



Ontario Association of Architects

Mayor John Tory and Toronto Councilors
100 Queen Street West
Toronto, Ontario, M5H 2N2

October 10, 2017

Dear Mayor Tory and Toronto City Councilors,

On behalf of the Ontario Association of Architects (OAA), I am writing to express our support for version 3 of the Toronto Green Standard. I urge Toronto Council to adopt this report and to continue to utilize the Green Standard as a guide for sustainable site and building design.

As you may be aware, the OAA is a signatory to and promotes the 2030 targets which strives to have all new buildings, developments and major renovations as carbon-neutral by 2030. Version 3 of the Toronto Green Standard will help to achieve this goal.

However, we are writing to make two additional recommendations for your consideration:

1. **Toronto Green Standard should increase the energy performance standard for Tier One.** The energy provisions of Tier 1 are too low and will not advance us quickly enough to Toronto's goals. Tier 1 targets represent a 25% reduction over the average energy use in 2006. The OAA currently recommends a 70% reduction over the building average in 2006, which equates to Tier 4. We believe that the industry has shown that it can readily hit deeper reductions, and will do so if it is mandated.
2. **Irrespective of the target, Toronto Green Standard should eliminate the compliance path that allows you to use the reference/proposed building method.** This method is inherently flawed and allows some buildings to meet the standard without actually improving performance over existing buildings. The OAA established energy targets for 40 different building types, making the EUI method available to almost all buildings.

With respect to the capacity of our industry to meet this challenge, the Ontario Association of Architects has identified the need to strengthen energy literacy and capacity in the design, regulatory and incentive sectors. As such, we have been supporting the development of an energy benchmarking tool, funded by IESO, and led by RWDI and the Toronto 2030 District, that will enable any architect, engineer or building official to check an energy model to see if it meets the current Toronto Green Standards, and can be used interactively to assist with design. Beta testing of

the tool will commence with designers, municipalities and a contractor in February 2018, and the tool will be available for use by all in Spring 2018. If passed, Toronto 2030 is poised to build the new standards into the tool so that it remains current.

The OAA is the self-regulating body for the profession of Architecture, dedicated to promoting and increasing the knowledge, skill and proficiency of its members, and to governing the practice of architecture and administering the *Architects Act* in order that the public interest may be served and protected. We have long been committed to working with government and other stakeholders to protect and improve environmental quality for all Ontarians.

We look forward to continued collaboration with the City of Toronto.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stephenson". The signature is fluid and cursive, with a large initial "J" and "S".

John Stephenson, Architect
OAA, MRAIC
President

