

Regulatory Changes Toward 3-3-3-1 Permitting Targets - Oppose

Date Received	Time Created	Subject	Position	Content	Author Name	Neighborhood	Attachment
2025-03-11	15:12	Regulatory Changes Toward 3-3-3-1 Permitting Targets	Oppose	<p>Good evening, Mayor and Council.</p> <p>Thank you for the opportunity to speak today. My name is Zoe Razavi, and I am an acoustical engineer with 25 years of experience. My work focuses on helping clients who are struggling with noise from roads, SkyTrain, and other urban noise sources—issues that often become crippling to their daily lives.</p> <p>I would like to mention some of the points that made in order to eliminate the acoustical report requirement.</p> <p>1. Noise is Not Just an Annoyance – It’s a Public Health Crisis Over the years, I have worked with countless residents who cannot sleep, cannot concentrate, and whose health is declining because of poor noise mitigation in their homes. Chronic noise exposure has severe health consequences—it disrupts sleep, increases stress, and is linked to cardiovascular disease. Our healthcare system cannot afford the additional burden that this policy change may create. Once a building is built without noise protection, the damage is done. Retrofitting is expensive, difficult, and often impossible to fully resolve.</p> <p>2. The Justification for This Change is not reasonable The argument that “building materials are better now” is misleading. Glass, concrete, and insulation do not automatically provide noise protection—they must be followed by professional recommendations for their assemblies for providing required noise mitigations. Without an acoustical report, developers may unknowingly design homes that are unlivable due to excessive noise.</p> <p>3. It is claimed that acoustical reports cost \$10,000 per application, but this is not a right estimate of all projects. This is not a right justification because the cost of fixing a noise problem after construction is exponentially higher. I have seen entire condo buildings where residents are forced to install secondary windows at their own expense—simply because no proper noise assessment was done before construction.</p> <p>4. The Proposal Leaves a Dangerous Gap If this requirement is removed, there will be no formal review of noise impacts at any stage of development. This means that: No one will check if SkyTrain, road, or industrial noise exceeds livability thresholds and that would mean ignoring CMHC requirements for livable spaces. CMHC recommends that indoor noise levels in habitable spaces (e.g., bedrooms, living rooms) should not exceed 35 dBA at night and 40 dBA</p>	organization STC Acoustical Consulting Ltd.	I do not live in Vancouver	

			<p>during the day for an acceptable living environment.</p> <p>Without an acoustical report at the Development Permit (DP) stage, there is no mechanism to ensure these noise limits are met in new residential developments.</p> <p>In Vancouver, many residential developments are adjacent to high-noise environments:</p> <p>SkyTrain and transit corridors: Regular exposure to noise levels above 65-75 dBA.</p> <p>Arterial roads and highways: Noise levels often exceed 60-70 dBA.</p> <p>Without noise assessments, developers may unknowingly build homes where interior noise levels exceed CMHC's 35-40 dBA standard, making them unlivable.</p> <p>3. The Vancouver Building By-law Does Not Regulate Environmental Noise and only addresses noise transmission between suites inside a building for walls and floors.</p> <p>It does not set requirements for outdoor noise mitigation (e.g., noise entering through windows, walls, and ventilation systems).</p> <p>CMHC explicitly recognizes the need for outdoor noise assessments—removing the acoustical report requirement directly contradicts best practices in noise mitigation.</p> <p>The result? More noise complaints, more unhappy residents, and more costly fixes that could have been avoided.</p> <p>5. A Smarter Alternative would be A Risk-Based Approach</p> <p>Instead of eliminating this requirement altogether, I urge Council to consider a balanced solution:</p> <p>Retain a preliminary noise risk assessment at the DP stage – This ensures that high-risk sites are flagged at their early stage of development.</p> <p>Then, at the BP stage for high-exposure locations requiring a full acoustical reports – This allows for precise noise mitigation measures where they are truly needed.</p> <p>I have spent 25 years working with people who are suffering from poor noise planning. Removing this requirement without a replacement process will lead to more unlivable homes and more preventable suffering. I strongly urge Council to reconsider this amendment.</p> <p>Thank you.</p>			
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2025-03-10	16:20	Regulatory Changes Toward 3-3-3-1 Permitting Targets	Oppose	<p>Comments are provided on behalf of members of the Association of Consulting Engineering Companies BC (ACEC-BC):</p> <p>ACEC-BC represents the business interests of the consulting engineering industry in BC. Our members employ over 14,000 British Columbians to deliver projects in both the public and private sectors, including engineering and other professional services for the City of Vancouver and for developers.</p> <p>Our Association encourages Council to reconsider removing the requirement for a registered professional acoustical engineering to evaluate indoor noise levels due to environmental noise.</p> <p>We strongly support streamlining regulatory processes and ensuring efficiency in submission and review of development permit applications and do not object to Council's authority to make regulatory changes. Rather, we believe that in this case the justification for the change may have been made without appropriate engineering review. That is to say that staff provided "engineering advice" and that staff are not registered professional engineers qualified to advise on such matters.</p>	Caroline Andrewes		
2025-03-10	18:23	Regulatory Changes Toward 3-3-3-1 Permitting Targets	Oppose	<p>I urge the City to reconsider the proposed change to remove the acoustic report requirement from various district schedules. If this requirement is removed, future residential developments will not be adequately designed and constructed to isolate noise such as road, SkyTrain, and heavy rail traffic, resulting in excessive, intrusive, and disturbing levels of interior noise levels that residents cannot escape.</p> <p>Studies have shown that environmental noise causes annoyance and disturbance, and poses negative effects on physical and mental health. The attached research paper by Hugh Davies at UBC discusses research conducted showing positive correlations between noise and health issues including coronary heart disease, diabetes, and adverse birth outcomes. The findings of the studies are widely cited and incorporated in World Health Organization community noise guidelines.</p>	Gary Mak	Sunset	Attachment 1
2025-03-10	19:37	Regulatory Changes Toward 3-3-3-1 Permitting Targets	Oppose	<p>Jericho Coalition demands halt to Vancouver's Draft Official Development Plan for Jericho Lands – it lets developer drop social and below-market affordable housing unless subsidized at huge cost; massive 60 luxury high-rise towers up to 49-storeys would be highly profitable – and outrageously expensive to Vancouver, BC and federal taxpayers – also on the hook for unnecessary and super costly \$8 to \$10 billion SkyTrain extension to UBC</p>	danny Lescisin	Oakridge	

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2025-03-11	11:17	Regulatory Changes Toward 3-3-3-1 Permitting Targets	Oppose	Please see attached for our letter regarding the proposed removal of acoustic report requirements.	Mark Gaudet	I do not live in Vancouver	Attachment 1