

January 4, 2017

Dear Planning Commission,

I'm kind of embarrassed. I had seen the Deep Green Incentive Program on the agenda for a couple Planning Commission meetings I attended, but it didn't really register, because the words "Deep Green" disarm me and make me feel warm and fuzzy.

Then I got email last week explaining that the City is proposing allowing double density in single family zones to incentivize developers to build "green buildings". Doubling density didn't sound very green to me at all, let alone "Deep Green", so I thought I'd better do some research.

I started with the Staff Report for the 1/5/17 Planning Commission meeting, and drilled down from there. Hundreds of pages later, I'm left with 8 major concerns, as well as many minor ones.

Bottom line: please don't allow double density in single family zones.

Here are my 8 major concerns:

1) the emissions numbers and percentages are different in each report, and are very confusing. How exact is the science of emissions measurement?

Please see "CONFUSING NUMBERS" below for more detail.

2) there's a very big elephant in the room - population growth

None of the documents I read even suggested that we might want to try to slow or stop population growth, which is ridiculous - we can tinker around the edges all we want, but if we allow infinite population growth, it won't make any difference.

For example, we learn on Page 6 of the 2012 Seattle Community Greenhouse Gas Emissions Inventory (SCGGEI) that "Seattle reduced GHG emissions by 1% from 1990 to 2012, falling short of the target. However, Seattle did reduce GHG emissions per person in the expanded view over the period by 20%." This illustrates that you can keep reducing and reducing per capita emissions, but overall emissions can still continue to grow.

Please see "POPULATION" below for more detail.

3) doubling density is a direct threat to habitat health, one of the goals described on Shoreline's "forevergreen" web site (<http://forevergreen.shorelinewa.gov/>).

Just last week, the Seattle Times ran an article describing how damaging development is to Swainson's thrushes and Pacific wrens, whose songs are among the most beautiful in our region:

<http://www.seattletimes.com/seattle-news/environment/birds-in-the-suburbs-faced-with-development-some-thrive-some-move-out/>

If the choice is between a green building and a non-green building, by all means, incentivize the green building, but if the choice is between one building or two, one is always better for the land.

4) doubling density in R-4 and R-6 zones is quite a giveaway to developers.

Unless we're sure it's worth it, why would we want to do it?

Once it's done, it's done, and the damage is irreversible. Why not try it first in the MUR zones and see how it works there?

5) the good old "neighborhood meeting".

Why even bother if the neighbors don't get a say? Exactly as with backyard tent cities, adjacent neighbors should have absolute veto power.

6) the penalties for getting your double density permit and then not really building green seem very minor compared to the financial gain from building two properties instead of one on the same lot.

What's to stop developers from selling the houses, paying the fine, and pocketing the difference between the sale price and the fine?

7) Climate Solutions, the authors of Deep Carbon Reduction in Shoreline (DCRS), chose not to support Initiative 732, which would have implemented a revenue neutral carbon tax:

<https://www.climatesolutions.org/article/1461206472-why-we-cannot-support-initiative-732>

However, Climate Solutions' very own DCRS, Page 14, states that "Statewide carbon pricing is essential to create the business case for meaningful carbon reduction".

Sure, I-732 wasn't perfect, but if climate change is the time-sensitive emergency that Climate Solutions says it is, I-732 would have been much better than doing nothing.

The perfect is the enemy of the good.

8) are green buildings even really green?

I'm still researching this, but I've found several sources that indicate that "green buildings" might not be so green after all.

CONFUSING NUMBERS

Here are a few examples of confusing and contradictory numbers:

1. SCGGEI states that "core greenhouse gas emissions" were 5.7 mtCO₂e per person in 2012 (Table 1, Page 3). But it also says that if you use "independent consumption based accounting", "household consumption per person" is 25 mtCO₂e (Appendix E, Page 44).

Table 1, Page 3 shows 2012 total "core emissions" as 3,728,000 mtCO₂e (3,647,000 after offsets), but Appendix E shows total "household consumption" as 15,860,000. That's a HUGE difference - over 400%! I think what this means is that transportation, buildings, and waste actually account for only 24% of Seattle's emissions (3,728,000/15,860,000).

On the other hand, Page v of "Getting to Zero: A Pathway to a Carbon Neutral Seattle" (GTZ) states that "About half the emissions associated with Seattle residents' consumption is associated with the production of goods, food, and services, emissions that occur largely outside the city limits."

So it appears that somewhere between 50% and 76% of Seattle's CO₂ emissions come from sources other than transportation, buildings, and waste.

2. The Shoreline Climate Action Plan, September, 2013 (SCAP), Page 19, states that each Shoreline resident emitted approximately 9.85 mtCO₂e in 2012, 53% of which comes from vehicle emissions, and 31% from residential energy use.

But Page 57 says that "Car and truck transportation makes up the highest amount of total household greenhouse gases in King County, contributing to 20% of the average household's carbon footprint".

So, which is it - 53% or 20%?

Also, I'm guessing that the 9.85 figure is measuring the same thing as "core emissions" in the SCGGEI. There's no mention in the SCAP of anything similar to the "independent consumption based accounting".

3. Page 4 of DCRS shows that each Shoreline resident emitted approximately 3.7 mtCO₂e in 2012, which contradicts the 9.85 figure in SCAP. Which is correct?

4. In the Staff Notes for the 1/5/17 Planning Commission meeting, the first paragraph of proposed Ordinance 760 states "WHEREAS, buildings are responsible for a large portion of negative environmental impacts, accounting for approximately 50% of U.S. carbon emissions.."

But Table 1 of the SCGGEI shows that buildings account for 33% of Seattle's "core emissions". And it's actually more like 8% ($33\% * 24\% = 7\%$)

POPULATION

Page v of GTZ says that "About half the emissions associated with Seattle residents' consumption is associated with the production of goods, food, and services, emissions that occur largely outside the city limits. ", and I think SCGGEI says it's about 76%.

In other words, even if you somehow managed to reduce building and vehicle emissions to zero, you'd still be left with ever-growing emissions as long as the population continued to grow.

Multiple documents discuss the need to reduce Vehicle Miles Traveled (VMT). For example, Page 9 of DCRS advocates for a 35% reduction in VMT by 2030, relative to 2012. That doesn't sound so bad, except it doesn't mean 35% per capita. The more population grows, the more sacrifice each person will have to make.

For example, let's assume that each person drives 100 miles per week now. Here's how much they'd be allowed to drive, based on population growth:

no growth: 65 miles per week
10% growth: 59 miles
15% growth: 56 miles
20% growth: 54 miles
25% growth: 52 miles
50% growth: 43 miles
100% growth: 32.5 miles

DOCUMENTS CITED:

Name: 2012 Seattle Community Greenhouse Gas Emissions Inventory
URL:https://www.seattle.gov/Documents/Departments/OSE/2012%20GHG%20inventory%20report_final.pdf
Acronym : SCGGEI

Name: Shoreline Climate Action Plan, September 2013
URL: <http://www.shorelinewa.gov/home/showdocument?id=14091>
Acronym: SCAP

Name: Staff Report for 1/5/17 Planning Commission Meeting
URL: <http://www.shorelinewa.gov/home/showdocument?id=30043>
Acronym: SR010517

Name: "Getting to Zero: A Pathway to a Carbon Neutral Seattle"
URL: https://www.seattle.gov/Documents/Departments/OSE/CN_Seattle_Report_May_2011.pdf
Acronym: GTZ

Name: Deep Carbon Reduction in Shoreline - What Will it Take?, October, 2014
URL: <http://www.shorelinewa.gov/Home/ShowDocument?id=18473>
Acronym: DCRS

Sincerely,
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