

Suggested Text for Draft Green Building Policy Update

Planning Commissioner David Brown – May 30, 2025

The Planning Commission wishes to commend and strongly support the Council's recent efforts to bring forward an updated and stronger Green Building Policy for new development. In the hope that it will in no way diminish our appreciation of the work done to date, the Commission requests that Council consider two small but important changes to advance the effectiveness of the new Policy. First, we recommend that the target of an 8 percent baseline reduction in energy use intensity (EUI) be increased to 35%. Second, we recommend that the Onsite Renewables Annual Energy Offset target of 3 percent be increased to 5 percent, and that the option of paying into a fund instead be increased from 90% of the onsite cost to 120% of that cost. A more complete discussion of the basis for these recommendations follows.

Background

In February of 2022, the Planning Commission, the Environmental Policy Commission, and the Transportation Commission provided Council with a joint letter declaring their shared concern that more must be done, and sooner, to address the climate emergency.¹ Of the five key recommendations, the first two pertained to sustainable new building development by both the public and private sectors, and the letter highlighted the limitation of the 2019 Green Building Policy in terms of getting to adopted Environmental Action Plan 2040 targets for citywide greenhouse gas emissions reductions.

Then in February of 2023, the Planning Commission and Environmental Policy Commission delivered another joint letter in which they focused on how planning tools could bring us more sustainable new building development: improvements to our master plans and small area plans, the Green Building Policy, Coordinated Development District Concept Plans and Development Special Use Permits.

The Office of Climate Action has now put forward a proposed Green Building Policy Update (the "Update"), focused first and foremost on energy use intensity, or EUI, as the cornerstone of sustainable building design. This performance-based approach ensures developers have the most flexibility possible within their design process, while also making the standard of performance clear. The Update's further commitments to building electrification, the option to off-site a portion of renewable energy generation for the City's net-zero buildings, and the provision of several alternative compliance paths provide a more effective green building framework for new development. The Update also smartly acknowledges the special cost and efficiency considerations of affordable housing projects and building conversions, offering nuance that is needed for community development priorities.

¹ Council's Emergency Declaration: https://www.alexandriava.gov/news_display.aspx?id=111923

Recommendations

There are two key areas where the Update could do more to help us meet the overall goal of reducing greenhouse gas (GHG) emissions 50% by 2030 (from 2005) and 80-100% by 2050.² If approved, we believe these recommendations would also more strongly further the Green Building Policy's standards of performance and mitigate, the negative climate impacts of new developments in our community.

1. Stronger EUI Targets under Compliance Option 1. Staff and consultants considered a range of options for setting EUI targets for new development, and then selected the lowest threshold as a step up from the baseline of how development performs today. Unfortunately, that small incremental step, just an 8 percent reduction from today's energy use baseline in the example of multifamily residential development, is not going to be enough to get us to our climate goals. We recommend that the Update establish a "better" threshold--35 EUI--which represents a 15 percent reduction in energy use intensity from the baseline of existing development in the City. We also recommend that in the the Office of Climate Action establish a schedule for incremental reductions in the EUI target over time which will align with reaching the City's net zero energy building goal.

2. A Larger Offset Under the Onsite Renewables Annual Energy Offset. We recommend that is offset be made larger, in recognition that the offset becomes a smaller total amount of energy generation the more energy-efficient the building design. The Update suggests that buildings only provide 3% onsite renewables. We find this too modest a goal to address our climate emergency. We think that with the efficiencies of new buildings, developers should be able to provide for 5% of the required building energy through onsite renewables.

In addition, the Update provides the developer the option of instead paying into a fund in lieu of providing onsite renewables. The payment is tied to 90 percent of the onsite cost. In fact, the amount should actually exceed the foregone onsite cost by a modest amount, such as 20 percent. This is in part to discourage use of the fund option in preference for more timely actual GHG reductions onsite. In addition, administering a fund to build renewables or energy efficiency improvements elsewhere comes with overhead and logistics challenges for the City to bear, apart from the fact that the delay in implementation will reduce the relative value of the payment through inflation and other factors. As in the recommendation for EUI, we recommend the Office of Climate Action establish a schedule for incremental increases in the expected percentage of on-site energy generation over time, and that the policy provide a foundation for discussion of

² This goal is promulgated in both the Environmental Action Plan 2040 updated in 2019 and the Energy and Climate Change Action Plan from 2023.

necessary on-site storage capacity as distributed energy generation becomes more prevalent in the future.

In closing, our two key recommendations are in keeping with the Update's appropriate recognition of the ever more urgent goal of ensuring that new development in the City of Alexandria is responsive to the City's established environmental goals and that the direct and embodied emission-impacts of new buildings are mitigated to the maximum practicable extent possible through to a strong, clear, and flexible Green Building Policy. The Planning Commission understands that property developers are working within economic constraints and that the macro national and even international pressures on their businesses change over time. Nonetheless, the climate emergency Council acknowledged in its 2019 declaration continues to be one of the greatest challenges of our time.

We thank you for the opportunity to comment on this vital aspect of public policy.