

## CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION

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

January 28, 2026

Honorable Matt de Ferranti, Chair  
Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

Re: Walgreens Site (3130 Langston Blvd)

Dear Chair de Ferranti and members of the County Board:

The Climate Change, Energy and Environment Commission (C2E2) has reviewed the application for the Walgreens Site project. The project is participating in the Green Building Incentive Program (GBIP) presumably at the baseline additional bonus density of 0.25 FAR — other than the required LEED scorecard and energy model, little information was provided during the SPRC process on how the proposed building would advance Arlington’s energy and climate goals. **Overall, based on the available information we have, we score this project's contribution to meeting Arlington County’s Community Energy Plan (CEP) targets at 50 percent, indicating the project falls short of what is necessary to meet the County’s carbon neutrality and other sustainability goals.**

The success of Arlington’s goals for carbon neutrality 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.

### **Green Building Certification and Lifecycle Carbon Reduction:**

As with almost all recent projects, the Walgreens Site is targeting LEED 4.0 Gold rather than the more rigorous LEED 4.1 (LEED 5.0 was adopted after the project had been submitted). The LEED scorecard does indicate the Applicant is at least considering up to 27 additional points - even if only about half were met, the project could achieve LEED Platinum 4.0. About half of the additional points under consideration would improve energy optimization. While the Applicant is planning to divert at least 75 percent of waste from landfill to reuse or recycling, there is no indication that they are considering other steps to reduce the embodied carbon by incorporating low-carbon and environmentally sustainable materials. We urge the Applicant to

consider Passive House Institute US Zero certification or the International Futures Living Institute's Zero Carbon certification and explore opportunities to lower the building's lifecycle carbon emissions.

### **Energy Efficiency:**

The Applicant is committing to an Energy Star score of 75 and to reducing energy use by 24 percent over the ASHRAE baseline as required by the GBIP. Both the LEED scorecard and the energy model indicate that energy savings could be higher. The energy model identifies numerous options to improve energy efficiency that not only will reduce carbon emissions but save residents money. We particularly urge the Applicant to pursue heat pump technology for hot water—centralized, tankless, and in-unit options are available—and clothes dryers.

### **Electrification of Systems:**

While appliances and most systems will be electric, the project is planning for a gas-fired boiler for the DOAS ventilation system, which is the least energy efficient and most carbon-intensive option. Many projects that we have reviewed over the last few years opt for a heat pump DOAS with either gas or electric auxiliary heat. We strongly encourage the Applicant to move to this more efficient technology with electric auxiliary heat to ensure that the building can operate with zero carbon emissions once the electric grid has shifted to renewable energy sources.

### **Electric Vehicle Charging:**

The Applicant is committing to the GBIP minimum requirement of 4 percent of parking spaces to have EV chargers and 15 percent of spaces to be EV ready. **The C2E2 strongly recommends that all projects that come to the SPRC strive for 50% of parking spots to be EV ready** (even if the grid capacity is currently insufficient). 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.

### **Stormwater Management and Biophilia:**

We commend the Applicant for working with the County to address stormwater management in this flood prone area of the Spout Run Watershed. The building site includes multiple features such as planters and a stormwater retention vault to capture, filter, and slow stormwater runoff from the site into the stormwater system. The Applicant has also adjusted the location of the building to allow for overland relief during heavy storms and is proposing to install a box culvert to attach to the existing stormwater system to expand capacity during extreme weather events.

The Applicant is also committing to provide 35 percent tree canopy coverage, in line with the County's Forestry and Natural Resources Master Plan and the Langston Boulevard Area Plan. A substantial portion of this canopy coverage is on the amenities terrace for the building. While the proposed design is attractive and includes both canopy and understory trees, we are concerned about the long-term viability. We urge the Applicant and the County to work together to determine whether there will be sufficient soil volumes and space for these trees and other

plantings to thrive. We also encourage the Applicant to continue to refine the plans for the open space and other ground-level landscaping to maximize the tree canopy coverage.

## **Transportation**

While we appreciate the Applicant's improvements to the streetscapes for pedestrians and bikers in line with the Langston Boulevard Area Plan, this project raises the broader issue of transforming Langston Boulevard into a Green Mainstreet that prioritizes the safety of all modes of transportation. The location of this site is particularly dangerous for bikers and pedestrians and piecemeal improvements by developers will not be sufficient to improve conditions.

Overall, we found the lack of discussion on sustainability commitments, particularly on getting to the County's carbon neutrality goal, discouraging. To transform our built environment to reduce and ultimately eliminate carbon emissions from our buildings, all building developers should make carbon neutrality and climate resilience a core design principle. The County Board and staff should expect developers to highlight how their project advances the County's climate and energy goals during the review and approval process.

Sincerely,



Cindy Lewin  
Chair, Climate Change, Energy and Environment Commission

Attachment: SPRC Checklist

CC: Nia Bagley, Chair, Planning Commission and SPRC  
Anthony Fusarelli, CPHD Director  
Matt Pfeiffer, CPHD Staff

**C2E2 SPRC CHECKLIST**

**PROJECT NAME:** Walgreens,  
3130 Langston Blvd  
**COMMISSIONER REVIEWING:**  
Joan McIntyre

**Overall Score**

**50%**

The Climate Change, Energy and Environment Commission (C2E2) has prepared this checklist to evaluate development projects participating in the SPRC process on a consistent basis. C2E2 uses this checklist regardless of whether the projects have opted to participate in the County’s Green Building Incentive Program (GBIP); as a result, the criteria differ from the GBIP but often tie to other recognized standards in the field of sustainability, such as LEED and Energy Star. Our goal is to determine whether a project aligns with the County’s goal for carbon neutrality by 2050 along with other established County goals for stormwater management, tree canopy coverage and biophilia, and more. We are available to discuss the checklist and can be reached through the contact listed on the C2E2 website.

| Building Component  | C2E2 Baseline (Minimum Criteria) (Meets)   | Requirements to Achieve Best Practices in Sustainable Construction (Exceeds)   | Evaluation | Recommendation / Comments  | Assessment  |
|---|--|--|------------|--|-------------|
| Green Building Certification and Carbon Reduction - 15 weight |  |  |            |  | 44%         |
| Certification   | Commercial: LEED 4.1 Gold<br>Multi-family: Earthcraft also permissible   | Commercial: LEED 4.1 Platinum, 5.0 when phased in<br>Multi-Family: PHIUS Zero, LFI Zero<br>Carbon also permissible   |            | LEED 4.0 Gold  | Falls short |
| Waste diversion   | At least 75% construction waste diversion  | At least 85% construction waste diversion  |            |  | Meets       |
| Building materials  | Meet the LEED v5.0 prerequisite for embodied carbon by quantifying and documenting emissions of structural, enclosure, and hardscape materials during construction   | Achieve the LEED v5.0 "Reduce Embodied Carbon" credit by implementing strategies that result in at least a 20% reduction in embodied carbon compared to a baseline building                      |            | No mention of a reduction of embodied carbon   | Falls short |
| Energy Efficiency - 15 weight                                 |  |  |            |  | 67%         |
| Energy Optimization   | For commercial buildings, demonstrate a minimum 10% improvement in energy performance over the LEED v4.1 baseline standards. For multi-family residential buildings, achieve a Home Energy Rating System (HERS) Index of 65. | For commercial buildings, demonstrate a minimum 20% improvement in energy performance over the LEED v4.1 baseline standards. For multi-family residential buildings, achieve a HERS Index of 50. |            | Committing to GBIP minimum requirement of 24% energy use reductions under ASHRAE standards | Meets       |

|   |   |   |  |  |             |
|---|---|---|--|--|-------------|
| ENERGY STAR Certification                               | Must meet ENERGY STAR Portfolio Manager score of at least 75 within 4 years   | Must meet ENERGY STAR Portfolio Manager score of 85 within four years .   |  | The presentation does not mention anything about ENERGY STAR. Per the developer, they do not plan to commit to this.   | Meets       |
| Energy Benchmarking                                     | Install energy meters or monitoring devices capable of tracking monthly electric and gas consumption for the entire building or arrange for comparable data through utility billing, and report data through ENERGY STAR Portfolio Manager. | Meet "meets" criteria plus the criteria that would earn the project at least 1 point for LEED version 4.1 EA credit for Advanced Energy Metering. |  | The presentation does not mention anything about benchmarking or metering. Reached out to developer for additional information. Per further communication with the developer, they are planning to commit to this. | Meets       |
| <b>Electrification and Renewable Energy - 35 weight</b> |   |   |  |  | <b>47%</b>  |
| Building's Electrical Capacity                          | 100% electrification except fossil fuel allowed for emergency back-up power   | Building meets 100% electrification including emergency back-up power (i.e. battery storage)  |  |  | Falls short |
| Renewable Energy  | 2W/ft2 onsite solar or equivalent   | On site energy, or equivalent (geothermal), but not RECs  |  |  | Falls short |
| Utilities Electrification                               | Water heating fully electric  | Water heating fully electric through use of high performance hot water system   |  |  | Meets       |
|   | Fully electric HVAC   | Fully electric HVAC through use of heat pumps or other high efficiency technology   |  | Planning gas boiler for DOAS   | Falls short |
|   | Fully electric cooking except for retail restaurants  | Fully electric cooking including retail restaurants   |  |  | Meets       |
| <b>Electric Vehicle Infrastructure - 10 weight</b>      |   |   |  |  | <b>67%</b>  |
| Electric Vehicle Charging                               | 4% of parking spots have EV charging  | 10% of parking spots have EV charging   |  |  | Meets       |
|   | 15% of parking spots are EV-ready   | 50% of parking spots are EV-ready   |  |  | Meets       |

|                           |  |   |  |   | 73%     |
|---------------------------|--|---|--|---|---------|
| Biophilia / Open Space    | Use of native or regionally adapted plants only, be within 3% of tree canopy goal for site   | Create a sense of natural environment, habitats, native or regionally adapted plants. Keep mature trees, exceed tree canopy goals for site                                |  | Meets goal of 35% tree canopy coverage , including extensive plantings at the terrace level. Project landscape designers were still exploring whether sufficient soil volume could be provided to ensure survival of proposed canopy and understory trees.  | Meets   |
| Stormwater Management     | Stormwater retention and/or detention measures confining post-development peak flow from a 10-year 24-hour storm within the County stormwater conveyance system, to avoid local flooding | Use of green infrastructure (e.g., green roof) to enhance stormwater retention/detention and to enhance other environmental and energy objectives beyond "Meets" standard |  | Proposal includes both planters and stormwater retention vault to capture and slowly release water per requirements, Building footprint was adjusted to provide overland relief for runoff from uphill of the site and also proposes to include a culvert to connect with existing infrastructure to reduce flooding. | Exceeds |
| Bird-friendly Material    | Must minimize bird strikes by using bird-friendly materials between 8 and 36 feet above grade or achieving Bird Collision Threat Rating of 15 or less.                                   | Use ground floor bird-friendly material and bird-friendly material above 36 feet if rooftop trees or other circumstances make it likely for birds to be present           |  |   | Meets   |
| Light Pollution Reduction | 90% of project fixtures qualify for Dark Sky-approved "Friendly Fixture" certification, except for emergency lighting or as required by code   | 95% of project fixtures qualify for Dark Sky-approved "Friendly Fixture" certification, except for emergency lighting or as required by code                              |  |   | Meets   |
| 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.  |  |   | Meets   |

| Environmental Justice - up to 5 bonus points |  |  |  |     | #DIV/0! |
|--|--|--|--|-----|---------|
| Environmental Justice                        |  | Up to 5 bonus points may be awarded based on environmental justice commitments specific to the project - not every project will have an opportunity to earn these points |  | N/A |         |