



May 5, 2020

North Carolina Housing Finance Agency
Chris Austin, Director of Rental Investment
3508 Bush Street
Raleigh, NC 27069

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

Dear Mr. Austin:

On behalf of Home Innovation Research Labs, I respectfully submit the following comments for your consideration for the 2021 Qualified Allocation Plan.

The 2020 QAP requires that new construction projects meet the ENERGY STAR 2.0, which is a dated program version that is no longer available for building certification. NCHFA has an opportunity to incorporate current energy efficiency and/or green building requirements while recognizing third-party green building certification programs that are already widely accepted across North Carolina. Home Innovation encourages NCHFA to consider credible third-party programs, like Home Innovation's NGBS Green Certification program—based on the ICC-700 National Green Building Standard (NGBS), that can offer the agency assurance of construction quality, operational efficiencies, and comfort afforded to building residents.

If requiring full certification is deemed not possible for the 2021 QAP, we support the prescriptive energy efficiency requirements proposed by the North Carolina Building Performance Association (NCBPA) in their comment letter dated April 29, 2020. This set of requirements would help your developer partners transition to higher efficiency and meeting green building certification, should that be required or incentivized by NCHFA in the future.

We look forward to discussing further with you or staff if you require a more detailed overview of the NGBS or the green certification program. We will also gladly send you any supplemental information that you might require for further support. Please don't hesitate to contact Michelle Foster (mfoster@homeinnovation.com, 301.430.6205), our Vice President, Innovation Services, directly if she can be of further assistance.

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I look forward to working with you to promote green certified housing in North Carolina.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Luzier". The signature is fluid and cursive, with a prominent loop at the end.

Michael Luzier
President and CEO