



June 28, 2013

Florida Housing Finance Corporation
227 N. Bronough Street, Suite 500
Tallahassee, FL 32301
Attn: Libby O'Neil

Dear Ms. O'Neil:

On behalf of Home Innovation Research Labs, I write to you for several reasons:

1. I request that the Florida Qualified Allocation Plan be amended to accurately identify the *ICC 700 National Green Building Standard™* (NGBS), which was incorrectly identified as "National Association of Home Builder's National Green Building Standard (NAHB) Certification"¹ in the most recent draft of the Florida Universal Application Instructions.
2. I request that the Instructions be revised to accurately represent the NGBS certification program's requirements with regards to certification by unit.²
3. I want to introduce you to the NGBS Remodel Certification options, which would achieve the renovation/rehabilitation requirements of Florida's Qualified Allocation Plan.

National Green Building Standard

The most recent draft of the *Florida Universal Application Instructions* refers to "National Association of Home Builder's National Green Building Standard (NAHB) Certification." This reference inaccurately reflects the certification name and implies association influence over the certification process. The National Green Building Standard was developed through the American National Standards Institute (ANSI), using a balanced consensus process, and is managed by Home Innovation Research Labs, an independent third-party certification agency.

The *ICC 700 National Green Building Standard™* is the first and only residential green building rating system to undergo the full consensus process and receive approval from ANSI. ANSI accreditation of any standard is important because it ensures balance, representation, openness, consensus, and due process in the standard's development process. The Consensus Committee that developed the first version of the NGBS was comprised of 42 individuals representing a variety of government agencies, municipalities, home building industry stakeholders, and non-profit organizations. For example, representatives from the U.S. Department of Energy and the U.S. Environmental Protection Agency were among the federal agencies represented. The U.S. Green Building Council was represented; and 10 state or local municipalities participated. Three members were builders. Diverse representation of stakeholders ensures that the NGBS maintains a balance of stringency with regard to desired

¹ Section III. B.5.(2). Page 71 of the DRAFT 2013 Universal Application Instructions. http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2013/ApplicationInstructionsRules/10-5-31-12%20Drafts/20-Draft_Instructions.pdf

² Page 71.

performance and practicability. Over 2,000 public comments were considered as part of the NGBS development process.

As an ANSI-approved standard, the NGBS is subject to regular reviews and periods of public comment. In fact, the second version of the *National Green Building Standard™*, known as the 2012 NGBS, followed as rigorous a process as its predecessor and was recently approved by ANSI. We anticipate the next version of the NGBS will start the development process in approximately two to three years.

Home Innovation Research Labs (formerly the NAHB Research Center) serves as Adopting Entity and provides certification services to the NGBS. Home Innovation Labs is a 49-year old, internationally-recognized, accredited product testing and certification laboratory located in Upper Marlboro, Maryland. Our work is solely focused on the residential construction industry and our mission is to improve the affordability, performance, and durability of housing by helping overcome barriers to innovation. Our core competency is as an independent, third-party product testing and certification lab, making us uniquely suited to administer a green certification program for residential buildings.

Home Innovation Labs is an independent subsidiary of the National Association of Home Builders (NAHB); however, our operations are completely separate from NAHB. Our national accreditations as a third-party laboratory are demonstrable proof that our work is independent of outside influence and that NAHB has no operational control over our business. We have an independent and separate Board of Directors that oversees our management.

Certification Requirements

The NGBS was intended to be a voluntary, above-code green program. For a single-family home or multifamily building to be certified, the building must contain all mandatory practices in the NGBS. The home or multifamily building must also contain enough practices from each of the six categories of green building practices to meet the required threshold points (See page 12 in the 2008 NGBS).

The six categories of green practices are:

- Lot & Site Development
- Resource Efficiency
- Energy Efficiency
- Water Efficiency
- Indoor Environmental Quality
- Homeowner Education

Under the NGBS, homes and multifamily buildings can attain one of four potential certification levels: Bronze, Silver, Gold, or Emerald. The NGBS was specifically designed so that no one category of green practices was weighted as more important than another. Peerless among other green rating systems, the NGBS requires that all projects must achieve a minimum point threshold in every category of green building practice to be certified. A project certified to the NGBS can't merely obtain all or most of its points in a few categories, as other rating systems allow. This requirement makes the NGBS the most rigorous green building rating system available at this time.

The NGBS has few mandatory provisions, though all of them must be met for certification at any level. Instead, the NGBS is an expansive point-based system that requires a project to include many different types of green practices. Builders and developers are able to customize their projects by the practices they select to earn the "Additional Points" that are required. This provides the flexibility builders and

developers need to ensure their green projects reflect their geographic location, climatic region, cost constraints, and the type of project they are constructing.

The draft *Florida Universal Application Instructions* include special funding requirements for Applicants who select to certify only a select number of units within a building.³ The instructions inaccurately state, “FGBC⁴ with a building of three floors or less and NAHB both certify by unit.”

NGBS certification applies to whole single-family homes and multifamily buildings, not individual units. For a multifamily building to achieve NGBS certification, points for the green building practices that apply are credited once for the entire building, and, where points are credited toward certification, practices must be implemented in all units. Further, Home Innovation-accredited NGBS Green Verifiers perform two inspections—rough and final—on all units to ensure all of the green practices claimed have been installed, and installed correctly. Unless all of the units within a multifamily building are in compliance with the NGBS requirements, the building cannot be NGBS Green Certified. Please update the Instructions accordingly to provide accurate guidance to your multifamily builders.

NGBS Remodel Certification

The *Universal Application Instructions* also include a special note about green building certification for rehabilitation projects: “If the proposed Development includes any rehabilitation units, Applicants should consult with a third-party verifier associated with the green certification program it intends to select to determine the extent the rehabilitation will allow for certification.”

Alternatively, Home Innovation Labs recommends that the Universal Application Instructions provide specific guidance to builders/developers by listing applicable green rehabilitation certifications, as it does for New Construction. The 2012 NGBS provides a certification path for single-family and multifamily renovations that we believe would be useful to recognize specifically in the Universal Application. If your staff has any questions about the NGBS Green Remodel certification, option my staff would be happy to meet with them to explain the program in detail.

The *ICC 700 National Green Building Standard™* includes a specific green remodeling certification that applies to all building types: single-family homes and townhouses; duplexes, quads, and garden apartments; high- and low-rise apartment buildings; and residential units in mixed-use buildings. A green remodeled home or multifamily building can be awarded a Bronze, Silver, Gold, or Emerald certification level. For a home or building to be NGBS Green Certified, the following requirements must be met: (1) Achieve significant improvements in energy and water efficiency; (2) Meet additional mandatory practices; and (3) implement sufficient additional green practices.

I am happy to meet with you or your staff should you require a more detailed overview of the NGBS or our certification program. I will also gladly send you any supplemental information that you might require. Please don’t hesitate to contact Michelle Desiderio (mdesiderio@homeinnovation.com, 301.430.6205), our Vice President, Innovation Services, directly if she can be of further assistance.

³ Section III. B.5.(2). Page 71 of the DRAFT 2013 Universal Application Instructions. http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2013/ApplicationInstructionsRules/10-5-31-12%20Drafts/20-Draft_Instructions.pdf

⁴ Florida Green Building Certification

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I look forward to working with the Florida Housing Finance Corporation to promote green certified housing built to the *National Green Building Standard™*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Luzier". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Luzier".

Michael Luzier
President and CEO