

January 19, 2017

Dear Planning Commission,

At the January 5th Planning Commission meeting, City staff assured us that it's nearly impossible for single-family dwellings to meet the requirements for the Deep Green Incentive Program (DGIP), so we really don't need to worry about DGIP increasing density in single-family neighborhoods.

I thought to myself - "if it's not going to happen anyway, what do you have to lose by removing single-family zones from DGIP, and why are you so adamant about leaving them in"?

So I did some research. I went to the web site of the International Living Future Institute (ILFI), and found the specifications for Version 3.1 of the Living Building Challenge (LBC) here:

<https://living-future.org/wp-content/uploads/2016/11/Living-Building-Challenge-3.1-Standard.pdf>

The document confirmed my fear that it might not be all that hard to qualify for "Petal Certification" aka Tier 2 of the DGIP.

To qualify for "Petal Certification", you have to meet only one of the Petals that address climate change - Energy, Water, or Materials (and I'm not even sure that the Water Petal really addresses climate change, but it is good for the environment generally). You can pick the other two from among Health/Happiness, Equity, Beauty, and Place. Except for "Place", these all have very squishy definitions, and it appears that it would be easy to fudge compliance.

In addition, I found in ILFI's FAQ section (<https://living-future.org/contact-us/faq/>) that one of the reasons for releasing Version 3.1 is to make it easier to achieve certification, which would, of course, make it easier to densify Shoreline. Here's a quote:

"The Living Building Challenge is constantly evolving in response to feedback from our project teams, and progress in the design, construction, and manufacturing industries. LBC v3.1 makes the Challenge more achievable without sacrificing the rigor or intent of the program..."

One has to wonder if Version 3.2 will set an even lower bar.

BOTTOM LINE:

It would be extremely unwise to harm Shoreline's wonderful low density neighborhoods for a "green building" standard that might not address climate change at all, and that appears to be getting easier and easier to achieve.

Sincerely,
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