



May 11, 2017

Honorable Mayor Allison Silberberg and Members of City Council
City Hall
301 King Street
Alexandria, VA 22314

Re: EPC Comments on the Old Town North and North Potomac Yard Small Area Plans

Dear Mayor Silberberg and Members of Council:

On behalf of the Environmental Policy Commission (EPC), I'm writing to share our comments on the proposed Small Area Plans for both Old Town North and North Potomac Yard. Given that these plans are being considered at the same time, I'm providing both sets of comments for efficiency and consistency.

First, let me applaud City staff for the significant work they have done engaging the community in drafting these two plans. The EPC recognizes how much time staff puts into community outreach and how seriously they take public input. Second, I'd like to acknowledge our support and appreciation for both plans' commitment to sustainability, which is very much in the spirit of our Eco-City Charter.

We also believe it is important to highlight the unique environmental context within which Council will consider these plans. While the Trump Administration has questioned the very existence of anthropogenic climate change, we in Alexandria understand and accept the scientific consensus. Much of the carbon emitted to date and in our lifetime will remain in the atmosphere for tens to hundreds of thousands of years.¹ Thus, the next few decades offer a brief window of opportunity to minimize potentially catastrophic climate change. We have a responsibility to ensure that City policy, as reflected in these two small area plans, publicly reaffirms our commitment to addressing this global challenge in our community.

I have focused this letter on the few places where we believe the plans require additional specificity and clarification to align more closely with the City's sustainability and climate goals, to take account of new technological trends and policy developments, and to provide greater consistency.

To that end, we offer the following recommendations:

¹ Clark, P. U., Shakun, J. D., Marcott, S. A., Mix, A. C., Eby, M., Kulp, S., ... & Schrag, D. P. (2016). Consequences of twenty-first-century policy for multi-millennial climate and sea-level change. *Nature Climate Change*.

1. Green Building:

Old Town North & North Potomac Yard: Both draft plans currently recommend, *“Explore a minimum of LEED Silver or comparable, or the City’s Green Building standards and requirements, whichever is greater. In addition, new buildings will comply with the EAP, as implemented through City policies. Energy consumption/utilization and stormwater should be prioritized in the certification for the buildings.”*

Commentary: Since the current EAP sets a target that by 2020 all new buildings will achieve LEED Gold standards, and by 2025 all new buildings will achieve LEED Platinum, both plans should set a more ambitious goal than LEED Silver. While the EPC expects that the City’s Green Building policy will be updated no later than the end of FY2019, including a more ambitious goal in these SAPs will signal to the development community the direction that the City intends to take the revised policy.² Further, City Council and staff agreed in June of 2015 that the Old Town North SAP specifically would be used to demonstrate new green building policies, but the current draft does not reflect that prior agreement. As we have recommended in the past and staff has committed to pursuing, we believe that the City should require developers to meet a minimum set of points towards their LEED certifications since emission reduction and stormwater reduction remain City priorities.³ We also believe that both plans present the City with opportunities to pilot new approaches to Green Building, including Passive House and Net Zero buildings that are not currently contemplated in either plan, but will be required if the City is to achieve its stated carbon reduction goals.

There are new opportunities available to the City to make both plan areas attractive to developers who are interested in pursuing green building and potential tenants who are interesting in occupying such buildings. Governor McAuliffe recently signed into law a bill, HB 1565, which authorizes the City to establish green development zones that would provide developers, tenants, and green businesses incentives to build and/or occupy green buildings.

Recommendations:

1a. Recognizing that the City’s Green Building Policy will be updated no later than FY2019, but that some development proposals may be submitted by developers before it is finalized, set a minimum of LEED Gold or comparable for all developments, or the City’s green building standards and requirements, whichever is greater.

1b. Specify that a minimum number of points from the “Energy and Atmosphere” and “Water Efficiency” categories will be required for buildings to meet the City’s Green Building certification requirements.

1c. Offer additional floor area to developers or other incentives, such as those authorized by HB 1565, that pilot Passive House certified buildings or Net Zero Energy Buildings as certified by the Living Future Institute.

² See Memo from Karl Moritz to the Planning Commission on the Long Range Interdepartmental Work Program dated May 2, 2017. http://legistar.granicus.com/alexandria/meetings/2017/5/1706_A_Planning_Commission_17-05-02_Docket.pdf

³ See Descriptions of the FY 2016 Interdepartmental Long Range Planning Work Program Projects: <https://alexandria.legistar.com/LegislationDetail.aspx?ID=2358003&GUID=4624A978-B410-49F7-873D-E8AA83635A7E>

2. Carbon Reduction & Alternative Energy

Old Town North: The current draft recommends that the power plant site “*should strive to achieve carbon neutrality by 2040.*”

The draft recommends that the plan, “*Encourage the use of alternative energy sources including but not limited to solar and wind power throughout the Plan area.*”

The draft has an objective for the power plant site of, “*Emphasizing renewable district energy including, solar, ground source heat pumps, Microgrids, and battery storage.*”

North Potomac Yard: The current draft recommends that “*North Potomac Yard should strive to achieve carbon neutrality by 2040.*”

The draft recommends that the plan, “*Encourage the use of alternative energy sources including but not limited to solar and wind power throughout the Plan area.*”

Commentary: Both plans should reiterate the City’s stated commitment in the Environmental Action Plan and the City’s Energy and Climate Plan, both of which set a goal for all new buildings to be carbon neutral by 2030, not 2040. The language in the OTN SAP only applies to the power plant site, but should apply to all new buildings in the district. Further, the current language in the draft SAPs is unclear and could be construed to suggest that both areas should be completely carbon neutral by 2040. While a goal of achieving carbon neutrality by 2040 for an entire area of the City is commendable, it would require radical technological changes outside of the City’s control or influence. Excluding emissions from transportation, for example, we could achieve such a goal if Dominion’s electricity were to become 100% carbon neutral and then also fully displaced local natural gas service. While we should strive to reduce emissions across the City, the goal of carbon neutrality should be focused initially on new buildings over which the City has more direct influence.

Both plans encourage alternative energy, but do so inconsistently and omit key local resources. There are local renewable sources that the City should work with developers to pursue, including geothermal energy, sewer heat, and waste heat from buildings. These can each be used as components in a district energy system or in some cases, like geothermal, can be used in a single building (e.g. Minnie Howard has a geothermal system). While the OTN SAP contemplates district energy in the power plant site, the NPY SAP is silent on district energy, which is likely the deepest source of potential emission reduction in the area. Developers should also be encouraged to explore solar PV and battery storage for onsite electricity production and consumption. While referenced, wind power is not meaningfully available on a local level.

Recommendations:

2a: Set a goal in both SAPs that all new buildings built in or after 2030 will be carbon neutral. Do not limit the goal in Old Town North only to the power plant site.

2b: Explore the development of district energy systems for heating and cooling that take advantage of local renewable energy sources, including but not limited to geothermal energy, sewage heat, anaerobic digestion, and waste heat from buildings.

2c: Encourage onsite generation and storage of renewable electricity from solar PV and other available renewable resources.

3. Transportation: Autonomous Vehicles, Electric Vehicles, and Vision Zero

Commentary: There is no mention in either SAP of Autonomous Vehicles (AVs) and the future role they may play, and only a short reference to electric vehicle (EV) charging. If the City is going to truly focus on reducing emissions, it will have to get serious about reducing transportation related emissions. The Metro station and additional bus capacity will be very helpful in that regard. But we should also take account of the emergence of AV and EV technologies, including how to support the future electrification of our DASH bus fleet. Further, the SAPs are silent on the City's Vision Zero goals, which should be reaffirmed.

Recommendations:

3a. Provide clear plans for incorporating both AV and EV technologies, including charging infrastructure, into development plans, and assess their potential for reducing emissions as well as parking requirements within the area.

3b. References be added to the City's Vision Zero goals in both SAPs.

Thank you for your consideration of these recommendations, and for your continued leadership and steadfast commitment to building a sustainable Alexandria.

Sincerely,



Jim Kapsis
Chair
Alexandria Environmental Policy Commission