



55 St. Clair Avenue West  
Suite 240  
Toronto, Ontario  
M4V 2Y7

Telephone: (416) 962-9080  
Facsimile: (416) 962-5841

Int.: [www.goldmangroup.com](http://www.goldmangroup.com)  
E-mail: [mail@goldmangroup.com](mailto:mail@goldmangroup.com)

December 14, 2021

His Worship Mayor John Tory and members of City Council  
City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

*Submitted electronically to [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)*

**RE: IE26.16 TransformTO - Critical Steps for Net Zero by 2040**

Dear Mayor Tory and members of City Council,

The Goldman Group are writing to voice our objection to a motion before Toronto city council to accelerate the timelines for the TransformTO climate action strategy without properly consulting members of the building community and considering the impact it would have on our ability to provide much-needed housing.

The existing timelines for TransformTO and the affiliated Toronto Green Standard (TGS) already posed significant challenges for the development industry and such a move could propel us down a path that is not practical nor feasible. It could also force the industry to embrace practices that are not yet proven to reduce greenhouse gas emissions.

We applaud council for showing leadership in the fight against climate change through implementation of the TGS dating back to 2010 and the more recent TransformTO climate action strategy. However, moving up the date of the strategy implementation ahead of the policies of higher-tier governments could result in unintended consequences.

Our industry is still working through COVID-related labour disruptions, supply chain unpredictability and productivity challenges. Advancing the timelines would put further undue pressure on the development and building industry. Moreover, data has not yet been provided to evaluate the projected cost premiums associated with accelerating the TransformTO timelines. The existing TGS version and tier progressions are not without their challenges, but they are at least laid out in a manner that allows industry time to prepare and plan for change.

Pushing up the timelines for implementation of TransformTO would result in confusion and hamper affordability of housing by increasing construction costs and complexity. Furthermore, without a more fulsome understanding of the cost implications attributed to the accelerated requirements, the city cannot adequately develop and administer the affiliated TGS Development Charge Refund program.

The TransformTO strategy is admirable in that it provides a plan for renewable energy sources and a carbon free electricity grid to be implemented and available by 2050. But many of the solutions that exist today are still being developed and the business case must be proven for them to be adopted.

While it may seem like the federal and provincial building code development process moves slowly, such an exercise involves countless subject matter experts, comprehensive research and development initiatives, monitoring of case studies, material and product evaluations as well as demonstration projects. RESCON supports the provincial and national building code development process over municipal programs, as there is a system of built-in checks and balances to vet changes to construction practices in buildings.

Building projects designed to meet the current TGS Version 3 requirements, implemented in 2018 with the new absolute performance target methodology, have yet to be validated by benchmarking energy models against real-world metered electricity and gas utility readings, as these buildings are either still under construction or nearing completion.

Policies that hastily push building electrification for space and water heating, if not properly timed and coordinated with the capacity of Ontario's electricity system, could also end up taxing the electricity grid and trigger a need for greater reliance on natural gas peaker plants which would actually increase greenhouse gas emissions.

The current TransformTO interim 2030 target of a 65-per-cent reduction in greenhouse gas emissions is already among the most ambitious interim targets in North America, which is admirable. The existing plan already presents challenges for the industry and pushes the limits of what is technically feasible for builders. Therefore, any move to accelerate the TransformTO, and particularly the TGS milestones, would be hasty.

The fight against climate change should not be a competition as to which jurisdiction can set the most rigorous targets first. It is about affecting meaningful and verifiable change to actually reduce greenhouse gas emissions.

There needs to be a more fulsome understanding of the technical merits and cost implications of the accelerated requirements. The ultimate goal here is to reduce greenhouse gas emissions to combat climate change. Council should therefore stick with the existing timeline under the TransformTO strategy.

The Goldman Group encourages City Council to reconsider accelerating the current TransformTO strategy.

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Thank you,



Jeremy Alter, P.Eng.

Vice President – Construction

Email: [jeremya@goldmangroup.com](mailto:jeremya@goldmangroup.com)