



City of
Richmond

Malcolm D. Brodie
Mayor

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November 30, 2020

The Honourable Josie Osborne
Minister of Municipal Affairs
PO Box 9056 Stn Prov Govt
Victoria, BC V8W 9E2

The Honourable George Heyman
Minister of Environment &
Climate Change Strategy
PO Box 9047 Stn Prov Gov
Victoria, BC V8W 9E2

The Honourable David Eby
Attorney General (and
Minister Responsible for
Housing)
PO Box 9044 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Ministers:

Re: City of Richmond Concerns on Recent Changes to the BC Energy Step Code

The Province of British Columbia can truly claim leadership in Canada by developing and rolling out the Energy Step Code, by creating a shared decision-making structure in the Energy Step Code Council, with stakeholders from all sectors represented. The City shares these values and is committed to leadership in building energy efficiency in our community, and achieving deep reductions in community-wide greenhouse gas emissions. The City has been directly involved in the development of the Step Code framework, and has supported successful implementation locally and regionally by the design and development community. The purpose of this letter is to state the City's concerns related recent changes to the Step Code.

Accordingly, Richmond City Council at its Regular Council meeting held on Monday, October 26, 2020 considered the above matter and adopted the following resolution:

That a letter be sent to the BC Minister of Municipal Affairs and Housing and the BC Minister of Environment and Climate Change Strategy stating the City's concerns about, and suggested improvements to, the December 2019 revision to the BC Building Code as outlined in the report titled "City of Richmond Concerns on Recent Changes to the BC Energy Step Code", dated September 16, 2020, from the Director, Building Approvals and Director, Sustainability and District Energy.

As noted in the attached report, local builders have had very good success in implementing the Energy Step Code, and the City continues to support the development community to transition construction practices that meet Step Code requirements. As such, Richmond is already benefitting from new homes with better-than-anticipated energy performance gains, enhanced airtightness, and a 100% regulatory compliance rate to date. Moreover, local builders are supportive of the City's

intention to increase Step Code requirements over time, at a pace enabling successful transition to higher-performance buildings.

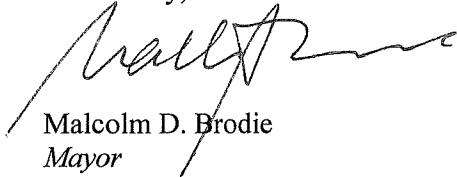
Our concern is the most recent (December 2019) revision to the BC Building Code 2018 that introduced two new ways for Part 9 Residential buildings (single-detached and duplex houses, townhouses and small apartment buildings) to meet the thermal performance requirements of the Step Code. One of these options includes a new "*Percent Better than EnerGuide Reference House*" metric for assessing envelope performance. Subsequent analysis by City staff indicates that this new metric allows significantly lower performance and increased energy consumption compared to the absolute thermal metrics in the Step Code, thus undermining the envelope-first approach of the Step Code. This relative metric is an easier target at a given Step Code performance level and thus, this will slow down progress toward better building techniques already underway, as well as hamper progress by the design and construction community toward the CleanBC target of Net Zero Energy Ready construction by 2032.

In light of this, we respectfully ask you to reconsider the regulatory change made in December 2019 by:

- a) Removing the "Percent Better than Reference House" building envelope metric as a compliance option from the Energy Step Code entirely; or
- b) Removing the "Percent Better than Reference House" building envelope metric as a compliance option from the Energy Step Code within Climate Zone 4.

If you have any questions or require additional information, please do not hesitate to contact Peter Russell, Director, Sustainability and District Energy at prussell@richmond.ca or 604-276-4130.

Yours truly,



Malcolm D. Brodie
Mayor

Encl. City of Richmond Concerns on Recent Changes to the BC Energy Step Code