



URBAN DEVELOPMENT INSTITUTE – PACIFIC REGION

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November 23, 2018

Kaye Krishna,
General Manager, Development, Buildings & Licensing
City of Vancouver
453 West 12th Avenue
Vancouver, BC V5Y 1V4

Dear Ms. Krishna

RE: Water Use in Buildings: Enhanced Public Safety, Efficiency and Long-Term Resiliency Measures

On behalf of the 850 corporate members of the Urban Development Institute (UDI), I would like to thank your office for consulting us on the proposed plumbing and mechanical systems amendments. We appreciated Chris Radzinski, taking the time to review the proposals with us directly in detail.

We generally do not oppose the proposed manner of gathering additional information on active cooling towers and decorative fountains through an online registration. At this point we do not have any issues with a “census-type” approach, using the existing POSSE online registration system. At this time our support is based on the understanding from conversations with City staff that related costs will be minimal, and not exceed approximately \$350 per year.

We view the consultation of key stakeholders as a critical part of current and future phases of changes to plumbing and mechanical regulations. As further changes are considered we would request that consultation meetings be held well in advance with stakeholders such as the Condominium Home Owners Association (CHOA), Building Owners and Managers Association (BOMA), LandlordBC, Vancouver Coastal Health, Fraser Health and other relevant groups. Buy-in from these stakeholders along with UDI will be important going forward. In addition, we would like the opportunity to review the fees and charges associated with any proposed changes. We would also ask for an inter-departmental approach to be taken to future consultations. This should include other city staff from the other departments and any others who may play a role in the planning, location or installation of water use systems.

We would also note that our support of these proposed changes is predicated on the assurance that the City is working with utility providers to take preventative measures at the water source. We expect that equally stringent regulations are, or will be, applied to infrastructure outside of buildings to ensure that once water reaches buildings through city plumbing, measures have already been taken to address potential concerns. We would stress that the responsibility for public safety not just be downloaded onto building owners.

Regarding the proposed rainwater harvesting regulations, we would encourage the City to track the installation of these optional alternate water systems as these changes are implemented. We would caution that the cost and complexity of connecting these systems to building plumbing through water closets and urinals will discourage many developers from installing them in new buildings.

It is our understanding that the proposed changes regarding the geothermal exchange systems are supported by those system builders, and as such we do not oppose these changes.

If you should wish to discuss these changes or future proposals further, please don't hesitate to contact us. We have a member committee that reviews changes associated with the Building Code, and we would be happy to organize a meeting at an appropriate time.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anne McMullin', with a stylized flourish at the end.

Anne McMullin
President & CEO

CC: Patrick Ryan, Chief Building Official
Jerry Dobrovlny, General Manager of Engineering