

CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION

**c/o Department of Environmental Services
2100 Clarendon Blvd., Suite 705
Arlington, VA 22201**

April 10, 2023

Honorable Christian Dorsey, Chair
Arlington County Board
2100 Clarendon Blvd., Suite 300
Arlington, VA 22201

Re: Americana Hotel Site (1400 Richmond Highway)

Dear Chair Dorsey:

The Climate Change, Energy and Environment Commission (C2E2) has reviewed the application for the Americana Hotel project (1400 Richmond Highway). We appreciate the applicant's decision to participate in the Green Building Incentive (GBI) program and to consider standards beyond LEED Gold in some areas. We also very much appreciate the applicant's willingness to meet with the Building Decarbonization Coalition at our request to discuss how to make the Americana an all-electric building.

Nonetheless, the project still falls short of what is necessary to address the climate crisis and Arlington's own climate goals. **Overall, we score this project's contribution to meeting Arlington County's Community Energy Plan (CEP) targets at 64%, indicating the project falls below what is required to achieve the County's carbon neutrality and other sustainability goals.** Please reference the Appendix for further detail on how C2E2 has assessed this project.

The success of Arlington's CEP depends, in large measure, on the County's resolve in ensuring that all buildings are at least zero carbon-ready. In practical terms, that means four things for every new and renovated building: make it highly efficient; make it electric; make the electricity renewable; and minimize its total carbon footprint through selection of low carbon materials and responsible management of construction debris. In this case, JBG Smith's application falls short in meeting these criteria. New buildings such as this one lock in use of fossil fuels for decades undermine the County's carbon neutrality goals.

Green Building Certification and Carbon Reduction:

The project is targeting a LEED V.4 Gold rating, but to achieve the County's stated CEP targets, **C2E2 recommends that developers be required to explore options to achieve Zero Carbon Certification.** A Zero Carbon Feasibility study, which the applicant has indicated it plans to conduct, could identify a pathway to zero carbon emissions in operations and reduce embodied carbon in materials and resources used.

Energy Efficiency:

The LEED scorecard for this project indicates a commitment to improve energy efficiency by 27 percent over the ASHRAE baseline and to achieve an Energy Star rating of 85, which is higher than most similar projects have achieved. We appreciate the hard work of the applicant in planning for these goals, but as noted, a Zero Carbon feasibility study could identify additional energy efficiency gains, which we hope the applicant will consider incorporating.

Electrification of Systems:

This project plans to utilize fossil gas for water heating as well as small amounts of gas to support the primarily-electric HVAC system, back-up generator, retail cooking, and outdoor amenities (e.g., grills, firepit, pool). We recognize that the technology for all-electric buildings is developing rapidly. At our request, the applicant has met with the nonprofit Building Decarbonization Coalition, which focuses on building electrification, and we are advised those conversations are continuing. We appreciate the applicant's willingness to engage with the Coalition. Nonetheless, the project plans still call for significant use of fossil fuels.

Electric Vehicle Charging:

The applicant has indicated that the project will have EV chargers installed in 5% of parking spots with another 15% of parking spots ready for future EV chargers. **The C2E2 strongly recommends that all projects that come to the SPRC for consideration strive for 50% of parking spots to be EV ready.** This will help meet future demand for a full transition to electric vehicles and avoid the need for much more expensive retrofitting later. The applicant should consider 'smart charging' technology to maximize the number of vehicles that can be charged while reducing demands on the electrical capacity available at site.

The latest report just released in March by the Intergovernmental Panel on Climate Change (IPCC) emphasizes the dire need for action to save our planet. The world is facing a catastrophic climate crisis that requires immediate action by individuals, governments, and businesses to avoid the worst consequences, and all future development needs to align to these goals. We urge the County to ask the applicant to move into the forefront with this project by offering an all-electric building.

Sincerely,



Joan McIntyre

Chair, Climate Change, Energy and Environment Commission

CC: Daniel Weir, Chair, Planning Commission and chair, SPRC
Anthony Fusarelli, CPHD Director
Kevin Lam, CPHD Staff

C2E2 SPRC CHECKLIST

PROJECT NAME: 1400 Richmond Highway --
Americana Hotel

COMMISSIONER

REVIEWING: Cindy Lewin and John Bloom

Overall Score

64%

Building Component	GBI or C2E2 Baseline (Meets)	Requirements to Meet CEP & Sustainability Goals (Exceeds)	1400 Richmond Highway -- Americana Hotel (Evaluation)	Recommendation / Comments	Assessment
Green Building Certification and Carbon Reduction					67%
Certification	Commercial: LEED Gold Multi-family: Earthcraft also permissible	Commercial: LEED Platinum Multi-Family: Earthcraft also permissible		LEED Gold plus GBI program participation	Meets
Zero Carbon*	Evaluate feasibility of Zero Carbon certification (ILFI)	Zero Carbon Certification (ILFI)--(GBI .7 FAR level)		Applicant has committed to undertake this study but it has not yet been completed	Meets
Building materials	Meet the criteria that would earn the project at least two (2) points for LEED version 4.1 MR credit Building Life Cycle Impact Reduction.	Score at least ten (10) overall for LEED version 4.1 Materials and Resources.		Applicant lists 4 of 13 LEED 4.0 points for sourcing of materials	Meets
Energy Efficiency					83%
Energy Optimization	Commercial: Min. 10% (20%) improvement LEED v 4.1 (v 4) Multi-Family: HERS Index of 65 also permissible	Commercial: Min. 20% improvement from LEED v4.1 Multi-family: HERS Index of 50 also permissible		Project has a reduction of 27% over ASHRAE baseline and energy cost reduction of 26% as compared to LEED 4.0	Meets
AIRE GBI required narrative	Provide narrative on Energy Efficiency	Make available on SPRC website		Staff confirms this has been provided to them for posting on the SPRC website	Exceeds

Energy Star Certification	Must meet Energy Star 75 within 4 years	Meet highest possible GBI standard (differs by FAR level)		Energy Star rating of 85, which exceeds the amount required for .25 bonus density requested under the GBI program	Exceeds
Energy Benchmarking	Install energy meters or monitoring devices	Meet GBI Extra on Advanced Energy Metering		Plan for energy benchmarking	Meets
Electrification					42%
Building's Electrical Capacity	Electrical infrastructure allows for GBI baseline	Electrical infrastructure allows for 100% electrification			Meets
Utilities Electrification	Electric water heating ready and narrative	Fully electric water heating (commercial and residential)		Plan for fossil gas condensing boilers	Falls short
	Electric HVAC ready and narrative	Fully electric HVAC (commercial and residential)		Small amount of fossil gas planned for HVAC system (about 4%) plus emergency generator	Falls short
	Electric cooking ready and narrative	Electric cooking; electric ready for restaurants.		Retail kitchen gas-fired equipment capped for future tie-in	Falls short
Electric Vehicle Infrastructure					67%
Electric Vehicle Charging	4% of parking spots have EV charging	10% of parking spots have EV charging		Plan for 5% of spaces with EV chargers	Meets
	15% of parking spots are EV-ready	50% of parking spots are EV-ready		Plan for 15% EV-ready spaces	Meets
Electricity from Renewable Sources					50%
Renewable Energy	2W/ft ² onsite solar or equivalent	On-site and/or off-site for 50% of annual load		Plan for offsite Tier 2 solar for 1-5% total electricity	Meets
Battery Energy Storage*	Battery Energy Storage ready	Battery Energy Storage as backup generation		No on-site renewable energy	Falls short
Environmental Sustainability					73%
Biophilia / Open Space	Provide narrative addressing listed issues	Create a sense of natural environment, habitats. Keep mature trees, tree canopy, native plants, etc		18.8% tree canopy, mostly private. Crystal City is a challenging location for natural environment	Meets

Storm Water Management	Meet Virginia building code	Seek use of pervious materials; offset storm water with green roof, bio-retention or manufactured treatment device		Partial green roof	Meets
Bird-friendly Material	Must minimize bird strikes by meeting GBI criteria	GBI criteria plus ground floor bird-friendly material		Meets GBI criteria	Meets
Light Pollution Reduction	Meet light pollution reduction in GBI	Dark Sky-approved "Friendly Fixture" certification		Plan to be Dark Skies friendly with certification through LEED credit for light pollution reduction	Exceeds
Water Use	WaterSense label for all toilets, bathroom faucets, and showerheads installed in residential and hotel units	In addition to Meets, must not use potable water for irrigation.		All water fixtures will be Water Sense labeled - use of stormwater runoff for irrigation still under consideration	Meets
Social Equity					67%
Diversity, Equity and Inclusion	1. One company on development team with DEI program 2. LEED Social Equity Checklist completed	1. Development team presents and discusses LEED Social Equity Checklist to SPRC and AIRE 2. Develop project specific DEI plan		Corporate commitment to diversity and inclusion; plan to complete LEED Social Equity checklist	Meets

***C2E2 Baseline Requirements**