

The Committee of 100 on the Federal City



www.committeef100.net

Founded 1923

November 8, 2018

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Subject: Department of Consumer and Regulatory Affairs: Proposed Rulemaking - Construction Codes Coordinating Board proposed new Green Construction Code Supplement of 2017 (12-K DCMR) (074301)

A 104 Site Project Electives: A104.3. Bird Collision Deterrence

Dear Ms. Stern:

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. The Committee of 100 is especially interested in protecting the environment, wildlife habitat and wildlife, including birds. The District is on the Atlantic Flyway, a migration route for birds in spring and fall, and is also home to hundreds of bird species. In the city as a whole, an estimated 120,00 birds collide with glass windows every year. We believe that adding the Project Site Elective, A104.3, Bird collision deterrence, to the Green Building Code furthers protection for birds.

To reduce bird collisions nationwide, in 2011 the U.S. Green Building Council (USGBC) introduced the bird collision deterrence pilot credit (LEED Pilot Credit 55: Bird Collision Deterrence) and revised the credit in 2015, making it available to all LEED rating systems except "neighborhoods." The credit was drafted by the American Bird Conservancy, the Bird-Safe Glass Foundation, and the USGBC. The goal of this credit is to develop a design and site strategy for a building to make the building visible as a physical barrier to birds. The American Bird Conservancy

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has developed and published quantitative threat levels for many building materials using scientific testing.¹

The Department of Consumer and Regulatory Affairs (DCRA) has published proposed regulations on the Green Construction Code, adding a Project Site Elective, A104.3, Bird collision deterrence, incorporating the standards in LEED Pilot Credit 55. We believe that this elective will help to reduce bird deaths from collisions; it is based on sound science, sets out objective tests for bird-friendly design and has been well-received by architects, developers, and DOEE. For these reasons, the Committee of 100 strongly supports adding Project Site Elective, A104.3, Bird collision deterrence, to the Green Building Code.

Thank you for considering our comments.



Stephen A. Hansen, Chair

cc:

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¹DOEE, Wildlife Action Plan, Appendix A (2015). Focusing on commercial buildings, scientists estimate that for a building between four and 11 stories tall, annual bird mortality from collisions is 21.7 birds. This number may be low. Between 2011 and 2015 there were an average of 27.3 collisions per year at the five buildings studied by *Lights Out DC* ((683 total collisions for all buildings studied between 2011 and 2015 ÷ 5) ÷ 5 years)) Focusing on the 5,539 commercial office buildings and apartment buildings, a conservative estimate of annual bird collisions is 120,196. (5,539 x 21.7). This is likely an undercount, because it omits higher collision rates at problem buildings, and omits government, university, and religious-use buildings. Scott R. Loss, Tom Will, and Peter P. Marra, "Direct human-caused mortality of birds: improving quantification of magnitude and assessment of population impact." Frontiers in Ecology and the Environment 10: (No. 7, Sept. 2012) 357-364. In the District of Columbia as of 2015, there are 330 Class A office buildings of 50,000 square feet or more, and 2,306 total commercial buildings. There are 174 Class A apartment buildings with 50 units or more, and 3,233 total apartment buildings. DC Office of Revenue Analysis Briefing Document 2015-10 (Oct. 2015), "Tangible markers of DC's recovery from the Great Recession: ninety-one new buildings." <http://cfo.dc.gov>. Internet; accessed 12 Mar. 2016.