

EPC Letter in Support of the Draft 2025 Green Building Policy Update May 23, 2025

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

The Alexandria Environmental Policy Commission (EPC) voted 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. We recommend the "Better" performance option over the City-proposed "Good" option as the starting point for all projects. Figure 1 shows the Baseline, Good, Better, and Best EUIs analyzed.

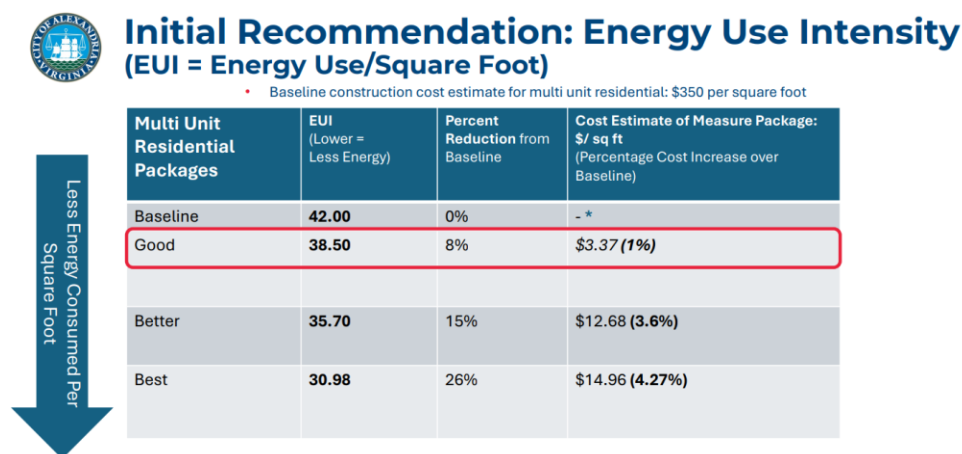


Figure 1: Green Building Policy Update February 14, 2025 - Slide 7

“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. The Build Our Future initiative in Alexandria (<https://buildourfuture.org/>) has featured webinars of multiple low-EUI new developments that showcase the technical feasibility and business case for achieving and exceeding these performance levels.

To align with Alexandria’s goal of net-zero new construction by 2030, we recommend that the City establish a starting point of the “Better” 35 EUI for new multifamily buildings in 2025. From there, the policy should clearly outline a phased reduction in EUIs annually, reaching “Zero Energy Ready” 25 EUI as the maximum allowable EUI by 2030. Including this trajectory explicitly in the policy will provide developers with the clarity they need to plan and design buildings that meet the City’s long-term sustainability goals. Figure 2 shows the Alx Baseline value compared to the New Buildings Institute’s zero energy-ready building targets where we recommend the trajectory end.

Property Use Type	ALX Baseline	Zero Energy-Ready Building Target
Single Unit Residential	35 ²	20
Multi Unit Residential	42 ²	25 ³
Commercial Office	47 ⁴	22 ³
Hotel	92 ²	36 ³
Retail	45 ²	25 ³
Restaurants	305 ²	

Figure 2: Green Building Policy Update February 14, 2025 – Slide 8

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 and 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 the EUI requirements outlined above will result in more efficient buildings, achieving 5% on-site generation is both feasible and reasonable since the overall energy consumption is lower.

Recent studies and case examples from the DOE’s Zero Energy Ready Homes program, along with projects certified under PHIUS and LEED Zero standards, demonstrate that new buildings, particularly mid-rise and garden-style multifamily developments, can reliably meet or exceed on-site energy production targets when paired with high-performance envelope design and efficient systems. This indicates that a 5% minimum requirement is achievable and aligned with



emerging industry best practices. Increasing the minimum on-site solar requirement would bring Alexandria's policy in line with current best practices while still maintaining flexibility for site-constrained projects through the Clean Energy Fund.

Additionally, we recommend increasing 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, plus administrative costs. As currently proposed, the 90% contribution unintentionally incentivizes developers to opt out of on-site solar, undermining the City's intent of on-site clean energy. Setting the contribution amount at or above full cost is essential to creating true parity between compliance pathways and ensuring that on-site renewable energy remains the more attractive option whenever feasible.

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