



21 May 2024

To: Hon. Ric McIver, Minister for Municipal Affairs
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Cc: Hon. Nathan Neudorf, Minister of Affordability and Utilities
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Shannon Phillips, MLA Lethbridge-West
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From: Southern Alberta Group for the Environment (SAGE)
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Re: Long-term Affordable Housing
Bill 18 *Provincial Priorities Act*, Bill 20 *Municipal Affairs Statutes Amendment Act*

The Guardian (9 May 2024) asked the question: ‘What are the most powerful climate actions you can take?’ From the leading experts queried, the fourth top response was to reduce home heating and cooling emissions. SAGE agrees, and would add that this also speaks to affordability.

Infrastructure Canada data indicates that the average expected useful life of a single detached home in Alberta is 65 years. The data collected was based on social and affordable housing assets in both urban and rural settings. This means that a home built today is expected to still be part of the building stock in 2090. We know that, between now and 2090, there are expectations that greenhouse gas emissions be reduced to net-zero. We have to ask ourselves: Are we building homes today for yesterday’s climate? And is this affordable in the long term?

It appears, in the absence of robust public discussion, that the *Provincial Priorities Act* (Bill 18) is designed to restrict Municipalities and other provincial entities to enter agreements with any other entity without prior approval from the Government of Alberta. One might imagine this approval process could include grants from corporate sponsors or the Government of Canada that are directed to the reduction of greenhouse gas emissions. If, say, climate change mitigation and adaptation were not a priority for the Government of Alberta, much needed funding for municipalities and public research may or may not be allowed. Such gatekeeping of the public

good may unintentionally restrict our collective ability to explore and innovate solutions for energy transition, building performance and, ultimately, long-term affordable housing.

Similarly, the proposed *Municipal Affairs Statutes Amendment Act* (Bill 20) limits the ability of municipalities to require “non-statutory studies as requirements for building and development permits.” Again, ‘non-statutory studies’ is a loosely defined category, but could include performance modelling for homes that are expected to meet higher standards as established by a municipality.

One of the motives expressed by the Government of Alberta for components of these Bills was to ‘standardize’ building in the province to make it more ‘affordable’. The standard would be the National Building Code, which (though being updated) currently sets a performance standard that will not only fail to achieve greenhouse emission targets, but also leave the homeowner with an unaffordable liability if energy prices continue to rise.

To achieve net-zero in our built environment, the Government of Alberta must set standards that exceed the National Building Code so that homes operate with lower emissions and are built to withstand extreme weather events already being observed, and as anticipated by climate models. This means using high-quality building materials and investing in innovative designs of building envelopes; reducing heating and cooling demands by increasing insulation and installing high-performance glazings; utilizing high-efficiency technologies that favour electricity that can most effectively be de-carbonized; and designing homes for disassembly to improve the reuse of materials. It should be further noted that the decisions on home design and performance depend largely on local climate, potential extreme weather events, and energy prices. This suggests that building codes and standards should be more locally nuanced than what would be regulated in a monolithic national code.

Resilient, high-performance homes can be realized with current knowledge in building design – but the transition needs to be supported with innovative financing, climate-appropriate incentives, and collaborative partnerships with all levels of government. And it is necessary to support those most in need during an affordability crisis by providing long-term solutions. Bills 18 and 20 appear to create barriers to achieving these goals. SAGE maintains that properly designed and properly financed housing with collaborative corporate and intergovernmental participation is the locus of long-term affordability while meeting climate emission targets and improving our collective ability to position the economy and enhance social well-being for a challenging future.

The Southern Alberta Group for the Environment has been a leading voice for a health and environmentally sustainable community in southern Alberta for the past 40 years. We encourage Government of Alberta to evaluate the impact of Bill 18 and aspects of Bill 20 that limit building standards and performance expectations for short-term notions of affordability at the expense of long-term liabilities to the homeowner. We look forward to your response to our concerns and invite Lethbridge MLA Neudorf and/or MLA Phillips to meet and discuss this matter further.