



June 29, 2026

Jennifer Cahill
Architecture & Construction Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, Ohio 43231

Re: Comments on Proposed Design and Architectural Standards
Sent via electronic mail to: DAS@ohiohome.org

Dear Ms. Cahill:

On behalf of Enterprise Community Partners ("Enterprise"), we are pleased to submit these comments regarding the Ohio Housing Finance Agency's ("OHFA") Design and Architectural Standards (DAS).

Enterprise is a national nonprofit whose mission is to make home and community places of pride, power, and belonging for all. To make that possible, we operate the only organization designed to address America's affordable housing crisis from every angle: we develop and deploy programs and support community organizations on the ground; we advocate for policy on a nonpartisan basis at every level of government; we invest capital to build and preserve rental homes people can afford; and we own, operate, and provide resident services for affordable communities. With this end-to-end approach, over 40 years of experience, and thousands of local partners, Enterprise has invested \$92 billion and created or preserved over 1.1 million homes in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, including over \$15.3 billion in Ohio that has helped create or preserve over 178,700 affordable homes.

Thank you for the opportunity to provide comments on the proposed revisions to the DAS. We appreciate OHFA's collaborative and inclusive approach and respectfully offer the following comments for consideration.

Proposed Changes to Green Building Certification for Ohio LIHTC Projects

We appreciate OHFA's efforts to address increasing development costs and financing challenges facing affordable housing projects throughout Ohio and recognize the role that streamlining the DAS can play in that effort. However, we are concerned that the proposed removal of green building requirements for new construction and the reduced emphasis on independent third-party verification in rehabilitation projects may unintentionally eliminate important safeguards that support long-term asset performance, resident well-being, and responsible stewardship of public resources.

Our concern is not about maintaining a green building program for its own sake. Rather, it is about preserving the impacts these programs currently provide. Green building frameworks such as Enterprise Green Communities serve as mechanisms for quality assurance, durability planning, commissioning, resident health protections, resilience, and independent verification. If OHFA



determines that these requirements should be reduced or removed, the critical question becomes: what mechanisms will the Agency rely upon to provide comparable accountability, verification, and assurance that publicly funded projects are achieving their intended building performance outcomes?

Affordable housing financed through the Housing Credit program is intended to remain viable for decades while delivering healthy, durable, and resilient housing for Ohio residents. Decisions regarding design standards should therefore be evaluated not solely on initial construction cost, but on their long-term impact on asset performance, resident health and well-being, lifecycle cost, and preservation of public investment.

One of the most significant concerns with the proposed changes is the potential shift toward evaluating projects primarily through a first-cost lens. While reducing upfront costs may improve short-term feasibility, affordable housing developments are long-term public assets. The relevant question is whether a design guideline improves long-term building performance, reduces future operating costs, maintenance costs, recapitalization needs, and risk exposure, and delivers better outcomes for residents over the life of the property.

Many affordable housing developments require substantial reinvestment at Year 15 and beyond to address building envelope deficiencies, moisture-related damage, ventilation issues, equipment failures, and deferred maintenance. While no building standard can eliminate future capital needs, comprehensive green building frameworks were developed specifically to reduce the likelihood of preventable performance failures through improved design practices, commissioning, quality assurance, and verification.

Long-term affordable housing owners increasingly share this perspective. Volunteers of America, the owner of the Cadence development in Fort Collins, Colorado, cited the desire to avoid returning for additional funding in 15 to 20 years as a primary reason for pursuing Enterprise Green Communities Plus certification, with the intent that building for long-term performance allows scarce affordable housing resources to be directed toward maintaining existing properties and creating additional housing opportunities¹.

The discussion surrounding green building requirements often focuses exclusively on energy savings. However, research evaluating affordable housing developments renovated to Enterprise Green Communities standards found statistically significant improvements in resident health outcomes, including reductions in asthma and other respiratory conditions, improvements in children's respiratory health, reduced moisture-related problems, improved indoor environmental quality, as well as the more commonly discussed reductions in energy consumption. These findings are particularly important because they demonstrate measurable resident benefits resulting from affordable housing-specific green building interventions.²

¹ <https://www.enterprisecommunity.org/story/step-above-colorado-housing-earns-first-ever-green-communities-plus-certification>

² Colton, M.D., Laurent, J.G.C., MacNaughton, P., Kane, J., Bennett-Fripp, M., Spengler, J., & Adamkiewicz, G. (2014). [Health Benefits of Green Public Housing: Associations with Asthma Morbidity and Building-Related Symptoms](#). American Journal of Public Health, 105(12). *The study evaluated affordable housing renovated to Enterprise Green Communities standards and found improvements in respiratory health, moisture conditions, indoor environmental quality, and energy performance.*



Additional research from the Harvard Healthy Buildings Program and related research institutions has documented the importance of ventilation, filtration, moisture control, and indoor environmental quality in supporting occupant health, comfort, and well-being.³

For residents, building performance directly affects indoor environmental quality, health, comfort, and housing stability. Measures that improve ventilation, reduce moisture accumulation, minimize mold risk, improve thermal comfort, and support resilience during extreme weather events provide direct resident benefits regardless of whether a resident ever sees a reduction in their utility bill.

The value of certification for residents is not the plaque, the label, or the marketing benefit. The value lies in the independent review, documentation, testing, and verification processes that accompany certification. Critical measures related to insulation installation, air sealing, ventilation balancing, commissioning, moisture management, and building performance frequently depend on construction quality and proper implementation. Design intent alone does not guarantee performance outcomes. Proof of green building certification can ensure for a housing owner and for OHFA that design intent was achieved by the end of construction.

Research on the value of third-party verification further supports this approach. A 2022 study of Georgia Housing Credit developments conducted by SK Collaborative examined a mix of affordable housing projects, including both projects pursuing green building certifications and projects that were not. The study was designed in part to evaluate a common industry question: if development teams are already building to code and meeting program requirements, what additional value does third-party verification provide? Across the projects evaluated, inspectors identified deficiencies related to insulation installation, air sealing, ventilation systems, moisture management, and other building performance measures. Importantly, the study found that projects pursuing green building certifications had fewer deficiencies and shorter punch lists than comparable non-certified projects. The findings suggest that standards alone do not necessarily produce equivalent outcomes and that independent verification, accountability, and quality assurance can contribute to improved implementation and building performance. While verification approaches vary across programs, the study highlights the important role that third-party review can play in providing confidence that publicly funded projects are delivering the outcomes they were intended to achieve.⁴

Energy codes serve an important purpose and establish minimum legal standards. However, they are not designed to provide comprehensive durability planning, commissioning, ventilation verification, building performance testing, or third-party quality assurance. Third-party verification provides accountability and helps ensure that publicly funded investments are delivering the results that project teams intended to achieve. Without an independent verification process, OHFA may increasingly be required to rely on assumptions that systems were properly installed and are functioning as intended.

Ultimately, the question before OHFA is not whether affordable housing developments can be built to code. The question is whether publicly financed affordable housing should be designed, constructed, and verified to perform successfully over the full life of the asset.

³ Harvard T.H. Chan School of Public Health, Healthy Buildings Program. [Research on Indoor Air Quality, Ventilation, and Health Outcomes](#).

⁴ https://www.skcollaborative.com/wp-content/uploads/2022/11/Value-of-3rd-Party-Inspections-Case-Study_FINAL.pdf



We believe Ohio's affordable housing residents, taxpayers, and housing providers are best served when public investments are evaluated through the lens of long-term performance, durability, accountability, and asset preservation. As such, we encourage OHFA to continue its long-standing commitment to sustainability and fiscal responsibility within the affordable housing industry – providing maximum value for investment.

Thank you again for the opportunity to comment on the proposed revisions to the DAS, and for your continued work to address housing affordability in Ohio. Enterprise looks forward to continuing to partner with OHFA. Please do not hesitate to contact us with any questions at: adonald@enterprisecommunity.org or kegger@enterprisecommunity.org.

Respectfully,

A handwritten signature in black ink that reads "A. Blue Donald".

Ayonna Blue Donald
Vice President, Midwest Market Leader

A handwritten signature in black ink that reads "Krista Egger".

Krista Egger
Vice President, National Initiatives