

Multi-Year Budget Recommendations

prepared by the City of London Environmental Stewardship and Action Community Advisory Committee (ESACAC)

January 3rd, 2023

ESACAC recommends that business case #P-56 Climate Emergency Action Plan (CEAP) Implementation Support should be funded in full.

The Environmental Stewardship and Action Community Advisory Committee (ESACAC) is pleased to advise Council on the 2024-2027 Multi-Year Budget as it relates to our committee's mandate, which includes:

- remedial planning toward the clean-up of contaminated areas;
- waste reduction, reuse and recycling programs;
- water and energy conservation measures;
- climate change mitigation;
- the development and monitoring of London's Urban Forest Strategy;
- Climate Emergency Action Plan and other related policies and strategies;
- the maximization of the retention of trees and natural areas;
- and other aspects of environmental concerns as may be suggested by the Municipal Council, its other Committees, or the Civic Administration.

This report contains four sections:

1. Rationale for supporting business case P-56
2. Breakdown of support for components of P-56
3. Support for other business cases
4. Overall feedback on the Multi-Year Budget

1. Rationale for supporting business case P-56: When Council declared that climate change represents an emergency two years ago, it committed to implement a Climate Emergency Action Plan. The successes of this Plan, and the returns on investment it will provide for the City, are linked to this budget funding the Plan's initial implementation. **If there's one message for Council to take from our MYB submission, it's that the medium to long-term costs of "doing nothing" (i.e., not funding climate change mitigation and adaptation at the scale recommended by current science) are far higher and will pose major risks to the City's finances indefinitely.**

Why is funding the Climate Emergency Action Plan important? Primarily, it is vital to protecting Londoners. The Plan is necessary to ensure the City can continue to fulfill its strategic objectives and deliver acceptable levels of service into the future. Our climate is changing quickly and severely as the planet accelerates to soon exceed 1.5° of warming, and we may be on our way to 2° of warming by the 2040s. Every additional fraction of a degree of warming magnifies cascading effects in the environment, turning up the dial on risk of extreme heat, wildfires and flooding. London has a long way to go to ensure we stop actively worsening warming through unnecessary combustion of fossil fuels, and transition to cleaner, less costly alternatives. This is where the Climate Emergency Action Plan focuses on *mitigation*.

The effects of climate change are already causing harm in London and are expected to become more severe in the coming years. This is where the Climate Emergency Action Plan emphasizes *adaptation*. If existing and new vulnerabilities are left unchecked, the cumulative economic, social and environmental costs to the City would be devastating. The ongoing sudden departure from previously-stable conditions is affecting all life on the planet, including London's Natural Heritage System, which is already under intense stress. Meanwhile, the City is undergoing significant growth, putting strain on infrastructure and services that are vital to mitigation and our ability to adapt to our "new normal". If the City does not plan its growth using a climate lens, factors that are causing climate change to worsen (namely, Greenhouse Gas Emissions associated with combustion of fossil fuels in buildings and vehicles) become further entrenched. Without urgent adaptation measures, over time the cumulative risks to the City will become more expensive and difficult to get under control. According to the [IPCC Summary for Policymakers](#), "*Adaptation and mitigation are already occurring. Future climate-related risks would be reduced by the upscaling and acceleration of far-reaching, multilevel and cross-sectoral climate mitigation and by both incremental and transformational adaptation.*"

To get a sense of the severity of these risks, we encourage Council to review the [Ontario Provincial Climate Change Impact Assessment report](#) published in 2023. The following summary table of current and future risks was adapted from the Executive Summary (page 20). By 2050 (in 26 years, or 6 terms of Council) Southwest Ontario is likely to face “High” to “Very High” risk in most indices, notably including “Very High” risk to the population.

Risk Table Legend		
Risk	Most at Risk Regions Abbreviations ¹	
Low	FN	Far North
Medium	NE	Northeast
High	NW	Northwest
Very High	E	Eastern
	C	Central
	SW	Southwest

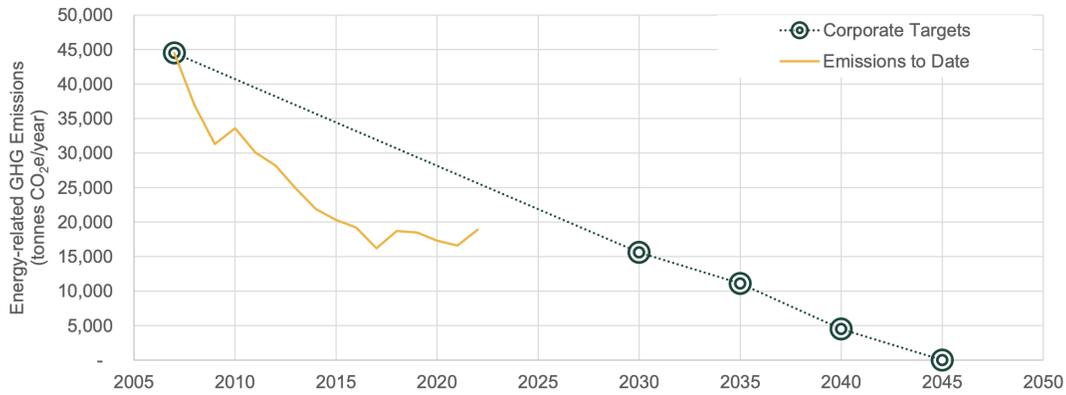
Business and Economy Area of Focus				
Level 1 Categories	Risk			Most at Risk Regions
	Current	2050s	2080s	
Accommodation and Food Services	Yellow	Yellow	Yellow	All
Arts, Entertainment and Recreation	Orange	Orange	Orange	C
Construction	Green	Green	Yellow	C, E, SW, NE, NW
Financial and Insurance	Yellow	Orange	Orange	All
Forestry, Fishing and Hunting Economies	Orange	Orange	Yellow	All
Information and Cultural Industries	Green	Green	Yellow	All
Manufacturing	Green	Green	Yellow	All
Mining, Quarrying and Oil/Gas Extraction	Yellow	Yellow	Yellow	All
Retail Trade	Green	Green	Yellow	C, E, SW, NE, NW
Transportation Economy	Yellow	Yellow	Orange	C, E, SW, NE, NW
Utility Services	Yellow	Orange	Orange	FN

Food and Agriculture Area of Focus				
Level 1 Categories	Risk			Most at Risk Regions
	Current	2050s	2080s	
Field Crops	Orange	Orange	Red	C, E, SW
Fruits and Vegetables	Orange	Orange	Red	C, E, SW
Livestock	Yellow	Orange	Orange	C, E, SW
Infrastructure Area of Focus				
Level 1 Categories	Risk			Most at Risk Regions
	Current	2050s	2080s	
Buildings	Yellow	Orange	Orange	SW, FN
Pipeline Transportation	Yellow	Yellow	Yellow	All
Stormwater Management	Orange	Orange	Orange	All
Transportation	Yellow	Orange	Orange	C, E, SW, NE, NW
Utilities	Yellow	Yellow	Yellow	All
Waste Management	Yellow	Yellow	Orange	C, E, SW, NE, NW
Natural Environment Area of Focus				
Level 1 Categories	Risk			Most at Risk Regions
	Current	2050s	2080s	
Fauna	Orange	Red	Red	C, SW
Flora	Yellow	Orange	Red	SW
Aquatic Ecosystems	Orange	Orange	Red	C, NE, NW, FN
Terrestrial Ecosystems	Yellow	Yellow	Yellow	All
Regulating Services	Orange	Red	Red	C, NE, FN
Provisioning Services	Yellow	Orange	Red	C, SW, E
Ecosystem Cultural Services	Yellow	Orange	Red	NE, NW
People and Communities Area of Focus				
Level 1 Categories	Risk			Most at Risk Regions
	Current	2050s	2080s	
Population	Orange	Red	Red	C, E, SW
Health Care	Yellow	Orange	Orange	SW
Social Assistance and Public Admin	Yellow	Yellow	Red	E
Indigenous Communities	Orange	Red	Red	All

ESACAC anticipates the actions outlined in the CEAP work plans will produce major savings for the City and residents over time, by providing resilience to imminent and potentially catastrophic disruptions at local, regional, provincial, national and global scales. In the medium to long term, the value of these measures will far exceed the current cost of supporting the Plan’s implementation. If Council does not fund CEAP implementation, which encompasses loss-prevention measures, adaptation, capacity building and long-term planning, ESACAC believes the City would sacrifice necessary preparedness and expose itself to greater climate risks likely to impact future budgets.

According to the 2022 Climate Emergency Action Plan Progress Report, the City’s corporate emissions are closer than community emissions to being on-track to meet reduction targets. Therefore, in the next section ESACAC provides recommendations of specific budget items within CEAP that we believe will be most effective at bringing reductions in community emissions into alignment with CEAP objectives.

Corporate GHG Emissions



Community GHG Emissions



2. Breakdown of support for components of P-56: If Council declines to support CEAP in its entirety, ESACAC recommends that the following components of business case 56 for CEAP be prioritized for inclusion in the Budget. The following table was adapted from pages 679 - 681 of the MYB for Business Case P-56. **Blue** indicates items are fully supported by ESACAC; **yellow** indicates tentative support with questions/feedback; **red** indicates not supported for the MYB but should be encouraged where there is other funding available.

#	Initiative	Total	ESACAC comments
1	Community and Business Support Investment		
1. a)	Home Energy Retrofit Financing Program to leverage funding from the Federation of Canadian Municipalities (FCM) Community Efficiency Financing (CEF) program to support the rollout of a residential building energy retrofit pilot project in 2024/2025 and staff resource to administer the program	\$1,924	ESACAC supports the City's involvement in financing of residential retrofits, and recognizes that in order to meet CEAP emissions reduction targets, Londoners will need to do a lot more than can be covered by small-scale pilot programs focussing on a small percentage of buildings. Selecting buildings strategically to receive retrofitting support can expand the return on investment for the City. ESACAC recommends that if this program is funded, priority access must be given to low-income households, since middle class/wealthier households with good credit can secure financing on their own. Selecting residences that are willing to participate in case study profiles about their retrofit projects could have great educational and demonstrative value for future program advertisements.
1. a)	Home Energy Retrofit Financing Program to leverage funding from the Federation of Canadian Municipalities (FCM) Community Efficiency Financing (CEF) program to enable low-interest loans to program participants (tax supported reserve fund contribution to a new climate reserve fund). FCM funding, if an application is approved, could add \$3.0 million to this program and provide \$1.5 million in	\$1,500	The federal government had a Greener Homes program that is expected to end in 2024. We heard that a new program may take its place in March, but details are

	grant funding to help administer the program.		unknown. Has the City evaluated all potential alternative external funding sources for residential retrofits? Can the total in this budget be adjusted without jeopardizing FCM funding?
1. b)	Proactive Communications (Education and Awareness) to enable a wide range of communication techniques to meet the needs of a diverse population.	\$435	A targeted communications strategy should identify and focus on reaching households most likely to benefit from energy retrofits by using available data from utility providers such as London Hydro. Current CEAP communication tools are likely reaching a small proportion of Londoners, and are only accessible to residents fluent in English. As the City grows, low-income households are disproportionately likely to be affected by climate change impacts. Reaching historically-excluded groups will require differentiated approaches to communications for which the City will need to develop capacity.
1. b)	Proactive Communications (Education and Awareness) to invest in new tools that enable a wide range of communication techniques to meet the needs of a diverse population	\$200	
1. c)	Growth of the Transportation Management Association (TMA) - Smart Commute London - Additional investment is required to help grow programs and opportunities to reduce reliance on single occupant vehicle trips, build stronger connections with business parks and emerging employment opportunities outside of London	\$230	This business case is unclear - it does not provide any information on the success of this program, so why spend more money? What is the money for? How are large employers being engaged in participating in recouping costs associated with the TMA? This program appears brand new and yet this investment seems geared towards “growth into more areas of London” – is this premature?
1. c)	Growth of the Transportation Management Association (TMA)- Smart Commute London - to increase bike racks, signage and other commuting amenities	\$40	
2	Community-Led Action Investment		
2. a)	Expansion of London Community Grants Program (with a focus on climate actions and resiliency).	\$1,700	Currently many of London’s environmental nonprofits carrying out CEAP-related work in partnerships with the City depend on multi-year funding for their core operations. Much of the progress to date implementing community-facing parts of CEAP stems from these partnerships. Expansion could help additional organizations to get their footing and grow capacity required to implement CEAP priorities. Is there a way to stretch these funds by introducing a matching program with corporate or other sponsors? ESACAC notes that many recent Neighbourhood Decision Making proposals fall under the City’s climate actions/resiliency objectives, yet they are put in competition with other neighbourhood improvement ideas. Maybe there are synergies to be found between these two programs.
2. b)	Expansion of the Community Connectors Resource Group and Community Liaisons (focus on climate change).	\$950	The City already has community connectors who attend all the festivals, community events etc. ESACAC wonders how this item would actually increase engagement, given connectors and liaisons already provide widespread coverage. A compromise could involve staff intentionally sending out existing resource members to more diverse community events.
2. c)	Creation of a new Neighbourhood Climate Action Champions Program.	\$400	This program description is not well-defined and seems to replicate existing and historic initiatives in the City that have found little success. Few neighbourhoods have existing associations and most are operating at capacity already. We are skeptical that a program like this can be sustained on a basis of volunteerism.
3	Corporate Investment		

3. a)	Accelerate Use of Climate Lens Framework - staff resource and technical funding.	\$450	This is of high priority because the City currently lacks necessary capacity to monitor, assess and manage climate-related risks associated with investments and plans, which constrains evidence-based decision making. For example, the City requires additional technical expertise to develop carbon budgeting/accounting needed for comparing the actual costs of proposals. Parts of the Climate Lens exist but are not applied - why? The Climate Emergency Screening Tool (CEST) was already supposed to be used across all departments and is currently not visibly implemented anywhere. Progress on CEST was described in a report to SPPC in February 2022 (p. 9) <i>“include a standard section in all Standing Committee reports that addresses the Climate Emergency Declaration and, where appropriate, apply the Climate Screening Process (previously called the Climate Emergency Screening Tool – CEET) to the issues that are addressed in each report. This last action is expected to be implemented in the second quarter of 2022.”</i> Next steps for implementing CEST were not mentioned in the 2022 CEAP progress report.
3. a)	Accelerate Use of Climate Lens Framework - technical funding for lifecycle assessment software and investment in collaborative climate lens consulting work with other municipalities	\$300	
3. b)	Climate Change Investment (CCI) Fund (tax supported reserve fund contribution to a new climate reserve fund)	\$16,000	ESACAC supports this in principle and sees potential for strong return on investment and linkages to other CEAP programs, but is unclear how much \$ is required, and what exactly the funding will be used for. Justification for this amount is unclear. If CCI funding is being put towards essential climate change mitigation and adaptation measures, it should be adopted.
3. c)	Facilities energy efficiency and resiliency measures for lifecycle renewal of existing City buildings and development of Net Zero Plan.	\$1,540	The City must lead by example by focussing on adapting its facilities and leading sources of GHG emissions. However, the \$12M seems high - does this include construction of a new City Hall? How is federal and provincial funding being leveraged to facilitate these upgrades? Would potentially be helpful if this funding could be used in conjunction with CCI Funds to incentivize private firms to incorporate energy efficiency in construction or install solar. Partnerships with local vendors could help to showcase solutions.
3. c)	Facilities energy efficiency and resiliency measures for lifecycle renewal of existing City buildings and development of Net Zero Plan (capital investments).	\$12,627	
3. d) i	Fleet transition to zero emission and clean energy technologies: Implement fuel conservation program through the installation of Telematics on all City vehicles.	\$1,232	“Municipal building and fleet vehicles have the largest share of corporate energy-related emissions” (p. 41 of the 2022 CEAP progress report). These upgrades are necessary to achieve the City’s corporate targets for reducing emissions. At some point, EV costs will decline as demand and supply increase. For fleet vehicles that are used exclusively for short trips, consider using PHEV (plug-in hybrid electric vehicle) as a lower-cost transition instead of full electric.
3. d) ii	Fleet transition to zero emission and clean energy technologies: Low-Carbon Fuel Switching - Renewable Natural Gas (RNG) delivery for Waste Management trucks.	\$317	
3. d) ii	Fleet transition to zero emission and clean energy technologies: Power and infrastructure changes for mobile delivery of RNG at EROC	\$500	
3. d) iii	Fleet transition to zero emission and clean energy technologies: Mechanic training, special tools and test equipment to support electrification.	\$292	
3. d) iii	Fleet transition to zero emission and clean energy technologies: Procurement of electric vehicles and equipment.	\$1334	

			unnecessary use of large trucks. ESACAC recommends that smaller vehicles should be used for operations purposes wherever possible.
3. d) iii	Electric vehicle and equipment charging infrastructure.	\$4000	ESACAC supports the creation of more charging infrastructure, but is unclear about the intended uses of infrastructure captured in this business case. Is it exclusively for supporting the City's fleet? Is it for use by City employees? We would like to see charging stations at civic facilities including libraries, municipal parking lots, etc. Costs of this infrastructure are coming down, and may be cheaper in future budgets. Are provincial and federal incentives used? (e.g., EV ChargeON program)
3. e) i	Climate-related financial disclosures in the City's annual financial statement reporting-staff resource and consulting to support additional regulatory requirements	\$482	Such disclosures are likely to become regulatory requirements in the near future; this is not really optional. More info
3. e) ii	Review and implement a corporate ESG strategy to guide financial decision-making, enhanced ESG reporting and a carbon accounting/budgeting process.	\$560	Carbon budgeting is a vital component of the climate lens that the City is currently lacking. An upper limit on the amount of carbon that can be "spent" without exceeding CEAP targets, and accounting for the carbon associated with project proposals, are necessary for Council to make decisions that support sustainable growth and not just "business as usual".

3. Support for other business cases: ESACAC recommends the following business cases marked be prioritized for inclusion in the 2024-2027 Multi-Year Budget.

BC #	Name	Average Tax Levy Impact (%)	2024 to 2027 Total (\$)	ESACAC comments
P-51	LTC - Transit Service Hours Growth	0.47	16,052,000	Minimum levels of transit service need to increase for non-vehicular transportation to be viable in many parts of the city, particularly along busy transit corridors and in new developments where service is absent. Reducing dependence on personal vehicles, by removing barriers for residents to adopt alternatives, is a priority for climate change mitigation.
P-31	Parks Operations Service Delivery Enhancements	0.07	2,332,000	Core park maintenance services need to improve to keep up with increased use and demands of parks. For example, garbage collection service in parks is currently insufficient and results in complaints, trash spills and potential biohazards.
P-61	Ecological Master Planning Funding	0.01	170,000	ESACAC supports fully funding the CMPs, post-development EIS monitoring, and the scheduled reviews of the Environmental Management Guidelines.
P-62	Environmentally Significant Areas Management	0.01	296,000	ESACAC supports this business case recognizing increasing use and strain on the City's ESAs since the pandemic and the need for capacity improvement. Council cut the budget in 2014, which reduced staffing by 1 FTE. Meanwhile the amount of land to be managed has increased.
P-26	Community Gardens Program Expansion to Support Food Security	0.01	195,000	The existing program is at capacity and cannot meet growing demand. More Londoners are facing food insecurity and as density increases, communal areas for urban agriculture are becoming more important. Facilitating agriculture in the City to feed more people reduces pressure on other programs and

				services.
P-32	Naturalization of Boulevards and Reduced Roadside Cutting	0.00	- 151,000	ESACAC supports this business case, recognizing the cost savings it would provide in the medium to long term, as well as ecological and social benefits. However, we also encourage the City to be proactive about developing and implementing landscaping standards for boulevard gardens that will maximize biodiversity benefits and limit risks. The business case says the following: “ <i>Rather than letting grassed boulevards overgrow in their existing state, targeted roadsides would be re-established with plantings of meadow grasses, wildflowers, shrubs, trees and other landscape features.</i> ” ESACAC recommends that the City should require strategic planting of approved NATIVE/INDIGENOUS plant species that are well adapted to roadside settings (e.g., tolerant of salinity, limited height) to improve prospects of plantings’ survival, and to prioritize areas lacking vegetative cover that are susceptible to heat island effects. Where possible, direct community involvement in boulevard naturalization projects should be encouraged. Public information signs will likely be helpful. ESACAC can assist the City to develop this approach.

4. Overall feedback on the Multi-Year Budget:

ESACAC recognizes that unfortunately, financial constraints on this budget will require Council to make difficult sacrifices as not every business case can be supported. During our review, we considered alternative ways that the actions outlined in business cases could receive support. Below we provide two pieces of feedback based on our observations.

- a) **We found that many of the business case descriptions lack details about applicable external funding.** ESACAC is concerned that the City is falling short of unlocking all available external funding sources and partnerships to cover climate change expenditures. Existing and new programs from the provincial and federal governments, sustainable finance tools, foundation grants and partnerships with neighbouring municipalities, local community groups and industry could help to alleviate budgetary pressures associated with climate change mitigation and adaptation investments. How does the City prioritize which opportunities to go after? We suspect that some value is being missed, and given limited financial resources available through the tax base, the City could benefit from increasing capacity to develop partnerships and ultimately secure greater external funding.

We are unsure how the City delegates responsibility for finding, applying to and reporting on external funding sources in general. We were unable to identify any business cases that, if supported, would directly improve capacity to access external funding. Other municipalities employ staff whose roles are specialized for securing funding. Institutions like Western University employ dedicated staff in Research Offices who are responsible for fundraising (for example, the research office at the Schulich School of Medicine and Dentistry brings in over \$100 M annually). How can the City be more aggressive in finding complementary sources of funding to support current and emerging demands of the budget?

ESACAC proposes the City consider two potential avenues to improve access to external funding:

1. The City could contract partners with existing grant writing capacity for a share of the value of the award. For example, UTRCA, Western University and LEN have had great success with securing funding for projects related to climate change adaptation. However, grant writing activities by smaller non-profit organizations can pose a major drain on their resources with unpredictable returns.
2. The City could expand the existing role of Government Affairs to include monitoring of external opportunities as well as coordinating submissions across divisions to climate change funding programs offered by other levels of government.

- b) **We suspect that pressure on the budget from some of the more expensive business cases could be exacerbated by inefficiencies and structural issues that are deserving of further study.** As service demands are increasing, it is important that additional investments are effective in terms of actually increasing capacity to keep pace. In particular, ESACAC is concerned about the apparent lack of feedback between LTC service expansion and developments occurring outside the existing service area. Without a mechanism to factor long-term transportation services and infrastructure into planning processes for new subdivisions, the City will continue facing growing costs and more Londoners will end up making trips in single-occupancy vehicles. ESACAC recommends that the City uphold its continuous improvement model and, through strategic audits focussing on the largest budget requests, examine sources of operational inefficiencies within and between the City's divisions and commissions, as well as internal structural factors and sources of friction contributing to elevated costs of service delivery.
- c) **The budget includes several items (TS 1348-1 to TS 1348-9) related to Wonderland Road widening projects that we believe should be examined.** The bulk of the cost (\$100,460,000) is post-2027 for the Guy Lombardo bridge work that was outlined in the Wonderland Road EA before the project was suspended. Basically, there was not enough room once bike lanes were included for complete streets, and there would be negative impacts to the natural environment. ESACAC has 4 questions about these road expansion projects:
- 1) How are these projects being screened using the climate lens? Didn't Council already do this [back in 2021](#)?
 - 2) Why is this being included in the MYB before the Master Mobility Plan is finalized? (see below under *Current Status*)
 - 3) If the Mode Shift that Council approved for the Master Mobility Plan is 35%, are these widening projects still required?
 - 4) What do these projects do to the next Development Charge? If it is not in the next DC, where is the money going to come from for these projects?

The following quote is from the Wonderland Road EA:

“Current status

In September 2021, the Wonderland Road Environmental Assessment was suspended at the direction of London City Council after the City completed a screening of current major transportation projects in relation to climate change and the City's declaration of a Climate Emergency.

The role and function of Wonderland Road will be considered as part of London's Mobility Master Plan. This plan is currently being developed and it will determine how London prioritizes transportation and mobility infrastructure, programs and policies for the next 25 years. This plan will also include actions to address traffic congestion areas on Wonderland Road with a focus on transit, high occupancy vehicle use and active transportation.”