



June 13, 2018

Mayor and Councillors
Standing Policy Committee on Utilities and Corporate Services
P.O. Box 2100, Station M
700 Macleod Trail South
Calgary AB, T2P 2M5

Dear Mayor & Councillors

Re: Proposed City of Calgary Climate Resilience Strategy and Action Plans

On behalf of BOMA Calgary, I would like to thank administration for the opportunity to participate in stakeholder sessions for the City of Calgary's Climate Resilience Strategy and Action Plans. In particular, I want to thank Claire Beckstead for her excellent work on this initiative, and the collaborative stakeholder process that informed it.

BOMA Calgary is a not for profit industry association representing the commercial real estate ownership and management sector in Calgary and southern Alberta. While commercial buildings are significant contributors to greenhouse gas emissions, commercial real estate professionals have also been leaders on voluntary GHG mitigation measures for over a decade. The commercial real estate sector understands the importance of reducing GHG emissions for multiple reasons. First, electricity, heating, and cooling are key cost drivers for a commercial building, making the reduction of use a valuable cost saving in an increasingly competitive marketplace. Second, as public awareness of climate change and energy efficiency increases, tenants and prospective tenants are beginning to put an emphasis on their workspaces being sustainable. Finally and most importantly, commercial real estate professionals are residents of their local communities and care about ensuring a high quality of life for future generations through meaningful action on climate change.

BOMA Calgary contributed to the development of this plan through participation on the Building and Energy Systems Working Group, and the Land Use and Transportation Working Group. Working Groups were encouraged to focus on an ideal state, and then discussed the various obstacles industry and citizens face in reaching it. Importantly, discussion centred on policies and tools that were not just effective in mitigating environmental impact, but could be done so at a cost that is attainable for all Calgarians and businesses. BOMA Calgary emphasized that there are many paths to reaching the ideal state, and that a long-term plan must recognize this and ensure flexibility. With that in mind, we are

pleased to see that the final plan is not overly prescriptive on particular mitigation measures. While the plan is extensive, BOMA Calgary will limit its comments to the areas of immediate importance to the commercial real estate sector.

Commercial Building Benchmarking

As the local delivery partner for BOMA BEST, a made-in-Canada voluntary benchmarking and certification program for existing buildings, we were particularly interested in the Building and Energy Systems Working Group discussions on energy benchmarking and labelling. We believe that benchmarking is an essential and low-cost tool to improving a building's environmental performance. This is based on our experience with BOMA BEST, where the program's true strength is its focus on continual improvement. Buildings are scored, verified, and then granted a certification level, however the application and the process behind it becomes an important management tool that guides building management on gaps to be addressed prior to re-certification. In fact, 27% of buildings achieved a higher certification level upon recertification. Notably, BOMA BEST certified buildings consume 8% less energy, and 30% less water than the Canadian average.

BOMA BEST's success as a voluntary product in the market is strong evidence that benchmarking can be an effective tool in combating climate change. In our view, the process of measuring and studying a building's performance is the necessary first step in identifying where improvements can be made. It is that initial assessment that then guides the mitigation actions that follow. For that reason, BOMA Calgary is supportive of Action 2.2 that calls for the development of a commercial building benchmarking program for Calgary. However, there are important principles that need to be reflected in the program to ensure success. First, the purpose of the program should not be to "name and shame" buildings. Benchmarking is best seen as an a tool that can actually provide valuable information to building management, as opposed to a stick that is used by policymakers to force compliance. Second, an effective benchmarking program only compares like buildings. Commercial buildings have numerous disparities (age, size, etc.) that impact what energy savings can be realized, and careful thought must be given to these disparities before requiring reporting. Finally, commercial buildings operate in a competitive environment with certain data being kept confidential; therefore we would recommend that any program be the product of industry consultation that establishes types of information to be disclosed as well as an accepted methodology to interpret the information.

We have seen the way the benchmarking has improved building performance in Calgary on a voluntary basis, but there are thousands of commercial buildings in Calgary that could see the benefit, and would in turn contribute greatly to City's target of an 80% GHG reduction by 2050. As an industry association with a strong record of promoting sustainability and building performance, BOMA Calgary is pleased to support the development of a commercial building benchmarking program.

Energy Performance Standards

Throughout the stakeholder process there was plenty of discussion around how building codes can be amended to enhance sustainability in the building sector. BOMA Calgary would be supportive of measures that enable a more sustainable built environment through the building code, however we

believe that any changes should be considered on a province-wide basis. Our industry operates across multiple jurisdictions, and a patchwork of building codes across Alberta will increase the costs, complexity, and uncertainty of starting or growing a business in Calgary.

The Climate Resiliency Strategy and Action Plan is an important first step in building a greener Calgary. It is an aspiration plan with clear targets and the outline of a plan to achieve them, but we know that this alone will not be enough. In many of the proposed actions – including commercial building benchmarking - the most complex work is yet to be done. As well, some of the proposed changes represent a significant shift in the environment that our industry operates in. This makes continued collaboration with industry stakeholder an integral piece of the action plan, and in our view a prerequisite for achieving the plan's goals without resulting in unintended consequences.

Thank you again for the opportunity to contribute to this plan and to provide feedback. We look forward to working with the City on the specific action items, and will continue to promote environmental leadership within the commercial real estate sector.

Regards,

A handwritten signature in black ink, reading "Lloyd Suchet". The signature is fluid and cursive, with the first name "Lloyd" and last name "Suchet" clearly distinguishable.

Lloyd Suchet
Executive Director
BOMA Calgary