

Green Remediation and Green Building – Is There a Connection?

by Daniel J. Sheridan

In September, 2010, the USEPA published its “Superfund Green Remediation Strategy”, the purpose of which is to reduce the environmental footprint associated with cleanup actions by reducing greenhouse gas emissions and other “negative environmental effects” of environmental remediation. You can view the principles here:

<http://www.epa.gov/oswer/greencleanups/principles.html>, [California](#) and [New York](#) are among a variety of States that have announced policies favoring green remediation. In a recently circulated “interested party draft” of its proposed rules relating to the Administrative Requirements for the Remediation of Contaminated Sites, the New Jersey DEP has taken the further step of defining “green remediation” as the “practice of considering all environmental effects of the remediation and incorporating options that maximize the net environmental benefit of cleanup activities.” Unfortunately, at this drafting stage, the regulations do not incorporate the definition into any substantive or operable provisions, leaving it more or less in “orphan” status.

The movement towards green remediation is a welcome development. But where does it fit into the overall scheme of green building? Within LEED v3 for New Building Construction and Major Renovation, there is one credit available for brownfields redevelopment, and another for “protecting or restoring habitat” (also a primary goal of green remediation). Obviously, not every remediation project is a development project, but many are (or someday could be). So, in addition to the regulatory mandate for green remediation, creation of additional development incentives in the form of available LEED credits for employing or selecting green remediation options could be created.

As a threshold matter, the weighting of site selection credits should be re-evaluated and better aligned with economic reality. The fact that a brownfield redevelopment earns the same credit weight as installation of a bike rack and changing room is completely inappropriate. Not only does brownfield redevelopment usually involve substantial economic investment, its long term benefits (at least from my layman’s perspective) far exceed those achieved from accommodating a handful of bike commuters. At the very least, the base credits available for brownfields redevelopment should be twice the number available for encouraging alternate transportation in the form of bike racks and changing rooms. On top of that, an additional point could be made available for employing (or having employed) “green remediation” techniques. While this credit could theoretically be achieved through an innovation in design (ID) credit, or form the basis for an exemplary performance credit or regional priority credit, embedding it into the LEED process as a stand-alone credit category would send a strong message. There is also precedent for this approach. In the LEED for Neighborhood Development standard, an additional credit is available under the brownfields redevelopment category for redevelopment of “high priority” brownfields.

The policy makers behind the green remediation movement have borrowed heavily from the green building principles developed by the USGBC and its industry partners,

including adoption of the “triple bottom line” approach. As is often said, imitation is the sincerest form of flattery. The USGBC, in turn, needs to repay the compliment by making available more substantial rewards for employing green remediation techniques.

Is there a connection between Green Remediation and Green Building? Sort of. Can it be stronger? Absolutely.