



BUILDING A GREATER GTA
Building Industry and Land
Development Association

June 19, 2013

Councillor Peter Milczyn and members of the Planning & Growth Management Committee
Planning and Growth Management Committee
City of Toronto
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H2N2

Dear Councillor Milczyn,

RE: Agenda Item PG25.10 - Toronto Green Building Standard

Firstly, BILD wishes to thank Toronto Planning staff for engaging its Toronto Chapter members on the technical updates related to the full Toronto Green Standard. The building and development industry is closely reviewing and consulting on sustainable building practice policies across a number of municipalities and we value having a seat at the table in Toronto. We thank Toronto Planning Staff for their thoughtful consideration of our comments delivered on behalf of the Toronto Chapter on April 30, 2013.

BILD supports the City's Toronto Green Standard as a mechanism to proactively consider design elements centered on sustainability lead principles. BILD remains committed to promoting sustainable communities and environmentally conscious development. As identified in the current staff report, 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.

That being said, the Ontario *Building Code Act* is legislation that has been carefully designed for the purpose of providing a clear set of uniform construction requirements to home builders in Ontario, and BILD will continue to support the view that any proposed recommendations above *The Act* be brought forward under the principle of **voluntary participation** such as those options identified through Tier 2.

In a general context, we continue to recommend that there be more inherent flexibility built into the system to recognize if and where items are competing with one another, but where overall benefit to achieving comprehensive goals are being achieved (I.e. increasing tree canopy vs. a mix of uses/densities/mobility). We trust these issues may be considered through the development review process on a site-by-site basis but would appreciate the opportunity to be part of any discussion in this regard, moving forward.

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The following is a list of some of the *specific* issues BILD presented through our letter to staff in April. We appreciate that some of our concerns may have been addressed through staff's revised TGS document and we have noted our understanding as such, below:

- ***AQ2.1 – AQ2.5 - Cycling Infrastructure***

The restrictiveness of bicycle parking requirements is a concern to many BILD members. The argument for incorporating a more flexible policy in this regard remains that the inherent space requirements for bicycles works against the logic of sustainability; understanding that actual rates are required through the City's Zoning By-law. What we mean is to say that a flexible approach to design requirements and consideration to including storage lockers in any bicycle space calculation should be considered in order to optimize space in buildings, and encourage innovation in sustainable design.

BILD encourages the City to consider allowing for cycling infrastructure to be accommodated anywhere on-site and for the consideration of uses to be shared in calculating the bicycle space requirement.

- ***AQ4.1 - Urban Heat Island Reduction at Grade:***

It is believed that the new shade strategies outlined in this section may be difficult to achieve for retail and/or industrial properties depending on the nature of the site and the movement of heavy truck traffic in relation to the site.

BILD suggests a different approach to urban heat island reduction for retail and industrial buildings be provided (or a more flexible combination of strategies be permissible).

- ***EC2.1 - Urban Forest Increase Tree Canopy:***

Respectfully, the City's goal of increasing the overall tree canopy to 40% has implications on project scope and viability.

BILD asks that the City confirm if the spacing interval requirements (one tree for every 66m² of 40% of the total site area) are anticipated to impede the ability to accommodate essential public services, such as utilities. If not, how and if so how would the city expect to manage this issue?

As noted at our Chapter meeting, BILD would object to any notion of a payment-in-lieu of trees policy for those that cannot be provided onsite, if this is in fact being considered by staff as a requirement through the TGS review.

- ***EC3.1 – Natural Heritage:***

In the experience of our members, TRCA often requires *no* work be done within a certain buffer from top-of-bank.

BILD requests confirmation if the requirement to plant the landscaped area of a setback from top-of-bank with native species is in keeping with TRCA requirements. Appreciatively, we see in the current report that language has changed to provide more clarity here.

- **GHG1.3 (Optional) – Minimum Energy Performance:**
The option to use on-site renewable energy systems to supply at least 5% of total energy use will be problematic when trying to group and calculate all renewable energy types of systems under the 5% minimum requirement. Most (if not all buildings in Toronto) will not be able to come close to the 5% of total energy capacity in solar panels or thermal, etc. In absence of this type of allowance, this strategy will be hard to implement and in our opinion will defeat the purpose of having it in there to begin with.

BILD suggests that this option be broken down into increments such as 1%, 2%...to 5% to allow different buildings with varying roof areas to participate.
Once again, we appreciate the changes as presented in the current report and that the option to use on-site renewable energy systems has been lowered to 1%.

- **SW1.3 – Storage and Collection of Recycling and Organic Waste:**
BILD is currently reviewing waste diversion policies in York Region and Richmond Hill and would be happy to engage City staff more fully in this area if and when appropriate. In the requirement to provide a waste sorting system using a single chute with a tri-sorter or two chutes, one with a bi-sorter.

BILD would ask that some flexibility for innovation and/or technological advancements be considered in this area.

We trust that you will take these comments into consideration and we look forward to our continued consultation. If you have any questions or concerns, please don't hesitate to contact the undersigned.

Sincerely,



Mara Samardzic, BURPI
Planner, Policy & Government Relations

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