



RE: EPC Letter in Support of the Draft 2025 Green Building Policy Update

Dear Mayor Gaskins, Vice Mayor Bagley, and Members of City Council,

The Alexandria Environmental Policy Commission (EPC) is writing to express our strong support for the proposed 2025 update to the City's Green Building Policy, as we asked for this update in our 2023 joint Planning Commission + Environmental Policy Commission letter to Council on strategies to advance more sustainable new developments. We commend the City for the significant progress represented in this draft update and are particularly pleased to see the policy's alignment with Alexandria's climate goals, including the 2030 targets previously approved by Council.

We are especially encouraged by the policy's focus on measurable energy performance through Energy Use Intensity (EUI) thresholds, the inclusion of clear guidance on electrification, the clarification allowing public buildings to use off-site renewables, and the flexibility offering multiple compliance paths for different stakeholder types. This update reduces the need for project-by-project negotiations around key sustainability features, and provides performance-based guidelines that allow developers to achieve the targets as they see fit.

To further strengthen the impact and transparency of this policy, and to support developers in long-term planning, we respectfully offer recommendations on two elements: **EUI** and **Renewables**.

1. Start with Lower EUI Targets, Establish a Defined Phase-Down Path for EUI Targets to 2030, and Clarify Zero Emissions Building Criteria

The EPC supports the policy's use of a performance-based approach to EUI and recommends that the "Better" performance option (which begins with a maximum EUI of 35 for multifamily) be adopted as the starting point for all projects. "Good" is simply not good enough. We appreciate that economic constraints were considered the analyses, and believe that developers are capable of achieving the "Better" EUI given today's market and technologies available.

To ensure consistency with Alexandria's goal of net zero new construction by 2030, the City will need to phase this EUI requirement down to a maximum of 25 (for multifamily) by 2030. We believe this phase-down should be stated clearly and prominently in the policy, allowing developers to anticipate and align their building designs with the City's trajectory.

In addition, we recommend the City define a "zero emissions building" directly within the policy, using the federal definition adopted by the U.S. Department of Energy: highly energy efficient, free of on-site emissions from energy use, and powered solely by clean energy. Embedding this definition—rather than pointing externally—will reduce ambiguity and reinforce the City's commitment to its own targets.

2. Increase the On-Site Renewable Energy Requirement, and Adjust Fund Contribution Option



We appreciate the policy's tiered approach to renewable energy compliance but recommend increasing the minimum requirement for on-site renewable generation from 3% to 5% of a project's anticipated total annual energy use. Given that more efficient buildings will result from the EUI requirements outlined above, achieving 5% on-site generation is a feasible and reasonable expectation.

Additionally, we recommend modifying the contribution alternative to the City's Clean Energy Fund from 90% to at least 100% of the estimated cost of meeting the on-site requirement. This adjustment would ensure stronger parity between compliance options and better incentivize on-site generation while maintaining flexibility for site-constrained projects.

In summary, the EPC supports the direction and framework of the 2025 Green Building Policy update and sees it as a critical step toward a more sustainable built environment in Alexandria. We respectfully encourage the City to consider the above recommendations to further align the policy with the City's 2030 climate goals and to provide developers with the transparency needed to plan effectively. Alexandria deserves better buildings; the updated GBP with our recommendations would spur development of them in our community.

We appreciate the opportunity to provide feedback and are available to discuss these recommendations further should that be helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Marta Schantz".

Marta Schantz
Chair, Alexandria Environmental Policy Commission