

Gale, Mia

From: KEN GARBER
Sent: Tuesday, April 12, 2022 10:44 AM
To: Planning
Subject: sustainability provisions in UDC

Dear Planning Commission:

I'm excited that you are starting this discussion. I realize that doing anything effective is really hard, since the biggest asks, building electrification and solar energy, are really building code (chapter 100) issues. And we are constantly told that we can't exceed the state building code, that the state code sets both a floor and a ceiling. As an aside, I believe that the city can go beyond state code, for example to exclude natural gas in new construction. Public Act 230 sets a floor, but there is nothing in it that explicitly sets a ceiling. But my arguments on this have gone nowhere, because the lawyers say I'm wrong. They don't convince me, but I'm just a random person, I have no agency to be able to keep this conversation going.

For the zoning code (chapter 55), I don't have any brilliant ideas. I really look forward to your discussion. Here is one idea, admittedly not well-formed. Maybe it's a non-starter, but perhaps parts of it are worth considering.

- Right now planning staff, for each petition, reviews use, area height placement, parking, landscaping, and stormwater, and so on. It should also review greenhouse gas emissions. Peter Drucker famously said, "If you can't measure it, you can't improve it." This is not that hard. The only source of direct emissions is gas combustion, which can be estimated based on standard tables for different building types in Michigan, and then translated to emissions using a known conversion factor. Indirect emissions are harder, but electricity consumption is easy to estimate, and a conversion factor exists to take into account DTE's energy mix. Embedded carbon is really hard, but the city is already developing standards for that, so skip it. Scope 3, or supply chain emissions, and transportation emissions, are probably about the same for everybody, so let's ignore those too. Just look at gas and electricity. When staff reviews a petition, estimate those in terms of annual CO2 equivalent emissions. Easy calculation—maybe 15 minutes. Much easier than, say, stormwater infiltration rates. You just need the square footage, building type, and intended HVAC modality, then use the conversion formula.
- Staff shall provide the petitioner with its emissions estimate, along with case studies of local low emission new construction: Valhalla Glen, 2111 Packard, Lockwood Senior Living, Veridian at County Farm Park, along with contact information for the individual developers.
- The ideal building would be fully electrified, with all electricity needs supplied by on-site solar. To the extent that the petitioner's building departs from this ideal—and most will—the petitioner shall submit a report justifying the shortfall, along with evidence that alternatives were investigated or seriously considered.
- If, in staff's judgment, the report fails to document that alternatives were adequately investigated, staff shall advise the petitioner accordingly.
- If planning commission, reviewing the project, concludes that the petitioner has not adequately investigated alternatives, this shall be grounds for denying site plan approval.

Maybe we can't legally deny a site plan based on a somewhat vague reporting requirement—it seems legally dubious to this non-lawyer—but at least requiring that petitioners go through a process like this should yield better results than what we have now.

Respectfully,
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