



May 5, 2025

Barbara Richards
Multifamily Housing Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Re: Comments on the 2nd draft of the 4% LIHTC with Bond Gap Financing Program Year 2025 Guidelines

Dear Ms. Richards,

Thank you for your thoughtful incorporation of stakeholder input into the second draft of the *4% LIHTC with Bond Gap Financing Program Year 2025 Guidelines*. In particular, we appreciate that you have:

- **Raised the per-unit funding limits** for Bond Gap Financing, moving closer to market realities for preservation deals.
- **Engaged in substantive discussions on cash-out to related-party sellers** and added a provision for exception requests while we continue to work toward a more comprehensive solution.
- **Added flexibility on TDC cost-containment**, allowing projects to meet either of two cost-containment standards.

Your responsiveness demonstrates a genuine commitment to balancing resource stewardship with the feasibility of viable affordable housing developments.

Below, we offer a couple of recommendations to enhance clarity, fairness, and program effectiveness:

Prior HDAP Affordability Period Restriction

Current language disqualifies any project with “prior HDAP still in their affordability period.” Because this prohibition in 24 CFR 92.214(a)(6), only applies to HOME funds, we suggest amending the restriction to refer specifically—and only—to HOME awards. This broader application unintentionally restricts other HDAP resources, which are too valuable and flexible to be limited by a federal HOME prohibition and play a critical role in supporting projects that do not use HOME funding.

Part II Historic Approval Timing

As we have previously noted, requiring full SHPO Part II approval at the proposal stage remains problematic. Part II demands near-final architectural drawings and a formal review, imposing significant cost and schedule risk on applicants before funding commitments are secured. This timing issue is further exacerbated by current SHPO staffing and funding constraints, which have led to longer turnaround times and heightened uncertainty. We therefore recommend adopting the language regarding Federal Historic Tax Credits in Appendix A of the *9% LIHTC Qualified Allocation Plan Program Years 2024-2025 with 2025 Technical Amendments*.

We appreciate OHFA's continued collaboration and look forward to working together as you finalize the *4% LIHTC with Bond Gap Financing Program Year 2025 Guidelines*. Please feel free to contact me directly with any questions or to discuss these comments further.

Sincerely,



Ryan Gleason
Executive Director

cc: Bill Beagle, Executive Director, Ohio Housing Finance Agency