



P.O. Box 3336, Vancouver, BC, V6B 3Y3, (604) 254-9411

July 21, 2010

Mayor Gregor Robertson and Council
c/o Vancouver City Hall
453 W. 12th Ave.
Vancouver, BC, V5Y 1V4

RE: Proposed Green Renovation Bylaw

Heritage Vancouver wishes to express its strong support for the City of Vancouver's efforts to meet sustainability goals through green retrofits to existing homes that will reduce household energy and water consumption. At the same time, we wish to emphasize that retrofits need to both recognize the inherent green features of pre-1930 construction, and follow a performance path that does not affect the physical integrity or value of heritage properties as defined in the B.C. Building Code. The latter includes all property on a Community Heritage Register.

Pre-1930 houses are inherently green in ways that need to be acknowledged in a holistic approach to sustainable design, and a sensitive and flexible performance path for green retrofits. Such historic homes were built to last with durable features such as wooden sash windows, which are operational for hundreds of years and can be repaired, in contrast to the short lifespan of new, energy-efficient aluminum and vinyl energy window assemblies. Windows are often perceived as a source of air leakage in historic buildings. However, the National Trust for Historic Preservation has reported U.S. findings that the performance of weatherproofed wooden sash and storm windows are comparable to new certified energy efficient vinyl assemblies, while the latter are non-degradable, not repairable, and require the use of limited natural resources to manufacture.

Optimizing the environmental qualities of historic buildings and assemblies has a low impact on the character-defining elements of heritage, while helping to achieve sustainability goals. Growing interest in green rehabilitation—in the heritage and green building fields—has led to innovative projects across North America in which the energy performance of heritage buildings is improved in ways that are sensitive to the retention of their historic fabric. Heritage buildings are being upgraded through many rehabilitation projects that are underway in Vancouver. These projects are being achieved through heritage equivalencies already allowed under the Vancouver Building By-law, that facilitate seismic, life safety and structural upgrades. In addition, the City also recognizes the Parks Canada "Standards and Guidelines for the Conservation of

Historic Places in Canada" that provide guidance on how to achieve the sensitive rehabilitation of heritage buildings, including appropriate energy efficiency upgrades, while still conserving the physical integrity and value of their historic features.

As the City contemplates changes to the Vancouver Building By-law Part 10 for Existing Buildings to include Energy Performance, we encourage the following considerations:

1. Heritage Building Equivalencies for Energy Performance: As are offered for Structural and Fire & Life Safety upgrades, it will be crucial to include equivalencies to allow alternate, performance-based compliance for Heritage Register buildings. This would align with the existing VBBL policies and would also align with provincial policies that now allow alternate compliance for heritage buildings under both the *Energy Efficiency Act* and the *Homeowner Protection Act*.

2. Mandatory Building Envelope Upgrades: We do not support the concept of mandatory building envelope upgrades under the proposed Energy Performance section of Part 10 of the VBBL. Alternate compliance should be considered for features such as existing siding and windows for heritage character buildings. It is good practice to consider inherent building performance before mandating upgrades otherwise we could also be placing onerous burdens on homeowners and other building owners. "One-size fits all" solutions are not supportable.

We look forward too further discussions regarding how heritage buildings can continue to be made more sustainable in a sympathetic and effective manner.

Yours Truly

A handwritten signature in black ink, appearing to read "don luxton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Donald Luxton, President
Heritage Vancouver

Cc Penny Ballem, City Manager
Marco D'Agostini, Senior Planner, Heritage Group
Brent Toderian, Director of Planning
Rachel Moscovich, Sustainable Development Planner, Sustainability Group
Richard Keate, Chair, Vancouver Heritage Commission
Mona Lemoine, Director of Education and Training, Cascadia Green Building Council