SK+I ARCHITECTURE

June 18th, 2015 **via: email**

Jay Wilson
Government of the District of Columbia
Department of Environment

Re: Z.C. CASE NO. 05-38B
Subject: Response to DDOE report dated June 4, 2015 regarding LEED

Dear Mr. Wilson,

We have reviewed your memo dated June 4th, 2015. In addition, at the Zoning Commission hearing on June 11th, we were asked to further review the recommendations from the DDOE.

We have evaluated with our team and our client's LEED consultants both prior to the Zoning Commission hearing and after. Our responses to the DDOE memo and to the comments from the Zoning Commissioners are as follows:

1. The applicant's commitment to LEED Silver equivalent under the LEED NC 3.0 rating has been thoroughly vetted by the applicant and consultants in order to ensure that the project will be designed to achieve as many points as practically feasible given the project's size, construction type, location, and development parameters. The 50 complying points as listed take into consideration many project specific issues that present budget challenges that are not necessarily the same issues on other new construction projects. Some of these challenges are as follows: proximity to fragile Metro tunnels along M street which impose foundation limitations, existing PEPCO vaults on the applicants land that serve properties off site which will require additional excavation and potentially lengthy conduit for the proposed PEPCO vaults serving the new construction, adjacency to existing buildings on site that will remain occupied during construction which have building entrances facing internal to the construction site, a lower water table with the proximity to the waterfront, and existing soils with low bearing capacity. Based upon these constraints, the applicant has only identified "yes" and "maybe" credits which are practical for the applicant to obtain. We have reviewed the additional credits that you have identified in your letter. However, our analysis determined that a number of these recommended credits would require further evaluations during the design process that cannot be assessed currently, changes to the design, or would otherwise trigger substantial additional costs. For example, we noted the following LEED credits as likely: RP1.2, WE1, EA4, and ID1.5. In the case of EA1, we have noted compliance for at least 3 points equating to an 18% performance above the ASHRAE reference, which does take into account the DC Green Construction Code requirements (with 14 SEER HVAC equipment and 95% efficient hot water heaters); going beyond that would require full building energy analysis which is premature in the current process.

2. DDOE suggested that LEED Homes Mid-Rise would be a more appropriate rating system for a project this size. There are at least two major differences between LEED Homes Mid-Rise and LEED NC that would require design changes to the proposed buildings if the applicant were to follow LEED Homes Mid-Rise. First, LEED Homes Mid-Rise requires mechanical ventilation for both fresh air and

kitchen exhaust. The proposed design already is taking into account mechanical ventilation for fresh air; however, in order to mechanically ventilate the kitchens additional changes to the facades and roof designs would occur as well as an increase to energy use of the building. Second, LEED Homes Mid-Rise requires Grade I insulation which is specific to the type of installation method; not the insulation value. The proposed design is a type IIIA building which requires 2 hour rated UL listed non-combustible exterior walls. The proposed insulation within the wall has to be rated with the wall assembly and is not viewed as independent of the exterior wall. The proposed wall design will have an R-21 insulation which meets the fire assembly and is above the code minimum R-value.

Furthermore, as mentioned in the DDOE memo, LEED Homes Mid-Rise has a different point structure than LEED NC, or “tier” structure as described by our LEED consultant. There are several “easy” points to pick up switching from LEED NC to LEED Homes Mid-Rise but they are unrelated to the proposed construction or energy performance. Thus, a rating of LEED NC Silver, switched to LEED Gold Homes Mid-Rise, or vice versa results in the same LEED equivalency. In the applicant’s experience, the proposed designs are more applicable the LEED NC which is performance based.

Finally, as mentioned at the Zoning Commission Hearing, the applicants’ sustainability goals go beyond the proposed new construction but also incorporate the improvements to the “great lawn” between the two existing buildings. The improvements to the great lawn will be as follows: reduction in impervious surfaces, increased green space, protection of existing mature trees on site, use of native plantings, and low-impact materials. Also per the WRT report, the applicant has also committed to improving the park’s hardscape; planting a mix of native ornamental trees, small shrubs, and grasses; and replacing existing light fixtures and benches, which will have a positive impact on the community and the environment.

Sincerely,

Dennis Connors, AIA,
LEED Green Associate
Project Manager

SK&I Architectural Design Group