



# SIERRA CLUB

WASHINGTON D.C.

July 26, 2020

Commissioner Anthony J. Hood, Chairperson  
Commissioner Robert Miller  
Commissioner Peter Shapiro  
Commissioner Michael G. Turnbull  
Commissioner Peter G. May  
Zoning Commission  
441 4th Street, NW, Suite 200S  
Washington, DC 20001

Dear Chairman Hood and DC Zoning Commissioners Miller, Shapiro, Turnbull and May,

The Sierra Club DC Chapter requests a 60-day extension for public comment to allow further study of the intended and unintended effects of the zoning change proposed in Z.C. 19-21 on existing and future residential solar energy installations in the District.

We support both increased housing density and renewable energy generation in Washington, DC. However, homeowners who have installed solar energy systems make such decisions with an expected return on investment. Existing zoning regulations offer some protections from new construction that would diminish solar energy generation by blocking sunlight from existing solar panels. These regulations help preserve the value and thus the viability of residential solar in the District. We understand the need for changes to zoning rules to allow for denser residential construction, but we need more time to understand how this rule could be interpreted by the Zoning Commission to approve construction that would “significantly interfere” with solar installation output, especially regarding how the special exception criteria for relief could be claimed and approved.

Housing density is important to reduce DC’s carbon footprint and to expand affordable housing in our city. Balancing that need with the imperative to meet DC’s commitment to renewable energy in its Renewable Portfolio Standard – five percent of electricity

generation from locally generated solar by 2030 and 10 percent by 2041 – requires careful study of the effects of this proposed rule. More time for both experts and members of the public to review this issue more closely will allow for better-informed comments on this proposed rule and its trade-offs.

The Sierra Club DC Chapter urges the Zoning Commission to proceed with caution and care on any measure that would disincentivize, and may be prohibitive to, installing more District-generated renewable energy.

Respectfully submitted,

Claire August, Energy Committee  
Lara Levison, Energy Committee Chair  
Aykut Yilmaz, Executive Committee Member  
Sullivan Gassman, Energy Committee

Cc: Chairman Phil Mendelson, Committee of the Whole  
Chair Mary Cheh, Committee on Transportation and the Environment  
DC Office of Planning