



May 23, 2019

Dear Chair Macek, Vice-chair Wasowski and members of the Planning Commission:

As Chair of the Green Building Update Task Force, I am writing in support of the proposed Green Building Policy update that you will review on June 4, 2019. The Green Building Policy Update Task Force was established by City Council Resolution No. 2841 in September 2018. Members of the Task Force served with the purpose of providing advice to City staff on the policy update relative to their area of expertise.

In that role, the Task Force met on four separate occasions at meetings led by City staff between November 14, 2018 and April 24, 2019. The group diligently and intelligently prioritized green building strategies for further analysis and inclusion in the Green Building Policy and provided guidance to City staff on the proposed outline and draft of the policy. Staff was responsive to the Task Force's input, incorporating all members' comments and creating an environmentally progressive policy that also considers the existing City policy expectations of development applicants and the economic and social benefits that new development brings to the City.

Overall, the Task Force reached agreement on the majority of Green Building Policy and Environmental Action Plan (EAP) initiatives that resulted from its meetings. Task Force representatives from the development community and those representing environmental positions voiced differing opinions in only a few areas. These included the provision for performance points in advanced energy metering and enhanced commissioning; the development stage when an applicant would provide a preliminary narrative regarding Green Building compliance plans; and the level of vigor the City should apply to achieving Net-Zero Energy (NZE) standards to new public developments. In each of these cases, the staff proposals for the Green Building Policy and the EAP Green Building Chapter, which you will also review at your June 4 meeting, represent initiatives that balance both sides and still maintain a green building standard that is competitive with municipalities similar in size and density to Alexandria and that will advance the City's environmental goals.

Further, as the proposed Green Building standards are more rigorous, the Task Force believed that additional City staff with specialized experience in green building practices will be required to manage and implement the Policy. This recommendation is reflected in the Green Building chapter of the EAP.

On behalf of the Task Force, I find that the staff's proposed Policy establishes a cutting-edge approach for new public and private development that will contribute to an overarching goal of the EAP to reduce energy use and greenhouse gas emissions. I look forward to your support of the staff recommended Green Building Policy and EAP Green Building Chapter.

Respectfully,



Donnie Simpson, Task Force Chair

Cc: Green Building Policy Task Force members: Bob Brandt, Mike Dameron, Garrett Erdle, Jenna Hamilton, Rentz Hilyer, Stephen Koenig, Lisa Lettieri, Brendan Owens, Chris Pyke, Jennifer Skow, Alexandra Taylor, Michael Wilson, Ken Wire, Debra Yap



June 4, 2019

Alexandria Planning Commission  
301 King Street  
Alexandria, VA 22314

**Re: Environmental Policy Commission recommendations on Docket Items #6 and #8**

Dear Chair Macek and Members of the Planning Commission:

EPC appreciates the time and effort of the Green Building Task Force in updating the City's Green Building Policy (Docket #6) and is encouraged by the direction the revised policy takes public and private development in Alexandria. We also appreciate staff's recommendations for additional short, medium, and long-term actions in the proposed Green Building Section of the Environmental Action Plan (Docket #8).

While we applaud the general outcome of both policy documents, we believe that they should be strengthened in a few places to deliver performance outcomes aligned with the City's ambitious sustainability goals and, in particular, its commitment to combat climate change.

**Docket #6**

We propose the following change to the proposed Green Building Policy 2019:

1. **Net Zero Energy for Public Buildings:** The EPC believes strongly that the City should pursue a net zero energy goal for all new public buildings without qualification. There are now several completed or planned net zero energy projects in Arlington County, Washington, D.C., and many other parts of the country.

To that end, we recommend deleting the "unless" clause below, which provides three separate policy exceptions to the net zero energy goal for public buildings. Providing so many qualifications of the goal undermines the strength of the policy objective. While we recognize that there may be circumstances that could constrain full achievement of the objective, the policy as drafted already contains a section called "Flexibility" that provides the Director of Planning and Zoning limited discretion to allow exceptions to the policy:

*In addition to the minimum level of certification and the designated Performance Points, public development will meet the following criteria ~~unless it is technically infeasible, not cost effective, or situationally inappropriate~~:*

2. **Definition of Net Zero Energy:** Net Zero Energy in the Green Building Policy should be defined in line with the U.S. Department of Energy's definition:

*An energy-efficient building where, on a source energy basis, the actual annual delivered energy is less than or equal to the on-site renewable exported energy<sup>1</sup>.*

## **Docket #8:**

We propose the following changes to the proposed Green Building section of the Environmental Action Plan. Note that, for clarity, the EPC is also attaching as a separate Appendix a fully redacted version of the short, medium and long-term goals, which includes some additional minor changes not explained in detail below:

### Short Term Actions:

- 1. Green Building Staff Position:** We join the Green Building Task Force in urging the City to establish and fund a city green building staff position to support the implementation of the Green Building Policy as well as the short, medium and long-term goals of the Environmental Action Plan. Arlington County has a green building team committed to working with developers and citizens to support their green building objectives. Given our environmental ambitions, we need a similar resource in Alexandria. We ask that the Planning Commission join this effort by recommending to Council that such a position be added to the Green Building section of the EAP as a short-term action to be completed by FY2021:

*By FY2021, the City shall create and fill a Green Building Director position in the Department of Planning and Zoning to work with the development community and building owners to support the implementation of the Green Building Policy.*

- 2. Strengthen and Consolidate Net Zero Energy Actions:** We recommend strengthening and consolidating the proposed short-term actions on net zero energy buildings in a new 3.1.7 to read as follows:

*Commit to build all new public building projects Net Zero Energy (NZE) for all projects not in design development by August 2019.*

- *Evaluate Net Zero Energy guidelines, standards, and rating systems.*
- *Investigate the feasibility of using performance-based procurement for construction of public buildings*
- *Establish a standardized process for recognizing and celebrating NZE buildings city-wide.*
- *Establish a standardized method to document the procurement/design/construction of NZE buildings to serve as a resource for future development*
- *Cost Estimate: Existing staff resources*

- 3. Add Fiscal Year Goals for Each Action:** In contrast to all other sections of the proposed EAP 2040, staff's recommendations do not include specific fiscal year dates for completion of the short or medium-term actions. EPC recommends that the City assign specific dates for each target action consistent with the rest of the EAP and has proposed dates in the Appendix.

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<sup>1</sup> [https://www.energy.gov/sites/prod/files/2015/09/f26/bto\\_common\\_definition\\_zero\\_energy\\_buildings\\_093015.pdf](https://www.energy.gov/sites/prod/files/2015/09/f26/bto_common_definition_zero_energy_buildings_093015.pdf)

4. **Move Regulatory Incentives from Medium Term to Short Term Actions:** We recommend moving mid-term goal 3.1.9 into the short-term action section and completing by FY2023. The EPC believes that the City should be designing incentives to help private developers exceed the goals of the new green building policy and that the addition of a full-time green building staff person (see recommendation 1) should accelerate the City's ability to evaluate and implement such incentives in the short term.

Medium Term Action:

1. **5-Year Update Cycle of the Green Building Policy:** We recommend editing long-term action 3.1.16 to set a goal for the Green Building Policy to be updated "at least every 5 years" and moving the action into the medium-term action section. Given changing green building practices and technologies, the EPC believes that the policy should be comprehensively reviewed at least every 5 years.

Long Term Actions:

1. **2030 Carbon Neutral Goal:** The original EAP from 2009 included a long-term action to "Require all new construction be carbon neutral by 2030." That recommendation was left out of staff's updated long-term recommendations and should be added back into the EAP 2040. This goal was recently reaffirmed in both the Small Area Plans for Old Town North and North Potomac Yard.

*Require all new construction to be carbon neutral by 2030.*

EPC appreciates the Planning Commission's consideration of our input and your commitment to a sustainable Alexandria.

Sincerely,



Jim Kapsis  
Vice Chair  
Alexandria Environmental Policy Commission

### New Short Term Actions

- 3.1.3. Update the Concept 2 Development Plan Checklist to include a requirement for projects to submit a preliminary compliance narrative that indicates the applicant development team is aware of the City's Green Building Policy and understands how it is applied.
  - Cost Estimate: Existing staff resources
- 3.1.4. Update checkpoints within the development review process to track compliance with the Green Building Policy.
  - Cost Estimate: Existing staff resources
- 3.1.5. Update standard development conditions for projects subject to the new Policy to include the following topics:
  - Staff access to post construction energy and water performance data
  - Sub-metering of EV charging stations (so that whole-building metering is not affected)
  - ~~Optional-e~~ Energy metering in multifamily and hotel developments
  - ~~Optional-e~~ Enhanced commissioning measures in private development
  - Cost Estimate: Existing staff resources
- 3.1.6. Establish incentive programs that encourage green building renovations for existing buildings, such as encouraging property owners to implement green building strategies within project scope and leasing agents to participate in a Green Lease Leader program.
  - Cost Estimate: Existing staff resources
- ~~3.1.7 Establish~~ Commit to build all new public building projects a Net Zero Energy (NZE) for all projects not in design development by August 2019.
  - ~~process for e~~ Evaluating Net Zero Energy standards in new public buildings, including applicable guidelines, standards, and rating systems.
  - ~~Investigate the feasibility of using performance-based procurement for construction of public buildings~~
  - ~~Establish a standardized process for recognizing and celebrating NZE buildings city-wide.~~
  - ~~Establish a standardized method to document the procurement/design/construction of NZE buildings to serve as a resource for future development~~
  - Cost Estimate: Existing staff resources
- 3.1.8 Evaluate regulatory incentives linked to specific green building performance measures for new private development:
  - Establishing a City-wide Green Zoning Overlay (e.g., incentivizing solar panels and wind turbines through additional building height or allowing floor area exclusions to accommodate passive design elements).
  - The feasibility of permitting bonus building height and density (once affordable housing bonuses are first exhausted) for applying green building practices above those outlined in the new Green Building Policy.
- ~~3.1.8 Start a pilot program that includes documentation of the procurement/reporting process to construct one net zero energy (NZE) public building.~~

### Mid-Term Actions

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