July 31, 2021

To the Climate Emergency Action Plan Team,

In June 2021, the Environmental and Ecological Planning Advisory Committee (EEPAC) was asked by the City of London to provide feedback on a discussion primer for the Climate Emergency Action Plan (CEAP). EEPAC formed a working group that convened over two meetings to discuss matters concerning the impacts of climate change on the Natural Heritage System.

A spreadsheet containing the comments produced by the EEPAC working group is enclosed with this letter, with comments corresponding to specific sections of the Climate Emergency Action Plan. In summary, the working group was somewhat unclear on the role that EEPAC is being asked to assume at this stage in the development of the Plan, but the working group felt that EEPAC could serve an important role moving forward into subsequent stages of the Plan's development and implementation.

EEPAC recommends the following:

1. A special advisory committee should be created to actively participate in the Climate Emergency Action Plan development and implementation. The committee should consist of representation from the City's Climate Emergency Action Plan team, representatives from advisory committees including EEPAC, First Nations and politicians. The committee structure will facilitate continuous, long-term consultation with key stakeholders and involvement of expertise available to the City through its advisory committees.
2. The impacts of climate change to the Natural Heritage System should be prioritized and considered holistically, not as an add-on to anthropocentric objectives; plans to protect and enhance the Natural Heritage System under climate change conditions should be explicitly included in the Climate Emergency Action Plan.
3. The Natural Heritage System should be fully harnessed as part of the City's approach to climate change mitigation, such as the sequestration of carbon by existing green spaces including wetlands, prairies, meadows, forests and mature woodlots, etc. (not only via tree plantings), management of stormwater under extreme weather events and vegetative cover to provide evapotranspiration, reduced temperatures and reductions in runoff and flooding.
4. To recognize the potential utility of the Natural Heritage System for climate change mitigation, we must better understand current baseline conditions. To begin, EEPAC recommends that the City assemble and present existing baseline data to EEPAC to support the quantification of carbon sequestration by the Natural Heritage System, as well as inventory of the amounts and quality of wetlands, woodlots and other natural lands currently remaining within the City of London. Only with baseline data can an effective and successful Climate Emergency Action Plan with specific targets and accountability be achieved. Using this baseline data, the impacts of climate change on the Natural Heritage System should be modeled under various warming scenarios (e.g., using Global Circulation Models). Further, models could be used to predict the extent to

which local climate change effects can be mitigated by Natural Heritage features (e.g., quantifying carbon sequestration and stormwater absorption by green spaces).

5. A framework should be developed to systematically monitor the impacts of climate change on the Natural Heritage System over time, with checkpoints to assess whether the City is on track to meet its climate targets and determine if further measures are warranted.
6. The role of EEPAC in the further development and implementation of the Climate Emergency Action Plan should be clarified. EEPAC wishes to remain involved in consulting with and supporting the City on the implications of the Climate Emergency Action Plan for London's Natural Heritage Systems.

EEPAC would welcome meeting with City staff to explore additional opportunities to be involved with further work on the Climate Emergency Action Plan.

Thank you for your consideration.

EEPAC Climate Emergency Action Plan Working Group