

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

Ministry of Municipal Affairs and Housing
Building and Development Branch
12th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

November 18, 2025

Re: Consultation on Building Code Proposals to support construction of Rapid Transit Stations

To Whom It May Concern:

The Ontario Association of Architects (OAA) has reviewed the proposed changes contemplated in the Consultation on Building Code Proposals to support the construction of rapid transit stations.

As a regulator entrusted with a clear mandate to serve and protect the public interest, the OAA shares a common interest with the Ministry of Municipal Affairs and Housing and all of government to ensure that as Building Code changes occur, life safety remains paramount.

Visual Systems – Proposed Changes to OBC Sections 3.13.5.2. and 3.13.5.12

Regarding the proposed changes to permit a passenger visual information system to be used as a visual signal device within a rapid transit station provided it is in public circulation routes and functions as a visual warning for passengers, the OAA supports the proposed changes.

Furthermore, to bring about greater clarity, the Association recommends that the Ministry consider including a definition/explanation of the exception to the public spaces, as well as quantity, location and information being shown.

Emergency Power – Proposed Changes to OBC Section 3.13.5.7

Regarding the proposed changes to permit an emergency power supply for a rapid transit station to be provided by a dual separate feed from a regulated electricity distribution company, the OAA supports the proposed changes. In particular, the Association is pleased to learn that efforts are being made to align Section 3.13.5.7 with the intent of NFPA. Implementing secondary feeds is a well-established solution for scenarios requiring enhanced reliability as it pertains to life safety.

The OAA recommends that MMAH consider conducting review of additional conditions – particularly those that ensure adequate spatial separation between the dual feeds. This separation is critical to prevent both feeds from being compromised by a single incident, thereby preserving system resilience and compliance with safety standards.

Headroom Clearance – Proposed Changes to OBC Section 3.3.1.8

Regarding the proposed changes to waive the requirements for headroom and protruding objects for repair garages, the OAA supports the proposed changes.

To emphasize the applicability of this proposed change to "service pits" in repair garages, the OAA suggests a minor edit to the proposed language to OBC section 3.3.1.8 Headroom and Protruding Objects:

- (1) Except within the floor area of a *storage garage* and **service pits in repair garage**, the minimum headroom clearance in every access to exit shall conform to the requirements of Article 3.4.3.4. for exits. (See also Sentence 3.3.5.4.(5)).

There may also be some opportunity to coordinate with other associated legislation that addresses specific hazardous situations for workers.

Fire Suppression – Proposed Changes to OBC Section 3.13.3.3

Regarding the proposed changes to permit the use of clean agent fire extinguishing systems in service rooms containing sensitive equipment in rapid transit stations, the OAA supports the proposed changes and recommends that this change be implemented as it is currently written.

The OAA enjoys a longstanding, collaborative relationship with government, and looks forward to continued work alongside the MMAH to promote and protect the public interest.

Sincerely,



Ted Wilson, Architect, OAA
President

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