

June 27, 2018

Chair Palacio & Members of the Committee Licensing and Standards
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Chair Palacio and Members of the Licensing and Standards Committee,

RE: City of Toronto's Proposed Regulations for Construction Dust

With more than 1,500 member-companies, BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area. Our industry is essential to Toronto's long-term economic strength and prosperity. In 2017 alone, the residential construction industry in Toronto generated over 90,000 on-site and off-site jobs in new home building, renovation and repair – one of the City's largest employers. As a simple rule of thumb, one crane in the sky represents 500 jobs. These jobs paid \$5.4 billion in wages and contributed \$10.8 billion in investment value to the local economy.

On behalf of our Toronto Chapter members, the Building Industry and Land Development Association (BILD) would like to thank your Senior Policy & Research Officers, Jessica Stanley and Dylan Feist for inviting us to participate in this stakeholder meeting on May 23rd, 2018. It is our understanding from our discussions that regulations are being brought forward as a result of the growing frustration amongst City residents who are disturbed by dust created from construction related activities – a subject the City currently has no formal policies on, outside of permitted construction projects.

In response, staff have been directed by City Council to recommend new dust control measures for infill construction and presented our members with two potential options for our feedback:

- *Option 1 - General Prohibition on Creating Construction Dust; or*
- *Option 2 - Prescribing Preventative Measures*

While our members are of the position that dust created from construction is inevitable and difficult to fully contain, we agree that there are industry practices that can help alleviate the nuisance of construction dust. These measures vary and tend to change as new technologies and construction trends come forward. Therefore it is important to consider a policy that will be flexible under these circumstances. In this regard, we believe *Option 1* would be the most effective approach to achieving the City's dust control objectives, but still allowing the industry to apply discretion as to what actions to take to manage the creation of construction dust.

For added clarification and readability to *Option 1*, we would also recommend the following minor alterations to its structure and language:

Option 1: General Mitigation on creating construction dust

- *Unless measures are taken to prevent the dust from disturbing the public and escaping the premises, no one can do any construction activity that creates dust that*

- A) may disturb any other person, and*
- B) escapes the premises or enters dwellings on the premises*

As your community building partners, interested and affected stakeholders, we trust you will find our comments helpful. Again, we appreciate the opportunity to provide our feedback and look forward to seeing the results of this review at the July 6th Licencing and Standards Committee meeting.

If you have any questions, please feel free to contact the undersigned.

Sincerely,



Carmina Tupe, B.URPI
Planner, Policy and Government Relations BILD

*Cc: Jessica Stanley, Senior Policy & Research Officer, City of Toronto
Dylan Feist, Senior Policy & Research Officer, City of Toronto
Paula J. Tenuta, Vice President of Government Relations, BILD
BILD Toronto Chapter Members*