


GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment



MEMORANDUM

TO: Zoning Commission

FROM: Tommy Wells 
Director
Department of Energy & Environment

DATE: June 26, 2020

SUBJECT: Skyland Town Center Comments

Thank you for the opportunity to comment on the Skyland Town Center Planned Unit Development. Based on our internal review, the District Department of Energy and Environment (DOEE) submits the following comments:

Energy Efficiency: While the project aims to achieve LEED Silver, DOEE encourages the project to seek additional gains in energy efficiency. Maximizing energy efficiency at the time of construction will assist in meeting the Building Energy Performance Standards in the future (described in more detail below) and mitigates the potential impacts of future updates to the building codes, which are continuously updated. Many energy efficiency strategies have minimal upfront construction costs, such as improvements to the building envelope, and will decrease utility costs. Some efficient heating and cooling systems can also save valuable rooftop space. Many strategies-including additional insulation, LED lighting and controls, high efficiency mechanical systems, and envelope commissioning and air sealing- have a return on investment within five years and can be financed with no up-front cost through the DC PACE program.

In order to meet the goals of the Sustainable DC and Clean Energy DC plans to reduce greenhouse gas emissions, DOEE encourages projects to consider eliminating the use of non-renewable fossil fuels in their buildings. Incorporating efficient electric systems, as one important example, can reduce indoor air pollution and save on operating costs, especially when coupled with solar energy. Accordingly, DOEE encourages the design team to consider an electric systems in lieu of natural gas.

Solar: DOEE supports the project's inclusion of a solar canopy and encourages the project team to consider maximizing the amount of solar across the PUD. DOEE urges the team to consider utilizing each open roof across the town center for solar, green roof or both. Maximizing the amount of solar aligns with the critical goal of the Sustainable DC plan to increase the use of renewable energy to make up 50% of the District's energy use. Increasing the size of the PV array would also offset a larger portion of the PUD's electrical load and reduce operational costs. The revised Clean Energy DC Omnibus Amendment Act of 2018, which expands the Renewable Portfolio Standard, provides significant potential benefits for the business and development community, including many financial benefits such as the potential sale of SRECs. There are a variety of financing and ownership options available for solar installations.

The project team should consult the District Department of Consumer and Regulatory Affairs (DCRA) for a complete list of design requirements for the installation of a solar canopy, particularly applicable setback requirements.

If the project team decides not to install rooftop solar at the time of construction, DOEE encourages the project to plan for solar-ready roofs. By minimizing penetrations and mechanical equipment footprints in prime locations, providing additional conduit where appropriate, and including space in the electrical panel at initial construction, future solar systems can be installed much more cost-effectively and with less disruption to building operations.

Electric Vehicle Charging: DOEE encourages the project to consider providing electric vehicle supply equipment (EVSE) or installing make-ready infrastructure so that charge points can be added at a later date for significantly lower cost and disruption to building operations. The 2017 DC Green Construction Code provides some suggested thresholds for supply equipment and make-ready infrastructure.

Stormwater and Green Area Ratio: Green Area Ratio (GAR) calculations were not included with the submission. Compliance with GAR will be reviewed during the building permit phase.

The District has among the most stringent stormwater management, hazard remediation, air quality, energy conservation, and green building code requirements in the country. A more substantial, full regulatory compliance review by DOEE and other appropriate agencies, including the Environmental Impact Statement Form process, Stormwater Management Permit review, and Green Building Act and DC Green Construction Code compliance, will occur during the permit application process. The project should consider additional green roof area, permeable pavers, bioretention, and other stormwater management practices to meet the required 0.25 GAR.

While the District's stormwater management regulations may not apply given the approval of the original PUD prior to their adoption, DOEE encourages the project to consider incorporating green infrastructure Best Management Practices to the maximum extent possible with a goal of retaining 1.2" of precipitation onsite.

Wetlands: Wetlands and streams are present along the eastern boundary of the project. See the image below - the green polygons represent wetlands.

All land disturbing activity, including vegetation clearing, should avoid the wetlands and streams.

Any proposed impacts to wetlands or streams will require: a jurisdictional determination from the US Army Corps of Engineers Baltimore District; a Clean Water Act Section 404/401 permit from DOEE and the Army Corps; and compensatory mitigation. If the applicant anticipates impacting the wetlands/streams, DOEE encourages beginning the permitting process early to avoid delays. Jennifer Dietzen (jennifer.dietzen@dc.gov) with DOEE is available to answer any questions.

DOEE also makes the project team aware of the following new policies that will impact the project:

New Building Energy Performance Standards (BEPS) were established in Title III of the Clean Energy DC Omnibus Act of 2018. The Act states that, starting in 2021, owners of buildings over 50,000 square feet that are below a specific energy performance threshold will be required to improve their energy efficiency over the next 5 years. Projects below the performance threshold will be able to choose between a performance pathway, which requires that they document a 20% reduction in energy usage over the 5-year compliance period, or a prescriptive list of required energy efficiency measures. For more information on the BEPS program please visit <https://doee.dc.gov/service/building-energy-performance-standards>.

DC has adopted the new 2017 DC Construction Codes, which includes advancements in both the energy conservation and green construction codes. Projects with permits or a signed design contract prior to the effective date will be grandfathered under the previous codes for a period of one year. DOEE encourages the project to consider the updated 2017 DC Energy Conservation and Green Construction Codes when designing the project regardless of whether the project is grandfathered.

Wetlands Present on/near PUD Site:

