

December 7, 2020

Arlington County Board 2100 Clarendon Boulevard, Suite 300 Arlington, VA 22201

Dear Chair Garvey,

The Arlington Chamber of Commerce supports the broad goal of the Green Building Incentive, but has concerns with some elements of the proposed update. We believe that an effective incentive program should remain connected to the actual costs of implementing green building techniques and focused on environmental outcomes. We further encourage Arlington County to consider how the Green Building Incentive interacts with other community priorities.

The Chamber strongly disagrees with the proposal to include an automatic update after 30 months, and encourages the County Board to remove this update from the policy prior to approval. It is unreasonable to ask the community to project with any certainty the technological environment or any continuing impacts from the pandemic that we will confront in June 2023. Arlington should convene a proper update process to ensure that any future changes are appropriate to the circumstances at the time they take effect.

As we stated in our August 2019 letter, the Green Building Incentive should give builders flexibility in how they meet its energy efficiency targets. We appreciate the movement of building electrification from being a required component to the list of "extra" options. Still, the Chamber encourages the County Board to reiterate the importance of flexibility and technological neutrality both in this and any future updates to the policy. Moreover, already-entitled site plans should not be subject to renegotiation of Green Building Incentive bonus density in the event of a subsequent minor site plan amendment.

We further encourage Arlington County to broaden its equity considerations in this policy to include potential inequitable outcomes on the cost of housing. The intent of the incentive is that the bonus density awarded should at least offset the cost of the green building components. If not, then the building's prospective tenants ultimately will bear these costs. To guard against this outcome, we encourage Arlington County to take to heart concerns raised by the development industry about the update raising the cost of building in Arlington and to consider their proposed mitigations to these concerns.

We thank you for your consideration of these comments.

Sincerely.

Kate Bates

President & CEO

Kate Bates

CC: Arlington County Board members Katie Cristol, Matt de Ferranti, Christian Dorsey, and Takis Karantonis; County Manager Mark Schwartz; Joan Kelsch and Jessica Abralind, Department of Environmental Services