Sanford, Florida

Use of LEED-ND as a Planning Tool
Report and Suggested Next Steps

Building Blocks for Sustainable Communities Program

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Introduction

Pursuant to our technical assistance award with the City of Sanford, this Memorandum constitutes Smart Growth America's final report summarizing the workshop on Using LEED-ND to accelerate the development of sustainable communities and suggesting possible next steps the City could take to craft a vision for Sanford's future development.

Representatives from Criterion Planners and Smart Growth America (SGA) met with municipal leaders and residents on August 4 and 5, 2015 to provide assistance under the Using LEED-ND tool, supported by a grant from the U.S. EPAs *Building Blocks for Sustainable Communities* program.

The first day of the workshop featured a presentation open to the public that provided an overview of the economic and environmental impacts of LEED-ND approved development patterns, focusing on the fact that some development patterns do a better job of supporting community economic and environmental development goals and can be served more efficiently by local government.

The second day of the workshop brought together an invited group of over 25 stakeholders. The group included diverse representatives from the City, county, and private sector. Leadership from the following city departments and agencies attended:

- City of Sanford
- Housing and Urban Development – Jacksonville Office
- Seminole County
- Orange County
- Hahn and Hahn Team

Other key stakeholders with leadership in attendance included:

- City of Casselberry
- City of Longwood
- City of St. Cloud
- City of Deland
- City of New Smyrna Beach
- City of Port Orange
- City of Ocoee
- University of Central Florida Graduate School

The invited group viewed additional presentations and also participated in facilitated brainstorming sessions to identify challenges and opportunities associated with encouraging the development and redevelopment of key sites in the city. Through the two-day program, city leadership was able to engage community stakeholders around the ways in which development patterns, design and strategic infrastructure investments can make Sanford more competitive and sustainable.

The intent of these workshops is neither for Smart Growth America to create a plan nor bind the community to any particular course of action, but to assist ongoing community efforts to create a more vibrant, successful region, consistent with the goals of their adopted plans.

Site Visit

Criterion and Smart Growth America staff visited Sanford on August 4 and 5, 2015. With City staff assistance, the group participated in three activities:

- An August 4 field tour of areas in the city where neighborhood planning could potentially benefit from the application of LEED-ND, including:
    - Central business district/waterfront/South Sanford Ave.
    - Community garden block and vicinity.
    - Historic Goldsboro Blvd.
    - Former public housing sites.
    - SunRail station area.

- A public presentation on August 4 of smart growth and LEED-ND principles and practices that may help strengthen Sanford's economic prosperity and its fiscal health.

- A stakeholder workshop on August 5 that applied LEED-ND to two current neighborhood planning situations:

    - Downtown/waterfront redevelopment. The City is pursuing master redevelopment of several downtown and waterfront blocks. In applying LEED-ND, workshop participants were able to achieve a theoretical Platinum ND rating, suggesting that, conservatively, the downtown redevelopment program could achieve a Gold rating. Development projects elsewhere in the country are using such an ND rating for positive market differentiation, and attraction of investors and property purchasers.

- SunRail station area planning. The City is pursuing implementation of the station area plan. It was determined that the station is unlikely to meet LEED-ND smart location criteria because of station siting on the periphery of the community's urbanized core. The location finding points up the value of using LEED-ND as a siting tool for major public facilities and services. Aside from location, workshop participants were able to achieve, theoretically, a Platinum ND rating for the station area development program, suggesting that, conservatively, the program could potentially achieve Gold.

Important LEED_ND Credits for Sanford

Based on site visit activities and background information, the following LEED-ND credits have particular relevance to Sanford, and should be used as technical resources when these issues arise in planning and development decision-making:

- SLLp1 Smart Location. The SunRail station experience illustrates the value in applying location efficiency criteria to the siting of major facilities or approval of large increments of development. The objective is physical contiguity that provides seamless connectivity and takes advantage of existing infrastructure.

- NPDp1 and c1 Walkable Streets. The current success of downtown is due in large part to its pedestrian-friendly built environment. Those standards should be strengthened and applied throughout the community, particularly to new commercial and mixed-use development.

- NPDc4 Mixed-Income Diverse Communities. The demolition of public housing in Sanford has created a significant need and opportunity to include affordable and diverse types of housing in development and redevelopment projects at the levels contained in this credit.

- NPDc14 Tree-Lined and Shaded Streets. Sanford can accelerate the achievement of pedestrian-friendly walking environments by shading sidewalks with trees, awnings, and similar structures. In addition to creating comfortable walking environments, these measures also reduce energy use in adjacent buildings.

- GIBp2, p3, c2, c3, c4 Building Energy & Water Efficiency, and Water-Efficient Landscaping. Energy and water use are important resource issues in Sanford because of the local climate and hydrology. Promoting energy and water efficiency inside and outside of buildings will reduce costs, improve economic competitiveness, and help achieve community goals.

- GIBc9 Heat Island Reduction. This measure goes hand-in-hand with NPDc14, in that it seeks to reduce ambient outdoor temperatures, making pedestrians more comfortable and reducing energy use in buildings. It can also simultaneously help manage stormwater and produce local food from vegetated roofs and walls.

- GIBc11 Onsite Renewable Energy. Sanford had a significant solar energy resource that should be incorporated into development and redevelopment projects through small-scale on-site photovoltaics in order to reduce energy costs and generation-related air pollutant and greenhouse gas emissions.

Community Options for Leveraging LEED-ND

The number of LEED-ND credits of importance to Sanford, along with the positive stakeholder workshop results, and the number of neighborhoods suitable for a LEED-ND planning approach, all suggest that sustainable neighborhood development is worth pursuing in the community. As discussed during the site visit, LEED-ND can be used in a wide range of ways tailored to local priorities and preferences. These options for community "leveraging" of LEED-ND include:

Gauge Community Circumstances

- Prepare a checklist audit of plans and codes using ND criteria to identify strengths, weaknesses, gaps, and conflicts. A sample checklist is attached.

- Inventory ND-eligible lands to locate and quantify community-wide ND-style development potential, and estimate infrastructure savings.

Remove Immediate Code Barriers

- Using audit results, amend codes to eliminate any immediate barriers to ND-style development projects.

Align Plans & Implementation Measures

- Amend plan policies and implementation measures to incorporate ND objectives and strategies.

- Establish an ND overlay or floating zone to facilitate and accelerate ND-style projects.

Establish Incentives

- Create formal incentive mechanisms for ND project certification or equivalent documentation (including minimum point levels and specific credits):
  > Green tape.
  > Development bonus.
  > Fee reduction, tax credit.

Catalyze/Assist ND-Style Projects

- Sponsor technical education for local designers/developers; and policy education for local officials.

- Include ND provisions in public agency RFPs for land and project development.

- Create public-private partnerships for development of ND projects.

- Provide geographic data and assistance documenting vicinity conditions needed by project developers for ND certification.

Require Consideration/Certification

- Amend the City code to define covered projects and require ND-equivalent documentation (optionally including minimum credits and points) without certification.

- Amend the code to define covered projects and require ND certification (including minimum credits and points).

Recommendations

As officials noted in their application for assistance, Sanford is preparing for the update of the City's comprehensive plan, and this provides a good opportunity to incorporate new strategies and tactics for the realization of long-term goals. Sanford has a number of significant assets on which to build a more environmentally-sustainable and economically-vibrant and future for the benefit of all of its residents. The key is to focus limited resources on key near-term objectives that can contribute the foundation for long-term success.

The following recommendations are based upon the goals articulated by discussion with leadership and participants in the workshop discussion, and our review of the context within which the City must make its decisions.

Specific recommendations

1. The City should review the foregoing LEED-ND leveraging options and, at a minimum, use the attached ND checklist to **perform a high-level scan of community circumstances to identify notable green neighborhood obstacles and opportunities**. Use the findings to prioritize other leveraging options.

2. In the **downtown/waterfront redevelopment area**, the City should **include some level of LEED-ND consideration in the upcoming master developer selection process**, e.g. qualifications/proposals invited to address ND goals.

3. At the **SunRail station**, City actions should be directed toward:
   a) A **transit-oriented development** on the vacant property adjacent to the rail station, and
   b) **Relocation of the electric substation** adjacent to the rail station, and replacement with a transit-oriented development.

4. **Consider applying LEED-ND to other neighborhood planning processes** to help strengthen environmental, social, and economic outcomes. In particular, the redevelopment of Historic Goldsboro Boulevard and several former public housing sites offer ideal settings for an inclusive, triple bottom line planning approach such as LEED-ND.

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LEED-ND Community Checklist

LEED-ND Components		*Checklist*	*Applicable ND Metric*
1. Planning Process			
1.1 Public involvement			
	1	Are incentives offered for beyond-code outreach to groups affected by development projects, eg developer-sponsored pre-design meetings, design charrettes?	
2. Land-Use			
2.1 Urban growth limit			
	2	Is community development geographically limited to a planned water/wastewater service area or similar urban growth control mechanism?	
2.2 Priority growth areas			
a. Redevelopment	3	Is priority given to, or incentives offered for, redevelopment of brownfields or other special designation areas, eg enterprise zones?	
b. Development		Is priority given to, or incentives offered for, development of the following site types:	
	4	- Infill?	75% of surrounding land previously developed; 140 intersections/sq mi w/i 1/2-mi
	5	- High connectivity? (intersection density)	200 intersections/sq mi (exemplary: 600+)
	6	- Adjacent and connected? (contiguous development)	25% adjacent to previous development and 90 intersections/sq mi w/i 1/2-mi, and 600-800 ft blocks
	7	- Transit-served?	50% of HH/non-res w/i 1/4-1/2-mi of 60 trips/weekday, 40 trips/weekend-day (exemplary: 640 weekday trips, 400 weekend trips)
	8	- Walkable diverse uses?	30% of HH/non-res w/i 1/4-mi of 5, w/i 1/2 mi of 7 (see ND list, group requirements, and NAICS use codes)
2.3 Density			
a. Transit corridor minimums	9	Are minimum densities required within 1/4-1/2 mi of high-frequency transit service? If so, at what DU/acre and FAR?	12 DU/ac, 0.8 FAR at 40/60+ trips *(note unique ND calc method)*
b. Other location minimums	10	What are minimum densities in all or other parts of the community? If so, at what DU/acre and FAR?	7 DU/ac and 0.5 FAR

c. Incentives/bonuses	11	Are incentives/bonuses offered for increasing densities above minimums? If so, at what levels of DU/ac and FAR, or comparable mechanisms such as increased height allowance?	Up to 63 DU/ac and 3.0 FAR
2.4 Mixed-uses			
a. Authorized/encouraged	12	Does zoning enable mixed-uses? Are incentives offered for mixed-uses?	See ND 'diverse use' list
a. Spatial extent	13	Where are mixed-uses located geographically in the community? Are they concentrated or dispersed?	4 "diverse uses" (see ND list) w/i 1/4-mi of 50% of HH (exemplary: 30 diverse uses)
b. Clustering	14	If diverse uses are clustered in certain areas, what are average walk distances between them?	600-800 ft (300-400 ft walk from cluster center)
2.5 Large retail uses			
a. Transit-served	15	Are large retail uses required to have superior transit service? Are there minimum headways for stops serving such uses?	Total retail of 150k sq ft, including 75k single retail use, requires 76/50 wkday/wkend-day trips w/i 1/4-1/2-mi
2.6 Housing			
a. Structure types	16	What range of dwelling structure types exist and how many units per type? Can the Simpson Diversity Index be applied to subareas of the community?	SDI of 0.5
	17	Are incentives offered for increasing diversity of structure types?	
	18	Are accessory dwelling units allowed?	
b. Pricing		What percent of rental units in the community are priced at:	
	19	- 60% of AMI	5% (exemplary: 30%)
	20	- 80% of AMI	10% (exemplary: 50%)
		What percent of for-sale units in the community are priced at:	
	21	- 100% of AMI	5%
	22	- 120% of AMI	8%
	23	Are incentives offered for creating affordable housing?	
c. Co-located type & price diversity	24	Are incentives offered for co-locating diverse structure types and affordable units?	
2.7 Jobs/housing balance			
	25	What is the community-wide jobs/housing ratio?	
	26	What are subarea ratios?	Minimum 1:0.5, 1:1 preferred
	27	Are incentives offered to strengthen ratios?	

2.8 Food production & sales			
a. Garden/greenhouse locations	28	Are gardens and greenhouses permitted in any yard area in any land-use zone?	
b. Neighborhood gardens		Are neighborhood gardens permitted/regulated, including:	
	29	- Minimum growing space	60 sq ft/DU @ 35 DU/ac, up to 200 sq ft/DU @ 7-14 DU/ac (see exemplary scale)
	30	- Minimum equipment	See list
	31	- Ownership & mgmt requirements	See specs
	32	What percent of HH are within 1/2-mi walk of neighborhood gardens?	
c. Farmers markets	33	Are farmers markets permitted/regulated?	
	34	What are farmers market operational characteristics?	Open once weekly, 5 months/yr, products grown w/i 150 miles
	35	What percent of HH are within 1/2-mi walk of a farmers market?	
	36	What percent of employees are within 1/2-mi walk of a farmers market?	
d. Community-supported agriculture	37	Are incentives offered for developer purchase of CSA shares?	See specs; 80% of DU receive shares (exemplary: 100%)
2.9 Energy facilities			
a. Renewable energy generation	38	Are renewable energy generation plants permitted in the local code?	
	39	What percent of total community electrical & thermal energy are provided by renewables?	5% of total costs (exemplary: 27.5%)
	40	Are incentives offered for increasing the share of energy met by renewables?	
b. District heating & cooling	41	Are DHC systems present in the community? Are they permitted in the local code?	
	42	What percent of the community's total annual thermal energy demand is met by DHC?	80% of bldg sq ft in service area (exemplary: 95%)
	43	Are incentives offered for new/expanded DHC systems?	
3. Transportation			
3.1 Pedestrian network			
a. Sidewalks	44	What percent of streets currently have sidewalks on both sides?	90%

	45	Is new development required to have sidewalks on both sides of 100% of new streets?	100%
	46	What are minimum sidewalk widths?	8 ft retail/mixed-use blocks; 4 ft all other blocks
	47	Are driveway intrusions across sidewalks limited?	No more than 10% of sidewalk length
	48	Are incentives offered for shading sidewalks?	40% of sidewalk length, tree shade w/i 10 years (exemplary: 60%
3.2 Bicycle network & storage			
a. Bike network	49	What is the total length of the local bike network? (in-street lanes, off-street paths, 25 mph or slower streets)	Minimum 5 mi
	50	What percent of HH are within 1/4-mi of the bike network?	
	51	What percent of employees are within 1/4-mi of the bike network?	
	52	Does the network connect to schools? Major employment centers? Diverse uses?	
b. Bike parking/storage	53	Are bike spaces required for dwelling units? At what rates?	1 space/occupant for 30% of occupants, or 1 space/DU, whichever is greater, for multifamily bldgs of 4 or more DUs
	54	Are bike spaces required for retail uses? At what rates?	1 space/worker for 10% of workforce and 1 space/5000 sqft
	55	Are bike spaces required for non-residential uses other than retail? At what rates	1 space/worker for 10% of workforce and 1 space/10,000 sqft
	56	Are showers for bicyclists required at non-residential uses?	1 shower/100-150 employees
	57	What are bike parking/storage design standards?	Locked, signage, lighting, within 100 ft of bldg entrances, protected from damage
3.3 Transit service			
	58	What percent of HH are within 1/4-1/2 mi walk of transit stops?	50%
	59	What percent of employees are within 1/4-1/2-mi walk of transit stops?	50%
	60	How many local transit stops meet ND minimum service levels?	60 weekday trips, 40 weekend daily trips

	61	What are minimum transit stop shelter standards?	Covered, partially enclosed, lighting, seating, service info
3.4 Street network			
	62	What is the street network intersection density? (community and subareas)	90 intersections/sq mi
	63	What are average block lengths?	maximum 600-800 ft
	64	Are incentives offered for increased intersection density/shorter block length in new developments?	
	65	Are through-connections required for new cul-de-sacs?	
	66	Are incentives offered for planting street trees?	60% of both sides (exemplary: 90%)
3.5 Motor vehicles			
a. Traffic speed	67	What speed limits apply to residential streets?	20 mph for 70% of streets (exemplary: 95%)
	68	What speed limits apply to non-residential and mixed-use streets?	25 mph for 70% of streets (exemplary: 90%)
b. Motor vehicle parking	69	What percent of streets have on-street parking on both sides?	70%
	70	Are off-street surface parking lots required to be on the side or rear of buildings?	
	71	Is there a maximum amount of project development area that can be devoted to off-street surface parking?	20% of total imperviousness
	72	Is there a maximum acreage for individual off-street surface parking lots?	2 acres
	73	Can off-street parking spaces in multifamily and non-res bldgs be unbundled for separate selling or renting?	90% of DUs or non-res floor area
3.6 Transportation demand management			
	74	Are TDM programs required for major developments? How much auto trip reduction is typically sought?	20% of weekday peak period
	75	Are major project developers offering public transit pass subsidies?	
	76	Are major project developers providing private developer-sponsored shuttle service?	
	77	Are vehicle sharing programs in operation?	

	78	What percent of HH are within 1/4-mi walk of shared vehicle locations?	50%
	79	What percent of employees are within 1/4-mi walk of shared vehicle locations?	50%
4. Resource Protection			
4.1 Wildlife habitat			
a. Imperiled species	80	Are federal/state/NatureServe species present or likely in the community? (see NatureServe list)	
	81	If so, are species protected by a Habitat Conservation Plan or equivalent?	HCP equivalency specs
	82	Is identified habitat protected from development disturbance in perpetuity?	Protection & mgmt specs
	83	Are incentives offered for habitat restoration? For ongoing management?	See restoration/mgmt specs; restore area equivalent to 10% of development footprints (exemplary: 20%)
4.2 Water resources			
a. Wetlands & water bodies	84	Are wetlands or water bodies present in the community?	
	85	If so, are wetlands/water bodies protected beyond minimum federal and state requirements?	ND specs differ from state/fed
	86	Are incentives offered for wetlands/water bodies conservation/restoration?	Restore area equivalent to 10% of development footprints (exemplary: 20%)
b. Floodplains	87	Are floodplains present in the community?	
	88	If so, are floodplains protected beyond minimum federal/state requirements?	
	89	Are incentives offered for avoidance of floodplains or increased resiliency?	
4.3 Soils			
a. Agricultural soils	90	Are ag soils present in the community?	Prime/unique/state significant
	91	Are ag soils protected by TDR programs, mitigation acreage programs, or similar mechanisms?	Protection program specs
	92	Are ag soils developable if the immediate vicinity is already committed to urbanization?	Infill and transit-served sites are developable

b. Steep slopes	93	Are steep slopes present in the community, and if so, what minimum slope percent is defined locally as steep?	15%
	94	Are steep slopes protected from development?	Protection specs
	95	Are incentives offered for steep slope restoration?	Restoration specs
c. Brownfield soil remediation	96	Are contaminated brownfield soils present in the community?	
	97	Is remediation required before development? Are incentives offered for superior remediation?	
5. Public Facilities & Services			
5.1 Civic & recreation spaces			
	98	What percent of HH are within 1/4-mi walk of a civic space, e.g. plaza?	90%
	99	What percent of employees are within 1/4-mi walk of a civic space?	90%
	100	What percent of HH are within 1/2-mi walk of a public outdoor or indoor recreation facility?	90%
	101	What percent of employees are within 1/2-mi walk of a recreation facility?	90%
	102	What are civic/recreation space minimum sizes?	Civic, 1/6 acre 1:4 proportion if less than 1 acre; recreation, 1 acre outdoors or 25k floor area indoors
5.2 School campuses			
a. Land area	103	Is new school campus acreage capped by school type?	Elementary 5 acres, middle school 10 acres, high school 15 acres
b. Access	104	What percent of HH are within 1/2-1 mi walk of elem/middle/high schools?	50% of DU within 1/2-1 mi walk
	105	What percent of each school's 1/2-1-mi walk routes are ND-compliant? (see specs)	Sidewalks both sides, bike network, traffic calming/controls
	106	What percent of ped routes on school campuses are ND-compliant? (see specs)	100% no crossing bus zones, parking ingress/egress, or drop-off areas
c. Joint use	107	Are incentives offered for joint use of school facilities?	
5.3 Infrastructure content & efficiency			

a. Recycled content	108	Do local govt procurement policies and public works standards require recycled content in purchased equipment/materials/supplies?	50% of total mass, see specs (exemplary: 75%)
b. Energy efficiency	109	Do local govt procurement policies and public works standards require superior energy efficiency in purchased equipment?	Energy use 15% below least first-cost option, see specs (exemplary: 30%)
5.4 Solid waste management			
		Are the following programs operated/publicized and available to all res and non-res customers:	
	110	- General recycling?	
	111	- Hazardous materials collection?	
	112	- Centralized composting?	
	113	- Sidewalk recycling receptacles?	
	114	- Construction waste management?	50% of volume
6. Site Development			
6.1 Site disturbance & preservation			
a. Erosion & sedimentation control	115	Are ESC plans required? Are their BMPs equivalent to Washington State or EPA BMPs?	See Washington State & EPA specs
	116	Are incentives offered to leave undeveloped land undisturbed? (or limit new development to previous development footprint)	See sliding scale
b. Construction impact zones	117	Are CIZs delineated to limit on-site disturbance during construction?	See CIZ specs, eg 40 ft beyond bldg perimeter
c. Tree protection	118	Are trees on development sites surveyed for condition, heritage/champion status, invasiveness?	See tree specs
	119	Are identified significant trees protected from development disturbance?	
6.2 Climatic design			
a. Solar orientation	120	Are incentives offered for solar orientation of new blocks and buildings?	75% of blocks or bldg floor area (exemplary: 95%)
b. Heat island reduction	121	Are incentives offered for shading sidewalks with street trees or over-hanging structures? Are incentives offered for high-reflectance materials, open grid paving, tree shading, over-hanging structure shading, or vegetated roofs?	50% of non-roof surfaces, 75% high-reflectance or vegetated roofs, see specs (exemplary: 100%)

6.3 Water resources			
a. Rainwater management	122	Do regulations require, or are incentives offered for, infiltration, evapotranspiration, or reuse of rainwater on new development sites? If so, at what rates?	Mgmt by 80th-95th percentile event; Wash State BMPs (exemplary: 97th percentile)
b. Landscape irrigation efficiency	123	Do regulations require, or are incentives offered for, reduction in water use for landscape irrigation? If so, at what rates?	50% reduction from baseline (exemplary: 75%)
c. Wastewater reuse	124	Is wastewater allowed to be separated or treated and reused on-site? If so, at what rate?	25-50% of annual volume (exemplary: 75%)
6.4 Exterior lighting			
	125	Do regulations require, or are incentives offered for, light pollution reduction?	See ND specs
7. Buildings			
7.1 Form & function			
a. Setbacks	126	What is the range of setbacks in the local code?	0-25 ft, see specs
b. Height	127	Are minimum building heights required relative to street width in selected areas?	15% of street length at minimum BH-SW of 1:3
c. Entries	128	Are building entries required to face public space? (other than parking lots)	
	129	Are entries required at minimum spacing on facades?	30-75 ft
d. Facades	130	Are non-res ground-floor building facades required to have minimum amounts of clear glass windows?	60%, see specs
	131	Are retail use windows required to be unshuttered at night?	
	132	Is the length of blank walls limited?	50 ft
	133	Are the number of garage openings/service bays on block faces limited?	20% of street frontage
e. Ground-floor uses	134	Is a mix of active ground-floor uses in new development required or incented?	See ND specs
	135	Must a share of ground-floor dwelling units be elevated above grade?	50% of DU at least 24 inches
7.2 Visitability & universal design			

a. Residential buildings	136	How much of total residential construction complies with ICC/ANSI A117.1/Type C or ND specs for 4+ unit bldgs?	20% of DUs, see specs (exemplary: 40%)
b. Circulation routes	137	Do outdoor routes of travel within projects, and public rights-of-way, comply with ADA /ABA?	100% compliance
7.3 Green performance			
a. Green certification	138	How many buildings are LEED or otherwise green certified?	
	139	What building types, what programs, what levels?	
	140	Is green building certification required or incented?	One bldg or 10% of sq ft (exemplary: 90%)
b. Energy efficiency	141	Is new construction/major renovation required/incented to achieve energy savings beyond code minimums?	10%, see ND specs (exemplary: 30% see specs)
c. Water efficiency	142	Is new construction/major renovation required/incented to achieve water savings beyond code minimums?	20%+, see ND specs (exemplary: 50%, see specs)
7.4 Reuse & historic preservation			
a. Reuse	143	Are incentives offered for building reuse?	50% of whole bldg or 20% of total project stock, see ND specs (exemplary: 75% and 40% respectively)
b. Historic preservation	144	Are historic-designated buildings present in the community?	
	145	If so, are such buildings protected by local or state/federal requirements for rehabilitation or reuse?	
	146	Are incentives offered for historic building rehabilitation?	Exemplary: 100% of bldgs or 90% of total bldg sq ft (see specs)