



SIERRA CLUB

DISTRICT OF COLUMBIA

Testimony
of
Matthias Paustian
Sierra Club DC Chapter
on Zoning Case 20-33B
for the construction of a DC Archives building at the University of the District of Columbia
Thursday, September 21, 2023

Thank you for the opportunity to testify at this hearing of the Zoning Commission regarding the Special Exception to construct the DC Archives building at the University of the District of Columbia's Van Ness campus. My name is Matthias Paustian, and I am speaking today on behalf of the Sierra Club, the nation's oldest and largest environmental advocacy organization, with chapters in every state. Here in DC, we have about 3,000 dues-paying members.

One of the Sierra Club's top priorities is fighting climate change, and in DC, that means reducing fossil fuel emissions from buildings. Buildings account for roughly 70 percent of the District's greenhouse gas emissions; almost a quarter percent comes from burning methane gas in those buildings. The Sierra Club has consistently advocated the building of newly constructed buildings without on-site combustion of fossil fuels and that they reduce energy use to a minimum. And for new government-owned buildings, such a standard is now law.

The Sierra Club agrees with the District Department of Energy and the Environment that the proposed project to construct the DC archives building does not appear to comply with DC law, namely with the Greener Government Buildings Act of 2022, because it does not adhere to net-zero energy standards. The Act requires District-owned and financed new construction and substantial improvement projects to be all-electric and adhere to net-zero energy (NZE) standards. Net zero energy standards enforce high energy efficiency standards and aim to produce as much energy on-site as possible. Any remaining energy is to be procured from renewable sources off-site.

According to this law, the project must be designed to comply with Appendix Z of the DC Energy Conservation Code, which is the District's current net zero energy building code. The law also prohibits the project from installing building systems that combust fossil fuels on-site (i.e. the building must be all-electric), with the exception of backup power generators.

The Greener Government Buildings Act has been funded in the FY24 Budget Support Act, meaning it is applicable beginning October 1, 2023, a little more than a week from today.

For this simple reason, the Sierra Club opposes the application. This commission should not accept a zoning change proposal that does not comply with current law and, hence, reject it. That said, we believe complying with the Greener Government Buildings Act would not be very difficult or costly. And we do not have any information that would lead us to oppose this project, if it were built to a net zero standard.

Let me also put this proposed project into the broader context of the District's climate commitments. The Climate Commitment Act of 2022 requires the District government to be carbon neutral in its own operations no later than 2040. And the District's Building Energy Performance Standard has strict requirements for buildings to reduce their energy use over time. If the DC Archives building were to construct this building without adhering to a net zero standard, it would incur higher energy costs over its lifetime and may need to be retrofitted at great cost in future. Hence, adhering to a net zero standard from the beginning would be fiscally prudent.

Furthermore, no later than 2026, new private buildings are required to be constructed to net-zero standards and operate without the combustion of fossil fuels. The Greener Government Building Act merely requires the government to lead by example to help grow awareness and support additional familiarity of contractors with this new standard. It would be a shame if the DC government did not live up to its own standards.

This concludes my remarks. Thank you for your time and attention.