



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

October 26, 2020

RE: Updates to the Green Building Incentive Policy

Dear Chair Garvey:

On September 24th the Urban Forestry Commission (UFC) received an informative presentation from Jennifer Abralind on the inclusion of biophilic design in the proposed updates to the County's Green Building Incentive Policy. The Green Building Incentive Policy (GBIP) is an important component of the County's approach for achieving the goals of the Community Energy Plan, including improving building energy efficiency. Since its establishment in 2000, the GBIP has been a key factor for encouraging developers to take more ambitious steps to improve building energy efficiency.

We commend staff for including attention to biophilic principles in the proposed 2020 policy updates to the GBIP. Just as the GBIP has been effective at incentivizing and accelerating energy efficiency improvements, we believe that – if properly structured- it could also help us accelerate progress towards our goals as a biophilic county, as set forth in the Biophilic City Resolution adopted by the County Board in December 2019.

Currently the draft policy requires developers to submit a narrative on the biophilic value of their project. We have several concerns regarding this component of the draft policy. First, the narrative asks, “how the project optimizes energy efficiency and environmental conservation in the community and enhances existing and/or creates new natural spaces for occupants and the public to interact with nature and creates habitat for people, plants and wildlife.” While incorporation of biophilic elements might indeed help to optimize energy efficiency, the way this requirement is framed gives developers the opportunity to simply repeat energy efficiency measures articulated elsewhere and pay minimal attention to other important elements of biophilia. We recommend rephrasing the narrative language and requiring developers to address their efforts in regard to several core components of biophilia. For instance, how a proposed project will: a) enhance connections between humans

and nature (e.g. physical opportunities to interact with nature, enhancing views of nature and green spaces, water, and sky, creating access to nature sounds, creating links to open spaces, etc.); b) create or expand natural habitats (e.g. native plants, tree canopy, pollinator gardens, butterfly gardens, milkweed plants, meadows, etc.), c) use natural forms and materials, and d) provide energy and environmental conservation co-benefits (e.g. solar access and shading, heat island mitigation, reducing runoff). Structuring the narrative around the above or other biophilic elements would ensure that developers more comprehensively address biophilia. We also strongly suggest that the instructions for the narrative include links to the County Board’s [Biophilic City Resolution](#), the [Biophilic Cities Network](#), and/or other resources on biophilia and biophilic design to assist developers in understanding the concepts of biophilia.

Second and most critically, there are no plans by the County to assess or score projects based on the biophilic narrative submitted by developers. While requiring submission of a narrative will enable the county to collect data on actions that developers are planning to take, it will not incentivize more ambitious actions on their part that will advance or better guarantee application of biophilic principles in future development projects. While we appreciate that staff would like baseline data to inform expectations and requirements for projects, we believe that it is possible to set some minimal requirements now to incentivize biophilic design, and that even minimal requirements will be more incentivizing than no requirements in advancing the goals of biophilia.

Various approaches could be taken to make the biophilic section more meaningful, including assigning “biophilic points” to different biophilic sub-elements (e.g. connectivity with nature, creation of habitat) and requiring developers to achieve some minimum number of these points in order to be eligible for bonus density. Additionally, adding a scoring system will also enable developers to better understand what the County’s goals are regarding biophilic design, and how strong their project is relative to others in the County. This will help prepare them for future updates of the GBIP and other policies that we hope and expect will more strongly incentivize biophilic design.

Regardless of whether a scoring system is added to the biophilic narrative in this update of the GBIP, we encourage the County to commit to updating the requirements for this section of the GBIP no later than 2023.

Additionally, as we collectively work to increase nature in our urban spaces through the implementation of biophilic design in development, bird-friendly design becomes increasingly important. The bird-friendly materials section of the GBIP update focuses only on building materials used less than 36 feet above grade. We believe this is insufficient. Especially as buildings are positioned in closer proximity to large trees, and as biophilic features such as green roofs are incorporated, a more nuanced and broader approach is critical to reducing bird collisions. Therefore, we recommend that the County Board direct staff to consider the standards outlined in [LEED pilot credit 55](#), focused

on preventing bird collisions. One important difference relative to the currently proposed GBIP language is that the pilot credit also requires use of bird friendly materials at least 12 feet above any green roof.

Thank you for this opportunity to share our views.

Sincerely,



Phil Klingelhofer
Chair, Urban Forestry Commission

Cc: Members, Arlington County Board
Mark Schwartz, Arlington County Manager