



**CONSULTATION SUR LE RÈGLEMENT MODIFIANT LE  
RÈGLEMENT SUR LA CONSTRUCTION ET LA  
TRANSFORMATION DE BÂTIMENTS**

**Mémoire présenté à la**

**Commission sur le développement  
économique et urbain et l'habitation**

**par la COALITION CLIMAT MONTRÉAL**

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## Présentation de l'organisme

La Coalition Climat Montréal regroupe des citoyens et organismes convaincus de l'urgence d'agir face aux changements climatiques. Elle vise la neutralité carbone pour Montréal d'ici 2042. L'atteinte d'un tel objectif exigera des efforts considérables ainsi que des changements majeurs dans plusieurs secteurs d'activités dont les principaux sont l'aménagement, le transport et l'habitation, ainsi que dans les normes sociales, les habitudes et les modes de vie des citoyens.

Dans cet esprit, plus de 120 organismes signataires de la Déclaration #MTL400 adoptée par la Coalition Climat Montréal demandent à la Ville de Montréal et à la collectivité montréalaise d'être exemplaires et d'entreprendre des actions concrètes, ambitieuses et réalisables afin de garantir l'atteinte de la neutralité carbone d'ici 2042, date du 400<sup>ième</sup> anniversaire de la Ville de Montréal. Pour réaliser ce grand but, l'organisme prône en outre l'adoption d'un « budget carbone » visant une décarbonisation rapide de l'économie ainsi que l'application à tout projet sur le territoire montréalais d'un « test climat » évaluant les émissions de GES de l'ensemble de son cycle de vie, et cela au sein de démarches de démocratie participative. Pour plus de détails, voir [bit.ly/Declaration-MTL400](https://bit.ly/Declaration-MTL400).

La participation citoyenne étant l'un des quatre piliers d'action de la Coalition Climat Montréal, nous saluons le fait que la Ville de Montréal tienne cette consultation et l'en remercions. Cet exercice est important, et nous souhaitons que les meilleures pratiques en participation publique soient implantées pour inciter plus de citoyens et organismes à prendre part.

## Key Points

- 37% of Montreal's greenhouse gas emissions come from fixed, non-industrial sources (2014), largely due to the combustion of natural gas and mazout to heat residential, commercial, and institutional buildings.
- Even with a net zero requirement of new construction moving forward, it is highly improbable that existing building stock will be replaced fast enough to achieve the city's GHG reduction targets of 80% by 2050.
- Montreal must go beyond requiring new construction to be net zero through bonus-malus measures inciting owners to retrofit properties for increased energy efficiency and renewable alternatives to fossil fuel combustion. Adoption of a city-wide **carbon budget** with annual emissions caps will provide an empirical framework for the stringency of such measures.
- The measures listed in the March 2017 report of the city's Environment Commission should be implemented in their entirety.
- Recommendations stemming from the OCPM's vertMTL consultation on the reduction of Montreal's fossil fuel dependence should be reviewed and implemented, particularly recommendations 10-14.
- During the consultation question and answer period on the 3rd of April 2019, it was mentioned that the cost of more sustainable buildings incurred by developers should not exceed 1% of a project's total budget. The Coalition opposes this arbitrary and unjustified percentage since it does not take into consideration the net present value of the additional costs. This stipulation should be reformulated to set a maximum payback period of 8-10 years for such investments.

## Sustainable Development Goals

The recommendations that follow are aligned with a number of Sustainable Development Goals:

### **SDG 8 Decent work and Economic Growth**

8.4: Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead.

### **SDG 9 Industry innovation and infrastructure**

9.4: By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.

### **SDG11 Sustainable cities and communities**

11.6: By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management

### **SDG 13 Climate action**

13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries

## **Recommendations**

### **Integration of measures to ensure the accessibility and adaptability of new housing units**

Providing housing in transit-served areas that is well adapted to families can help stem their exodus to the suburbs, where high-emissions lifestyles due to transportation and material consumption are commonplace. The city should put pressure on the CMM, Québec and Ottawa to establish a methodology (**climate test**) for calculating emissions that such housing projects help avert, opening the possibility for funding from ecofiscal mechanisms like the Fonds Vert. Cutting-edge GHG measurement technologies are coming online and are increasingly able to measure per-capita emissions at impressive levels of granularity (1km x 1km). Such technologies could open the door for additional ecofiscal measures for higher density communities, rendering them more affordable and accessible.

### **Possibility to build, under certain conditions, buildings of up to 6 storeys with wooden structures**

The Coalition supports policy allowing for low and mid-rise wooden structures, as they are among the most cost-effective ways of drawing carbon from the atmosphere and putting it to productive use while reducing dependence on carbon-intensive building materials such as steel and concrete. Ecofiscal policy should be drafted to ensure that funds collected from carbon emitters are made available for solutions that pull carbon pollution from the atmosphere.

Montreal should take advantage of the well-located metro stations in the city, many of which are one-storey buildings at street level. Commissioning exemplary ecological housing on these sites could set a new standard of excellence for ecological living, both in built environment and transportation.

### **Integration of measures to increase the quality of housing units**

As evidenced by the successful petition to the National Assembly, planned obsolescence is widely recognized as a problem that requires immediate legislative attention. By setting standards high in Montreal's construction by-laws, an influence will be exerted on the discussions to be undertaken at the provincial level in the coming months and years. Best practices can be drawn from European Union and Swiss building codes.

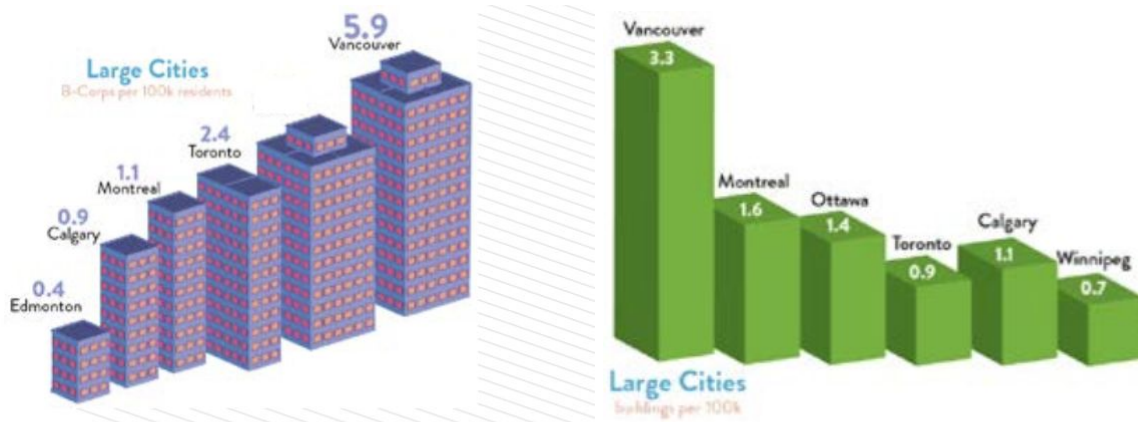
### **Addition of a requirement concerning preventive structural reinforcement allowing future green roofs**

By applying a life cycle analysis (climate test) of carbon emissions attributable to the estimated additional building materials required by this policy decision, the city would be able to evaluate whether the cost of carbon inherent in reinforcing structures that may or may not include green roofs is justified by the positive impacts of urban heat island mitigation, storm water management, and biodiversity.

The city should consider including a standard in this policy that would require certain roofs to be accessible to residents and occupants, thus providing a respite from the concrete jungle and ameliorating attractiveness of the city for potential residents.

## Addition of requirements concerning energy efficiency

The city could use these bylaws to spur growth in the green building construction sector, providing long term cost saving benefits to building owners and occupants, and strengthening the city's green economy whose companies and employees will see the value of the necessary transition. Vancouver provides an instructive example, as they lead the country's large cities on green jobs and net zero buildings.



**Figures 1 & 2 : Green jobs (left) and net zero buildings (right) per 100k residents in large Canadian cities. Source: National Climate League 2018 Standings**

### Vancouver's green brand

"In Vancouver, a vibrant green economy employs one in 15 Vancouverites – up from one in 20 just four years ago, while 30 percent of businesses deliver products or services that help to restore or preserve the environment. Vancouver's reputation as a clean and green leader drives a brand valued at \$31.5 billion, and the economy grew faster than any other city in Canada from 2010 to 2017. All this while carbon emissions declined by 11 percent, resulting in the carbon intensity of our GDP (tonnes GHGs per dollar of GDP) decreasing by 30 percent."

- State of Vancouver's Green Economy 2018, Vancouver Economic Commission

Just this week, New York City approved a bylaw in the same vein: "The legislation, expected to be passed by the City Council on Thursday, would set emission caps for many different types of buildings, with the goal of achieving a 40 percent overall reduction of emissions by 2030. Buildings that do not meet the caps could face steep fines."

- New York Times, April 17, 2019

