



**Residential & Civil  
Construction Alliance  
of Ontario**  
Constructing Ontario's Future

September 4, 2008  
His Worship Mayor Miller  
City of Toronto  
City Hall, 2nd Floor  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Mayor:

Re.: Mayor's Tower Renewal Initiative

Congratulations on the launch of the Mayor's Tower Renewal to rehabilitate our city's older concrete high-rise building stock. This is an important initiative that will enhance the liveability for thousands of Toronto residents as well as provide for a range of environmental and economic benefits. The Residential and Civil Construction Alliance of Ontario and its member organizations support this initiative.

It appears that a comprehensive planning and implementation approach will be taken based on your report to the Executive Committee dated August 19, 2008. One of the issues that has been identified is expediting permit and approval processes associated with the four pilot sites. We would suggest that the Tower Renewal Office consider the following points:

In April 2008, RCCAO released a report "Examination of Recent Reforms to the Building Code Act and the Building Permit Process in the GTA" by Hemson Consulting Ltd. The use of Registered Code Agencies (RCA's) would be extremely helpful to facilitate streamlining of building permit processes. Where there might be potential bottlenecks in the review process because of limited staff resources, strategic use of outside expertise could be employed as a way to fast-track approvals based on city-defined criteria. RCA's offer a realistic way of avoiding permit bottlenecks that are typically the result of seasonal and long-term fluctuations in building activity.

The Hemson report also points out that while some municipalities have been making investments in new technology, there are examples from other jurisdictions where more ambitious technological solutions have been embraced as a way to speed up the process for both building permit and site plan approvals. We would encourage the City of Toronto to more aggressively pursue such solutions.

Infill opportunities for new residential, commercial and institutional developments will also require innovative solutions. The construction industry looks forward to working with your team on these city-building projects; particularly on projects that will advance Toronto's official plan objectives. RCCAO's contractor and construction union members have also been strong advocates of the principles of maximizing existing infrastructure to accommodate growth and of creating more compact development. It is our hope that council will collectively be supportive of development proposals that increase transit-supportive densities even though there will undoubtedly be NIMBY-type objections to intensification around towers.

Related to this, council must also consider the cost framework for these new projects so that development charges are applied fairly (site specific approach would be preferable to uniform charges). Tax increment financing might be an option to consider for development around existing towers, at least for the pilot projects, to help fund future infrastructure improvements.

In addition to the energy consumption efforts of this initiative there are potentially significant measures that could be taken to conserve water resources. For instance, the installation of smart meters will provide environmental benefits by lowering water consumption. Variable water pricing could be implemented to reflect time of day or seasonal water demand pressures. While metering is admittedly more complex to introduce into a multi-unit apartment structure compared to single-family housing, there are obvious benefits in terms of the overriding goal of making older high-rise buildings "greener."

These and other ideas are contained in two RCCAO reports released in July 2007 on 'Financing Water Systems in the Greater Toronto Area: What Should be Done?' and 'Water and wastewater asset management in the GTA: Challenges and opportunities'.

There are of course many other complementary benefits that will result from this initiative such as providing training and job opportunities for local youth, enhancing the development of green infrastructure, and fostering locally-based manufacturing and supplier chains.

RCCAO wishes your administration great success in the Tower Renewal initiative to dramatically improve the built environment of this significant component of our housing stock. We would be pleased to further discuss these ideas with you or selected project staff. Do not hesitate to contact me at 905 760-7777.

Yours truly,

Andy Manahan  
Executive Director

Copy to:

Heavy Construction Association of Toronto

Greater Toronto Sewer and Watermain Contractors Association

Joint Residential Construction Council

Residential Low-rise Forming Contractors Association of Metro Toronto & Vicinity

LIUNA Local 183

Residential Carpentry Contractors Association

Carpenters' Union

Ontario Concrete & Drain Contractors Association

Toronto and Area Road Builders Association