

January 25th 2021

Neil Dobson
Executive Director
CleanBC Implementation
Climate Action Secretariat
Ministry of Environment and Climate Change Strategy

By email to: CleanBC@gov.bc.ca

Dear Mr. Dobson,

Thank you for the opportunity to provide feedback to the CleanBC Greenhouse Gas (GHG) Emissions draft strategy framework. We look forward to working closely with your Ministry while these GHG targets are developed.



BUILDING OWNERS AND MANAGERS

ASSOCIATION
British Columbia

Suite 556
409 Granville Street
Vancouver, BC
V6C 1T2

TELEPHONE
(604) 684-3916
FASCIMILE
(604) 684-4876
WEBSITE

Questions on Principles

BOMA advocates the Province adopt flexible policies, with support and education to help our industry achieve these goals. Flexibility will be key for energy retrofit projects as commercial properties vary according to building type, ownership structure, age of construction, tenant mix and intended use.

Each building will have a different approach and preference on how to achieve their emissions reductions. For example, a commercial office tower with several floors occupied by a data centre will have a different path to meet targets than a recently built tower with retail on the ground floor. Commercial buildings also have different financing options available for efficiency upgrades.

Commercial building owners are often not the occupants of a building. A building's intended use is often not determined by the owner. Additionally, energy savings benefit tenants, as a reduction in energy costs translate into lower common area maintenance (CAM) charges. This split incentive discourages building owners to make energy efficiency investments, unless a tenant space is sub-metered, which is rare in the office building environment.

Questions on Target Metrics

We agree percentage-based metrics make sense and provide a clear direction. We recently launched the Greater Victoria 2030 District, where our property management member companies have committed to reducing building emissions by 50% by the year 2030 (from 2007 levels). Currently, there are 36 buildings participating representing more than 3.5 million square feet of space, initiated on a voluntary basis with some seed funding provided by BOMA BC, the City of Victoria and District of Saanich.

To meet GHG reductions of 40% by the year 2030 (from 2007 levels) in a cost-effective way, BOMA BC advocates for flexible policies which allow choice. It is also crucial to provide necessary funding supports for education to help our industry achieve these goals. Education funding includes online tools, learning sessions, and hands-on expert advice.

Questions on Sector Groupings

Since the commercial building stock differs in use and emissions from residential buildings, we prefer the 12-sector grouping proposal, separating commercial and residential buildings. If possible, we would further advocate for a separation between commercial buildings and other industrial or public buildings, such as schools and hospitals.

Our members have always been leaders in adopting new technology to reduce their carbon footprint and have been successful at adopting voluntary industry led programs which help reduce their building's emissions.

Questions on Other Design Features

If there is a way to provide a targeted tax incentive, such as a Revitalization Tax Credit (enabled at the provincial level) to support resiliency and energy efficiency initiatives, we believe it would increase the uptake of building retrofits.

We also support implementation of innovative financing tools, such as Commercial Property Assessed Clean Energy (C-PACE) legislation, which are critically needed to spur the uptake of energy efficiency retrofit projects. A suite of targeted incentive programs and support are required if we are going to collectively meet our goals.

If the Province provides tax incentive support to building management programs such as BOMA BEST®, it will increase the uptake of continuous building improvement and significantly increase the engagement of tenants and owners. BOMA BEST® was created in BC by industry leaders in a voluntary manner. The government could provide incentives for participation in programs like BOMA BEST® certifications to further promote continuous improvement.

Industry programs such as BOMA BEST® allow participants to get familiar with whole building management and set goals each year to improve the building's entire performance, which leads to staff and tenant engagement, and more likelihood of success in reaching provincial targets.

BOMA BEST® buildings are higher performing and provide a catalyst for staff and tenants to participate in sustainable operations. The 2020 National Green Building Report from BOMA Canada showed BOMA BEST® certified buildings saved 54,000 tonnes of GHG emissions and three billion bottles worth of water.¹

Additionally, the Province could support a Climate Action Manager position to help our members navigate incentive programs, understand what is available, and help build their business cases. We believe this is critical to ensure our industry's success.

¹ http://bomacanada.ca/wp-content/uploads/2019/11/2020_BOMA_NGBR_English_191114.pdf

We would be happy to host an industry roundtable to engage more closely with staff. And if I can be of any more assistance, or provide any more information, please do not hesitate to ask. Either way, we look forward to providing additional commentary in the final stages of this policy process.

Thank you again for the opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Stathonikos". The signature is fluid and cursive, with a large initial "D" and "S".

Damian Stathonikos
President
Building Owners and Managers Association of British Columbia (BOMA BC)