

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment



MEMORANDUM

TO: Anthony J. Hood,
Chairman, DC Zoning Commission

FROM: Jay Wilson, DDOE
Green Building Program Analyst

DATE: May 03, 2016

SUBJECT: Waiver of Rules for Late Submittal of a Report pertaining to 15-15 Eckington
Yards

The attached report concerning Zoning Commission Case 15-15 is being submitted less than 10 days prior to the Zoning Commission's Public Meeting. The Department of Energy & Environment respectfully requests that the Commission waive its rule and accept this report into the record.

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SUBJECT: 15-15 Eckington Yards – LEED and Green Building criteria

The objective of this memorandum is to respond to concerns raised by the applicant regarding the level of commitment to LEED certification and sustainable building strategies for the PUD application for 15-15, Eckington Yards.

DOEE met with the applicant in August and September of 2015 to discuss the project and at that time suggested numerous strategies to enhance the project's commitment to sustainability. It does not appear that the project had incorporated these strategies. The applicant's pre-hearing statement to the Zoning Commission (Exhibit 11) indicates that they are unable to attain LEED certification at the Gold level, due to the building being wood framed and not taking advantage of central systems. While a wood framed building adds complication for some credits, such as FSC certified wood, it is not true that it would preclude a project from attaining higher LEED certification. In fact, Sheridan Station, an affordable housing development in DC has a decentralized HVAC and hot water systems and was certified LEED Platinum (LEED Homes Mid-rise rating system) in 2012.

Below is a list of strategies that the project could incorporate that would increase the project's commitment to sustainability:

- Energy efficiency – By adopting the 2012 International Conservation Code, the District has strong standards in place for energy efficiency. The LEED checklist indicates that this project is meeting the minimum standard required by code. Given market conditions and the District's goal of net zero energy properties by 2032, it is strongly encouraged that the project team revisit their energy model and commitment to increased energy efficiency. While some strategies could have minimal construction cost impacts, it would also decrease utility cost for residents and lessees of the commercial space. Every dollar saved on utilities can be invested into growing these small businesses. Specific strategies for consideration include: continuous rigid insulation or structurally insulated sheathing on the outward side of the structure; upgraded or triple pane glazing, high efficiency mechanical systems such as VRF (variable refrigerant flow) units; air sealing and compartmentalization of the apartment units; and LED lighting and lighting controls.

Finally, enhanced commissioning of lighting and HVAC systems can ensure that all systems are installed and operating properly, ensuring maximum efficiency.

- Finance – Financial tools like the DC Property Assessed Clean Energy (DC PACE) program can pay for increases in construction cost for on-site generation and any strategies that increase efficiency above the baseline code requirements. This financing does not increase debt on the property and is repaid over time as a special assessment on the property tax.
- Solar electricity – Per the District’s Sustainable DC Plan, one critical goal is to increase the use of renewable energy to make up 50% of the District’s energy use. As this is a major priority of the administration, legislation is in place (2011) which created the Renewable Portfolio Standard (RPS) and requires a solar carve out of 2.5% or 191 MW by 2023. For the business and development community, the ramification of this legislature is that DC has the best financials for solar energy in the country. A power purchase agreement (PPA) may be executed for leased solar panels and zero up front cost. Also, for owner financed solar panels (which can be financed by DC PACE, the typical return on investment is between two and five years. Through the District’s Community Solar program, the energy generated can be net-metered and the residents or commercial tenants can “subscribe” into the system providing mutual benefit for both the property owner and residents.
- Stormwater Management – The project proposes meeting the stormwater management retention requirements mostly through green roof. While this would minimally satisfy the requirements, DOEE recommends that the project also maximize opportunities to capture street runoff including engineered tree pits, bioretention facilities with curb cuts for roadway runoff, and permeable pavement. In addition, DOEE recommends that the project consider rainwater harvesting for water reuse within the building, especially for non-potable uses within the common areas and maker-spaces.

Well integrated designs prioritize green building goals in order to hit the LEED Gold target. This is not an unrealistic target for a project of this size in an urban setting. DOEE would ask that this project reconsider opportunities to increase its commitment to LEED Gold certification and also integrate on-site renewable energy to help the District meet our goals and ensure that the project is economically competitive into the future. Incorporating on-site renewable energy and buying green power, increasing efficiency, commissioning, increasing ventilation and indoor environmental quality, or limiting parking could be considered in order to guarantee the additional credits.

DOEE is glad to be a technical resource as the project continues forward. In addition, all projects are urged to take advantage of the strong financials for solar power in DC (less than a 3-5 year return on investment), the DC PACE program, and/or our Stormwater Retention Credit Trading program to decrease first cost and maximize operational savings.