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Our Hometown Yours and Mine

July 23, 2025

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Columbus, Ohio 43231

The proposed Neighborhood Opportunity Index (NOI) threshold outlined in the draft QAP presents a significant barrier to housing development in rural counties like Williams County, Ohio (AND Appalachian Counties) While the intention behind the NOI is understood—to incentivize development in high-opportunity areas—the current implementation creates an unintended and inequitable consequence for rural communities that already struggle to attract investment.

Williams County has a population of approximately 36,000 and is classified as rural by ODOT, HUD and USDA. We have a documented shortage of quality affordable housing, with vacancy rates near historic lows, long waitlists for existing subsidized units, and increasing demand for workforce housing due to expanding regional employers in manufacturing and logistics. However, nearly all census tracts in Williams County fall below the median NOI score as calculated by OHFA, effectively disqualifying us from competing under the proposed scoring rubric, regardless of the strength of our proposals in other categories such as site control, local support, or readiness to proceed.

This policy does not account for the unique challenges rural areas face, including limited public transportation, lower density development, and reduced access to state-assigned metrics such as walkability or proximity to services—which are often used in NOI calculations. Yet these communities still have significant housing needs that LIHTC was designed to address.

Additionally, embedding this NOI threshold within the competitive scoring section (page 48) rather than clearly presenting it as an eligibility requirement creates confusion and limits transparency. Applicants may invest time and resources into site selection and proposal development only to learn later that their projects are not eligible due to this single factor.

We urge OHFA to reconsider this threshold-level requirement. Instead, we recommend one of the following solutions:

1. Remove the NOI threshold entirely and allow it to remain a competitive scoring factor among others, providing balance in the evaluation process. Most or All

Census Tracts in Williams County fall below the Region's Median.

The QAP mandates that any project must be in a census tract with an NOI score \geq the region's median for that project type. The statewide USR methodology (Urban-Suburban-Rural) means that Williams County's rural tracts are assessed against other rural tracts—but these rural medians remain out of reach for most of our county. Williams County of OHFA's interactive map, when filtered for Williams County, confirms nearly all census tracts in Williams fall into low-opportunity categories, nowhere near the rural median threshold.

2. Introduce a rural adjustment or exemption for non-metropolitan counties like Williams, where NOI metrics do not reflect true need or development feasibility. Effectively disqualifies our county from competition. As a result, no new 9% LIHTC projects could even apply in Williams County, regardless of how strong they are in other criteria like readiness or housing need. This is a significant reversal from the previous QAP cycles, where low rural opportunity scores might have disadvantaged a project—but did not make it strictly ineligible. Local Consequences for Affordable Housing in Williams County. Affordable housing stock remains stagnated. The county faces low vacancy rates, long waitlists, and unmet demand, particularly for workforce and senior housing. Opportunity inequality persists. Rural residents are denied access to new, affordable rental options—even though they are experiencing acute housing stressors. Competitive advantage shifts away from rural. Developers will logically focus on higher-NOI tracts in metropolitan areas, leaving rural Ohio behind.
3. Provide transparency and alternative compliance pathways for applicants located in census tracts with lower NOI scores but with other compelling merits, such as alignment with local housing plans or community revitalization strategies. Lack of Transparency in QAP Structure. Embedding the NOI minimum within the "Competitive Scoring" section (p. 48 of the QAP) obscures the severity of its impact. Rather than a simple scoring preference, it's functioning as a hard eligibility cutoff. Applicants may unwittingly invest months preparing proposals—only to learn their site is ineligible due to location, not project quality.

Affordable housing is needed in all of Ohio—including rural areas like Williams County. We respectfully ask OHFA to ensure the final QAP reflects a balanced approach that does not disadvantage communities based solely on geography or outdated index formulas.

Sincerely,



Dawn Fitzcharles