



Community Builders...

Building Communities

July 22, 2020

Dear CRD Chair, Municipal Mayors and Councils,

RE: Cost Estimate of BC Step Code – Tier 3

The Victoria Residential Builders Association asked a Builders Council member to provide an estimate of added costs building to the BC Step Code - Tier 3. Our concern is some municipalities are adopting and fast-tracking the BC Step Code, even bypassing Tier 2.

This not only raises housing costs, but also opens the door to potential unintended consequences, some of which were outlined in the memo by the Canadian Commission on Building and Fire Codes (CCBFC), which we distributed May 26, 2020. These include risks of overheating, fire spread, and radon ingress. Radon is the second leading cause of lung cancer and radon maps are unreliable, demonstrated by the BC government recently establishing Duncan as an elevated radon area. Radon is site specific and studies show more energy efficient homes, without radon mitigation, can have higher levels of radon than older homes.

The BC Energy Step Code is a “voluntary” bylaw for municipalities and a significant responsibility. The Municipal Insurance Association says, *“Building bylaws are one of local governments’ greatest exposures to liability risks.”*

Our builder’s estimate of the added cost for a BC Step Code Tier 3 home is \$28,000 not including overhead. The home was modeled by a Certified Energy Advisor and this was the lowest cost option.

The BC government has previously claimed the added cost is \$3,945 for Tier 3 and \$17,485 for Tier 5/Net Zero-ready in our region, climate zone 4. VRBA does not view the BC government’s estimates as credible.

Our builder is a long-time standing Built Green contractor with extensive education and experience building energy efficient homes. The cost incurred by a builder with less education and experience may be even higher than the \$28,000 estimate.

VRBA supports diligence by the National Building Code and advises against code changes (eg BC Energy Step Code) until after the National Code is approved and becomes mandatory. Feel free to contact me for additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Casey Edge".

Casey Edge
Executive Director