



THE DISTRICT
OF COLUMBIA 
COMMISSION ON
CLIMATE CHANGE
& RESILIENCY

Commissioners

Uwe Brandes, Chair
James Dougherty
Alan Etter
Maureen Holman
Anthony Kane
Sandra Knight
Peggy Keller
Colin McCormick
Chelsea Mervenne
Steven Moore
Molly Rauch
Jason E. Turner
Kathryn Zyla

Sarah Edwards, DOEE
Designated Staff Executive

Chairperson Danielle Gurkin
District of Columbia Construction Codes Coordination Board
via email

August 12, 2022

Dear Chairperson Gurkin and Board Members:

The District of Columbia Commission on Climate Change & Resiliency (“Commission”) is charged with advising the Mayor and Council on the District’s progress to mitigate and adapt to climate change (D.C. Law 21-185). To fulfill our mandate, the Commission regularly engages agencies, stakeholders and the public to review plans, policies, programs and the science of climate change.

The Commission acknowledges the critically important work of the Construction Codes Coordinating Board (“CCCB”) in meeting the District’s legislated climate goals. The fact that 72% of the District’s overall carbon emissions relate directly to the design and operations of buildings underscores this importance.

The District of Columbia’s net-zero energy targets are codified in the [Climate Commitment Amendment Act of 2021](#) and the [Clean Energy DC Building Code Amendment Act of 2021](#) subsequently mandates that all new construction and substantial improvements of buildings achieve net-zero energy standards by 2026. This includes a prohibition of on-site combustion of fossil gas.

The Commission supports CCCB’s goals to comprehensively align building codes with the District’s legislated carbon emission reduction targets. We kindly request a formal presentation to our members as the appointed non-governmental experts on climate change in the District.

On behalf of the Commission, we are grateful for this opportunity to express support for the Construction Code Coordination Board’s proposal for building electrification of new construction and substantial improvements.

Sincerely,

Uwe S. Brandes, Chair

First Name	Last Name	Seat Designation (specific role)	Appointee Designation
Sandra	Knight	Emergency Preparedness Member	Mayoral Appointee
Kathryn	Zyla	Energy Member	Mayoral Appointee
Maureen	Holman	Environmental Science Member	Mayoral Appointee
Jason	Turner	Environmental Science Member	Mayoral Appointee
Anthony	Kane	Transportation Member	Mayoral Appointee
Stephen	Moore	Transportation Member	Council Appointee
James	Dougherty	Natural Resources Member	Council Appointee
Alan	Etter	Emergency Preparedness Member	Council Appointee
Peggy	Keller	Public Health Member	Mayoral Appointee
Uwe	Brandes	Natural Resources Member	Mayoral Appointee
Colin	McCormick	Environmental Science Member	Council Appointee
Chelsea	Mervenne	Environmental Justice	Council Appointee
Justin	Lini	Environmental Justice Member	Mayoral Appointee
Edward	Yim	Energy Policy	Council Appointee
James	Landau	Insurance Member	Council Appointee
<i>Vacant</i>		Public Health Member	Council Appointee

Representation	Term end	Attendance
Citizen	5/25/2023	3/4
Citizen	5/25/2023	2/4
Citizen	5/25/2025	4/4
Citizen	5/25/2025	3/4
Citizen	5/25/2023	4/4
Citizen	11/8/2022	3/4
Citizen	11/8/2022	3/4
Citizen	11/8/2023	1/4
Citizen	5/25/2025	3/4
Citizen	5/25/2025	4/4
Citizen	11/8/2023	1/4
Citizen	11/8/2023	3/4
Citizen	5/25/2025	1/1
Citizen	11/8/2025	1/1
Citizen	11/8/2025	1/1
Citizen		



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Sarah Edwards, DOEE
Designated Staff Executive

October 28, 2022

Hon. Tommy Wells and Hon. David Gadis, Chairpersons
District of Columbia Flood Task Force
via email

Re: Climate Commission Comments on Draft Action Plans Batches 2 & 3

Dear Chairpersons Wells and Gadis:

The Commission on Climate Change & Resiliency (“Commission”) is charged with assessing the District’s ability to mitigate and adapt to climate change. (D.C. Law 21-185). To fulfill its mandate, the Commission reviews plans, policies, and programs in order to advise the Mayor and Council.

The Commission appreciates the opportunity to participate as a member of the DC Flood Task Force and share preliminary comments. The Commission applauds the Flood Task Force’s efforts to advance the District’s ability to prepare for and withstand current and future flood conditions, recognizing the growing risks of sea level rise and increasing rain events.

Our preliminary comments on the Batch 2 Action Plans:

- Action Plan 5.1, Develop a List of Flood Infrastructure Projects – The Commission supports the endeavor to inventory infrastructure projects with the purpose of reducing flood risks at a large scale. The Commission recommends the Task Force to:
 - Ensure that these dedicated projects anticipate future projected climate impacts and are not reliant on only historic data.
 - Annually revisit, revise, and update the list of candidate flood infrastructure projects in light of evolving risk and vulnerability. This may result in reprioritization of projects for funding, or amending project designs to better account for the latest climate science.
 - Establish evaluation criteria in the capital budget planning process which assesses flood risk reduction measures in all capital improvement projects so as to leverage pipeline investments and strengthen community resiliency

Our preliminary comments on the Batch 3 Action Plans:

- Action Plan 1.5₂, Join FEMA’s Community Rating System to Reduce

Insurance Premiums – The Commission encourages the Task Force to pursue a course of action guided by the greatest benefit to disadvantaged communities with high current and future flood risks. This approach may result in the District not participating in the CRS program. Prior to dedicating the time and resources for the costly CRS certification, the Task Force should ascertain the barriers to obtaining flood insurance for residents and the degree to which a CRS discount would overcome those barriers.

- Action Plan 9.3, Install Flood Signs and Sensors - The Commission supports this Action Plan and further encourages the Task Force to consider additional educational signs alerting residents of flood zones and high-risk flood areas.

On behalf of the Commission, we are grateful for this opportunity to participate in and provide comment to the Flood Task Force.

Sincerely,



Uwe S. Brandes

Chairman



Commissioners

August 22, 2022

Uwe Brandes, Chair
James Dougherty
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Sarah Edwards, DOEE
Designated Staff Executive

Hon. Tommy Wells and Hon. David Gadis, Chairpersons
District of Columbia Flood Task Force
via email

Re: Climate Commission Comments on Draft Action Plans

Dear Chairpersons Wells and Gadis:

The Commission on Climate Change & Resiliency (“Commission”) is charged with assessing the District’s ability to mitigate and adapt to climate change. (D.C. Law 21-185). To fulfill its mandate, the Commission reviews plans, policies, and programs in order to advise the Mayor and Council.

The Commission is honored to participate as a member of the DC Flood Task Force and applauds the Flood Task Force’s efforts to advance the District’s ability to prepare for and withstand current and future flood conditions, recognizing the growing risks of sea level rise and increasing rain events.

Our preliminary comments on the released Action Plans include:

- Action Plan 3.1, FloodSmart Homes -- The Commission supports the goal of retrofitting homes for flood resilience located in the 100-year and 500-year floodplains. In select individual cases, it may be more prudent to offer voluntary property acquisition as an eligible use of the program funding, with similar programs in the State of New Jersey and North Carolina serving as models. Additionally, the program should be designed to safeguard against subsidizing investor-owned rental properties and target owner-occupied homes in a manner that is equitable to residents of the District of Columbia.
- Action Plan 6.1, Update Floodplain Regulations -- The Commission supports the Flood Task Force’s proposal to extend risk-reducing regulations to the 500-year floodplain. The Commission encourages the Flood Task Force to identify current and future risk areas in the flood hazard areas, as FEMA’s 100- and 500-year floodplains do not account for pluvial flooding, projected sea-level rise, or other risk factors such as groundwater, underground streams and springs. The Commission encourages the Flood Task Force to account for more comprehensive flood risks in the proposed flood hazard rule updates (such as interior flooding and projected weather changes) and directly

correlate these risk factors with both existing conditions and the Future Land Use Map codified in the recently updated DC Comprehensive Plan.

- Action Plan 8.4 Coordinate Yearly Public Outreach -- We request the Commission's inclusion in the coordination of public outreach.
- Action Plans 7.3 and 7.4 Update Watts Branch and Oxon Run FEMA Maps -- We offer the Commission's support for proposed public outreach activity in the Oxon Run and Watts Branch mapping updates.

On behalf of the Commission, we are grateful for this opportunity to participate in and provide comment to the Flood Task Force.

Sincerely,



Uwe S. Brandes

Chair

CC:

DCCCCR Commissioners



Commissioners

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Sarah Edwards, DOEE
Designated Staff Executive

September 7, 2022
Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
via email
Re: Notice of Proposed Rulemaking RM48-2022-01-E

Dear Brinda Westbrook-Sedgwick:

The Commission appreciates the opportunity to submit comments regarding the proposed rulemaking RM48-2022-01-E. Microgrids and Distributed Energy Resources are a strategic component of the District's response to climate change as a means to achieve legislatively mandated emissions reductions and foster resilience for local communities and businesses.

The Commission urges the Public Service Commission to develop rules embracing microgrids as a distributed energy resource. The many benefits, co-benefits, and risk mitigation opportunities that microgrids represent can only be captured if the regulatory approval path for microgrids is made to be feasible.

As structured, the proposed regulations appear ill-suited for market-based and community-based development and unlikely to catalyze public and private capital investment in clean energy and energy storage. Absent a regulatory structure which enables new entrants into the marketplace, the District will not reap the substantial benefits associated with microgrids.

We look forward to future dialogue and coordination.

Sincerely,