



September 24, 2024

Via Email

Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair Perks, Vice Chair Bradford, and the Planning and Housing Committee,

RE: 2024.PH15.1 – OPA 528: Updating Policies for Infrastructure Projects in Parks and Open Space Areas

The Ontario Geothermal Association (OGA) is a not-for-profit industry association representing 75 member companies engaged in all aspects related to Geo-Exchange in Ontario. Our mission is to help our members advance Ontario's Geothermal heating and cooling industry by serving as a bridge between consumers/end-users, government, and industry professionals.

We wish to express our support for Official Plan Amendment 528.

Geo-Exchange systems are playing a crucial role in Toronto's transition to sustainable, low-carbon energy solutions. However, many urban developments are constrained by limited site footprint, making it challenging to fully decarbonize fully with a geothermal heat exchanger. Allowing non-intrusive access for Geo-Exchange systems in adjacent Parks and Open Space Areas, particularly through angled drilling, can help these buildings meet decarbonization targets efficiently while preserving the integrity of parklands and public spaces.

It is our recommendation that the Planning and Housing Committee ensure OPA 528 explicitly allows:

- Geo-Exchange as an "alternative energy system"
- Private alternative energy systems as part of "public works and utilities"



The inclusion of private Geo-Exchange systems within OPA 528 is a forward-thinking policy that will enable more new developments to significantly reduce or eliminate their reliance on fossil fuels to meet their thermal energy needs in a cleaner, more sustainable manner.

Please feel free to contact us should you have any questions or wish to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Hunter', with a long horizontal stroke extending to the right.

Jeff Hunter
Chair, Ontario Geothermal Association