

CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION

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

October 15, 2024

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

Re: 2451 Crystal Drive – Crystal City Block W

Dear Chair Garvey:

The Climate Change, Energy and Environment Commission (C2E2) has reviewed JBG Smith's (the Applicant's) application for a seven-story mixed use building known as Crystal City Block W. We appreciate that the Applicant has made efforts to incorporate sustainability elements into their design and appears willing to work with the County on further design and construction improvements to reduce the building's footprint and environmental impact. However, the site plans fall short of expectations in key areas of sustainability and open space. We understand that the Applicant was conducting a Zero Carbon Feasibility Study that would identify a pathway to a design consistent with current imperatives of the climate crisis.

C2E2 requests the Site Plan Review Committee (SPRC) request these documents be made public before proceeding with further approvals. In the absence of such data, we score this project's contribution to meeting Arlington County's Community Energy Plan (CEP) targets at 61%, indicating the project falls below what is required to achieve the County's carbon neutrality and other sustainability goals. We believe the Applicant is on track to improve this score, but should be held accountable for follow-through on critical decision points.

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 every new and renovated building should be: highly efficient; all-electric; powered by clean energy; and sustainably constructed – meaning the applicant has minimized the building's total carbon footprint through selection of low carbon materials and responsible management of construction debris. In this case, applicants appear responsive and willing to make sustainability improvements, but have not yet followed through to prioritize and confirm this commitment.

Green Building Certification and Carbon Reduction:

C2E2 appreciates that the project is targeting a LEED Gold rating to unlock bonus density through the County's Green Building Incentive Program. The Applicant has also reportedly conducted a Zero Carbon Feasibility Study to identify a pathway to zero carbon emissions in operations and reduce embodied carbon in materials and resources used. This study has not been made available

to C2E2, but C2E2 urges the Applicant to follow up on its recommendations to reduce overall carbon emissions and be at least zero carbon ready for operations for the building's life.

Energy Efficiency:

C2E2 also appreciates the Applicant's efforts to make this building all-electric. The LEED scorecard for this project indicates a 24% energy cost savings as required by the GBIP and an EnergySTAR score above 75. The Applicant is evaluating the feasibility of on-site renewable generation with solar panels and a green roof, and/or renewable purchased power for a 10% offset of the building's energy use, to further enhance the building's sustainability components. C2E2 encourages the Applicant to pursue these improvements to the building's design to achieve energy savings of 25 percent or more.

Electrification of Systems:

The Applicant is exploring the possibility of making this building all-electric, but current plans call for use of methane gas for both HVAC and hot water systems. C2E2 is encouraged by the Applicant's reports that they have had positive conversations with retail tenants about all-electric commercial spaces – including restaurants, which is particularly encouraging. However, the Applicant's preliminary energy performance analysis ranks heat pump water heaters (a crucial element of electrification) as a low feasibility, and intends to rely on fossil gas for backup power. C2E2 encourages a commitment to all-electric design at the earliest possible stage of development.

Electric Vehicle Charging:

The Applicant has indicated that the project will have EV chargers installed in 6% of parking spots with another 19% of parking spots ready for future EV chargers. 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 the site. C2E2 commends the Applicant for reducing the number of planned spaces by incorporating off-site parking at an existing site, which preserves the embodied carbon and eliminates carbon emissions associated with demolition and reconstruction.

Biophilia:

While the Applicant is pursuing beneficial modifications of its building design, C2E2 is concerned about the plans for green space connected with this development. Namely, the project abuts an adjacent, existing park space that will be impinged by modification of an existing fire and service lane, and the County appears poised to allow the Applicant to expand this easement into a neighboring plat to reach the 38,000 SF threshold envisioned by the Crystal City Sector Plan. We would suggest the Board seek clarity on how this expansion will create new open space.

Further, the Applicant appears to be considering artificial turf for a planned dog park in the adjacent park, which reduces the opportunity for biophilic, native grasses to support the overall ecosystem. C2E2 also appreciates the intent to preserve existing tree canopy and to enhance the landscaping

plan, but we are concerned that there is insufficient soil to support the number of trees envisioned for the space. Instead, the Applicant should reduce the building footprint to increase the actual green space surrounding the building, especially since the current zoning allows for several more stories of vertical space in this densely-populated, transit-adjacent location.

The world is facing a catastrophic climate crisis that requires immediate action by individuals, governments, and businesses to avoid the worst consequences. Further, Arlington County has a stated goal of becoming carbon neutral by 2050. Arlington County residents value the County's leadership in ensuring permitting decisions align with these goals. We urge the County to ask the Applicant to release additional documentation on its plans and to commit to the sustainability components it is currently evaluating.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Lewin". The signature is fluid and cursive.

Cindy Lewin
Chair, Climate Change, Energy and Environment Commission

cc: Sara Steinberger, Chair, Planning Commission
Tenley Peterson, Vice Chair, Planning Commission
James Lantelme, SPRC Chair
Anthony Fusarelli, CPHD Director
Krissy Walentisch, CPHD Staff