



WODA COOPER COMPANIES

June 29, 2026

Ms. Jennifer Cahill
Architect & Construction Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Dr., Suite 300
Columbus, OH 43231

RE: 2027 Design and Architectural Standards Draft Comments

Dear Ms. Cahill,

On behalf of Woda Cooper Companies, Inc., (“Woda Cooper”) we are pleased to submit the following comments regarding the 2027 Design and Architectural Standards (“DAS”) Draft. We hope these comments will assist the Ohio Housing Finance Agency (“OHFA”) in furthering its mission of facilitating the development, rehabilitation, and financing of low- to moderate-income housing for all Ohioans. Please see below:

1. Section 504 of the Rehabilitation Act of 1973 (Section 504) (page 9):
OHFA requires all 504 units be provided in a variety of unit configurations and distributed throughout the development and buildings on multiple floors. We respectfully request OHFA allow an option for all accessible units to be on the ground floor. The issue with putting accessible units on multiple floors is receiving elevator parts in a timely fashion should the elevator require any work as it creates a major inconvenience to residents living in accessible units on higher floors.
2. Additional Features for 504 Mobility Units (page 11):
We appreciate OHFA allowing a menu of items to be chosen to meet the additional features for 504 mobility units. Based on our experience, we respectfully request OHFA add the following options which we have found to be beneficial to the residents we serve:
Column A2:
 - i. Add benches at elevator lobbies
 - ii. Concierge service for trash pickup upon resident requestColumn B
 - iii. Kitchen sink with pull out faucet
 - iv. Adjustable height shelves in wall cabinets (from OPTIONAL UD item list)Column C
 - v. Color contrast between stair treads and risers (from OPTIONAL UD item list)
 - vi. Lights inside closets (from OPTIONAL UD item list)
3. R5. Minimum Scope of Work (page 23):
We appreciate OHFA’s flexibility in allowing for applicants to submit an exception request if existing materials having an Remaining Useful Life (“RUL”) of less than 50%, but determined to be in excellent condition and not intended for replacement. This allows for a more efficient

targeted approach to rehabbing the most critical items. We recommend OHFA change the verbiage from excellent to “good” or “still in proper working order” as it is unlikely the component would be in excellent shape based on normal wear and tear over a decade or longer.

4. Rehabilitation Minimum Hard Construction Costs

The current 2026 Multifamily Rental Underwriting Guidelines (“Underwriting Guidelines”) include a rehabilitation minimum for hard construction costs of \$60,000 per unit. Additionally, OHFA allows for an exception if the minimum per unit amount cannot be met, but the level of rehab definition outlined in the DAS is met. OHFA should include the rehabilitation minimum hard construction cost in both the Underwriting Guidelines and the DAS. Additionally, OHFA should clarify that the minimum rehab construction category is the Moderate Rehabilitation A as many older existing rural LIHTC communities in our portfolio are not located in a QCT/DDA and therefore are not eligible for the basis boost and do not score so they are reliant on the 4% LIHTC program to be resyndicated with scarce resources.

Please contact me at (614) 377-1750 if you have any questions. Again, we greatly value this opportunity to provide feedback as we find it important to creating good public policy to better serve Ohio’s low-income housing needs.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Jonathan McKay". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Jonathan McKay, Vice President
Woda Cooper Development, Inc.

Cc: Jeffrey J. Woda, Chief Executive Officer, Woda Cooper Companies, Inc.
David Cooper, Jr., Director, Woda Cooper Companies, Inc.