



FOUNDERS

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Dear Ms. Cahill,

On behalf of the U.S. Green Building Council, our nearly 9,000 member companies nationwide, and our strong Ohio community, USGBC is pleased to provide the Ohio Housing Finance Agency (OHFA) with comments on the [Draft 2027 Design & Architecture Standard](#) ("DAS"). **USGBC strongly recommends that the OHFA revise the Draft 2027 DAS to retain the current DAS requirement for all projects to obtain a green building certification with qualified third-party verification.**

USGBC supports the development of prosperous, healthy, and resilient communities through the built environment. Through our flagship [Leadership in Energy and Environmental Design \(LEED\)](#) green building certification, USGBC is committed to transforming how our buildings and communities are designed, constructed and operated, enabling an environmentally and socially responsible, healthy, and prosperous environment for all, including low-income housing residents.

New Construction Developments

The current Design & Architecture Standard (DAS) (2024) requires all affordable housing projects to (1) obtain an approved green building certification, with evidence from the chosen green building rating system and (2) certification from a Homes Energy Rating System (HERS) rater as to meeting a specific energy efficiency threshold. The Draft strikes any sustainability requirement for new construction and instead only requires code-level energy efficiency measures prescribed by the Ohio Building Code (OBC). The OBC relies on model energy codes, which are technical standards for energy efficiency. The OBC would not address water efficiency, important indoor environmental quality factors like IAQ, VOCs, or stormwater management and resilience, which are addressed under systems such as LEED.

Retaining the 2024 DAS approach requiring new construction developments to achieve a holistic green building certification would help ensure a healthy living environment for tenants and performance measures that support the resilience and longevity of the development and reduce costs for tenants and property owners.

Rehabilitation Housing Projects

As mentioned above, the 2024 DAS currently requires all rental housing development projects to achieve a green building certification, however the Draft instead requires rehabilitation projects to meet the requirements of, *but not obtain*, one of an expanded list of programs which represents a diverse mix of standards, from green building certifications to energy-only systems. (We note that the

second requirement, related to the HERS certification for energy efficiency, is unchanged.)

Under the proposed changes to the current green building certification, developers can decide to “design to” a program that is much narrower in scope, such as ENERGY STAR or PHIUS. While these programs address energy efficiency and indoor air quality, they do not address many other sustainability outcomes that are included in the current green building programs, which generally are more holistic systems in which energy efficiency is one component. LEED certification requires projects to meet rigorous prerequisites and evaluates projects on components that affect resident health, such as indoor air quality (IAQ) and materials, water efficiency, stormwater management, site design, and resilience, that reduce costs for property owners and residents and prolong the life of the building.

Requiring projects to meet the criteria of, but not *obtain*, a green building certification poses two problems. First, it is unclear if the Draft intends that a HERS rater would verify that a project meets the criteria of a system such as LEED, but a HERS rater would not be qualified to do so. For example, LEED v5 Silver for Building Design and Construction (BD+C) for new construction or major renovation¹ prerequisites include, fundamental commissioning, energy and water metering and reporting, planning for zero waste operations, quantifying and assessment of embodied carbon, and a human impact assessment—all of which are outside the scope of expertise of some HERS raters.

Additionally, while the DAS requires “evidence” that certification was obtained, the Draft does not specify any standard of documentation to assure that the project met the criteria of a green building certification system.

Conclusion and Recommendations

Green building certification is a valuable tool for OFHA to ensure that affordable housing projects provide a holistic, healthy living environment that goes beyond energy efficiency and encompasses indoor environmental quality and other outcomes. Therefore, **USGBC strongly recommends that the OHFA retains the current DAS requirement for all projects to obtain a green building certification with qualified third-party verification.**

Thank you for your time in considering these comments. USGBC looks forward to continuing working with the OHFA in the future.

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¹ [LEED v5 Rating System: Building Design and Construction](#). USGBC, February 2026 Edition.