



Memorandum

September 18, 2018

To: Adam Laughlin, P.Eng.
Deputy City Manager, Integrated Infrastructure Services

From: Sustainable Building Policy Committee

Subject: **C532 - Sustainable Building Policy
Clarifications & Interpretations 2018.03
'Exemptions' vs 'Exceptions' & Processes**

Issue

This memo is to clarify the difference between A) '*Exemptions*', facilities not required to meet C532 as contemplated and allowed in scope of policy; and B) '*Exceptions*', facilities that would normally be in the scope of C532 but for some extraordinary reason are being excepted. Required Processes are also described herein for both A) and B).

Recommendation

That the "Deputy City Manager who has oversight of facility planning, design, construction, operation, maintenance, renovation and demolition of City-owned buildings [...] responsible for ensuring that City buildings comply with the Sustainable Building Policy" approve the following clarifications and processes regarding '*Exemptions*' vs '*Exceptions*':

A) Exemptions to the policy are based on the following:

- 1.1 Design and Construction of City-Owned Buildings
 - 1.1.3 For design and construction of new City-owned and Occupied buildings, major renovations, or new additions with gross floor area of 500 square meters or greater (see definitions):
- 1.6 City-funded non-City owned Buildings
 - 1.6.1 New non-City owned buildings that are more than 33% funded by the City shall meet the same policy standards that are required of new City-owned building if they are greater than 1000 square meters in gross floor area and anticipated to be greater than \$3 million in capital project cost.

- Minor Renovation:

Any renovation to a City-owned building that is less than 40% of the existing gross floor area of the building or any project characterized as 'Minor' or 'Medium' in accordance with the Project Classification Tool of the City of Edmonton - Project Management Reference Guide.

Additionally, refer to 1.1.4 "Construction Certification-Exempt projects will demonstrate how the project will be designed and constructed to meet the intent of this Policy, as per 2.1.1c." Sustainable Design and Construction of Certification Exempt Buildings.

In summary, projects determined to be 'Exemptions to the policy' under the three categories listed above shall still meet the *intent* of the Policy Statement *where* possible.

Process: The demonstration of *intent* by the Project Team is required documented within the required deliverables by specifically noting the sustainable goals that will be pursued and achieved in the completed project. No formal exemption procedure applies.

B) Exceptions to the policy are more broad and include:

- 1.7 Exceptions to this Policy
 - "1.1.7 The policy standards may be adjusted by the appropriate Deputy City Manager(s), whose business unit(s) are responsible for achieving the specific policy standard(s) in cases where the cost to achieve an applicable policy standard(s) outweighs the expected benefits, as demonstrated by a Lifecycle Cost Benefit Analysis, to be completed in accordance with 2.1.1b." Lifecycle Cost Benefit Analysis and Sustainable Return On Investment Methodologies.

In summary, if a project is reasonably determined to incur capital costs higher than the expected benefits over the lifecycle of the facility, then a request for an exception could be made. An example of this may include major renovation project where a renovation is greater than 40% of the GFA however, the number of LEED credits would not be possible without significant investments, above and beyond the renovation budget and intent.

Exceptions are also required to be included in the annual reporting to Council.

Process: Supporting documentation (Lifecycle Cost Benefit Analysis) is required for the Exception request to be made to the Sustainable Building Team (sustainablebuildingteam@edmonton.ca). Once this team pre-authorizes an Exception, the Project Manager will submit the request to the Deputy City Manager(DCM) of Integrated Infrastructure Services via the appropriate protocols. The DCM's approval is required to formally authorize an Exception to the policy.

The Sustainable Building Policy (C532) is available on edmonton.ca.

For general inquiries or questions contact: sustainablebuildingteam@edmonton.ca

DECISION

[Identify the decision made by the Department Management Team.]

Approved: Deferred: Defer Date: Cancelled

Signature:  Printed Name: Adam Laughlin, DCM IIS

Date: Oct 22/18