

May 19, 2009

Mr. Anthony Hood
Chair
D.C. Zoning Commission
441 4th Street, N.W.
Suite 200 South
Washington, D.C. 20001

Re: ZC Case # 08-15

Dear Chairman Hood,

The Zoning Commission has a unique opportunity to require the Giant PUD, ZC #08-05, to offset the negative sustainability affects of this project with state-of-the-art energy efficiency, energy conservation, and clean renewal energy production features. The recent assertion by the applicant that they will seek LEED Silver certification may not be a meaningful step toward reducing greenhouse gas emissions, which is a District land use policy priority. The Zoning Commission should carefully review what the applicant is promising and evaluate whether the features used for LEED certification match the numerous District laws and policies aiming to reduce greenhouse gas emissions. The Zoning Commission has the authority to further these policies by applying current standards to its environmental review of this or any other PUD application. It is not enough to accept LEED certification when that can often be achieved without meaningful energy efficient design, construction, or operation.

LEED Silver

Exhibit C, October 2008 submission, is a checklist of project attributes under the LEED-Neighborhood Development pilot project. This is a smart growth oriented category that credits building in urban locations but doesn't require the applicant to go beyond most building code requirements. Indeed the optional credits for energy efficiency and renewable energy measures have been almost entirely neglected by this applicant. They estimate amassing 6 of a possible 31 points for green construction and technology, no points for achieving ENERGY STAR energy efficiency (DC has the most ENERGY STAR buildings per capita in the nation), no points for storm management, no points for solar, on-site energy generation, on-site renewable energy sources, wastewater management, infrastructure energy efficiency, or light pollution reduction. In short, this PUD is not designed to increase energy efficiency and contribute to reducing the use of fossil fuels or greenhouse gas emissions.

The submitted checklist for LEED for Homes mid-rise pilot project is equally illuminating and disappointing. It rewards location and this applicant meets all the location criteria, but the PUD garners no points for orienting the building for solar, or for having 50% more glass glazing surface on north/south walls than on east/west walls or for shading the south exposure in summer only. The PUD would yield only 6 of 38

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possible points in the energy and atmosphere category, which places a premium on optimizing energy performance.

What Could They Do?

Commercial buildings account for 18% of the total U.S. energy consumption and they contribute an estimated 15% of U.S. greenhouse gases. In California, Safeway has retrofitted 16 grocery stores and the estimated reduction in greenhouse gas emissions has been compared to removing 1000 cars annually from the roadways. Buildings that meet ENERGY STAR standards use up to 35% less energy than conventional buildings and generate 35% less carbon dioxide. The American Institute of Architects in its Sustainable Architectural Practice Position Statement recommends design that will achieve 50% reduction of fossil fuel used to construct and operate new and renovated buildings by 2010. The Architecture 2030 challenge establishes regional benchmarks by type of building that will lead to energy efficient buildings by 2030. These initiatives are being adopted by many companies, including grocers like Harris Teeter, Safeway, Hannaford, Giant Eagle, and Whole Foods. These and many other grocers have partnered with the EPA through its GreenChill program to reduce energy consumption for refrigeration, which accounts for at least 50% of grocery store energy costs. If Stop & Shop and Giant are joining the efforts of their fellow grocers that should be applauded but it is not apparent in this project.

What Now?

The road map for energy efficiency is readily available, the Office of Planning is informed and promotes many, if not most, of these initiatives, and yet, they have not moved to require District environmental policies as part of this PUD. This is a shocking lost opportunity. The Zoning Commission has authority pursuant to the PUD regulations to require superior demonstration of environmental benefits stemming from this project. The interpretation of these benefits is not static and as technology and knowledge merge with public policy the Zoning Commission should take note. According to the National Capital Region's 2008 Climate Change Report, "based on current business-as-usual projections of growth in population, housing, employment, and energy use, total emissions from energy consumption (**excluding transportation**)...in the [Washington metropolitan] region will increase by 35 percent by 2030 and 43 percent by 2050." I urge the Zoning Commission to ask the Office of Planning to review this PUD again with a bright light on its environmental impacts and a recommendation on how this project that seeks so much zoning relief could be an asset to our built environment.

The data is clear that our buildings are not solving global warming, but contributing to it. Planting trees is desirable and installing average flow faucets is smart, but this PUD should be expected to implement energy efficient strategies for its buildings, its lighting, its mechanical equipment, and its overall operation. Specifically, I would like to see consideration of the

- incorporation of the International Dark-Sky Association standards to reduce light pollution and reduce building energy consumption (applicant wants control of all lighting);

-employment of flat solar panels on the flat roof of both the North and South Buildings for renewable energy production (pinpoint skylights on South Building could complement a green roof or solar panels and there is room on North Building roof for solar and/or green roof);

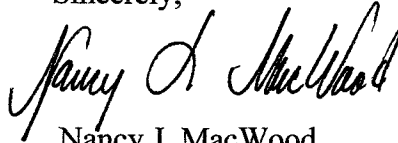
-creation of a district energy system that could produce steam, hot water or chilled water at a central plant and then pipe that energy out to the buildings. This is an ideal location for such a plant. Other buildings in the area could potentially be retrofitted to connect to the central plant and thus benefit from the resulting energy efficiency;

-construction of a geothermal heating and cooling system; both residences and institutions in the PUD neighborhood have already, or plan to, install geothermal systems.

-creation of green roofs, which require minimal maintenance, in place of or in addition to the proposed rooftop gardens, which require considerable maintenance.

This is not a last minute request. The small ANC group that met with StreetWorks as the site plan was developed repeatedly mentioned that we wanted to see significant energy efficiency measures incorporated into the eventual building proposal. Consideration of geothermal heating and cooling was specifically mentioned at many meetings. The applicant was often reminded that we wanted responsible and progressive environmental features. Reducing the number of required parking spaces was not what we had in mind.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy J. MacWood". The signature is fluid and cursive, with the first name "Nancy" being more prominent.

Nancy J. MacWood
ANC 3C09