



November 21, 2024

The Honorable Libby Garvey, Chair  
Arlington County Board  
2100 Clarendon Boulevard, Suite 300  
Arlington, VA 22201

Re. Green Building Incentives Policy

Dear Chair Garvey and members of the County Board:

EcoAction Arlington applauds your initiative in updating the Green Building Incentive Policy (GBIP), particularly its expansion to existing buildings and support for adaptive reuse for aging commercial buildings. Nevertheless, we think the minimum requirements for participation and related incentives, should be stronger. We live at a time of environmental crisis, and the County's Policy should reflect this. The most recent UN climate report foresees "debilitating impacts to people, planet and economies" unless nations take a "quantum leap" in emissions reduction (see: [UN Environment Programme, Emissions Gap Report](https://www.unep.org/resources/emissions-gap-report-2024): <https://www.unep.org/resources/emissions-gap-report-2024>).

To address this urgency and realize the County's goal of carbon neutrality by 2050, we need to do much more to reduce greenhouse gas (GHG) emissions from buildings. The way to get there is to encourage increased energy efficiency in buildings and the use of high-efficiency electric systems and appliances to displace fossil fuel combustion in buildings and transportation (e.g., Energy Star cold climate heat pumps, geothermal heat pumps, electric induction stoves, heat pump water heaters, electric vehicle charging). Accordingly, we recommend that minimum requirements be strengthened in all participants in the program, regardless of pathway.

We are most excited about the Climate Adaptation Pathway and the higher tiers for the Traditional Pathway that focus on certification from the Passive House Institute and International Living Futures Institute and hope that the County will make these pathways the centerpiece of the updated GBIP. Both of these certification programs require high energy performance building designs, be all electric, rely on renewable energy, and prioritize low carbon and environmentally safe materials. Buildings meeting these standards will also be more resilient in the face of extreme heat, severe weather, and extended power outages. Existing buildings depending on the extent of renovations could also qualify for these certifications, especially the projects under the Adaptive Reuse Pathway given the extent of the renovations required.

For the other pathways—Traditional, Existing Buildings, and Adaptive Reuse-- participants in the program should advance full electrification and achieve energy performance targets that align with the County's Community Energy Plan target of a 38 percent reduction in energy use by 2050. As currently proposed, electrification is not required for the Traditional, Existing Buildings, and Adaptive Reuse pathways and energy efficiency targets are unimpressive. We recommend that a common energy performance

standard be required across all pathways, either based on an EnergyStar score of 85 or higher or an energy use intensity measure aligned with the County's target. Full electrification for new construction and adaptive reuse should be required and participants in the Existing Buildings Pathway should at minimum be required to develop an electrification plan to provide a pathway to operating with zero GHG emissions once systems need to be replaced. We also recommend that buildings under the Traditional and Adaptive Reuse pathways comply with LEED v5 Gold level when it is published next year. (LEED V5 just completed its 2<sup>nd</sup> public review on October 28.)

EcoAction Arlington urges the County to create an incentive and outreach package that will make the program accessible and attractive to developers and building owners and serves as a catalyst driving rapid building decarbonization across the County. At present the proposed incentives outside of the traditional bonus density rely largely on cash payments, which given perennial budget constraints would likely limit participation in the new pathways to only a handful of projects as projected by the County Staff. A combination of tax incentives, cash payments, expedited permitting, and technical assistance structured to favor the Climate Adaptation Pathway while still encouraging less ambitious but still important decarbonization measures. Furthermore, extensive outreach to building owners, developers and contractors to provide information about current technologies and available incentive programs and assistance in calculating the cost/benefits of building decarbonization. The County's presentation indicates that the upfront costs for the Climate Adaptation Pathway is less than 5 percent more than traditional construction. The lifetime savings in energy use is almost certainly much greater.

The County should also consider enhancing other requirements for participation in the program:

- Strengthen the requirements for green infrastructure, as appropriate. The Climate Adaptation Pathway notably includes impressive requirements, specifically accessible vegetated roofs and/or landscaped areas equal to 35 percent of lot area. The County should establish more specific targets for tree canopy coverage that aligns with the County's Forestry and Natural Resources Plan goals, with minimum targets for all new construction and higher targets for construction under the Climate Adaptation Pathway.
- Require EV charging infrastructure for new construction and as feasible existing building renovations sufficient to support a rapid transition to electric vehicles over the next decade or so.
- Strengthen requirements to reduce embodied carbon in building materials and during construction. The Traditional Pathway has added a life-cycle carbon analysis requirement but targets for reducing embodied carbon are minimal. In addition, the waste diversion target is too low.
- Incorporate County affordable housing goals as part of the requirements for getting the maximum incentives under the program under the Climate Adaptive Pathway similar to the Adaptive Reuse Pathway. Meeting the County's environmental justice goals will depend on making sure that all of the County's diverse members benefit from building decarbonization and are not left behind or displaced.
- Look for ways to simplify the program requirements without compromising on the baseline requirements and in consultation with developers, contractors, and building owners.

It's time to get aggressive about the efficiency and decarbonization requirements for new construction and major renovations in Arlington. The District of Columbia and Montgomery County Maryland have done so. Arlington should join these jurisdictions in leading the way on our needed energy transition.

Thank you for your continued leadership on these issues, and the opportunity to comment.

Sincerely,

/s/\_\_\_\_\_

Elenor Hodges

Executive Director, EcoAction Arlington

Mike Lowe,

Chair, Board of Directors

cc: Arlington County Board Members