

October 19, 2012

Mr. Scott Farmer  
Director of Rental Investments  
North Carolina Housing and Finance Agency  
3508 Bush Street  
Raleigh, NC 27609

Dear Mr. Farmer,

I am a Carrboro, North Carolina resident who works for Southface Energy Institute, a 501(c)(3) green building nonprofit based in Atlanta, Georgia. For more than 34 years Southface has been promoting sustainable homes, workplaces, and communities through education, advocacy, research, and technical assistance. One example of these efforts is the development of the EarthCraft Program in 1999 and the subsequent certification of more than 24,000 housing units across six southeastern states including North Carolina.

Southface has a rich history of providing training and technical assistance to the residential construction and retrofit industries for both single family and multifamily housing. Thanks in part to our technical assistance efforts both Georgia and Virginia have high sustainability standards in their Qualified Allocation Plans (QAP). Approximately 10,000 Low Income Housing Tax Credit (LIHTC) units have been certified in these two states over the last five years because of the inclusion of LEED for Homes, EarthCraft, and Enterprise Green Communities in the QAPs.

I am writing to propose and respectfully request that the North Carolina Housing and Finance Authority follow the standard set by Georgia and Virginia and include similar active green building program options for certification of funded LIHTC projects.

The current North Carolina QAP requires an inactive version of the EPA's ENERGY STAR New Homes program, ENERGY STAR Version 2, under Appendix B. This is a good strategy in that the standard will provide for duct system and envelope performance testing, but the energy efficiency standards are outdated and have in some instances been surpassed by the current North Carolina Energy Code. One potential option to reflect more current standards in North Carolina may be the inclusion of LEED for Homes, EarthCraft, Enterprise Green Communities, and NAHB Green (at the "Emerald" level), in the 2013 North Carolina QAP. This inclusion will provide LIHTC developers in the state with multiple active options for valuable green building certification as these programs are the most active and recognized program in the southeast currently.

Please let me know if I can help in any way as you explore this recommendation. Thank you for your consideration.

Sincerely,



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