

August 29, 2019

Chris Austin  
Director of Rental Investment  
North Carolina Housing Finance Agency  
3508 Bush Street  
Raleigh, NC 27609

Submitted via email to [rentalhelp@nchfa.com](mailto:rentalhelp@nchfa.com)

**RE: 2020 NC Draft Qualified Allocation Plan (QAP) and potential inclusion of the ICC/ASHRAE 700-2015 National Green Building Standard**

Dear Mr. Austin:

On behalf of the National Association of Home Builders (NAHB), I am pleased to submit the following comments regarding the 2020 draft North Carolina Qualified Allocation Plan (QAP).

NAHB is a federation of more than 700 state and local associations representing more than 140,000 member firms nationwide. NAHB's members are involved in home building, remodeling, multifamily construction, land development, property management, and light commercial construction. Collectively, NAHB's members employ more than 1.26 million people and construct about 80 percent of all new housing units constructed within the U.S. each year. As such, NAHB is providing the following suggestions in response during the public comment period for the State of North Carolina 2020 QAP.

NAHB members are optimistic that the North Carolina Housing Finance Authority (NCHFA) will consider including an option to earn points in the 2020 QAP for attaining a green building certification. Green certification programs like the *ICC/ASHRAE 700 National Green Building Standard™* (NGBS) are currently recognized in many state QAPs, and an increasing number of State Housing Finance Agencies have been adding these green certification programs to their QAPs to help promote green affordable housing.

Providing builders and developers with options and opportunities to demonstrate successful green building practices in the homes we build can only help further sustainability within affordable housing throughout the state. The map<sup>1</sup> shows the states that currently recognize NGBS, LEED, Enterprise Green Communities and other nationally recognized green certification programs as of Spring 2019.

The NGBS encompasses high-performance strategies across the entire building spectrum, including energy, water, resources and lot design efficiency, indoor environmental quality, and owner education and operation. Also, the straight-forward and low-cost nature of the NGBS certification program make it ideally suited for affordable housing development.

Given the inclusion of green building certifications as a way towards qualifying for LIHTC in other state QAP programs, NAHB respectfully requests that the NCHFA include these same programs like the NGBS Green Certification in the North Carolina QAP.

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<sup>1</sup> Attachment 1: Qualified Allocation Plans that Recognize NGBS and other programs (as of Spring 2019)  
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Additionally, NAHB respectfully requests that the NCHFA consider updating the current reference to ENERGY STAR Version 2.0 in Appendix B to align with the current North Carolina multifamily requirements for the ENERGY STAR Residential New Construction Program, as outlined by Energy Star [here](#).

### **Additional Information on the ICC 700 National Green Building Standard (NGBS)**

The NGBS stands apart from other programs in that it is the only residential-specific green building rating system to undergo the full consensus process and receive approval from the American National Standards Institute (ANSI). In addition to meeting all the mandatory practices, the NGBS is also unique in that it requires every building to earn a minimum number of points in each practice area to achieve each level of certification. This prevents builders from focusing their efforts on only one practice area like energy efficiency to get the majority of the required points for certification and ignoring other aspects of sustainability. Additionally, all NGBS projects must undergo two mandatory inspections by an independent third-party verifier to ensure every green practice has been successfully incorporated in the building.

The straight-forward and low-cost nature of the NGBS certification program make it ideally suited for affordable housing development. The NGBS is utilized by builders and developers across the country to implement green building practices in their homes. To date, over **187,000 residential units** have been certified to the NGBS. A list of other state and federal programs that recognize the NGBS can be found here: <http://www.homeinnovation.com/ngbsgreenincentives>.

### **Conclusion**

NAHB appreciates the opportunity to submit comments on the 2020 North Carolina QAP and provide additional information on the *ICC/ASHRAE 700-2015 National Green Building Standard*. NAHB urges the NCHFA to consider offering nationally recognized third-party green certification programs such as the NGBS as a way to earn points toward LIHTC in the 2020 QAP and to update the ENERGY STAR reference in Appendix B to be consistent with other North Carolina multifamily ENERGY STAR requirements. If you have any questions or would like additional information, please contact my colleague Michelle Dusseau Diller at (202)266-8375 or [mdiller@nahb.org](mailto:mdiller@nahb.org).

Sincerely,



Jaclyn S. Toole, Assoc. AIA, CGP  
Assistant Vice President, Sustainability & Green Building

**ATTACHMENT 1**  
**Qualified Allocation Plans that Recognize NGBS, LEED and/or Enterprise (as of Spring 2019)**

