



The Minto Group
90 Sheppard Ave E, Suite 500
Toronto, ON M2N 3A1

October 10, 2017

Via Email to pgmc@toronto.ca

Planning and Growth Management Committee
City of Toronto
Toronto City Hall
100 Queen Street West, 2nd Floor
Toronto, ON M5H 2N2

Attention: **Ms. Nancy Martins, Committee Administrator**

Dear Mr. Chair and Members of Committee;

**Re: Toronto Green Standard Review and Update
Planning and Growth Management Committee Item PG23.9 for October 12, 2017**

On behalf of Minto I would like to express our appreciation to the City of Toronto for the implementation of the Toronto Green Standard, (TGS) and express our support for its continuation and future enhancement. It is great that Toronto is pushing for better quality, higher performance buildings as it grows. We know how challenging it can be to do things differently and to be the first ones to pave the way. Toronto is demonstrating true leadership by defining the path towards energy efficient and resilient buildings and in its support of the innovative companies that design and build them.

Minto has used the TGS since its inception in 2010. Minto is proud to have developed the first project to achieve the Tier 2 requirements, with 361 units constructed at 775 King Street West. Since then, Minto has also achieved the following projects under the Tier 2 DC Refund program:

- Southshore (148 units) – Low Rise – Completed in 2014; Tier 2 DC refund received
- 88 Sheppard (374 units) – High Rise – Completed in 2015; Tier 2 DC refund received
- 30 Roehampton (361 units) – High Rise – Completed in 2016; Tier 2 report submitted for review

In addition to our completed projects, Minto is proud to be working with the City to achieve Tier 2 in the following projects:

- Longbranch Phase 1 (333 units) – Low Rise – to be completed in 2017
- Longbranch Phase 2 (130 units) – Low Rise – to be completed in 2019
- Minto Westside (1194 units) – High Rise – to be completed in 2019
- Minto Yorkville Park (197 units) – High Rise – to be completed in 2020

The impact of targeting Tier 2 on our high rise buildings alone will result in an overall reduction of approximately 4,825 tonnes of carbon each year, which is reduced even further by an associated 45% reduction in potable water use. These impacts not only help to create healthier and more comfortable



The Minto Group

90 Sheppard Ave E, Suite 500
Toronto, ON M2N 3A1

environments for people to live, but also help to benefit everyone who lives and works in the City of Toronto.

Minto sincerely appreciates the financial incentive offered for achieving higher building performance levels. We view this as an act of good faith in sharing and mitigating the risks associated with innovation, which moves the industry towards better and more sustainable developments and allows Minto to maintain affordability for our customers. This is a value Minto and the City jointly share and we would like to see this program continue. The progressive tiers released in the new TGS represent a significant jump in performance, and we encourage a corresponding tiered incentive structure with escalating incentives that reflect both the complexity and cost of achieving each of the tiers. In addition to the DC refund, we also urge you to consider some of the following measures:

- Section 37 fee reduction/credit
- Property tax reduction/credit for rental properties
- Reduction in parking requirement

As you may already be aware, Minto has been actively involved in the development of the upcoming third version of the Toronto Green Standard, and we appreciate the city's frequent consultation with industry stakeholders. Through these consultations, Minto has had the opportunity to attend the following meetings

- June 10, 2016 Energy Modeling Charrette
- September 21, 2016 Technical Advisors Workshop
- November 25, 2016 Review of Final Recommendations
- March 29, 2017 BILD Members Call to Review
- May 11, 2017 BILD Consultation #1
- May 24, 2017 Part 9 LR Residential TGS Meeting
- September 6, 2017 BILD Consultation #2

Minto further appreciates the efforts taken to engage industry stakeholders and have meaningful discussions on the Standards. In many ways the approved Standards will stand on their own, however there are several aspects of their implementation that warrant further discussion.

Minto would like the opportunity to continue involvement in the discussions regarding implementation of the standards in advance of the 1 May 2018 implementation date. We would also like to see the 1 May 2018 date moved to later in 2018 to allow time to adapt, engage consultants and review specifications for pending development applications and encourage further dialogue on the specifics of implementation for certain development scenarios. We recommend setting the date of implementation



The Minto Group

90 Sheppard Ave E, Suite 500
Toronto, ON M2N 3A1

no earlier than 9 months following council approval of the Standard. Other issues that Minto strongly urges for consideration include:

- more flexible transition for projects already working through an approval (OPA/ZBA),
- how to address Standards in a phased project,
- how to address Standards in a scenario of integrated Mid to High-Rise and Low-Rise - components, and -
- proposals involving properties with proposed and existing buildings with varying degrees of building integration.

As experienced builders of Tier 2 projects across the City of Toronto, and as an organization that holds green development and sustainability at the very core of its values, Minto commends the City of Toronto for continuing to work diligently to create a responsible and forward thinking pathway to net zero development in 2030. While Minto is excited to be a part of that pathway moving forward, we also want to stress the importance of providing appropriate support and incentives to encourage the parties clearing the path for those that follow. We believe that the opportunity to engage in further dialogue on these topics before progressing would allow for a more effective implementation of the third version of Toronto's Green Standard. We look forward to working with the City moving forward.

Sincerely,

Agnieszka Wloch
Vice President, Development
Minto Communities - Canada