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May 4, 2018

Jamie McNease, Community Disaster Recovery Manager
Florida Department of Economic Opportunity
Division of Community Development
Community Disaster Recovery
The Caldwell Building
107 East Madison Street, MSC-400
Tallahassee, Florida 32399

**SUBJECT: STATE OF FLORIDA 2018 ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT
DISASTER RECOVERY (CDBG-DR) PROGRAM**

Dear Ms. McNease:

The Florida Home Builders Association respectfully requests that all of the green building programs listed by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register Notice Docket No. FR-6066-N-01, dated Feb. 9, 2018, such as ENERGY STAR, ICC 700 National Green Building Standard (NGBS), LEED, and Enterprise Communities, be included in the State of Florida 2018 Action Plan for the Community Development Block Grant Disaster Recovery in addition to the Florida Green Building Coalition Program. It is important that builders have choices when it comes to these types of programs so that they are best able to meet the needs of their client, the project, and any other local green building mandates. By including these additional green building program options, builders and developers are provided flexibility without compromising the rigor.

As we are part of a larger Federation, the National Association of Home Builders (NAHB), it is important to note that NAHB's policy for green building supports above code, voluntary programs including those identified by HUD. And while the NAHB's preferred green building program is the NGBS, it has provided numerous comparisons to show the differences between several of these national green building programs. We have added the Florida Green Building Coalition Program to the comparison and attached it for your review and consideration. As you will see, the Florida Green Building Coalition requirements are equally as rigorous in some areas while in others they are less stringent.

Additional Information on the ICC700 National Green Building Standard (NGBS)

The NGBS requires that a building must implement green practices within six categories: Location and Site, Materials, Energy, Water, Indoor Environmental Quality, and Operation and Maintenance. Every project must comply with all mandatory green practices and requirements, as well as earn enough points through optional green practices to achieve certification. Conformance is verified through construction documents, plans, specifications, mandatory in-field inspections, and other data which demonstrate compliance with the points being pursued.

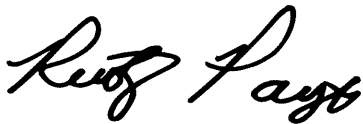
The NGBS stands apart from other programs in that it is the only residential-specific green building rating system to undergo the full consensus process and receive approval from the American National Standards Institute (ANSI). It is also unique in that it requires every building to earn enough points in every category to earn certification, in addition to all mandatory practices. This prevents builders from focusing on only a few areas, and ignoring other aspects of sustainability. Lastly, 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 NGBS is utilized by builders and developers across the country to implement green building practices in their homes. To date, over **135,000 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>.

Given the inclusion of the national green building programs such as the NGBS in other state and federal programs, as well as the comparable focus and requirements of these national green building programs to the Florida Green Building Coalition requirements, the Florida Home Builders Association respectfully requests the inclusion of the ICC700 National Green Building Standard, LEED, Enterprise Communities, and ENERGY STAR along with the Florida Green Building Coalition requirements into the State of Florida 2018 Action Plan for the Community Development Block Grant Disaster Recovery.

If you have any questions, please let me know. I can be reached via email at rpayton@fhba.com or via phone at (850) 402-1841.

Sincerely,

A handwritten signature in black ink that reads "Rusty Payton". The signature is written in a cursive, flowing style.

Rusty Payton
CEO/Chief Lobbyist

	Enterprise Green Communities	Green Globes New Construction	LEED BD+C: New Construction	LEED BD+C: Homes & Multifamily Lowrise	Florida Green Building Coalition Requirements	National Green Building Standard™
ANSI Approved Standard by Consensus Development Process	No	No	No	No	No	Yes
Applicable Building Type(s)	Single-family Low to High-Rise Multifamily Moderate to Substantial Renovation	Multifamily Commercial	Commercial High-Rise Multifamily (9 stories+) Major Renovation Only	Single-family Low & Mid-Rise Multifamily (8 stories Max)	Single-family Existing Homes Low to High-Rise Multifamily Commercial Land Development Remodeling	Single-family Low to High-Rise Multifamily Minor to Major Renovation
Total Certified* (All Tiers)	Over 38,000 Residential Units	≈475 Projects	Over 37,000	Over 120,000	17632	Over 135,000 Residential Units
Current Version	2015 Enterprise Green Communities	2004	2013	2013	Single-family: Version 11 High-Rise Residential: Version 3 Land Development: Version 8	2015
Green Practices/Credits/Imperatives	82	129	54	59	186	444
Mandatory Practices/Credits/Imperatives	44	0	12	18	3	46
Maximum Points Available	259	1,000	110	110	300 (max allowed, each category has maximums) 426 total points in the system	1,100
Minimum Total Points Required for Certification Levels	New Construction - 35 Renovation - 30	1 Globe - 350 2 Globes - 550 3 Globes - 700 4 Globes - 850	Certified - 40 Silver - 50 Gold - 60 Platinum - 80	Certified - 40 Silver - 50 Gold - 60 Platinum - 80	Bronze - 100 Silver - 131 Gold - 161 Platinum - 191	Bronze - 231 Silver - 334 Gold - 489 Emerald - 611
Minimum Points Required for Each Green Practice Category? (Water Efficiency, Energy Efficiency, etc.)	No	No	No	No	Yes - All categories must achieve minimum points for each tier (Bronze, Silver, Gold, etc.)	Yes - All categories must achieve minimum points for each tier (Silver, Gold, etc.)
Site Development/Location Category	Yes	Yes	Yes	Yes	Yes	Yes
Construction Waste and Building Materials/Resources Category	Yes	Yes	Yes	Yes	Yes	Yes
Energy Efficiency Category	Yes	Yes	Yes	Yes	Yes	Yes
Water Efficiency Category	Yes	Yes	Yes	Yes	Yes	Yes
Indoor Environmental Quality Category	Yes	Yes	Yes	Yes	Yes	Yes
Owner Education and Training Category	Yes	No	No	No	Yes	Yes
Energy Codes / Energy Performance Baselines	ENERGY STAR New Homes (New) ENERGY STAR Multifamily High Rise (New) HERS Index (Rehabs) ASHRAE 90.1-2010 (Rehabs)	ENERGY STAR Target Finder ASHRAE-90.1-2010 ANSI/GB 01-2010 ASHRAE Building Energy Quotient	ASHRAE 90.1-2010	HERS Index ENERGY STAR for Homes V3	HERS Index	IECC 2015 HERS Index ENERGY STAR for Homes V3
Onsite Inspections	Projects are randomly selected for onsite verification on a quarterly basis	1 - Post-construction	No onsite inspections required	2 - Pre-drywall and Post-construction	No onsite inspections required	2 - Pre-drywall and Post-construction
Certification Fees (Only includes Certification Fees administered by Certifying Body)	No registration or certification fees associated with this program	Registration and certification fees quoted per each individual project	All Buildings: Registration: \$900 Certification: \$2,750 to \$30,000 (based on sq ft)	Single-family: Registration: \$125 to \$225/home Multifamily: Registration: \$900 to \$1,050 Certification: \$0.040 to \$0.045/sq ft	Single Family: Builder or Homeowner Must be a Member \$ 75/Member of FGBC and FHBA \$100/Member of FGBC or FHBA \$125 Non Member Multi-Family: \$100 application fee + \$100 per building + \$25 per unit Members \$100 application fee + \$100 per building+ \$35 per unit	Single-family: Registration: \$0 Certification: \$200/home Multifamily: Registration: \$0 Certification: \$200 to \$600 + \$30/unit
Possible Additional Fees	None	Additional fees quoted per each individual project	Inquiries: \$220/credit Appeals: \$500 to \$800/credit	Inquiries: \$220/credit Appeals: \$500 to \$800/credit Green Rater Fee: Market Price	\$50 Pre-Application fee which is deducted from final application cost \$38 FGBC Certified Home Bronze Plaque	Inquiries: \$0 Appeals: \$0 Green Verifier Fee: Market Price
Approved Product List	No	No	No	No	No	Yes (www.homeinnovation.com/services/certification/green_certified_products)
For additional information about getting your project certified	www.enterprisecommunity.org/solutions-and-innovation/green-communities/certification/eligibility	www.thegbi.org/guiding-principles-compliance-certification/new-construction/	www.gbci.org/certification	www.gbci.org/certification	www.floridagreenbuilding.org/homes	www.homeinnovation.com/services/certification/green_homes
Copies of Rating System	www.enterprisecommunity.org/solutions-and-innovation/green-communities/criteria	www.thegbi.org/training/user-resources/downloads/?topic=Green+Globes+NC	www.usgbc.org/credits/new-construction/v4	www.usgbc.org/credits/homes/v4 www.usgbc.org/credits/mid-rise/v4	www.floridagreenbuilding.org/homes	www.builderbooks.com/book/green-building/icc-ashrae-700-2015-national-green-building-standard.html