
HDGF 2025 Draft Guideline comments

From Brittany Keller <brittany@yshome.org>

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To QAP, OHFA <QAP@ohiohome.org>

Cc Emily Seibel <emily@yshome.org>

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To Whom it May Concern:

I wanted to share my comments on the draft HDGF guidelines. I attended the public input meeting on Friday 9/19, but wanted to share written comments as well.

- Non-PJs should be able to apply for an exception to apply for more than 50% of project costs, as in previous years. Municipal resources are extremely limited for Non-PJs.
- The exception request form should include exception requests for both 10% withholding prior to the issuance of the final performance report and non-PJs' ability to request more than 50% of project costs
- The competitive scoring for non-PJ areas mimics larger LIHTC projects and not the smaller, more nuanced projects non-PJs tend to develop in hard-to-develop areas.
- If there is competitive scoring, things that developers can control - support services, green certifications, local partnerships, permanent affordability, etc.
- Focus on high number of units and opportunity indexes further restrict creative developments in non-PJs.

Best,
Brittany Keller

Brittany Parsons Keller

(she/her)

Development Coordinator

Yellow Springs Home, Inc.

(937)767-2790 ext. 1#

brittany@yshome.org