



July 31st, 2026

Barbara Richards, Director of Multifamily Housing
Ohio Housing Finance Agency
57 E Main Street
Columbus OH 43215

Dear Ms. Richards:

Thank you for the opportunity to comment on Ohio Housing Finance Agency's (OHFA) 2026-2027 9% Qualified Allocation Plan Technical Amendment. Lincoln Avenue Communities (LAC) is a mission-driven affordable housing developer currently active in thirty-three states. Please note, all page references below refer to the Draft 1 of the 2026-2027 9% LIHTC QAP with 2027 Technical Amendments (hereinafter the "2027 TA"). The comments are ordered based on their significance:

1. Threshold Requirements

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We urge OHFA to reconsider the competitive 9% LIHTC program's threshold requirements relating to:

- Minimum percentage of Extremely Low-Income (ELI) units;
- Increase in the minimum number of three-bedroom units for general occupancy units from 10% to 15%.

While we support and actively contribute to the effort to house Ohio's extremely low-income families, in a rising construction and operating cost environment, the reduction in debt proceeds, resulting from deeper income targeting thresholds, are making affordable housing transactions financially unviable. This forces developers to source scarce gap funding and vouchers which add construction costs and delay closings at a time when total development costs are under heightened scrutiny.¹ We recommend that these policy goals be pursued through set-asides or competitive scoring points rather than blanket threshold requirements.

2. Building, Unit, and Lifestyle Amenities

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In order to help drive more efficient affordable housing development costs and deliver the highest number of high-quality affordable units, we ask OHFA to reconsider a few items within the required Building, Unit, and Lifestyle Amenity menus that drive material cost and unit-size increases beyond typical market practice or undermine the quality of the product provided.

We ask OHFA to reconsider the 2027 TA requirement that grab bars be installed in lieu of towel bars in 100% of resident bathrooms. LAC strongly supports providing high-quality, safe affordable housing that

¹ According to a recent study from the University of California Turner Center for Housing Innovation, "the inclusion of one additional public funding source [in a LIHTC development] adds, on average, four months to the timeline of being able to start construction, and is associated with an increase of approximately \$20,460 in per-unit total development costs."

<https://turnercenter.berkeley.edu/research-and-policy/reducing-the-complexity-in-californias-affordable-housing-finance-system/>

is comparable to market-rate housing. We believe that requiring visible grab bars in every bathroom, rather than only where accessibility needs warrant them, may create a more institutional appearance without providing a meaningful increase in resident safety. This is particularly true given that the prior language already required structural reinforcement to allow grab bars to be installed as needed. In addition, we ask OHFA to update the current 2027 TA by reducing or removing the following minimum requirements:

- Private patio/balcony (20% of units);
- Roll-in showers (30% of units) and Section 504 compliance (15% of units);
- Designated outdoor smoking area.

Each of these requirements adds square footage and construction cost to individual units, reducing the total unit count a project can deliver within a fixed development budget. In addition, a designated smoking area, apart from removing amenity space, clearly conflicts with the resident health objectives promoted by healthy housing standards.

3. Preserved Affordability – Minimum Rehabilitation Costs

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We urge OFHA to reconsider its Minimum Rehabilitation Costs. While we recognize that some properties have substantial physical needs, the \$80,000 per-unit minimum rehabilitation hard construction cost risks exceed the capital needs for many projects that are otherwise at risk of loss from housing affordable housing stock. We suggest adjusting the minimum rehabilitation standard to align closer to the FHA 223(f) rehabilitation threshold or restoring the 2024–2025 9% QAP's \$50,000 minimum.

4. Build America, Buy America (BABA)

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We appreciate OHFA's updated language clarifying the availability of a BABA waiver process for CHDO projects. This is a welcome and practical addition that gives developers a clear path to compliance flexibility where applicable.

Conclusion

Lincoln Avenue Communities appreciates the opportunity to work with OHFA on this Technical Amendment. We welcome the opportunity to discuss these comments further and can be reached at 646-585-5526 or tamdur@lincolnavenue.com.

Regards,



Thom Amdur
Executive Vice President, Policy & Impact
CC: Cody Price, Hume An, Daniel Wilson

About Lincoln Avenue Communities

Lincoln Avenue Communities is one of the nation's fastest-growing developers, investors, and operators of affordable and workforce housing, providing high-quality, sustainable homes for lower- and moderate-income individuals, seniors, and families nationwide. LAC is a mission-driven organization that serves residents across 33 states, with a portfolio of 207 properties comprising 35,000 units.