, features, or efficiencies, of our shared goal to produce as many affordable homes for seniors and families as possible.
- It should be explicitly stated that developers cannot be held to any requirements not listed in this document.
 - In the past, developers have been told they must incorporate additional or alternative items that 1.) do not appear in the applicable DAS, 2.) are staff preferences rather than Agency requirements, 3.) originate after both the architectural approval and financial closing, and 4.) as a condition of construction completion being acknowledged.
- Reviews should be as decisive and definitive as possible; we need to know that we can move our developments forward without worry of change. Leaving any items to be "verified at a later date" or "conditionally" approving requests creates unnecessary uncertainty. We have, on multiple occasions, had to move forward with closings and construction while waiting for OHFA to provide their review comments. This poses real financial risk, but waiting for approval would lead to catastrophic outcomes.
- Existing projects do not have the flexibility in design like new construction or adaptive reuse developments do. We ask that minimum requirements for rehabs, such as unit sizes, bedroom sizes, and LF storage space be removed.
- There are 3 email addresses in this document: DAS@ohiohome.org, arch@ohiohome.org, and constructionmonitoring@ohiohome.org. This is likely to lead to confusion as to which address gets which communications.
 - Can a chart be provided that displays to whom each type of communication should be directed?

- **Submissions and Correspondence**

- “State the project name as it appears in the AHFA/GFA and OHFA tracking number in the subject line, *and copy the OHFA architectural staff...*”
 - Is the architectural staff one of these 3 email addresses or a different one?
- Change of Contacts Form
 - Can this form “live” on the FTS site? This way, developers can update whenever their information changes without bothering staff.

- **Review Process**

- “After submitting 80 percent drawings, applicant *should* expect to receive a review letter from OHFA architectural staff *prior to* the indicated date of financial closing.”
 - What happens if we don't get the review letter by the time we're ready to close?
 - What if we get the review letter before we intend to close but a) can't make the changes required in time to close or b) can't make the changes because the requirements significantly impact the underwriting or c) do not agree with/accept all of the comments?
 - OHFA should commit to a specific turnaround time for this review.
- “If the review identifies any items of noncompliance, the development team...”
 - OHFA reviews should only point out items that specifically do not comply with their written standards. They should not include alternative suggestions or reminders for those that comply.
- “All OHFA architectural reviews and approvals must be completed prior to construction commencement. For any *outstanding items* the development team must contact the OHFA architectural staff the earlier of 60 days prior to construction commencement or as identified in the architectural review.”
 - Historically we haven't been waiting on a few “outstanding items”, but rather we haven't received any review response at all.
- “Decisions made by the OHFA Staff Architects may be appealed to the Director of Multifamily Housing in writing. Appeals must be specific and, where appropriate, *cite the governing regulation* that conflicts with the Staff Architect decision.”

- It's not governing regulations that are typically in question, but OHFA's own documentation that is contradicted.
 - Appeals to OHFA reviews that hinge upon the contradiction of OHFA's own documentation should be expedited.
- **Required Documents – Preliminary Architectural Submission**
 - Can "Preliminary" change to "Proposal" Architectural Submission? The Final Architectural Submission matches the Final Application in nomenclature; changing Preliminary to Proposal will align its submission nomenclature as well.
 - New Construction developments shouldn't have to provide a Scope of Work Form. Architectural plans are a higher and better version of this Form. It's duplicative and therefore unnecessary.
 - "include all site details" should include a list or otherwise be defined.
 - "Color-coded floor plans with legend, indicating area classifications per BOMA and OHFA guidelines."
 - Please provide more detail.
 - Will this need to be displayed on the approved drawing sets? Our concern is this will confuse city/county plan reviewers.
- **Required Documents – Final Architectural Submission**
 - "The submission *must show conformity to the preliminary submittal drawings and forms if applicable.*"
 - How do we adequately demonstrate conformity?
 - "The DCF included/incorporated into the front of the 80% drawing sets. The DCF... in the application for funding."
 - Where should these pages be in the set? Can an example be given?
 - "Documentation that all items required to be completed per Phase I or II Environmental Site Assessment, or per applicable Environmental Review performed by OHFA, have been or will be completed during construction."
 - What specific documentation?
 - "Drawing sets should provide documentation of the project meeting all design requirements of the DAS."
 - Isn't this what the OHFA review is? How do we provide any documentation other than the plans themselves?

- **Exception Requests – New Construction**
 - “Items that are unable to be complied with for a *compelling reason*, as fully described by the applicant in the Exception Request form.”
 - This is subjective- compelling to whom and in what way(s)?
- **Exception Requests - Rehabilitation and Adaptive Reuse**
 - “Projects involving rehabilitation or adaptive reuse may seek an exception to any design requirement in the DAS if able to provide evidence that incorporating a specific element is *infeasible*.”
 - This is subjective- infeasible to whom and in what way(s)?
 - Financial reasonableness should be a factor when determining feasibility.
- **Exception Requests – Exceptions after Architectural Review Approval**
 - “OHFA must be *notified* of such a request within 30 days, and the *complete exception request* can be submitted when a solution has been identified.”
 - This process is confusing:
 - We're to notify OHFA- is this via an Exception Request?
 - Notify within 30 days of what?
 - Is OHFA a party to the solution that gets identified or does the developer determine this independently?
 - What timeframe for a determination can we expect?
- **Construction Progress & Monitoring – Notification of Construction Start**
 - “Projects with HDAP funds must hold a preconstruction meeting, and provide OHFA with documentation of that meeting with the first draw of HDAP funds.”
 - Will OHFA be attending the preconstruction meetings?
 - If yes, OHFA should already have documentation of the meeting.
 - If no, why do HDAP deals need a preconstruction meeting, but non-HDAP deals don't?
- **Construction Progress & Monitoring – Construction Monitoring**
 - “A member of the development team (owner or architect) must attend all Construction Monitoring.”
 - How much notice will the development team get for these mandatory meetings? Every effort should be made to coordinate these meetings with the monthly construction draw meetings/inspections.

- “Additionally, for all OHFA projects, OHFA requires the submission of any change orders for *any major building systems* that do not have a *substantially similar* material or solution.”
 - Almost everything falls into some kind of major building system. Can OHFA reject a change order? If so, under what circumstances?
 - Please define “substantially similar”.
- “(5) substantial changes in costs including, cost changes of 20% or greater, use of contingency 10% or greater, cost savings of \$10,000 or more, and value engineering.”
 - Is the 20% for each item (e.g. sidewalks), each category (e.g. Sitework), or the full contract?
 - Is the 10% or greater applicable to:
 - Only the change orders that are individually over 10% of the total contingency?
 - The change order in which 10% of the total contingency is spent in aggregate (and each one after that)?
- “OHFA staff will provide a response within two weeks.”
 - This isn’t an acceptable timeframe to avoid pausing work.
- **Construction Completion**
 - “Project closeout and issuance of Form 8609 will not occur until the above have been submitted and reviewed by OHFA and any remaining issues have been resolved.”
 - Please commit to a review time turnaround.

Standards

- **G1. Introduction**
 - Change “principals” to “principles”.
 - Affordability is noted as, “Improve energy & resource efficiency to reduce utility costs to the project and residents. Minimize future tenant damage, in concert with Durability goals below.”
 - While important, utility costs are a fraction of what contributes to the overall cost of affordable housing. They’re also an operating consideration, not really a design and construction consideration. The main driver of affordable housing costs are materials, which aren’t mentioned here.

- Requiring more durable, and therefore costly, materials in order to offset resident activity is imprudent and we don't agree it will change the ultimate outcome.
- Accessibility notes, "Encourage architectural adaptations beyond the code minimum."
 - While well-intentioned, this is in direct conflict with the principle of Affordability. In this case, "beyond the code minimum" means "beyond a reasonable cost".
- Applicability
 - "sections beginning with "N" apply to new construction and adaptive re-use projects."
 - Should this just be labeled "N-AR" then?
 - "The DAS represents the minimum requirements necessary to receive OHFA funding; requirements may be increased or modified by a program-specific guideline or an incentive."
 - Can "only" be added between "modified" and "by"?
- Notice & Disclaimer
 - Since Federal and State law apply to all OHFA LIHTC projects, can those be incorporated into this document? Local law will obviously vary.
- **G2. Definitions**
 - ASTM E2018-24 is available and definitions should be used verbatim. It's incredibly important that terms are defined in whole, unedited, and used consistently throughout these documents to maintain their integrity.
 - "Assemblies" isn't a defined term in ASTM E2018-24.
 - Add:
 - "Building System(s)- interacting or independent building components or assemblies, that form integrated units that comprise a building and its site work, such as, pavement and flatwork, structural frame, roofing, exterior walls, plumbing, HVAC, electrical, etc."
 - "de minimis- any consideration, finding or condition that, in the sole opinion of the consultant, does not represent an imminent threat of physical harm to occupants, and (1) can be remedied through routine maintenance or (2) where the cost of corrective action is expected to be below the agreed reporting threshold."

- “effective age- an opinion representing the difference of the expected useful life and the remaining useful life. The opinion of effective age may be more or less than the actual age and can vary significantly based upon maintenance history, location, weather conditions, and other factors.”
- “long term costs- opinions of cost for anticipated replacement of building systems and building components over an evaluation period defined by the user. Long-term costs are generally based on the findings of the PCA and are frequently presented in tabular format. Unless expressly agreed between the user and consultant, long-term costs are not intended to represent enhancements or upgrades to the subject property.”
- “Physical condition- the physical state of a subject property, building system or building component. Within the context of the assessment, the consultant may offer opinions of the physical condition of the subject property, or of observed building systems or building components. Such opinions commonly employ terms such as good, fair, and poor; though additional terms such as excellent, satisfactory, and unsatisfactory may also be used, provided that the utilized terms are defined within the PCR. Where used to describe the physical condition of a subject property, building system, or building component the opinion is intended to reflect the predominant condition. For example, an air conditioning system may be in good condition despite a requirement to replace a limited number of units. Alternatively, a range of conditions may be described by combining terms such as “good to fair”, or “fair to poor.” Where conditions are not uniform, an explanation of the various disparate conditions shall be included in the report. Terms not defined above should be defined in the report or agreement for services.”
- “routine maintenance- an activity that can be conducted within the budget and skill set of typical maintenance staff and does not require specialized equipment, professional services, or contractors.”
- Revise all of the other terms to match the ASTM-E2018-24 wording, including any *Discussion* text that immediately follows the definition.

- Circulation Space
 - How are breezeways classified?
- Common Space
 - Circulation space is listed as a component of Common Space, but it has its own definition above. However, community space and property management space are also components of Common Space, but do not have their own definitions.
 - Using “etc.” leaves room for interpretation and guesswork. These lists should be exhaustive.
 - Property Management Space isn’t really designed for resident use. Perhaps removing “for resident use” from the definition of Common Space if this is to remain a component.
- Dedicated Program Space
 - Puzzle/game rooms, libraries, fitness rooms, and computer rooms are better classified as Common Space since they don’t have “program-driven purpose.”
- Physical Capital Needs Assessment (PCNA)
 - *“An inspection and resulting report for a property that provides detail on the property’s current overall physical condition and identifies immediate physical needs, significant deferred maintenance, and an opinion of costs to remedy physical deficiencies. EUL values are used in a Capital Needs Assessment when assessing the current condition. Remaining useful life (RUL) is used to evaluate existing materials in meeting OHFA required durability”.*
 - PCNAs don’t only identify immediate physical needs. They opine on all physical needs/conditions.
 - Similarly, PCNAs note whatever deferred maintenance is apparent, not just those that are “significant”.
 - It’s worth pointing out that “opinion of costs” are for like-for-like replacement and do not consider any alterations or enhancements to the components or systems. For example, going from thru-wall air conditioners and baseboard heating to a split-system HVAC is apples and oranges.
 - The EUL of a product is fixed, as given by the values in Appendix C. So, it has no bearing on the point-in-time

condition. The RUL is a result of the fixed EUL + the observed condition; it's a judgement on whether the EUL *can* be met. The life of any product is its actual life. The expected life is just that, an expectation. The expected Remaining Useful Life and the actual Remaining Useful Life are not always equal.

- Support Space
 - “A room or space outside the residential living unit that is not intended for resident use.”
 - Could this be “that is not intended *primarily* for resident use”
 - Management offices are better put here than in Common Space.
- **Construction Categories**
 - Adaptive Reuse
 - “If the building has undergone a change of use to residential occupancy less than 24 months prior to the submission of application to OHFA, it will be considered an Adaptive Reuse.”
 - If the building has already been “adapted”, it should only be considered a rehab or else these types of projects will have a cost per unit and/or tax credit per unit advantage over those projects that haven’t already been “adapted”.
 - OHFA Square Footage Calculation
 - How are breezeways considered?
 - “The burden of compliance rests with the project team. Owners/developers and/or architects will be required to certify to OHFA that they have complied with applicable regulations.”
 - We concur. Will OHFA staff therefore only do a summary regulatory review?
 - Mobility Unit
 - This requirement should only apply to new construction. If you have a multilevel building(s) without an elevator, it doesn’t make sense to create upper floor mobility units.
- **G5. OHFA Accessibility Requirements**
 - Number of Section 504 Mobility Units
 - Which applies to Adaptive Reuse?

- To avoid confusion, consider adding “OR” between Options A and B and Options B and C, along with “AND” after Option C but before “2% of units must meet Section 504 Sensory Standards.”
- Additional Features for 504 Mobility Units
 - This section is well-intentioned and these features can benefit some residents, but we are concerned that adding features that are above and beyond Code create inequity in cost vs. impact, especially when they require more maintenance and/or are less durable. Candidly, developers will likely choose the least expensive items to incorporate. At the end of the day, our projects need to be competitive in terms of credit and soft funding requests, so committing to higher cost items directly decreases the chances of being funded.
 - We look at our Scope of Work holistically; it’s not just the construction materials and labor, there are longer-term impacts to operating costs and replacement reserves when these items will need maintenance and eventual replacement. To mitigate these impacts, we encourage OHFA to only include features that are industry standard, of nominal cost, and with low short- and long-term maintenance impact. As with comments elsewhere, inclusion is more difficult in rehabilitation than new construction developments.
 - We recommend removing Column A2 as every item has a significant cost impact.
 - More than one elevator serving the building.
 - Elevator components with install is approximately \$150,000 and the elevator shaft construction is approximately \$125,000.
 - Permanent generator that provides power to the elevator.
 - A 50KW generator on a concrete pad will run about \$60,000.
 - A playground or splash pad designed for wheelchair-inclusive play.
 - This is an approximate 75% increase in cost over a “standard” playground setup.
 - It’s also intended for children and therefore would be inappropriate for a senior development.

- Casement windows with all operating hardware within reach.
 - A casement window is about 33% more expensive than a single-hung window. Casement windows also tend to be a difficult maintenance item as they aren't as durable as single-hung or slider windows.
 -
 - “Manual pull to close door on all passage doors within unit and any exterior doors.”
 - This item is unclear.
 - Important Reminders
 - “Accessible units must have *comparable features* to non-accessible units, including counter space and storage comparable to what is provided in non-accessible kitchens & bathrooms.”
 - Does the inclusion of Additional Features from the previous section render these 504 units non-comparable since they have amenities that “standard” units do not? For example, if the 504 units have dishwashers (Column C), but the non-504 units do not, is that not disparate?
- **N1. Applicability**
 - “The Guidelines for New Construction, in addition to the General Requirements above, apply to the ground-up construction of a new building(s) as well as projects defined as Adaptive Reuse.”
 - If this applies to New Construction and Adaptive Reuse, the heading should list both, not just New Construction.
- **N2. Radon Reduction and Prevention**
 - This Section, along with the same R2 Section, should be combined and moved into General Requirements. This is especially relevant because Adaptive Reuse falls within New Construction Guidelines, except as it relates to radon, where it follows the Rehab Guidelines.
 - “a vertical vent pipe from the permeable layer through the roof to vent outside.”
 - Venting through the roof creates an unnecessary roof penetration. It is a common practice for radon vent pipes to be vented through an exterior wall so long as the exhaust terminates above the roof line.

- **N3.2. Building Design**

- “The maximum common area, using the Common Space definition for what constitutes common area, must not exceed 20 percent of the total gross building square footage.”
 - Using both “common area” and “common space” as separate and distinct terms is confusing, especially if one is a subcomponent of another.
- “Common area hallways must be a minimum of 42” in width.”
 - Instead of using “common area hallways”, use “circulation space hallways” since you’ve created that Definition.
- “Developments serving seniors or a PSH population with a high rate of disability must not exceed one story unless the building has an elevator accessible to all residents.”
 - What constitutes a “high rate of disability”?

- **N3.3 Unit Sizes**

- “At least 6 LF of hanging storage for Efficiency and 1-bedroom units, plus an additional 4 LF for every additional bedroom.”
 - In a 3-BR unit, for example, does that mean there needs to be a total of 14 LF?

- **N3.9. Durability**

- N3.9.2 Material Specifications
 - “Insulation must meet the ASHRAE 90.1 Standard at the time of OHFA application (e.g. -2019).”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - “Windows and exterior doors must meet at minimum Version 6 (V6) Energy Star rating for climate zone 5.”
 - Many counties in the southern part of Ohio are in Zone 4.
 - “Window manufacturer must provide a letter identifying number of windows provided to the project complying with Energy Star V6 and windows U-value, infiltration and wind speed rating per V6.”
 - “HERS rater must certify those windows were installed on the project”
 - A specification sheet will provide all information requested here. Manufacturers will balk at providing a letter and simply

refer us to the spec sheet as it already defines the standards with which it complies.

- Also, the industry standard is now Version 7.0.
- “In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.”
 - Quarterly cleaning is far too frequent. Annually is reasonable.
- “Moisture-resistant gypsum board is required in the following areas.”
 - What Standard calls for the 4’ distance from water sources?
- N3.9.3 Construction Practices
 - “All downspouts must empty onto concrete splash blocks with a positive slope away from the building or be piped to an appropriate location.”
 - Please consider plastic splash blocks as an alternative.
- **N3.10. Building Systems**
 - N3.10.1 Plumbing Systems
 - “Water heaters must meet current (adopted by Ohio at the time of 80% drawing submittal to OHFA) version of ASHRAE 90.1.”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - N3.10.2 HVAC Systems
 - “Must meet current (adopted by Ohio at the time of 80% drawing submittal to OHFA) version of ASHRAE 90.1.”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - N3.10.3. Electrical Systems
 - “Switches must be rocker, touch light, or hands-free.”
 - Why is toggle not permitted? They should be ADA-compliant as long as they have the correct height and clear space.
- **R2. Lead-Based Paint Hazard Reduction**
 - “The requirements in this section apply to all properties seeking OHFA funding for rehabilitation of a pre- 1978 structure.”
 - Please define “pre-1978 structure”. Does that mean PIS by December 31, 1977? Started construction prior to January 1, 1978?

- “Certain properties *may be exempt* and are able to seek an exception to this requirement:”
 - When would a property be able to provide proof of one of the three situations but not be exempt? This shouldn’t require an Exception Request; if proof can be provided, it should be automatic.
- “Properties found not to have lead-based paint during earlier testing *that meet the requirements of prior evaluations.*”
 - What are prior evaluations? Do they vary from the requirements in this section?
- “Properties in an area where state and local governments banned lead-based paint prior to January 1, 1978.”
 - Should clarify that the property was built within that banned timeframe.
- “For properties in *good condition*, a lead hazard screen risk assessment may be performed first to determine whether a full risk assessment is necessary.”
 - Please define “good condition”.
- **R3. Radon Reduction and Prevention**
 - This Section, along with the same R2 Section, should be combined and moved into General Requirements. This is especially relevant because Adaptive Reuse falls within New Construction Guidelines, except as it relates to radon, where it follows the Rehab Guidelines.
 - “Rehabilitation Projects may request an exception to the requirement for a radon mitigation system based on pre-construction testing results below 4.0pCi/L.”
 - When and why would an Exception Request not be granted if all pre-construction levels are below 4.0pCi/L?
 - “Radon testing, mitigation, and laboratory work for developments to be funded with OHFA resources must be performed by individuals who meet the certification and licensure requirements as outlined in OAC 3701-69.”
 - This is listed at the end of both subsections.
- **R4. Sustainability**
 - “All OHFA funded projects must meet the requirements of one of the below energy efficiency or green building certifications.... Certification from the

applicable green building rating system itself is recommended but not required.”

- Will OHFA require any documentation if certification isn’t ultimately pursued? HERS Rater
 - “The development meets or exceeds the higher of either the certification selected or the Ohio Energy code using the current ASHRAE 90.1 (e.g. 2019).”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - “For rehab: The post-construction blower door test must achieve 12 ACH or lower.”
 - The project’s original construction type will have a major impact on how this number is achieved. Enterprise Green Communities uses 1980 as a cutoff for testing limits; we’d ask that these Standards use that same threshold allow pre-1980 developments to pass with a higher ACH post-rehabilitation.
 - “HERS Rater must be engaged at the *application or preliminary phase* through construction completion.”
 - Why must we engage so early? This will increase costs.
 - Which application?
 - Please define “preliminary phase”.
- **R5. Minimum Scope of Work**
 - “Any rehabilitation projects seeking HTC (competitive or non-competitive) must *significantly address* major building systems (MBS).”
 - The term “significantly address” is different than how the Rehabs are defined earlier in the document, which is via “majority replacement.”
 - “Total replacement of a Major Building System is not required, but the greater part (at least 50%) must be replaced.”
 - How is 50% measured? By number? Cost?
 - How is each component of a MBS weighted? (e.g. is 1 window = 1 door?)
 - How is < full replacement weighted? (What % is painting doors and installing new hardware vs. fully replacing the doors?)

- Does upgrading the item get more weight than a like-for-like replacement? (e.g. replacing PTHPs vs. converting to split system HVAC)
- We appreciate that there is objectivity in the intent to quantify the rehab threshold (>50%), but there isn't a complete methodology for objective measurement and therefore the standard is incomplete.
- All building systems/assemblies in need of replacement and/or repair as identified in the PCNA *or identified by the architect* must be included in the scope of work regardless of if these elements are part of a Major Building System identified above. This includes items identified in the PCNA as having *an RUL of less than 50%.*
 - The PCNA is an independent, professional report; if what is "identified by the architect" may supersede its findings and/or conclusions, it, along with the PCNA professionals' integrity are devalued. Either the PCNA is a valuable, independent report or it isn't. (An omission or obvious error in the report should understandably be remedied).
 - We shouldn't be required to replace anything that has a RUL > 15 years, even if its RUL is less than 50% of its EUL. For example, a property built in 2005 will have toilets that are 21 years old. With an EUL of 40 years, the (expected) RUL is 19 years. By this rule, we'd need to replace all of the toilets even though they have a significant amount of RUL remaining. Put simply, having an RUL <50% doesn't mean replacement is necessary.
- *"All deficiencies observed in the PCNA must be addressed."*
 - This is far-reaching. It's also slightly different than what's called for earlier in the document: *"All building systems/assemblies in need of replacement and/or repair as identified in the PCNA..."*. Any discrepancy leaves room for interpretation, which opens up the possibility of disagreement.
- *"Exterior concrete, stairs, play equipment, shelters, and outbuildings shall be in good condition upon completion without damage, rust, or rot and must have a painted or weather cover meeting OHFA's DAS."*
 - Is this meant to say, "must be painted or have a weather cover?"
 - How do we provide either for exterior concrete?

- **R6. OHFA Design Requirements**

- (Everything following should be labeled starting with R6, not R4)
- R4.1. Site Design Requirements
 - “During construction, measures must be implemented to remove invasive species and prevent their re-establishment.”
 - This could be a very expensive undertaking with no real value to the residents. Please consider revising to “During construction, measures must be implemented to remove invasive species *within the existing landscaped area* and prevent their re-establishment.”
- R4.2. Building Design
 - “If the footprint of the existing building is being expanded, maximum common area, using the Common Space definition for what constitutes common area, must not exceed 20 percent of the total gross building square footage.”
 - Is there something in Section 42 that is driving this restriction?
 - What if the building already has Common Space that is > 20% of the total building square footage?
- R4.3. Unit Sizes
 - “Senior Developments may not have any unit larger than two bedrooms.”
 - What if an existing senior property already has a unit(s) that is 3-BR or larger?
 - “All affordable units must include adequate storage space for unit residents.”
 - This should not be required for rehabs. The unit floorplans are fixed and so any additional space requirements (e.g. closet/storage space), will not only require the creation of that space (framing, drywall, painting, finishes) and the associated cost, but will equivalently decrease area of other spaces, such as bedrooms, living rooms, kitchens, bathrooms, and hallways. This is a zero-sum situation; what is gained by storage is lost elsewhere.

- R4.4. Bedroom Sizes
 - “All affordable unit bedrooms must meet the following minimum size requirements:
 - Primary bedroom: 110 square feet
 - Secondary bedrooms: 90 square feet”
 - The comment to the previous item is also applicable here.
 - “Bi-fold or accordion-type doors are not permitted.”
 - Replacement of bi-fold and accordion type doors isn’t as simple as just installing a standard swinging or sliding door; upgrading to these types of doors requires framing and additional hardware. The result could be a non-standard sized opening that requires custom (expensive) doors. Can existing bi-fold or accordion-type doors remain if existing and will be replaced with new?
- R4.9. Durability
 - “If existing EIFS is intended to remain, *applicant must provide a report documenting the condition of the existing EIFS, condition of the building envelope at the EIFS location, and making recommendations for any repair or replacement to maintain the integrity of the building envelope over the entirety of the compliance period. Rehab scope of work must incorporate those recommendations, subject to OHFA’s review.*”
 - Why is EIFS treated differently than any other building component in that the PCNA is not sufficient to detail its condition?
 - What is the name of this specific report?
 - Is “OHFA’s review” separate and distinct from the standard PCNA and Scope of Work review?
 - “Any insulation that is installed *or accessible* during the rehabilitation (e.g. attic insulation) must be upgraded to meet the ASHRAE 90.1 Standard at the time of OHFA application (e.g. -2019).”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.

- What is “accessible” insulation?
- “New and replacement windows and exterior doors must meet at minimum Version 6 (V6) Energy Star rating for climate zone 5.”
 - Many counties in the southern part of Ohio are in Zone 4.
 - Also, the industry standard is now Version 7.0.
- “In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.”
 - Quarterly cleaning is far too frequent. Annually is reasonable.
- “All downspouts must empty onto concrete splash blocks with a positive slope away from the building or be piped to an appropriate location.”
 - Please consider plastic splash blocks as an alternative.
- R4.10. Building Systems
 - “Water heaters must meet current (adopted by Ohio at the time of 80% drawing submittal to OHFA) version of ASHRAE 90.1.”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - “Must meet current (adopted by Ohio at the time of 80% drawing submittal to OHFA) version of ASHRAE 90.1.”
 - In addition to ASHRAE 90.1 for commercial projects, the Ohio Building Code also recognizes 2021 IECC for commercial and 2018 IECC for residential projects.
 - “Package Terminal Air Conditioner (PTAC) units are not permitted. Package Terminal Heat Pump (PTHP) units are permitted only in rehabilitation projects in openings where PTHPs or PTACs currently exist.”
 - Does this mean existing PTACs must be replaced?
 - “Switches must be rocker, touch light, or hands-free.”
 - Why is toggle not permitted? They should be ADA-compliant as long as they have the correct height and clear space.
 - Does this mean existing must be replaced if not one of these types?
 - “Obsolete electrical panels, meter equipment, disconnects etc. throughout the entire property must be replaced. This includes

electrical panels that contain components that are *not readily and commonly available at a reasonable cost*. Common examples include: Federal Pacific, Wadsworth, Bryant, Sylvania, Challenger, Cleveland (Cleveland Switch Board), Push-O-matic, Zinsco, any screw-in fuses, any split buss panels, *etc.*”

- Please be exhaustive in lieu of using “etc.”
 - Please define “not readily and commonly available at a reasonable cost”.
- “Where MDP or disconnects utilize renewable cartridge fuses (such as Bussmann, Cooper, etc) these are not considered obsolete.”
 - Please be exhaustive in lieu of using “etc.”
- “Where panels no longer manufactured have currently manufactured replacement breakers. These replacement breakers must have an Underwriters test letter from the replacement breaker manufacturer that allows the new U/L rated breakers to be installed in the project specific obsolete panel make and model number.”
 - This is unclear and obtaining a letter from the manufacturer isn’t feasible.
- **Appendix A: Physical Capital Needs Assessment Standards**
 - OHFA should have a list of pre-approved PCNA providers like they do for Market Studies.
 - Definitions:
 - This section should be moved to section G2 Definitions, as EUL and RUL already appear there and are relevant to PCNAs.
 - Comments in G2 are relevant here as well.
 - The inclusion of Scope and Process sections indicates the intent to “redefine” what a certified PCNA Report is. Historically, PCNAs have received significantly more scrutiny than other reports and have been held to both higher and different standards than these professionals’ expert opinions. Like any other third-party report provider (Phase 1, Market Study, Appraisal, etc.), their expertise should be recognized and relied upon without undue scrutiny.
 - Scope
 - “PCNAs produced for USDA or RAD projects *may* be used with OHFA approval of an Exception Request prior to submission.”

- There's gray area here since no detail is given regarding why OHFA's approval may or may not be given. In what scenario would OHFA not approve a USDA or RAD project PCNA? Or, alternatively, in what scenarios would OHFA approve a USDA or RAD project PCNA?
 - This is an example of wording that lacks definitive detail as to when and/or what directly leads to decision making, which creates a layer of uncertainty that must ultimately be resolved at some later time.
- "The PCNA must identify any repair items that represent an immediate threat to health and safety, *and all other significant defects*, deficiencies, items of deferred maintenance, and material building code violations that would *limit the expected useful life* of building systems or *assemblies*."
 - Consider removing "significant defects", as it is not an ASTM-defined term.
 - As noted earlier, the Expected Useful Life and the actual useful life are not always the same. The Expected Useful Life never changes, but the actual useful life can be diminished. Unfortunately, there are an almost infinite number of factors that can contribute to any such diminishment and so a requirement to identify "any" and "all other" of them is unrealistic.
 - Consider removing "assemblies", as it is not an ASTM-defined term.
- Process
 - Why are the ASTM standards not acceptable as-is?
 - "The PCNA provider may attest that the PCNA remains valid or provide a letter of amendment without requiring an additional site visit, up to 1 year after issuance. OHFA may require the third-party qualified professional to update any report that is greater than 6 months old at the time of *submission*."
 - These two statements contradict. If the PCNA provider can attest to or provide a letter of amendment, why would OHFA then still require an update?

- What “submission” is referenced here?
- Guidance
 - “The EUL/RUL of an item does not equate to need. Need is the second half of evaluation for replacement that must be documented.”
 - This just isn’t true. The RUL is derived from taking an item’s EUL and then filtering it through the observation of that item’s condition. RUL can be thought of as Actual Useful Life; it’s the output of the analysis. Need doesn’t get layered onto an RUL, because it *already has been*. This is why RUL doesn’t always equal EUL minus age. It’s also why, when the age of an item isn’t known, its RUL can still be estimated because its condition is observable.
 - “When evaluating a system or assembly, the following questions must be clearly answered in the PCNA:
 - What is the current condition?
 - Does it need to be replaced?
 - How much of the system needs to be replaced (as a percentage)?”
 - Everything eventually breaks down and needs to be replaced. For this reason, rather than “does it need to be replaced?”, we recommend asking “*When* does it need to be replaced?”
 - Similarly, rather than “how much of the system needs to be replaced?”, ask “how much needs to be replaced *at that time*?” with a natural follow up (if the answer is less than 100%) of “how much needs to be replaced at a later time and when is that?”
- **Appendix C: OHFA EUL Table**
 - General
 - The EUL table to be used should be taken directly from ASTM or another Standard. None is listed.
 - “Any materials used in OHFA projects (New or rehab) must be in the table to be used in OHFA projects.”
 - This is unclear.



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Thank you,

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