



September 25, 2018

Dear Mayor Silberberg, Vice Mayor Wilson and Members of Council:

On behalf of the Environmental Policy Commission (EPC), I am writing to share our comments regarding the Environmental Action Plan Phase 1 update proposed by staff, including our recommendations for changes to the staff proposal.

We greatly appreciate the time and effort that staff across multiple city departments have devoted to working with us and our community in this process. The proposal before you reflects a broad consensus between EPC and staff in almost all areas, developed over more than a year of intense deliberation, several public meetings and comment periods, and joint work sessions with the Planning Commission and with Council.

In a few key areas, however, we continue to disagree with staff and respectfully provide the following alternative recommendations for Council's consideration.

1. Renewable Energy

Under short term Action #3, the EPC recommends clarifying that on-site renewable energy is not required and therefore that the \$7.5m capital cost would ONLY apply if staff were to pursue an on-site option. The section should clarify that if the City were to pursue a Power Purchase Agreement (PPA) and/or a Renewable Energy Credit (REC) only strategy, the capital cost to the City would be zero.

2. Energy Efficiency

Under short term Action #3, the EPC recommends that Staff include operational savings, not just capital costs, from the investment in LEDs. Since the payback period for the capital investment is relatively fast, it is important for Council to see that the benefits from the capital investment accrue quickly to the City's operating budget. As currently written, the section makes it seem as if there are no financial benefits to the City from the capital outlay.

3. Climate Change

The EPC recommends moving up the update of the City's Energy and Climate Change Action Plan in short term Action #1 from FY2023, as proposed by staff, to FY2021. We have not updated our strategy since 2011, and waiting longer than 10 years to update our strategy is simply not consistent with our Eco-City charter. Climate change is the defining environmental challenge of our time, and we must prioritize taking action to mitigate our own contribution to the problem as well as adapt to its unavoidable effects on our community.

The numbers from the most recent greenhouse gas emissions inventory for Alexandria conducted by the Metropolitan Washington Council of Governments (COG) do not look good. Although our emissions have gone down, this is entirely due to improvements made by Dominion Energy. If Dominion's emissions rate in producing electricity had stayed constant between 2012 and 2015, Alexandria's greenhouse gas emissions would have gone *up* by 2.2%. In contrast, we will need to reduce greenhouse gas emissions community-wide by roughly 4%—each year, for the next 32 years—in order to meet our longstanding 2050 emissions reduction target. We cannot wait any longer to update our Energy and Climate Change Action Plan.

Proposed Language:

- a. Establish a multidisciplinary task force to guide and complete by FY2021 an update of the Energy and Climate Change Action Plan.

4. Green Building

The EPC recommends both simplifying and strengthening the Target for Green Building to clarify how the updated policy will specifically help achieve Greenhouse Gas Emissions, water use, and storm-water runoff goals in the EAP, and to set as policy a goal for all new city-owned buildings to meet a net zero energy standard as soon as practicable.

The current EAP from 2009 called for all new buildings in the City to achieve a net zero energy standard by 2030, but the EPC believes that this can be achieved sooner, especially for city-owned buildings. For example, Arlington County already has a net zero school and has several more in their near term development pipeline. Alexandria has none and none in our pipeline. We believe that Council should set a clear policy for city-owned buildings to seek to meet a net zero energy standard, which will provide clear direction to the new Green Building Task Force to determine how best to achieve that goal for any projects initiated started in FY2020 or later.

Proposed Language:

- a. By FY2019, the Green Building Policy will set expectations for how both new and existing buildings should contribute to the achievement of the goals for GHG emissions, water use, and stormwater runoff reduction established in the EAP, and will set a goal for new city-owned buildings to seek to meet a net zero energy by FY2020."

5. Open Space

The EPC recommends making the open space and land use recommendations more ambitious by establishing the open steering committee envisioned in short term Action #1 sooner than the staff proposed FY2023, and by clarifying in short term Action #3 that open space should be prioritized that is at ground level, maximizes pervious surface and includes larger shade trees that help meet our tree canopy and stormwater goals. We support staff's effort to evaluate and update the City's open space requirements in FY2019, but believe that it is important for Council to clearly articulate what it believes is "meaningful" open space to sufficiently guide that update and to ensure it is consistent with the City's stated environmental priorities.

Proposed Language:

- a. Protect and add open space through acquisition, preservation, and conservation as prescribed in the Open Space Master Plan (updated 2017) and by FY2023, evaluate

increasing the target to 7.5 acres per 1,000 residents. This includes, by FY2020, City Council will reestablish the open space steering committee to re-asses the methodology, evaluate, and prioritize potential open space sites. Tools to be considered for open space preservation or restoration will include purchase, easements, or repurposing land as funds can be made available, development occurs, or partnerships can facilitate.

- b. By FY2020, evaluate and update the requirements of open space on residential, commercial and mixed-use private development. Issues include rooftop/ground floor open space, framework for developer contributions to off-site open space, impervious surface percentages and consistency of open space requirements across similar zones, with a goal of achieving meaningful open space at ground level, vegetated with native plants including large shade trees, and maximizing the area of pervious surface.

Thank for your continued commitment to our environment and for your consideration of our views.

Sincerely,



Jim Kapsis
Chair
Environmental Policy Commission