

DATE: **February 11<sup>th</sup>, 2021**

TO: **Paul Stoddard, Principal Planner, Falls Church City**

CC: **Celeste Heath, City Clerk**  
**Andrew Young, Chair, Environmental Sustainability Council (ESC)**  
**Kate Walker, Staff Liaison to ESC**

FROM: **ESC Energy Transition Subcommittee, Jon Ward, Chair**

SUBJECT: **Suggested Changes to Special Exception Code Provisions (TO20-26)**

---

On January 31<sup>st</sup>, 2021, the Environmental Sustainability Council (ESC) submitted a memo to the Planning Commission regarding the Commission's consideration of TO20-26. Among the ESC's recommendations was that the secondary Special Exception criterion in Sec. 48-90(d)(2)(j) be amended to read:

j) The resulting development utilizes (Leadership in Energy and Environmental Design) LEED criteria (or other rating systems such as the WELL Building Standard) in the design of the project to achieve high standards for environmental sustainability and climate resilience. Certified projects are encouraged to achieve LEED **GOLD Silver** or greater rating, **and deliver a minimum 20% improvement in energy performance.**

On February 3<sup>rd</sup>, 2021, the Planning Commission voted to recommend that City Council incorporate this text in the amendments considered under TO20-26.

The Energy Transition Subcommittee (ETS) was able to review this text during its February 4<sup>th</sup> monthly meeting and would like to convey a clarification and a recommendation to City staff.

First, we want to clarify that the ESC recommendation that projects "deliver a minimum 20% improvement in energy performance" should be interpreted to mean the project's predicted energy usage should be at least 20% below the baseline calculated under LEED v4. For reference, this 20%-below-baseline was a performance target made available in 2012 to developers in Arlington County, VA, in pursuit of additional FAR allowances from the county.

Second, the draft amended language reviewed by the ESC included the text "LEED criteria (or other rating systems such as the WELL Building Standard) ... to achieve high standards for environmental sustainability and climate resilience." From that draft added text, it might be inferred that the WELL Building Standard could significantly replicate LEED in metrics that are typically associated with environmental sustainability. Upon further review, the ETS believes this would be inaccurate. The WELL standard (v1, 2016) claims to focus "solely on the health and wellness of building occupants" and to have been developed because "health and well-being have played a relatively small role in the evolution of building standards" (such as LEED). It appears to be silent on metrics such as energy efficiency, stormwater management,

and life-cycle waste reduction. Therefore, if the WELL Building Standard is to be cited, it may be better to list it in a separate secondary criterion focused on occupant health.

In summary, the ETS recommends that secondary criterion (j) be amended as:

"The resulting development utilizes (Leadership in Energy and Environmental Design) LEED criteria (or other comparable rating system) in the design of the project to achieve high standards for environmental sustainability and climate resilience. Certified projects are encouraged to achieve LEED GOLD or greater rating and deliver a minimum 20% improvement in energy performance relative to LEED v4 baseline performance."

I have discussed these comments with Andy Young, the ESC Chair. The ETS recognizes that this recommendation differs slightly from the ESC recommendation reviewed and endorsed by the Planning Commission at its February 3<sup>rd</sup> meeting, but we consider it a clarification that is consistent with the Planning Commission's intent. Thank you for considering our suggestions.