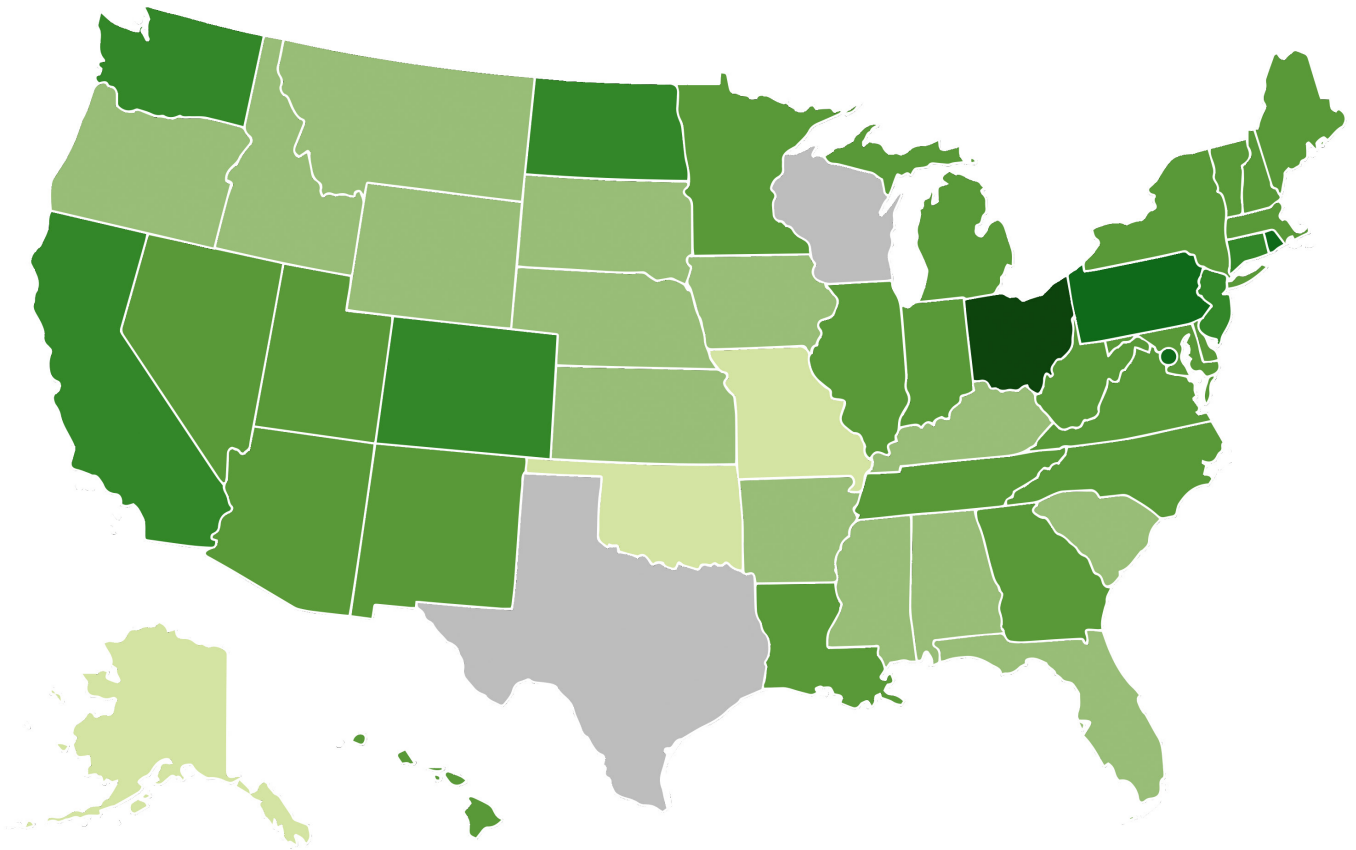


2016 QAP ANALYSIS

GREEN BUILDING CRITERIA IN LOW-INCOME HOUSING TAX CREDIT PROGRAMS



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Global Green USA is the American affiliate of Green Cross International, founded by President Gorbachev, to foster a global value shift toward a sustainable and secure future. For nearly 20 years, Global Green USA has been a national leader in advocating for smart solutions to global warming, including green building for affordable housing, schools, cities and communities that save money, improve health, and create green jobs.

This report is made possible through the support of NeighborWorks America.

For more than 35 years, NeighborWorks America, a national, nonpartisan nonprofit, has created opportunities for people to improve their lives and strengthen their communities by providing access to homeownership and to safe and affordable rental housing. In the last five years, NeighborWorks organizations have generated more than \$27.2 billion in reinvestment in these communities. NeighborWorks America is the nation's leading trainer of community development and affordable housing professionals.



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INTRODUCTION

Thirty years ago, the federal Low-Income Housing Tax Credit (LIHTC) program was established to serve as an incentive for private investment in affordable rental housing. Although a federal program, each state's housing finance agency (HFA) assumes responsibility for the allocation of the tax credits to developers. This is typically done through a competitive process based on criteria put forth by each state in a Qualified Allocation Plan (QAP). Global Green, through our Green Affordable Housing Initiative work over the past twenty years, recognizes that the LIHTC program and the QAPs that guide the distribution of tax credits can play an essential role in increasing the national rate of adoption of green building practices in affordable housing design and construction.

Starting in 2005, Global Green has completed a regular review of the green building practices represented in each state's QAP and published a national performance ranking of QAPs. The goal of this analysis is to identify leading policy trends, share best practices, and suggest technical, procedural, and policy options that can further increase the incorporation of green building procedures into affordable housing developments.

2016 TRENDS AND PROGRESS

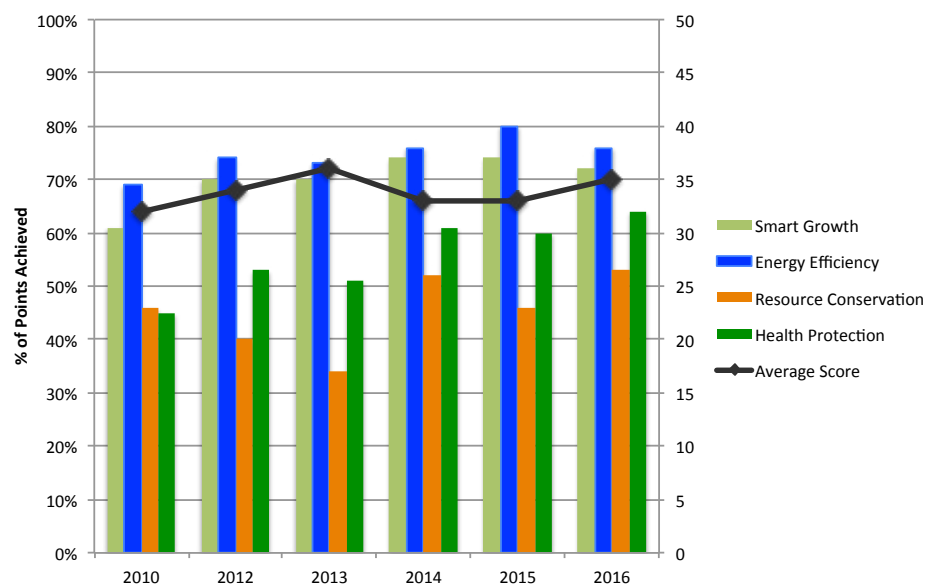
From 2005, the first year of our analysis, until 2013, (the year we last put out a QAP analysis report), the adoption of green building practices in QAPs grew steadily each year. Since 2013, however, the average score has fluctuated between 33 to 36 points, with the highest average score of this range (36) having been achieved in 2012, and the lowest (33) in 2015. This year's average score of 35 shows a move in the direction of higher scores and affirms the continued support for green building practices.

In 2016, nearly three-quarters of all state agencies incorporated smart growth principles and energy efficiency standards into their QAPs, and over half now include resource conservation and health protection strategies. As in previous years, the overall number of points scored in the Smart

Growth and Energy Efficiency categories greatly exceed those scored in Resource Conservation and Health Protection. However, the percentage of total points scored by all states in Smart Growth and Energy Efficiency has only risen slightly (2% to 3%) since 2013. Conversely, Resource Conservation and Health Protection scores each increased by 13% since 2013, scoring all-time high percentages of 53% and 64%, respectively **[Figure 1]**.

References to topics in Resource Conservation have steadily increased from 2013 to 2016, with all topics gaining references from year to year. Most notably, references to stormwater protection and water conservation have increased by 25% and 36%, respectively. In the Health Protection category, references to topics pertaining to healthy building materials and environmental health have also all increased since 2013, with some topics having varied by plus or minus 6% from 2015 to 2016.

Figure 1. Seven Year QAP Trends (2010-2016)



ANALYSIS APPROACH AND METHODOLOGY

As in past years, QAPs and supporting documents in all 50 states, as well as New York City and Washington D.C., were analyzed and ranked on a 50-point scale. This scale is made up of 32 prescriptive subtopics, worth 45 points and distributed across four main categories: Smart Growth, Energy Efficiency, Resource Conservation, and Health Protection. There are also five bonus points available for states that demonstrate the adoption of emerging best practices.

Since we began our review of QAPs in 2005, the national performance ranking we've established has been based on prescriptive green building criteria mentioned in state QAPs and supporting documents in order to determine each state's score and ultimate rank. In 2012, a revision was made to this scoring system in order to adequately compare states with prescriptive measures in their QAPs to the efforts of states using third-party green building certification programs as their criteria. The first path, prescriptive, accounts for the 32 prescriptive subtopics in our original scoring process and the second path, performance, applies to states where a majority of LIHTC-funded projects (60% or greater) commit to achieve third party green building certification. These programs include the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) rating system, Enterprise Community Partners' Green

Communities Initiative, or regional green building programs such as Southface Energy Institute's EarthCraft or Build It Green's GreenPoint Rated Program in California. Each pathway is a distinct 45-point scoring system with the ability to receive up to 5 bonus points, making 50 points the highest achievable score **[Figure 2]**.

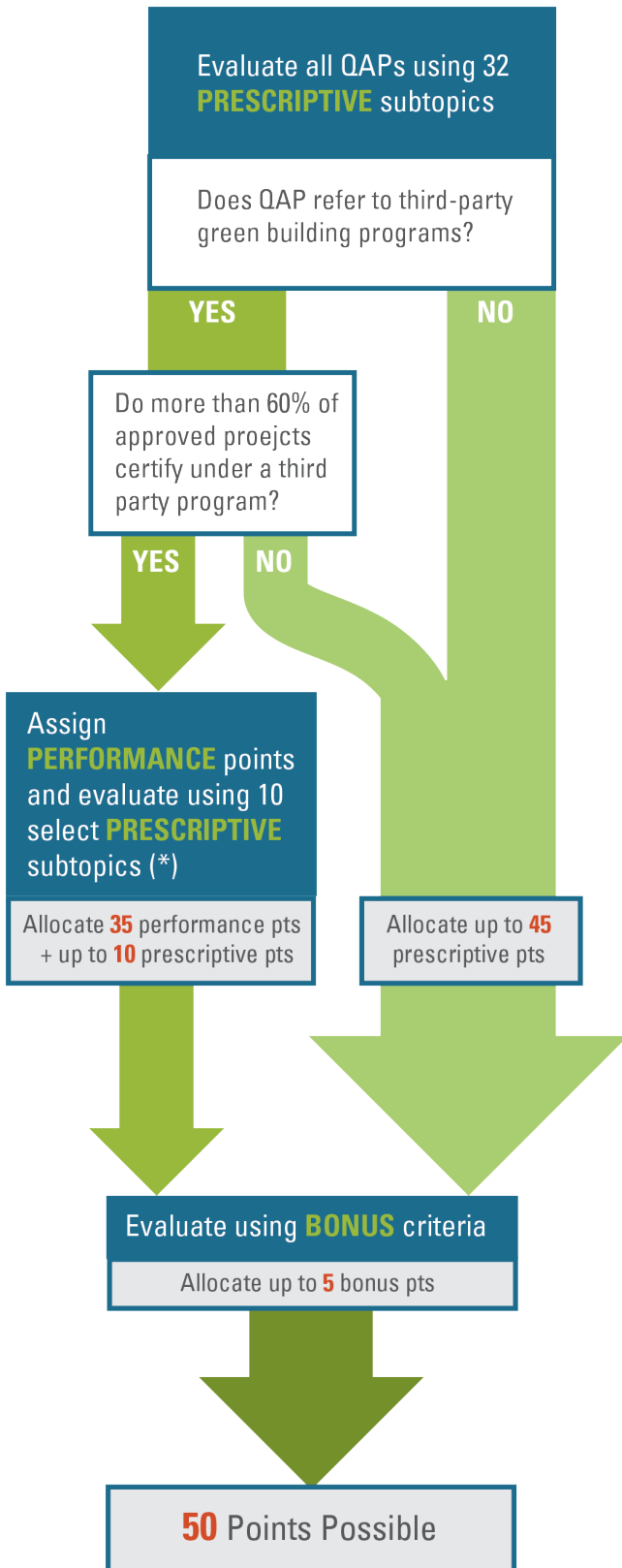
The five-point bonus, available to all states regardless of scoring pathway, is comprised of three measures:

1. The state agency requires that all LIHTC-funded projects commit to undergoing third-party green building certification (2 points)
2. The state agency's QAP and/or supporting documents recommend or require energy benchmarking in LIHTC-funded projects (2 points)
3. The state agency's QAP and/or supporting documents recommend or require LIHTC-funded projects are designed to promote active occupants (1 point)

TOPIC-BASED ANALYSIS

For our analysis, each state's QAP and any supporting documents available (e.g., appendices, building and design standards, green checklists) were examined for references to any of the 32 prescriptive subtopics. These subtopics cover a broad spectrum of sustainability and green housing practices, and are distributed

Figure 2: Performance vs. Prescriptive Determination and Scoring



PRESCRIPTIVE SUBTOPICS

Smart Growth		10 Points Possible
BR*	Brownfield Redevelopment	1
UI*	Urban Infill	1
AR	Adaptive Reuse	1
PT*	Proximity to Public Transit	1
PS*	Proximity to Services	1
XH	Existing Housing Rehabilitation	1
RP*	Revitalization Plans	1
HP	Habitat Preservation	1
FP	Floodplain Preservation	1
WP	Wetland Preservation	1
Energy Efficiency		12 Points Possible
PV*	Photovoltaics	1
SP	Specified Efficient Products	1
IS	Insulation Standards	1
EP	Energy Star Appliances	2
HV	HVAC Performance	2
	Heating/Ventilation (1)	
	Cooling (1)	
EC	Energy Codes	2
EB	Energy Star Homes	3
Resource Conservation		12 Points Possible
EF	Existing Flora Preservation	1
RC*	Recycled Content Materials	1
MF	Maintenance Free / Durability	1
WC	Water Conservation	5
	Fixtures (3)	
	Irrigation (1)	
	Landscaping (1)	
NM*	Renewable Materials	1
UM	Reused Materials	1
CD*	Construction & Demo. Recycling	1
SW*	Stormwater Protection	1
Health Protection		11 Points Possible
HZ	Hazard Proximity	1
EA	Environmental Assessment	1
HA	Hazard Abatement	5
	Lead-Based Paint (1)	
	Asbestos-Containing Materials (1)	
	Radon (1)	
	Groundwater (1)	
	Soil (1)	
QP	Paint (Low/No-VOC)	1
QC	Carpet (Low-VOC)	1
QF	Formaldehyde-Free	1
QV	Quality Ventilation	1

(*) PERFORMANCE SUBTOPICS

amongst the major categories of Smart Growth, Energy Efficiency, Resource Conservation, and Health Protection.

This review was conducted from February 2016 to September 2016. Any documents related to the 2016 QAP criteria that were unavailable within that time frame were not evaluated. An issue that may influence the scoring, to some degree, is that several states had not finalized their QAPs by the end of the review period. In addition to evaluating each of the 32 subtopics, the QAPs were reviewed for references to green building certification programs. Each state that referred to third-party programs was contacted to determine if a majority of projects receiving allocations chose to pursue certification and thus be eligible for the performance pathway scoring.

An initial analysis was completed in August 2016 and distributed to each of the state HFA representatives for review. Comments, clarifications, and additional information received from the state representatives were incorporated into the final analysis and scoring.

SCORING

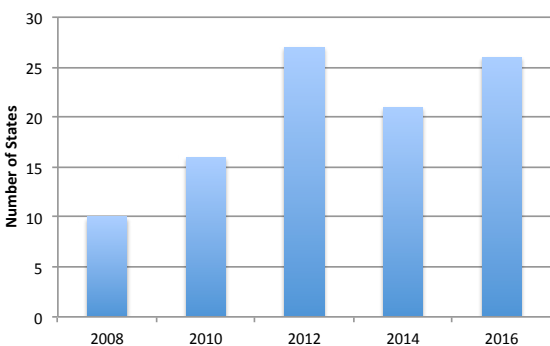
In scoring the states this year, a key issue was making the determination of whether housing agencies were eligible to be scored using the performance pathway. In order to be scored using the performance pathway,

60% or more of approved applications must make a commitment to meet the certification requirements of a third-party green building program. As most housing agencies do not make this information readily available, each LIHTC-funded project must be contacted directly to confirm third party certification commitment. Because we were unable to ultimately receive confirmation from all of the allocated project recipients, in several cases it was not possible to determine the eligibility of states for the performance pathway scoring. In these cases, the prescriptive pathway was used for the evaluation.

There were 25 state housing agencies offering points or incorporating language related to green building certification programs in their 2016 QAPs. Of those 25 states, 13 were scored using the performance pathway. For six states, we were unable to confirm if they qualified for the performance pathway, and of those six, three states were scored using the performance pathway in previous reports. Six new states, Hawaii, Indiana, Louisiana, Michigan, Tennessee, and Vermont qualified for performance pathway scoring for the first time since the performance pathway scoring approach was created. If three or more of the unconfirmed states were to be scored using the performance pathway, this would represent the greatest number of states to date and would be indicative of substantial progress in the direction of green building becoming a standard practice

among affordable housing developers [Figure 3].

Figure 3: Third Party Programs Mentioned in QAPs, 2012-2016



A concurrent trend is that, several of the states that now encourage the use of third-party green building programs are removing prescriptive green building criteria from their QAPs. Six of the 13 performance states included significantly fewer (>10) prescriptive green building elements in their QAPs this year. Hawaii’s prescriptive score is 29 points fewer than it’s performance pathway score, while Virginia’s and Indiana’s scores were 16 and 15 points fewer, respectively. Incentivizing or requiring green building certification, rather than relying on prescriptive measures in the QAPs, is emerging as a preference among state agencies as a way to provide clear direction to developers and confidence at the agency level that the green measures are being implemented.

REVISED BONUS STRUCTURE

Up to five bonus points are available to

states that demonstrate a commitment to the implementation of innovative green building strategies. To better differentiate between the highest performing states and to recognize leading efforts in implementing green building, the 2016 analysis instituted a revised bonus structure. Since 2013, several emerging topics are starting to be incorporated into third party certification criteria and QAPs. These include: environmental health and resiliency, neighborhood connectivity and walkability, energy benchmarking, and design for active occupants.

Given the increasing prevalence and importance of these health and energy-focused topics, we felt the bonus structure of previous years (for green building capacity, resources, and technical support within housing finance agencies) was no longer representative of emerging best practices.

For the 2016 analysis, criteria for assigning bonus points are:

- **REQUIREMENT OF THIRD-PARTY GREEN BUILDING CERTIFICATION.**

Many State housing agencies that award points for use of green building programs allow applicants to commit to the standards but do not require formal certification. Requiring that all projects commit to third-party green building program certification, which typically requires verification during

both design and construction, increases the consistency in delivery of the green building benefits.

- **ENERGY BENCHMARKING.**

Energy benchmarking tracks utility data in order to monitor system performance as well as reduce overall energy cost and consumption. State housing agencies recommending this practice then incentivize project owners, staff, and residents to better understand system performance, as well as maximize durability and cost savings.

- **DESIGN FOR ACTIVE OCCUPANTS.**

Encouraging design approaches that promote occupant health through physical activity is increasingly incorporated into the QAPs. Examples of design for active occupants include placing stairways in a more easily accessible and visible location than elevators, providing exercise equipment and/or recreational space for both children and adults, and incorporating gardening space.

GRADING

This year's grading system uses the same A through F structure established in previous analyses. An adjusted bell curve was applied to the final scores using standard deviation from the mean, 10 and 35, respectively **[Figure 4]**. To establish the grading tiers, the bell curve was adjusted by subtracting

2 points from the mean, in order to allow for a larger cluster of states to achieve higher grades while still maintaining the integrity of the standard deviation. Thus, 1 standard deviation above the adjusted mean (33-42) marks the B range, and 1 standard deviation below the mean marks the C range (23-32). Two standard deviations above the mean assigns the A range (43-50), and two below assigns the D range (13-22) with anything below that exhibiting an F (0-12). The A and B ranges were divided into thirds (B-, B, B+) to better distinguish among top performing states.

REVIEW PERIOD

After the preliminary QAP scoring and grading, each state was given an opportunity to review and comment on our findings. Individual state scorecards for 2014, 2015, and 2016, along with information on our scoring criteria were sent to a list of contacts first obtained from the National Council of State Housing Finance Agencies (NCSHA) and then updated throughout the QAP evaluation process. A 10-day comment period was provided for states to identify any standards or design criteria that were overlooked during the assignment of scores.

ANALYSIS AND FINDINGS

Ten years ago, the average score was 14 out of a possible 45 points. Now in 2016, the average score has grown to 35, a 250%

increase. In the last year of our report, 21 out of 32 subtopics were mentioned in at least half of the state QAPs. Six more subtopics have since been included in over half of state QAPs, meaning that 84% of prescriptive subtopics are now incorporated into LIHTC criteria put forth by state housing agencies.

in the QAPs is that more states are incorporating green building certification criteria as supporting documents to their QAPs. For example, Colorado, Minnesota, New York City, Ohio, Pennsylvania, and Washington D.C. all refer directly to the 2011 or 2015 Enterprise Green Communities Criteria as a supplementary document to their QAPs, in order to provide a robust set of green building criteria to LIHTC applicants.

One factor that is increasing the representation of prescriptive subtopics

Figure 4: Grading Distribution

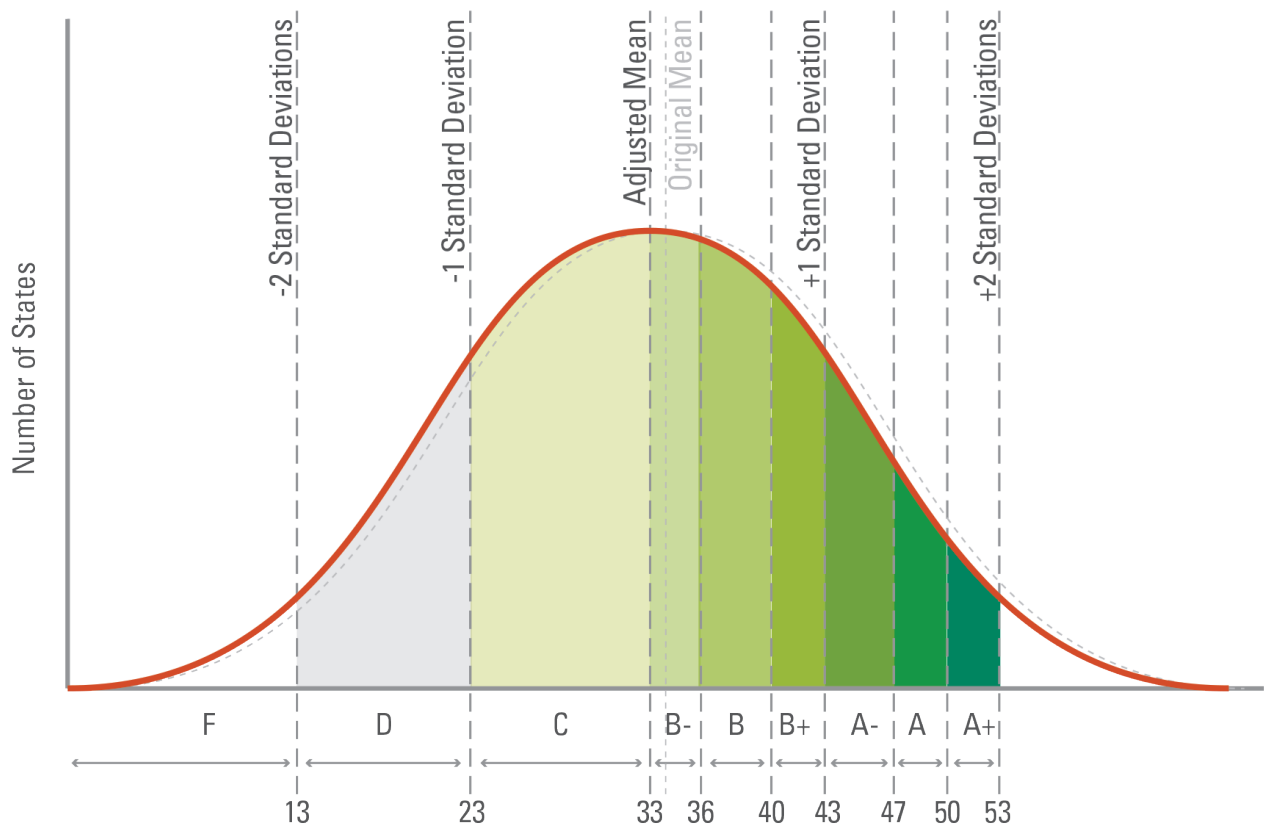


Figure 5. Prescriptive Topics Ranked by Change in Representation, 2013-2016

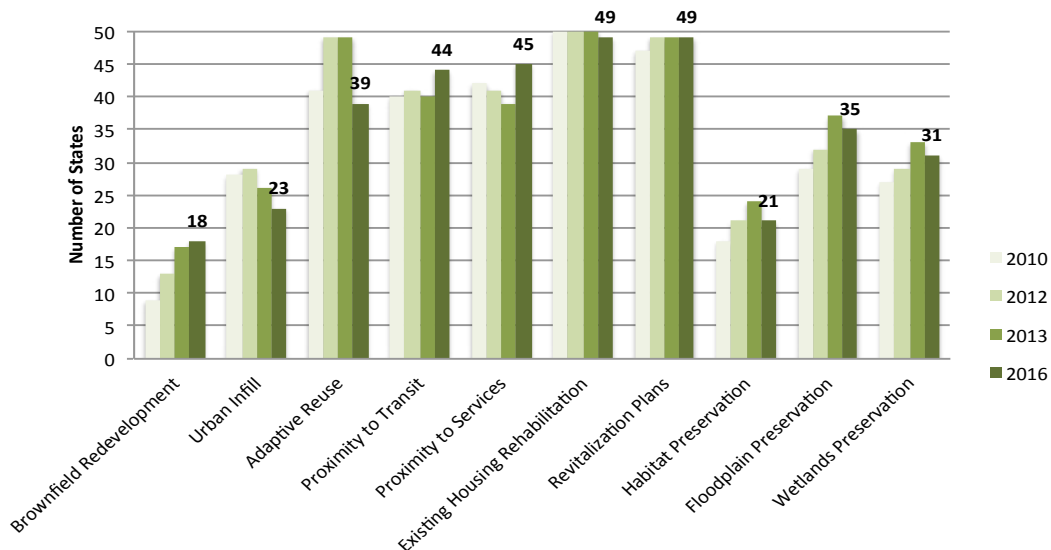
Category	Subtopic	Number of all HFAs in 2016
Energy Efficiency	Energy Codes	45
Resource Conservation	Stormwater Management	35
Resource Conservation	Reused Materials	23
Resource Conservation	Recycled Content Materials	25
Health Protection	Hazard Abatement	42
Health Protection	Low/ No-VOC Carpet	31
Smart Growth	Proximity to Services	45
Health Protection	Hazard Proximity	37
Health Protection	Environmental Assessment	43
Resource Conservation	Water Conservation	48
Resource Conservation	Preserve Existing Flora	26
Health Protection	Quality Ventilation	41
Smart Growth	Proximity to Public Transit	44
Resource Conservation	Maintenance Free/ Durability	37
Resource Conservation	Construction & Demo. Recycling	24
Health Protection	Formaldehyde-Free	26
Smart Growth	Brownfield Redevelopment	18
Energy Efficiency	Insulation Standards	42
Resource Conservation	Renewable Materials	18
Health Protection	Low/ No-VOC Paint	32
Smart Growth	Revitalization Plans	49
Energy Efficiency	HVAC Performance	46
Smart Growth	Rehabilitation-Existing Housing	49
Energy Efficiency	Specified Efficient Products	45
Smart Growth	Floodplain Protection	35
Energy Efficiency	Energy Star Appliances	43
Smart Growth	Habitat Protection	21

SMART GROWTH

The Smart Growth category has seen a great deal of variation through the past few years of our analysis. Overall, there has only been a 2% increase in subtopics mentioned this year compared to 2013, but the category peaked in 2015 with 74% of all possible points. Only 3 subtopics have increased since 2013; these subtopics are brownfield redevelopment, proximity

to transit, and proximity to services. The remaining Smart Growth subtopics such as urban infill, adaptive reuse, revitalization plans, and habitat preservation fell by 5% since 2013, and by 10% since last year alone. References to Smart Growth topics such as floodplain preservation and wetlands protection, following a decrease from previous years in 2015, rebounded this year back to 2013 levels [Figure 6].

Figure 6: Smart Growth, 2010-2016



ENERGY EFFICIENCY

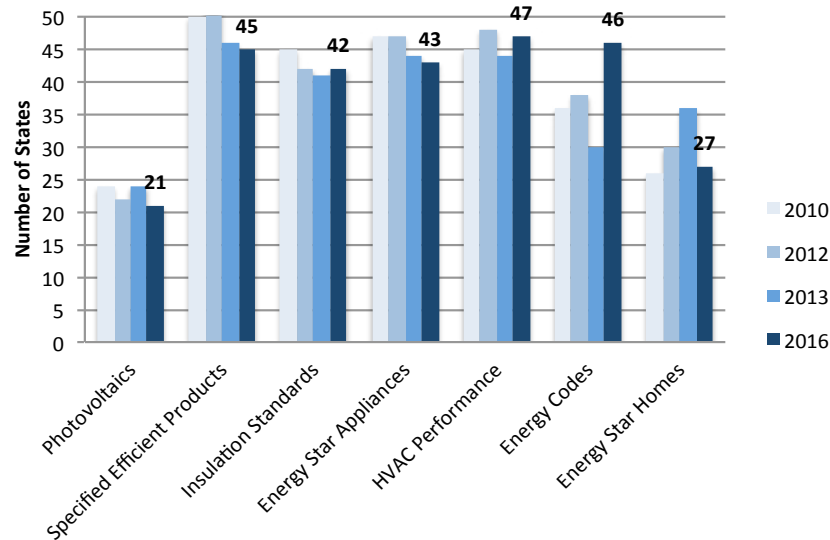
As in previous years, Energy Efficiency is the most addressed category, fulfilling 76% of possible prescriptive points. The percentage of points scored in this category peaked in 2015, and regressed in 2016 from 80% to 76%. Although references to most topics in this category differed by less than 4% from 2013 to

2016, references to Energy Star Homes decreased by 15%, while references to energy codes increased significantly by 33% [Figure 7]. The decrease in the number of states referencing Energy Star Homes may be a result of increasingly stringent energy codes that address many of the Energy Star Homes issues, and a growing number of states that are encouraging the use of comprehensive green building programs

which incorporate the Energy Star Homes standard as a prerequisite. Energy codes was the only subtopic to exceed the points achieved in both 2012 and 2013, and several

subtopics such as photovoltaics, specified efficient products, and insulation standards even fell below the amount of points earned back in 2010.

Figure 7: Energy Efficiency, 2010-2016



RESOURCE CONSERVATION

Resource Conservation continues to be the least represented category in 2016, with 53% of all possible points scored by states. However, this is a 13% increase from 2013 and for the first time in over 6 years, all Resource Conservation subtopics increased in representation. Most subtopics in this category reached all-time highs, with the exception of recycled content materials. Existing flora preservation, water conservation, and stormwater protection gained the most with increases of 14%, 36%, and 25%, respectively **[Figure 8]**.

HEALTH PROTECTION

In 2016, Health Protection also experienced a 13% increase in overall possible points achieved, from 51% in 2013 to 64% in 2016. Similar to the Resource Conservation category, all but 2 subtopics increased in representation; the subtopics of low/no-VOC paint and formaldehyde-free flooring did not see increases, because they retained the same amount of points as they achieved in 2013, 31 and 24, respectively. Overall, the largest increase in this category was in the representation of low/no-VOC carpet, which increased by 23% **[Figure 9]**.

Figure 8: Resource Conservation, 2010-2016

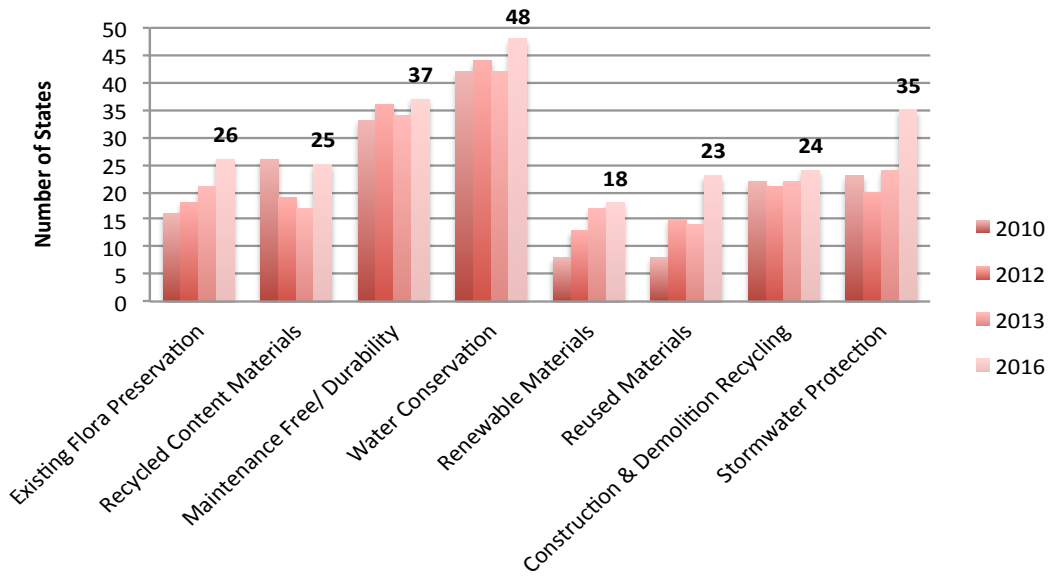
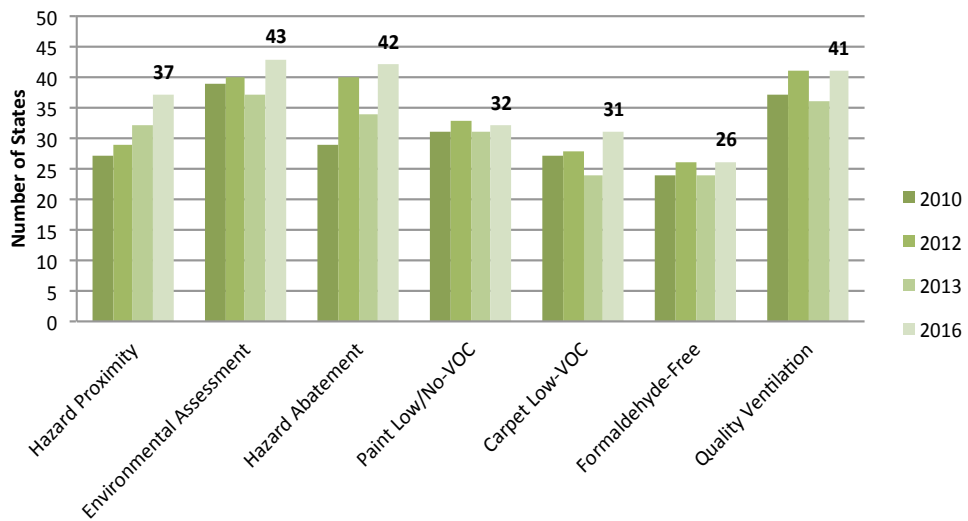


Figure 9: Health Protection, 2010-2016



FINAL GRADES

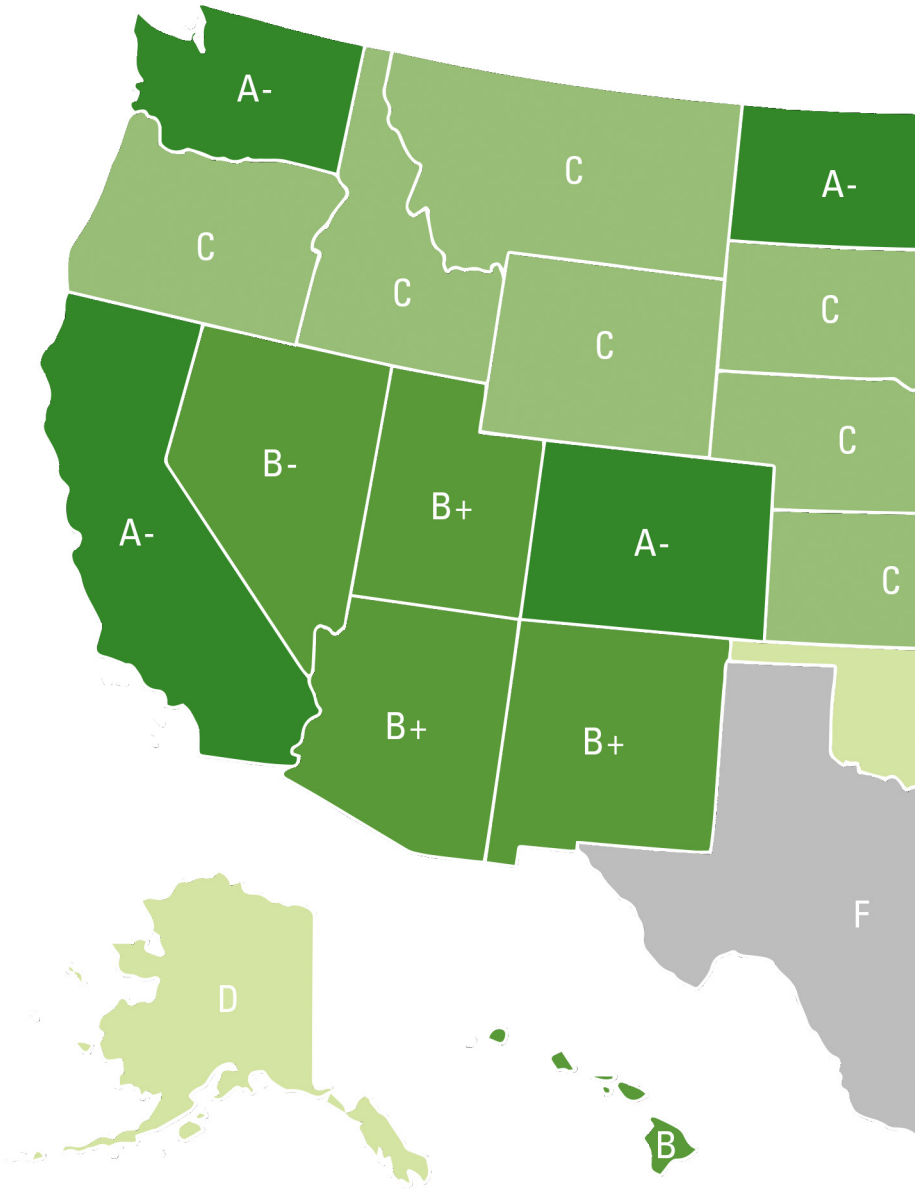
In the analysis of 2016 QAPs, the only perfect score was received by the State of Ohio. Having improved from a B+ in 2013, Ohio has since included all prescriptive subtopics into their QAP and attachments by adopting the 2015 Enterprise Green Communities Criteria and requiring 3rd party certification. Ohio also meets all the revised bonus criteria. Connecticut and Maryland, top scorers in previous years, received perfect prescriptive scores as well, but failed to meet most of our revised bonus criteria this year.

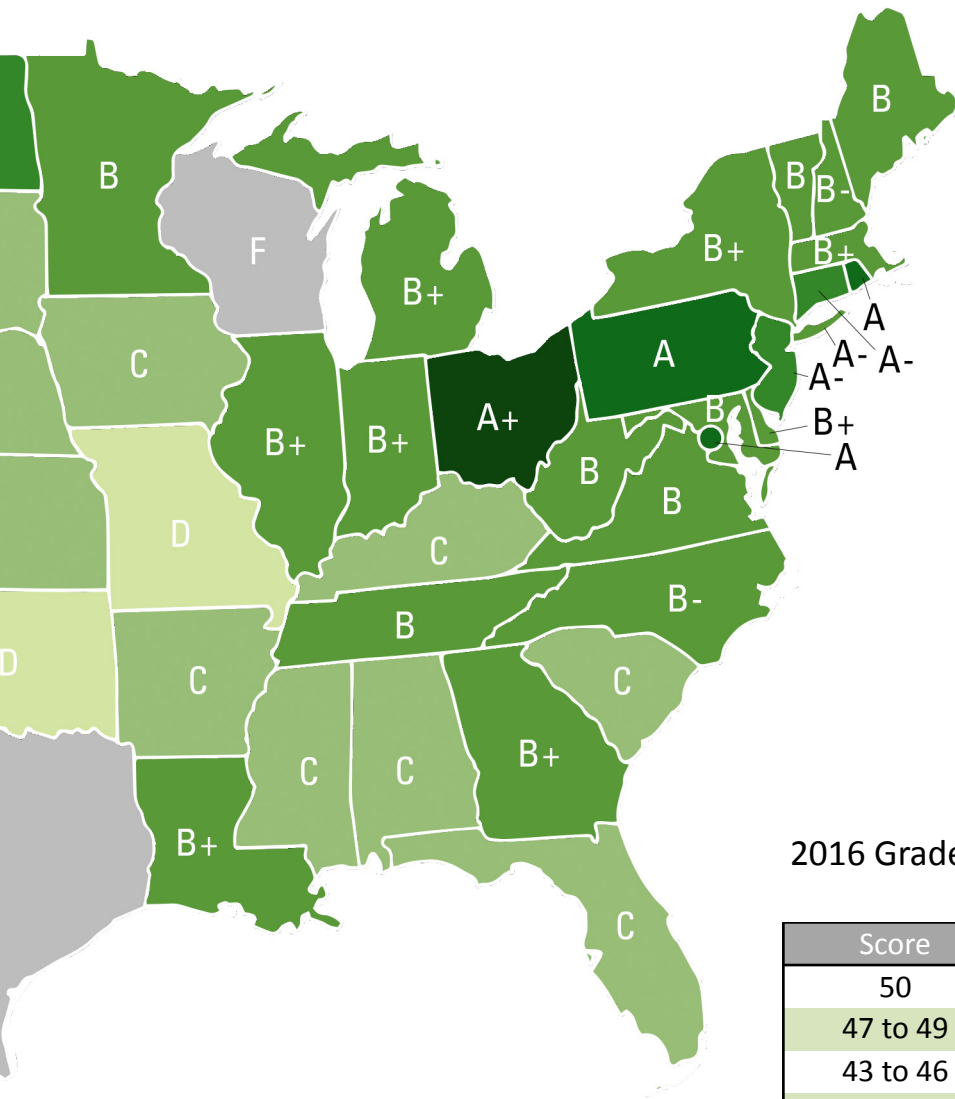
Pennsylvania, Rhode Island, and Washington D.C. received A's, and 8 more states achieved an A-. Collectively, 22% of states scored an A- or higher in 2016, and 40% of states scored in the B range. Overall, nearly two-thirds of the states are receiving a B or better, showing sustained progress across the entire cohort, rather than exemplary performance by a handful of high achievers, as was the case in 2006. Of the remaining states, 27% are in the C range, 6% of states received a D and, for the first time since 2008, 2 states received an F in our ranking system **[Figure 10]**.

There has been some backsliding. Minnesota, one of the top scoring states of 2013 has since dropped by an entire letter grade from an A+ to a B, due to the removal of requirements for several prescriptive subtopics including brownfield redevelopment, urban infill, and renewable materials, as well as earning just 1 out of 5 bonus points. The other top scoring states of 2013, Connecticut and Maryland decreased from an A+ to an A- and B, respectively.

With the exception of Pennsylvania, the states whose grades increased the most were scored according to the performance pathway. Utah made the single greatest improvement, from a D to a B+, based on the state becoming eligible for the performance scoring pathway. Making a similar leap, Tennessee improved their score from a D to a B, also having taken on the transition from a prescriptive to a performance pathway. Not only does Tennessee's QAP now suggest third party certification to be achieved by LIHTC recipients, but 100% of projects this year committed to certification through the Green Communities Initiative. More than three-quarters of LIHTC award recipients committed to achieving third party certification through LEED or the Green Communities Initiative this year.

Figure 10: Grade by State





2016 Grades by State

Score	Grade	# of States
50	A+	1
47 to 49	A	3
43 to 46	A-	8
40 to 42	B+	11
36 to 39	B	7
33 to 35	B-	3
23 to 32	C	14
13 to 22	D	3
0 to 12	F	2

CONCLUSION AND RECOMMENDATIONS

Integration of green building and sustainable development practices into affordable housing development continues to move toward becoming a norm in the industry. The fundamental benefits of utility cost reduction, increased durability, and health benefits are well understood within the industry through the outreach and education programs provided by organizations such as Neighborworks America, Enterprise Community Partners, LISC, and US Green Building Council.

Through the review of the 2016 QAPs, several emerging trends and best practices in green design were identified, along with new areas of concern and opportunity. The following recommendations are based on these findings:

- **Require benchmarking and monitoring of energy, water, and solid waste.** Extending the green building engagement into management and operations is needed to ensure that the full value of the investments in green strategies, systems, and materials is being realized. Energy Star Portfolio Manager should be used as a common reporting platform, while encouraging the use of other tools such as WegoWise to provide additional analytic functions and performance comparisons.
- **Continue to expand the application of criteria related to proactive health strategies.** These include: no-smoking requirements, participation in the Energy Star

Indoor airPLUS program, integrating active design features such as those described in Enterprise Green Communities 2015 criteria 1.2a Resident Health and Well-Being: Design for Health, as well as providing exercise rooms and equipment.

- **Update the definition of Revitalization Plans used in QAPs to include current innovations in neighborhood planning and district-scale sustainability.** The LEED for Neighborhood Development rating system can serve as a valuable tool for the planning of mid- to large-size projects that incorporate multiple buildings or span several city blocks (LEED ND has been encouraged in the application criteria for the HUD Choice Neighborhood program for the past several application rounds). The EcoDistricts Protocol is another tool that provides a structure for integrating low-income housing into a comprehensive neighborhood revitalization plan. Recognition could be given to projects that are located in communities that have committed to the Protocol and/or are pursuing EcoDistricts certification.
- **Establish a common standard for addressing resilience in the context of affordable housing design and construction.** Increased frequency of climate change-related extreme weather events may place public investments in housing and the vulnerable communities they serve at increased risk. A common standard for evaluating stresses, vulnerabilities, risk, and mitigation measures should be established to provide consistency in

determining what measures should be included in individual projects and what should be addressed at the neighborhood or citywide level. Consider methods to encouraging innovative approaches, such the creation of neighborhood resilience hubs that can operate for several days autonomous to the electrical grid and provide basic services. The Enterprise Community Partners publication, Ready to Respond: Strategies for Multifamily Building Resilience provides guidance on building design and community engagement practices that can be applied to increase resilience. The LEED Pilot Credits "Assessment and Planning for Resilience" and "Design for Enhanced Resilience" also offer guidance on how to make resilience a part of the integrated design process.

APPENDIX 2

2016 Subtopic Scoring for Performance States

Grade	State	Brownfield Redevelopment	Urban Infill	Proximity to Transit	Proximity to Services	Revitalization Plans	Photovoltaics	Renewable Materials	Recycled Content	Construction & Demolition Recycling	Stormwater Management	Total	Performance Points	Bonus	Score
A+	OH	1	1	1	1	1	1	1	1	1	1	10	35	5	50
A-	ND	0	1	1	1	1	0	1	1	1	1	8	35	0	43
A-	CA	0	0	1	1	1	1	1	0	1	1	7	35	1	43
B+	IL	0	0	1	1	1	0	0	0	0	1	4	35	3	42
B+	IN	1	1	1	1	1	0	0	0	0	1	6	35	0	41
B+	LA	0	1	1	1	1	0	0	1	0	0	5	35	1	41
B+	MI	1	1	1	1	1	0	0	0	1	1	7	35	0	42
B+	GA	1	0	1	0	1	1	0	0	1	0	5	35	1	41
B+	NM	1	0	1	1	1	0	0	0	0	1	5	35	1	41
B+	UT	0	0	1	1	1	0	0	1	0	1	5	35	1	41
B	HI	0	1	1	1	1	0	0	0	0	0	4	35	0	39
B	TN	0	0	1	1	1	0	0	0	0	1	4	35	0	39
B	VA	0	0	1	0	1	1	0	0	0	0	3	35	0	38
Totals:		4	4	10	8	10	2	0	2	2	6			AVG:	41



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