

May 21, 2020

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

Submitted via email to claustin@nchfa.com; cc: to Russ Griffin (rsgiffin@nchfa.com)

RE: 2021 NC Qualified Allocation Plan (QAP) and potential inclusion of the ICC 700-2020 National Green Building Standard

Dear Mr. Austin:

On behalf of the National Association of Home Builders (NAHB), I respectfully submit the following comments for your consideration for the development of the 2021 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 for consideration as you develop the 2021 QAP for North Carolina.

Given the number of green homes certified in the state of North Carolina, NAHB is optimistic that the North Carolina Housing Finance Authority (NCHFA) will consider including an option to earn points in the 2021 QAP for attaining a green building certification. Green rating systems like the *ICC 700-2020 National Green Building Standard*[®] (NGBS) are currently recognized in many state QAPs, and an increasing number of State Housing Finance Agencies have already added these green rating systems to their QAPs to help promote green affordable housing. The map¹ shows the states that currently recognize NGBS, LEED, Enterprise Green Communities and other nationally recognized green rating systems as of May 2020.

The residential construction industry will be a key force leading the U.S. economy out of the recession propagated by the current health crisis. Building efficient, comfortable, healthy, durable homes is critical to managing monthly utility bills, minimizing intrusive maintenance and helping keep residents safe and well in their homes.

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 Green certification program make it ideally suited for affordable housing development.

¹ Attachment 1: Qualified Allocation Plans that Recognize NGBS and other rating systems (as of May 2020)
1201 15th Street NW | Washington, DC 20005 | T 800 368 5242 | nahb.org

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 and provide North Carolina's residents with living space that will meet their needs moving forward.

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 green rating systems like the NGBS in the North Carolina QAP.

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

The NGBS stands apart from other building standards 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 Green 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 Green 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 **220,000 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

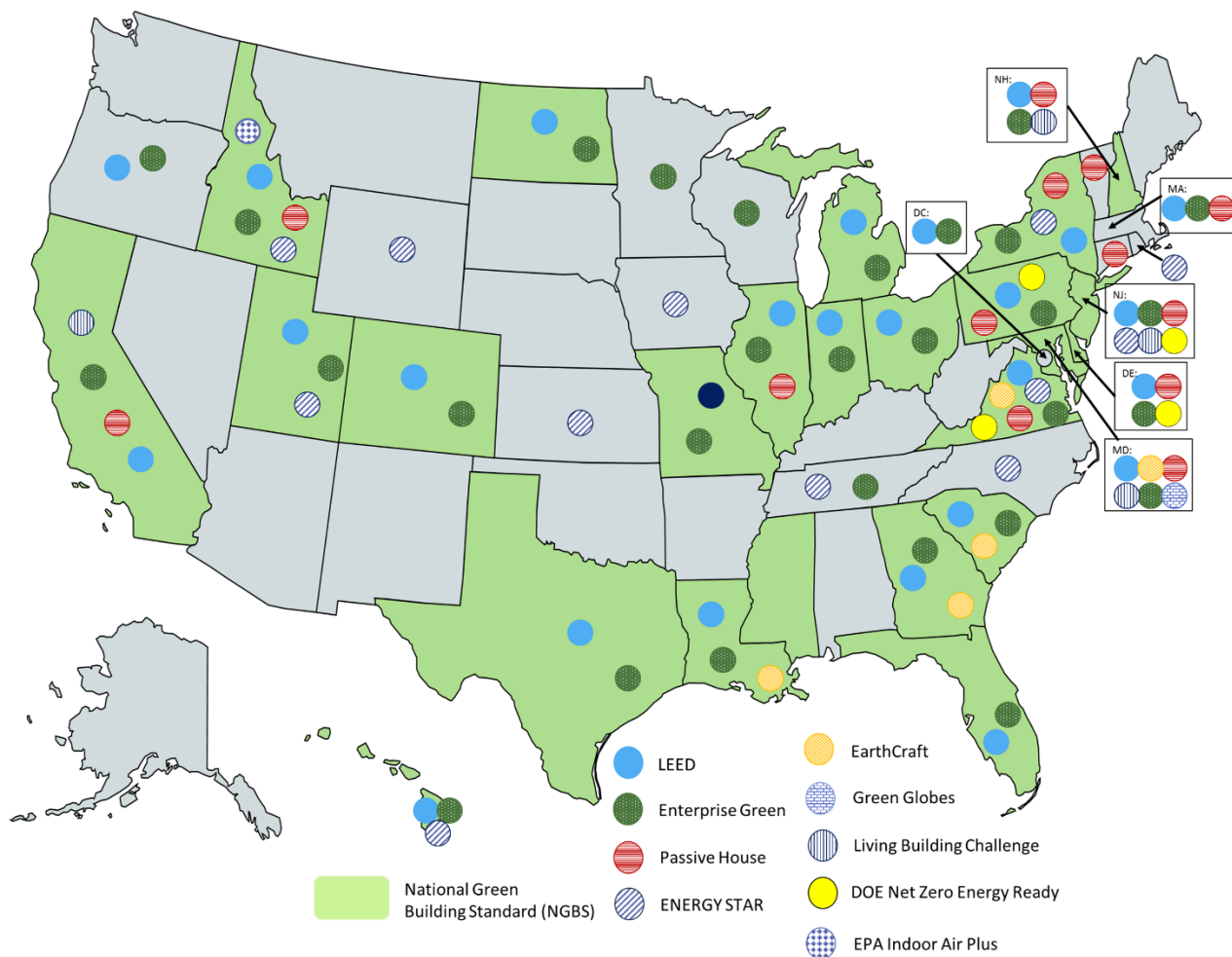
NAHB appreciates the opportunity to submit comments on the 2021 North Carolina QAP and provide additional information on the *ICC 700-2020 National Green Building Standard*. NAHB urges the NCHFA to consider offering nationally recognized third-party green certification programs such as the NGBS as a way to earn points toward LIHTC in the 2021 QAP. 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.

Sincerely,



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

ATTACHMENT 1
Qualified Allocation Plans that Recognize NGBS and other Third-Party Green Rating Systems
(as of May 2020)



Created with mapchart.net ©