TASK FORCE COMMENTS ON CONSULTANT REPORTS

PERSON	TASK FORCE SEAT	COMMENT	NOTES	INTEGRAL RESPONSE
GROUP		1) Focus on health/wellness improvements and measures, especially in schools. 2) Factoring in Earthcraft for Affordable Housing - how can LEED work with affordable housing developments given the cost caps? 3) Clarifications on the version of the building code and certification system that determined the base rate/baseline. 4) Map Ingetral strategies to costs in WSP analysis 5) Consider interactions with other City policies (parking, setbacks, stepbacks, design, etc.) 6) Consider the 50 year build cycle in cost analysis, especially for public buildings.	Comments received by group at Task Force meeting	1) Addressed as performance target for public development. 2) Addressed in report, see pages 18-19. 3) See WSP Report 4) Not applicable 5) Recommendations provided, see page 44 6) See WSP Report.
Garett Erdle	Residential Home Builder	How do other cities address redevelopment in their Historic Districts? We have one which is ~1000AC and there are limitations on height, lot coverage etc. A new Green Building program with density incentive may not work in 1/10th of our City due to Historic considerations.	Comments received via email during Task Force Meeting	The density incentives being proposed are for specific parts of the city outside the historic district.
		It sounds like only a Site Plan will trigger the need to adhere to the new Green Building Policy. Should there also be a development density threshold? Maybe more than four units or 10,000SF of commercial/office?	Comments received via email during Task Force Meeting	This is a policy decision for Alexandria to make, in light of Virginia law, and outside the scope of our research.
		How do you recommend we encourage existing building owners to begin to capture their energy and water usage? There are many small commercial buildings in Alexandria which are family owned, I believe we should find a way to teach them the benefits of a program like Energy Star.	Comments received via email during Task Force Meeting	Addressed on page 29.
		What additional resources will the City need to acquire (new hires, technology etc) in order to administer a new Green Building Policy?	Comments received via email during Task Force Meeting	Addressed on page 31.
		I suggest we select a project in Arlington. That jurisdiction offers both ADU and LEED density bonus, as we are considering. Suggest you reach out to Bob Brant so he may poll his office for a representative project. A few come to mind but he will know of more options.	RE: Public education event	No response needed.
Jenna Hamilton	Third-party Certifier (Green Globes)	First, I want to address the recommendation of Integral Group that any policy allowing the use of the Green Globes Green Building Certification System should require that Green Globes users achieve a Three Green Globes certification level, while only needing to achieve a LEED Silver certification. There is no evidence that maintaining a lower LEED Silver requirement for private projects and requiring Three Green Globes is justified. While the process that GBI uses to guide clients through certification is different than that used by LEED, the sustainability goals are not.		Updated equivilance recommendation to 2 Green Globes per conversation with City on 2/12; see page 16
		Green Globes has repeatedly been identified by federal, state and local jurisdictions as equivalent to LEED certification, with Two Green Globes equating to LEED Silver, Three Green Globes equating to LEED Gold, and Four Green Globes equating to LEED Platinum.		Updated equivilance recommendation to 2 Green Globes per conversation with City on 2/12; see page 16
		In 2013, the U.S. General Services Administration identified Two Green Globes as equivalent to LEED Silver for projects undertaken by the federal government. The analysis that led to this determination was completed by Pacific Northwest National Laboratory (PNNL) in 2012. The Integral Group report in fact references this same analysis related to equivalence in Section 5.4 of the report (page 13) but fails to point out that the outcome of the analysis determined that both LEED and Green Globes were identified for use by the federal government, and that they were equated at the LEED Silver and Two Green Globes level.		Updated equivilance recommendation to 2 Green Globes per conversation with City on 2/12; see page 16
		Since the PNNL study in 2012 many jurisdictions have found the same result on equivalence between Green Globes and LEED. Locally, the largest of the most recent assessments was conducted in the state of Maryland in 2016-2017. The result was a determination by the State that Two Green Globes would be equivalent to LEED Silver for use in State projects.		Updated equivilance recommendation to 2 Green Globes per conversation with City on 2/12; see page 16
		Further, the Integral report's initial draft, which contained the recommendation of Three Green Globes vs. LEED Silver for private projects, included numerous errors related to the requirements and point allotments in Green Globes. These oversights indicate to us that the recommendation made for Three Green Globes was based on an incomplete understanding of Green Globes' actual requirements. Integral updated their analysis at the Task Force meeting as a result of information provided by GBI but did not change its recommendation for certification levels. Integral's presentation at the Task Force meeting indicated that they had extensive experience with LEED, and some limited experience with Living Building Challenge, but had no actual experience with the Green Globes system. GBI remains committed to providing any information necessary to demonstrate how Green Globes meets and exceeds the City of Alexandria's requirements.		Addressed. All areas where the prelimianry report indicated Green Globes did not address that topic, but it does, we have corrected, and added specific point requirements for Green Gloves. The PDF document provided by GBI was very useful. The only area where we still list Green Globes as not sufficient is renewable energy, where the awarding of points is not currently linked to any given level of renewable energy generation.
		I also note that the initial draft, which contained the errors, is still included on the Alexandria Green Building Policy Update website. We are concerned that those who access that report will not realize that the information contained in the report was not accurate and was updated via the Powerpoint presentation made during the meeting.		The final version will replace the draft version on the City's webpage.
		6.3 Strategy C: New Private Development The Integral report includes a recommendation that the City pursue state enabling legislation to operate a home labelling and rating program. While GBI does not do certifications on single family homes, I would strongly recommend that the City of Alexandria discuss this option with local Realtors in the community before moving forward. In my experience, the Realtor community has had a strong reaction to the concept of home labelling, as they have previously in other jurisdictions feared the potential impacts on sales of existing homes (versus new homes in the marketplace) and the resulting effects on overall home values.		This is an important issue for the City to consider, and which they are already aware of. Realtor opposition is already addressed in the report and no further changes are needed
		6.4 Strategy D: Existing Private Buildings GBI has long believed that more effort—on the part of everyone—needs to be put into identifying and promoting incentives to push the existing building stock toward sensible, voluntary green building practices. As building codes, technologies, and construction practices evolve, many of the green building components of the past have become standard components of new construction. However, we could be having greater impact on the energy efficiency and climate change goals of the community by bringing more existing buildings to the table. Understanding that these types of incentives may not be within the scope of the Policy update taking place in June 2019, we do want to encourage the City of Alexandria to continue looking into the existing building stock, and ways in which those owners can be incentivized to improve their buildings' performance.		No response needed.
		Green Leases and Tenant Build-Out Green Globes' suite of certifications also includes Green Globes for Sustainable Interiors, which is directly aimed at certifying the sustainability of leased spaces and tenant build-outs. In 2016, Green Globes SI was identified by GSA as equivalent to LEED ID+C. GBI strongly feels that, like with existing buildings, education in the marketplace of lease-holders and building tenants about their own sustainability options and roles is essential in making significant progress to achieve sustainability and climate change goals. Incentivizing the use of pathways like Green Globes for Sustainable Interiors, and/or LEED ID+C certification can help create a dynamic effect of education among building tenants in the city. Additionally, GBI would recommend that the City look at some of the model commercial green leasing guidelines produced by the Green Building Advisory Committee of GSA in 2016. The advice letter issued on December 6, 2016 includes recommendations made by the GBAC after over a year of analysis of green leasing concepts in the marketplace. (https://www.gsa.gov/cdnstatic/GBAC_HP_Leasing_Criteria_-_FINAL.pdf) This document may provide additional insights into some of the goals that the City of Alexandria may want to incorporate into any incentive program in this area.		Addressed on page 33-34--both GG SI and the GSA GBAC citation have been added.
		Tax Incentives I want to underscore the analysis made by both WSP and Integral on the importance of analyzing any potential impacts of tax incentives. GBI has found that, without question, tax incentives provide an incredible market motivation to pursue and achieve increased sustainability and performance in buildings. We have also seen in several jurisdictions that that tax incentives are effective, but also rapidly understood to be very expensive. GBI believes that the limited-scale tax credit program suggested in the draft analysis by Integral is probably the best fit for Alexandria. A program tailored to create incentives for specific types of projects, such as smaller developments, or small existing buildings projects, could provide much benefit with a more controlled cost to the City.		See WSP Report.
Brendan Owens	EPC Representative	Two bills – once in each chamber – have been introduced in Virginia. HB 2192 and SB1331. The House bill has been reported out of a subcommittee with a sub, the Senate one hasn't moved yet. So – too early to know how real this may be. The bill summary: Establishes standards for the design, construction, maintenance, and operation of public school buildings and facilities and allows for a local school division to enter into a lease agreement with a private entity to meet such standards. The bill would allow for net energy metering in public school buildings and facilities. The bill would also authorize the Virginia Resources Authority to provide partial funding for school modernization projects, effective January 1, 2020. Notably the bills: • Both establish standards (key paragraphs pasted below) stating intent for both new construction and renovations to be energy positive schools and references the Zero Energy/Advanced Energy Design Guide for Schools. Language is different between the two bills. • Authorizes leases with private developers for the school design, construction, operation, RE system, and related items • Authorizes schools to negotiate net energy metering with the utility without the contract falling under the SCC • Have different approaches to contracting / financing House bill: • Authorizes local industrial development authorities (entities previously authorized for other types of public interest facilities) to construct or improve (among other things) public schools meeting the standards Senate bill: • Authorizes competitive negotiation for school construction / renovation • Authorizes the Virginia Resources Authority to provide partial funding to school mod projects meeting the standards I don't know enough about finance to have an opinion on the industrial dev authority vs competitive negotiation approaches; but I will say that the Senate provision on partial state funding is positive. I'm also attaching the local government cost impact statement which indicates how a few of the school districts think about facilities and energy costs. The Rappahannock County critique of Discovery School is quite biting – Anisa or Brendan, perhaps you might want to flag this for John Chadwick in case he hasn't heard about it? If you do so, it would be good to get his take on the renewable energy section. I understand Arlington had to get special legislation to get credit for Discovery's excess solar generation. Alternately, we can contact him directly. I think there is a problem with the language. I recommend we actively support the bill. We may want to suggest a few language changes, especially the RE section. I also think it is likely (1) some people may try to eliminate or change the energy positive standard, and/or (2) it may not move. But, it would be good to connect with the sponsors and build relationship for this and future efforts.	Attachments provided with detail on the bills.	Fully addressed on page 36.
		As part of the follow up to the jan 30 meeting i've taken some data which chris had provided from our market insight tool and created what we might consider as a baseline project for alexandria. i've split the rating system up a bit and, it must be said, there's a bit of interpretation inherent in this analysis but with those caveats: • "baseline" credits are credits that were routinely achieved by projects in alexandria - i'm proposing that these be considered our base case for any economic analysis • "optional" credits are credits that were achieved by fewer projects - i'm proposing these be considered the credits that for which some green premium be determined. • the $P column is my very rough estimate of an appropriate cost premium (0, L, M, H) - i've backed this assessment up with no actual data at this point. the point of this exercise is that the base case that integral/wsp start with will dictate the premium they calculate. i think what i've attached is a strong argument that the 'base' project for alexandria is a mid-level leed certified project (45 points) and that if we were to pick leed silver or gold as the benchmark we'd be talking somewhere in the 5-15 additional effort.	Baseline scorecards provided.	No response needed.

Chris Pyke	Third-party Certifier (USBGC)	One item to get started. Here's a link to the affordable housing study that Brendan mentioned in the City of Boston: https://s3.amazonaws.com/academia.edu.documents/44973276/Indoor_Air_Quality_in_Green_Vs_Conventio20160421-27319-rk79k8.pdf?AWSAccessKeyId=AKIAIWOWYYGZ2Y53UL3A&Expires=1549476793&Signature=YI06LYG8ODCUgRxZyWKMbhLawvY%3D&response-content-disposition=inline%3B%20filename%3DIndoor_air_quality_in_green_vs_conventio.pdf In brief, the treatment was: The green buildings were located at the OC housing development in South Boston and consisted of newly constructed town-homes and a six-story building. The buildings were designed with many green features and were certified Leadership in Energy and Environmental Design (LEED) platinum in July, 2012. The response was: We observed 57%, 65%, and 93% lower concentrations of PM2.5, NO2, and nicotine (respectively) in green vs control homes ...., as well as fewer reports of mold, pests, inadequate ventilation, and stuffiness....Participants in green homes experienced 47% fewer sick building syndrome symptoms ($p < 0.010$). We observed significant decreases in multiple indoor exposures and improved health outcomes among participants who moved into green housing, suggesting multilevel housing interventions have the potential to improve long-term resident health. The "control" were conventional, code-compliant buildings. I would expect analogous results for K-12 schools.		These findings have been incorproated into new sections on human health in both the private new construciton and public new construction sections; see pages 21-22 and 26-27. Additionally, Integral has worked with Chris Pyke to come up with additional recomendations for improving human health in public buildings, which were approved by City staff on a call on 2/13/19 and are included on pages 26-27.
		1) Stressing the importance of a performance monitoring program for private buildings to be incorporated in Policy update in June 2) Green building in affordable housing should be equitable 3) Stressing importance of indoor environmental quality, especially in schools 4) Stressing importance of directed credits (prioritize performance based credits)	Chris and Brendan meeting after Task Force Meeting	(1) Performance monitoring discussed on pages 24-27 (2) affordable housing addressed on page 16-17 (3), IAQ for schools discussed on pages 26-27, (4)directed use is a key part of our strategy; language updated on page 18 to emphasize this.
Jennifer Skow	Affordable Housing Developer	I have concerns with the way the consultants dismissed Earthcraft without providing any link between their recommendations and the programs which fund multi-family affordable housing in the City of Alexandria. The concern is less about promoting green building efficiency, as there is documented benefit to green building and affordable housing, and more about having a better understanding of how the proposed outcomes will impact the competitiveness of Alexandria's affordable housing deals to the rest of the State, given the way that affordable housing projects are typically financed. Low-Income housing tax credits are incredibly important to the capital stack of an affordable housing deal. Oftentimes, projects win credits from Virginia Housing Development Authority (VHDA) by slim margins. Carpenter's Shelter, for example, will be built to Earthcraft Gold, is located within a ½ mile from transit, and has other important features which earned it additional points – the project won by a 0.5% margin. Any upward fluctuation of development costs is a concern. I applied an additional 13% on top of our development cost (mentioned in the WSP report) to the Carpenter's Shelter project. The increase in costs proposed by WSP would have exceeded VHDA's cost cap limits. Not only does VHDA have cost caps, but VHDA projects receive up to 300 points by documenting efficient use of VHDA's resources, which is all based upon development costs and low-income housing credit/cost. Essentially, the less the development costs, the less the tax credits the project needs, the more points projects receive. By comparison, we would receive just 10 points for achieving any of the following Green Certifications – Earthcraft Gold, LEED, NGBS Silver or higher, or Enterprise Green Communities. While developers and the City of Alexandria can certainly advocate for greater points for green building within this process, VHDA controls the scoring spread. I propose that the consultants review VHDA's tax credit manual as well as VHDA's permanent financing Minimum Design Requirements to see how their proposed recommendations compare to projects that have won tax credits and received permanent financing from VHDA. It would be beneficial to see this analysis against a recent project that received entitlement, tax credits, and VHDA funding. I would work with the consultants to share information about Carpenter's Shelter so the consultants could have a local example with which to do a sensitivity analysis. The sensitivity analysis would evaluate development and operational cost impacts to install greener systems, a lot-yield analysis given the proposed FAR incentives and the affordable/green build bonus density stack, and an assessment of how those changes impact the project's VHDA tax credit application. This sensitivity analysis would help inform policy decisions and ensure that the proposed green outcomes dovetail with the requirements set forth by the State's financing agency. Recognizing the importance of cost containment at the State level, the City of Alexandria could reduce its own fees, such as real estate taxes, permit fees, offsite contributions, or sewer tap fees, for affordable housing deals. Carpenter's Shelter is governed by the Braddock Neighborhood Small Area Plan. Per this plan and our site plan conditions, the project will pay ~$700k in offsite contributions towards an open space fund and ~$8,000 per year towards a transportation management fund. In addition to these, other government fees amount to nearly $1.5 million towards project development costs. A reduction in government fees may allow projects to spend additional resources on green building while ensuring the project remains viable and competitive in the VHDA tax credit program. On a more minor point, I echo another commenter who requested a better understanding/explanation of the costs to manage and maintain these more sophisticated systems.		The project schedule did not permit full evaliation of VHDA requirements. However, after discussion with City staff on 2/12/19, we have altered the discussion of Earthcraft to make clear it is a viable option for affordable housing properties. This issue is dicussed on page 16-17.
Alexandra Taylor	Environmental Consultant	Based on the presentations today, would it be possible for WSP to cost out the preliminary assumptions of the report from Integral group? During their report, it seemed like integral group estimated a certain number of credits to be required in certain LEED categories. Some of the one I jotted down were: 12pts in Optimized Energy Performance Required Credits of Outdoor water use reduction, Enhanced Commissioning and Renewable energy production. If these are the performance requirements we are looking at to make standard, it would be great to see the cost impact of these preliminary required credits vs. what developers and the city is currently paying. I hope this makes sense. I know it was mentioned to identify a baseline of the cost, but I'm not sure if it was mentioned to coordinate these estimates with the preliminary assumptions from the Integral Group analysis.	Per call with WSP and Staff on 2/5, this level of analysis is not within scope.	N/A