
Comments - Second Draft of 9% LIHTC Qualified Allocation Plan Program Year 2026-2027

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Hello,

I appreciate the thoughtful revisions which were made to the Second Draft 9% LIHTC QAP for Program Year 2026-2027 on page 38:

Please note: For the Southeast region, OHFA will give priority consideration to projects located in Southeast counties that have received fewer LIHTC awards (9% and 4% LIHTC) in the past three program years. This approach is intended to ensure that all parts of the Southeast region have equitable access to development opportunities while maintaining a competitive scoring framework.

Housing equity and access throughout Southeast Ohio is important. The housing markets throughout Southeast Ohio are relatively small and it takes years for the impact of new LIHTC housing awards to be felt in the market. Taking recent new housing projects funded by OHFA in Athens County as a representative baseline for these timelines -

- Kershaw Greene I and II were awarded in 2020 and the apartments were being rented to new residents in summer 2024.
- Kershaw Greene III and IV were awarded in 2021 and the apartments were still being advertised to new residents in 2025.
- Blackburn Landing was awarded in 2024. They held their site review with the Athens planning commission over the summer of 2025. It is unclear when the project will be completed as it has not really started yet but past experience suggests the housing might become available in 2028.
- Avanelle Crossing was awarded in 2025 and its impact on the market will not be felt for some time, possibly in 2029.

Given these lead times from project award to apartment availability, it is clear that a three year lookback period is not long enough to adequately assess the impact of these awards on the local housing market. Southeast Ohio consists of relatively small housing markets and any new supply in the market does not immediately change rents in the market. Rather, rents adjust over the following year to reflect the new level of supply. It takes yet another year after these rent adjustments for this demand to be reflected in HUD's official statistics and new LIHTC decisions are made some time after that.

In my earlier public comments, I suggested a ten year lookback period. While ten years may be too long, three years is too short. A 6-7 year look back period would give time for LIHTC allocation decisions to more deliberately consider the impact of LIHTC projects on small housing markets as this would provide 4 years for projects to be built, 1 year for them to be rented and change market rents, and an additional year for these changes to be reflected in HUD market rents.

Thank you again for your consideration.

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