

PG25.10.12



**BILD**

BUILDING A GREATER GTA  
Building Industry and Land  
Development Association

CITY CLERK'S OFFICE  
SECRETARIAT SECTION

2013 JUL 15 P 4: 27

July 15, 2013

His Worship Mayor Rob Ford and Members of City Council  
City of Toronto, City Hall  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

Dear Mayor and Members of City Council,

**Re: PG25.10 - Toronto Green Standard Review**

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The Building Industry and Land Development Association (BILD) would like to take this opportunity to highlight the extensive consultation that has occurred between our Association and the Toronto City Planning Office regarding the Toronto Green Standards (TGS) review.

We feel it necessary to stress this information since it appears changes to the minimum energy performance targets for green house gas / energy efficiency requirements may be considered above those which were recommended by City Planning in their report of May 23<sup>rd</sup>, and in absence of thorough industry input.

BILD remains concerned with implementation challenges for the industry *and* the City requiring building standards above and beyond the Ontario Building Code. BILD members are similarly challenged with an ambitious timeline if the proposed enhanced targets will go into effect on January 1, 2014.

We continue to appreciate the City of Toronto's commitment to our industry in helping foster the ability for us all to move forward in community development, together and hope our comments will be taken into consideration.

BILD is of the opinion the industry is making strides in the take-up of greener building practices, exemplified by buildings that meet the energy requirements outlined in the existing OBC (O.Reg 350/06). The OBC currently requires all Part 3 buildings (those with 3+ storeys) to meet energy standards that are 25% higher than the national standard outlined through the Model National Energy Code for Buildings (MNECB), making it arguably the most efficient code in all of Canada.

BILD's consultation with City planning staff had us understand that in the face of upcoming enhancements to the provincial standards (that will go towards setting targets when the OBC is reviewed in 2017), that the TGS would mirror the OBC in Tier 1 while requesting a heightened standard for the voluntary Tier 2 program. We were satisfied that the targets would allow time for both the industry and City Building to come to terms with changes that came as a result of the TGS implementation date in 2010, and updates to the Ontario Building Code in 2012. The industry and the City are simultaneously learning how to implement, how to enforce and how to evaluate these standards but an ever-changing policy framework makes it difficult to keep all the moving parts working to achieve the goals for which

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they are intended, sustainable community building. We suggest that the learning curve for shifting an industry towards enhanced energy standards is challenging at best when considering the education that must keep pace alongside changes to policy in this regard. Building science professionals, designers, engineers, construction personnel, HVAC technology designers; they are all part of this learning curve.

**BILD strongly suggests that it would be prudent to consider enhanced standards through the more appropriate mechanism, which would be the OBC review in 2017. In absence of such an opportunity, we ask that our members' ability to meet new requirements be acknowledged with more realistic time expectations for policy implementation and an opportunity to be at the table where decisions on these changes occur before they are finalized.**

Enhancing the standards in absence of industry participation at the decision-making level works to detract from city-building objectives because it forces the industry to focus on how to keep up, instead of how to consistently improve. It means a couple of large players are able to participate, while smaller equally innovative firms struggle to enter the marketplace.

**Again, BILD requests an opportunity to engage with City officials, stakeholders and other interested agencies, to have a more meaningful dialogue regarding industry perceptions on energy efficiency capabilities before a final decision is made by Council on the proposed energy efficiency targets. We would suggest that in the meantime, we allow for the standards to remain as proposed through City Planning's recommendations, allowing voluntary take up of the program to fill the transition gap.**


In addition to challenges around implementation, the City's own aspirations for enhanced Tier 2 take-up (25% above OBC2012) by builders is, in our opinion, detracted from when weighed against the proposed Tier 1 requirements (15% above OBC). The inherent prohibitive nature of the new Tier 2 target will be difficult to market when builders will already be required to meet the 15% enhanced standard through Tier 1. And though it has been suggested the industry is capable of absorbing the 15% enhanced standard with ease, and though this may be true for a small number of large developers, it discounts the capabilities of smaller organizations who all want to build efficient, long-lasting mid to high-rise product as well. Our members have told us Tier 2 targets make the program cost-prohibitive, despite information coming through other outside agencies.

BILD sees the merit in voluntary programming geared towards industry education on sustainable building tool kits. These programs provide the industry with access to skilled, qualified evaluation modellers, in fact, a number of industry-accepted channels have been or are being developed for the purpose of improving access for builders and developers to sustainable building-practice initiatives such as EnerQuality's development of a high-performance, high-rise building program for building certification. We value the opportunity to be part of these conversations where our industry experiences can be used to help identify best practices and find value-added opportunities that work well in principle and in practice in the areas of planning, development and building.

**Lastly, we remain concerned that a separate channel for considering changes to the City's development charge policy (DC) may not be closely reviewing impacts on incentive programs such as the 20% DC reduction for Tier 2 participants. With the Tier 2 program already challenged, BILD strongly suggests that it is prudent to look more closely at any proposed changes to this incentive, any reductions or caps which we would not be in support of.**

We would like to take this opportunity to express our continued appreciation to Council for setting the appropriate direction for city planning staff to consult with BILD on matters of interest and we would also like to express our appreciation to city planning staff for their commitment to our members. We greatly value the strong working relationship with city planning staff and we look forward to further dialogue in this regard.

Sincerely,



Mara Samardzic B.Ur.Pl  
Planner, Policy & Government Relations

Cc: *Ann Borooh, Chief Building Official*  
*Jennifer Keesmaat, Chief Planner, City Planning, City of Toronto*  
*Paula Tenuta, VP Policy & Government Relations, BILD*  
*BILD Toronto Chapter Members*

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*With more than 1,400 member companies, BILD was formed through the merger of the Greater Toronto Home Builders' Association and the Urban Development Institute/Ontario and is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area.*