



Delegated Action of the Executive Director

PROJECT Capital Solar Challenge - Package 2 Columbia Plaza 2401 E Street, NW Washington, DC	NCPC FILE NUMBER 7789
	NCPC MAP FILE NUMBER 00:00(38.00)44378
SUBMITTED BY United States General Services Administration	ACTION TAKEN Approve as requested
	REVIEW AUTHORITY Approval Per 40 U.S.C. § 8722(b)(1) and (d)

The General Services Administration (GSA) submitted for preliminary and final building plan approval a proposed rooftop photovoltaic system at Columbia Plaza, 2401 E Street, in Northwest Washington. This submission constitutes package 2 of a multi-package implementation plan for the White House's Capital Solar Challenge. Launched in April of 2014, the White House challenged federal agencies and military installations in the National Capital Region to implement solar renewable energy. The initiative resulted in the identification of 18 federal buildings in Washington, DC that could benefit from rooftop photovoltaic arrays. GSA has now entered into a contract with WGL Energy Systems (WGL), which has a subcontract with Inman Solar to develop, engineer, and construct the rooftop photovoltaic systems for the 18 federal buildings.

The Capital Solar Challenge contract is structured as a Power Purchase Agreement (PPA) between GSA, which will buy the power produced by the systems, and WGL, which will own and operate the system. As such, there is no upfront investment by GSA. WGL will bill GSA for the power produced at an agreed-upon price that is below market price for a 10-year term. After that time, GSA will have the option to purchase the systems, extend the PPA for 10 years, or pay to have the systems removed. It should be noted that the environmental attributes of the system, most notably the Renewable Energy Credits, will be retained by WGL, which is what allows them to offer the power at below market prices.

The site for the subject installation is Columbia Plaza. Finished in 1963, the plaza was intended to be part of two urban renewal development areas in the Foggy Bottom neighborhood. The project was significantly scaled back, and of the planned hotel, apartments, commercial plaza, and parking area, only a small part was ever constructed. The subject building underwent a major renovation in 1992, which converted it from residential use to office space. It was leased by the Department of State (DOS) for two decades before being purchased by GSA for DOS use in 2012. It is adjacent to the Columbia Plaza Apartments, another renewal project building that remains residential.

The Columbia Plaza rooftop photovoltaic system consists of 304 solar panels generating 335 watts of power each, with a total system size of 102 kW of DC power. This power, once converted to AC power, will directly offset that which is currently consumed by the building HVAC equipment including chillers, fans, pumps, and air handling units. The proposed solar panels will be installed

on the seventh-floor roof, the eleventh-floor roof, and the penthouse roof. The seventh-floor panel installation will be visible from the higher floors within Columbia Plaza; however, for all the installations, the top edge of the solar panels will be 14 inches above the surface of the roof and the panels will be set back a minimum of six feet from the edge of the building. As confirmed by GSA's viewshed analysis, the minimal height of the panels combined with their setback from the roof edges will ensure that they are not visible at street level.

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), on June 3, 2016, the DC State Historic Preservation Office (DC SHPO) concurred with GSA's determination of no adverse effect on historic properties. As this is a federal project located in DC, NCPC has an independent responsibility to comply with NHPA. NCPC staff has elected to designate GSA as lead agency pursuant to the Section 106 regulations.

Pursuant to its regulations implementing the National Environmental Policy Act (NEPA), GSA submitted a categorical exclusion determination for the Package 2 project. The automatic categorical exclusion applied by GSA includes: "Outleases, licenses, and other arrangements for non-federal use of space in existing Federal office buildings, where such use is consistent with local planning and zoning, where Section 106 of the NHPA is complied with, where applicable, and there is no evidence of community controversy or unresolved environmental issues." As this is a federal project in DC, NCPC has an independent NEPA responsibility for approval of the project. Staff has determined that this project qualifies for a Section 8(c)(2) categorical exclusion pursuant to NCPC's Environmental and Historic Preservation Guidelines. The specific categorical exclusion, number 21, includes: "Review and approval of acquisition of occupiable space by lease acquisition, construction, or expansion, or improvement of an existing facility" where certain conditions are met. Prior to applying this categorical exclusion, NCPC staff determined that no extraordinary circumstances were present.

The Coordinating Committee reviewed the proposal at its June 15, 2016 meeting. The Committee forwarded the proposal to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia Department of Transportation; the DC HPO; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

*

*

*

