

Office of Sustainability and Innovations Memorandum

Date: February 20, 2026

To: Alexis DiLeo

From: Steve Christensen and Carissa Ebling, Office of Sustainability and Innovations

Topic: OSI Response to Amendments Related to Exceptions to Height Limits February 24, 2026

Office of Sustainability and Innovations staff received a draft of 2026-02-24 Staff Memo (Exceptions to Height Limits). We provided feedback as embedded comments in document sent on February 18, 2026.

To summarize our major comments, we recommend:

- Adding the following definition of all-electric development for clarity: “A development that uses a permanent supply of electricity as the only source of energy for all on-site space conditioning (including heating and cooling), water heating, cooking appliances, and clothes drying appliances. If backup power outside of battery storage is required by code, delivered fuel must be used as the backup power fuel source.”
- Maintaining the on-site solar requirement (solar panels cover at least 60% of the building footprint area), which I believe is what you’re proposing.
- Requiring the “Use of air source or ground source (geothermal) heat pumps” instead of “Use of geothermal heat pumps” to enable more flexibility in situations where geothermal is not possible due to site limitations.