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Sent: Thursday, June 25, 2026 1:27 PM
To: OHFA Design and Architectural Standards
Subject: 2027 DAS Comments
Attachments: OTRCH 2027-DAS-Review-Comments.docx

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Attached please find my comments to the 2027 DAS.

I was disappointed that these did not seem to capture the comments for the March 3 input session that highlighted the need to allow for renovation projects to be allowed to re-submit if they were approved by OHFA under previous guidelines. Additionally, it still appears that there are requirements in the guidelines that go beyond what market-rate requires. I left that input session with the understanding that this would be a litmus test: "if market rate doesn't require it, OHFA shouldn't require it"

I tried to capture these comments in the attached, but I would ask that you also consider them globally.

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#	Page	Section	Referenced Text	Comment / Question
1	10	G5	All Rehab: 504 Mobility Unit Requirements	How do you deal with re-syndication projects where this requirement is greater than what was approved previously? A "Mod Rehab A" may not impact any plumbing fixtures, does this mean that you have to change plumbing fixtures? If so will there ever be a "Mod Rehab A" or will everything be forced into "B"?
2	11		Additional Features for 504 Mobility Units	I appreciate the intent, but I think that many additional features are already noted in throughout the standards. Further, I struggle with how this fits with the intent listed in on page 4. The Accessibility sections states "Encourage" rather than require. Further many items in this section do not appear to "thoughtfully balance mission and cost considerations". Has OHFA put together what the additional cost to projects will be? Will the amount of credits/funding go up proportionately with these requirements? Will cost containment go up? Will the board be informed that increased per unit and per square foot costs are being driven by OHFA and not developers?
3	11	Col. A1	Oven with side opening door	These appear to be \$2,000 - \$3,000 each. This is not only an upfront development cost, but also an ongoing operating cost.
4	11	Col. A2	Whole Building	This section should be deleted. The title of the page references additional features for Mobility Units, not the entire building.
5	11	G5 / Col. A2	More than one elevator serving building	This is just crazy. I can't imagine bringing a project to OHFA's board and getting grilled over cost with this suggestion. Has OHFA researched what the cost of this will be, both initial install and ongoing operating and inspection cost?
6	11	G5 / Col. A2	Playground or splash pad designed for wheelchair-inclusive play	What do urban projects with no site area do? Per above has OHFA researched what the cost of this will be?
7	11	G5 / Col. A2	Permanent generator that provides power to elevator	Is a power grid redundant — is that sufficient? Does the building code allow that? Has OHFA researched what the cost of this will be, both initial install and ongoing operating and inspection cost?
8	11	G5 / Col. A2	Casement windows with all operating hardware within reach range	What about historic projects or other projects that have design requirements that don't allow for this?
9	11	G5 / Col. B	42" wide leaf for all passage doors	All passage doors? Throughout or just in 504 units?

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10	11	G5 / Col. c	Space designated for wheelchair charging in appropriate location	I hesitate to comment on this because I fear it will be "over designed" — but who decides what is appropriate?
11	11	G5 / Col. c	Storage in bathroom (e.g. for healthcare supplies)	Is a medicine cabinet sufficient? What about a drawer in a vanity? A cabinet above the toilet?
12	11	G5 / Col. C	Grab bars installed at toilets and tubs/showers	Aren't these already required in 504 units? If so this should be deleted, creating redundant requirements has created a lot of confusion in the past.
13	11	G5 / Col. C	Pull-out work surface near the oven, refrigerator or microwave	Dimensions?
14	11	G5 / Col. C	Ice and water dispenser within reach range	Does a sink count as a water dispenser?
15	14	N3.1.2	All main entries must have a roof, awning, or overhang (min. 30" depth, 54" for mobility units)	Is this necessary? I know it is a nice feature, but does market rate require it?
16	14	N3.1.3	Provide landscaping, which at a minimum must include grass or ground cover.	What about projects with no site area? What if a site is in an urban area and has room for a building and a sidewalk only — would the building size have to be reduced to provide an area for grass or ground cover? Can a project just have mulched beds?
17	14	N3.1.3.1	Remove invasive species during construction	Remove invasive species from the entire site? What if you have a 40-acre site with the building only on 2 acres?
18	14	N3.1.4	All new sidewalks along the accessible route must be a minimum of 5-feet in width	Why? Does market rate provide this?
19	14	N3.2.1	Maximum common area must not exceed 20% of total gross building square footage	PSH should be allowed to have a greater percentage by right and not have to ask for an exception. .
20	14	N3.2.2	Common area hallways must be a minimum of 42" in width.	I think this should be removed and you should allow the building code to drive this. It is my understanding that the OBC requires 44" wide corridors. This is illustrative of why I think that the DAS should be paired back even further, items like this create confusion and are not necessary for OHFA to opine on.
21	14	N3.2.3	Building and all dwelling units must have no-step entry (1/2" or less) at main entrance.	See above.
22	15	N3.3.1.1 / N3.3.1.1.1	Studio/efficiency: 400 sq ft; Assisted Living: 350 sq ft	Allow PSH to be 350 sq.ft.
23	15	N3.3.2	Single-room occupancy units (SROs) are not permitted	Why not?

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24	15	N3.3.4.1	At least 6 LF of hanging storage for efficiency and 1-bedroom units, plus 4 LF for each additional bedroom	What is this based on? This feels like more than market rate.
25	15	N3.5.2	Multi-story townhomes must have a visitable toilet room on the accessible floor	All townhomes or just accessible units? This is \$\$\$\$.
26	15	N3.5.3	All 504 mobility units provided must have one roll-in shower	No! Accessible tubs should be an option. Residents have shared how much they appreciate being able to therapeutically soak.
27	16	N3.5.5	PLAM countertops may not have sharp 90-degree corners, in case of a bathroom fall.	This is just clunky — other requirements don't give a "why" as part of the requirement. Can solid surface tops have a 90-degree corner?
28	16	N3.6.1.1.1	For Affordable Assisted Living, a microwave (or other cooking appliance) with a dedicated 20-amp outlet may be provided instead.	Allow this for PSH as well.
29	16	N3.6.1.3	Energy-Star certified dishwasher (if provided)	This reads oddly. The section starts by saying "all affordable unit kitchens must include:" — so are dishwashers now required? They should not be.
30	16	N3.7.1.1	Minimum 32" clear width	Is this already covered by the OBC/ORC if so eliminate
31	17	N3.9.2.2	Exterior insulation finishing system (EIFS) is prohibited	Why? Market Rate uses this material? It is has a great insulation value. It feels like this is a comment left over from the 1980's
32	17	N3.9.2.5.1	Window manufacturer must provide a letter identifying number of windows complying with Energy Star V6	Why do you need this? Why is it required for windows specifically? It is not a requirements for other conditions, and it shouldn't be for windows.
33	19	N3.10.2.4	PTAC units are not permitted; PTHP units permitted only in AAL projects	Allow for PSH.
34	19	N3.10.3.2	Switches must be rocker, touch light, or hands-free	Just allow traditional switches. It doesn't feel like much but each and every thing that OHFA requires beyond market rate means additional cost, which means fewer units get built.
35	24	R4.1.1	Provide landscaping	See comment above (N3.1.3). This suggests that landscaping is required, but what about projects that do not have any area for landscaping?
36	24	R4.1.2	Any new sidewalks along the accessible route must be a minimum of 5-feet in width.	What about replacement? Can they be replaced in-kind (same width)?
37	24	R4.2.2.2	Developments serving seniors or PSH with high disability rate must not exceed one story unless building has an elevator	What if a project is a re-syndication and was approved by OHFA — would an elevator be required to be added? This could mean that properties that are online now could fall into dis-repair or be lost.
38	24	R4.3.1.1.1	Assisted Living: 350 square feet [minimum unit size]	Add PSH.
39	24	R4.3	R4.3. Unit Sizes	What if a project was previously approved by OHFA and is going to a re-syndication?

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40	25	R4.3.4	All affordable units must include adequate storage space	What about layouts that were previously approved by OHFA? Meeting these new requirements could mean that a re-syndication project would have to considerably reconfigure units and potentially lose units — which then means the Restrictive Covenants need to be modified for fewer units, all for additional closets space? Don't make every rehab go through the exception request process.
41	25	R4.3.2	Single-room occupancy units (SROs) are not permitted.	What about existing SRO projects?
42	25	R4.4.1	Primary bedroom: 110 sq ft, Secondary bedrooms: 90 sq ft	What about projects that have smaller bedrooms (or counted the closet in the square footage) and were previously approved by OHFA? What if you had a compliant bedroom, but not compliant closets? Don't make every rehab go through the exception request process.
43	25	R4.5.1	All 504 mobility units provided must have one roll-in shower.	See comment above (N3.5.3) — why are you excluding tubs?
44	25	R4.5.3	PLAM countertops may not have sharp 90-degree corners [Rehab section]	See comment above (N3.5.5).
45	25	R4.6.1.1.1	For Affordable Assisted Living, a microwave may be provided instead [Rehab section]	Allow for PSH.
46	26	R4.9.2	Specific materials designated as historic by SHPO as addressed in writing by SHPO are exempt	SHPO hasn't typically written letters. Would the approved Part 2 be sufficient? Please clarify.
47	27	R4.9.3.4	Any insulation installed or accessible during rehab must be upgraded to meet ASHRAE 90.1	I get the intent, but what if I open up a 2x4 wall — I wouldn't be able to bring this up to code by replacing and/or adding batts. Would I then be required to furr the wall out? What about historic buildings where furring of walls is not permitted.
48	27	R4.9.3.5.1	Window manufacturer must provide a letter [Rehab section]	See note above (N3.9.2.5.1).
49	28	R4.10.1.3	All existing buildings must have shut-off valves replaced with full port stainless steel shut-off valves.	Where? At the meter? At all fixtures? Are you requiring more than would be required for a new project under the current plumbing code?
50	28	R4.10.2.1	HVAC systems must meet current version of ASHRAE 90.1	What if the HVAC isn't being updated?