

**ENVIRONMENT AND ENERGY CONSERVATION COMMISSION**  
**c/o Department of Environmental Services**  
**2100 Clarendon Blvd., Suite 705**  
**Arlington, VA 22201**

January 27, 2020

Honorable Libby Garvey, Chair  
Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

**Re: Concerns with JBG Smith's Proposed Development at 1900 Crystal Drive**

Dear Chair Garvey:

The Environment and Energy Conservation Commission has reviewed the application for JBG Smith's 1900 Crystal Drive development project. Based on our review, the Commission does not recommend approval of the project without further commitment to the goals found in Arlington's Community Energy Plan (CEP). We believe this project deserves close attention because it is one of the largest residential developments ever proposed in Arlington and because it is one of many new developments expected to be brought forward in a short period of time.

We find that the energy use and greenhouse gas emissions profile of this project, as presented to the Site Plan Review Committee at its final meeting in December, fall well short of community expectations in light of the County's commitment to achieving carbon neutrality community-wide no later than 2050.

The success of Arlington's CEP depends, in large measure, on the County's resolve in ensuring that all new development is consistent with the letter and spirit of the Plan. In practical terms that means three things for every new and renovated building: Make it **highly efficient**; make it **electric**; and make the electricity **renewable**. In this case, JBG Smith's application falls short in all three of these essential categories as follows:

**Efficiency:** The project application materials propose buildings that are about 9 percent more efficient than the energy baseline, representing 2 out of 18 possible points for "energy optimization" on the LEED scoresheet. For reference, Amazon's Met Park buildings are expected to achieve at least 23.5 percent improvement in energy efficiency. The Crystal Houses multifamily buildings, approved by the County Board in December, include a commitment to a minimum 15 percent improvement in energy efficiency and a commitment to earn the U.S. EPA's Energy Star label within four years of occupancy in order to verify ongoing energy efficient operations. If this project would achieve efficiency in that range, and commit to earning Energy Star, it would be a step in the right direction to achieve Arlington's energy efficiency goals.

**Electrification** (i.e., elimination of onsite fossil fuel combustion): The application indicates significant natural gas use for domestic hot water and the HVAC system. There is no apparent reason why these buildings could not join the growing number of all electric, or virtually all electric, buildings in Arlington, including Amazon's Met Park buildings. Electric heating, hot water and cooling systems powered by renewable electricity, as JBG Smith indicates is likely for this building, would reduce greenhouse gas emissions from those systems to zero, consistent with CEP goals. We also urge JBG Smith to adopt battery-based approaches to backup power supply, which provide power quality control and electric rate arbitrage opportunities.

**Renewable energy:** JBG Smith indicates a likelihood that it will purchase some form of green power or offsets equal to 100 percent of electricity usage. That is a welcome and significant step. However, no details are provided or commitments made in the project application materials. We recommend that the County create a site plan condition to clarify the full extent of JBG Smith's commitment in this area. We are hopeful that the company will enter into a long-term contract for renewable electricity, with additionality, sufficient to offset its entire building portfolio in Arlington. That would be a huge step forward for Arlington's CEP.

We understand and appreciate that the County is seeking to balance multiple priorities and that talks with JBG Smith are ongoing. For the sake of our community and climate, we encourage strong effort by all sides to achieve the outcomes outlined above.

As always, we would be happy to answer questions and explain our views in greater detail at any time.

Respectfully,

A handwritten signature in black ink, appearing to read "K Michael Hanna".

Mike Hanna, Chair  
Environment and Energy Conservation Commission

cc: Arlington County Manager  
Site Plan Review Committee  
Planning Commission