

ID	Type	CEAP section	Staff response?	Feedback	Sources
1	Comment	N/A		In general, the description of the CEAP seems overly anthropocentric (concentrated on human dimensions of climate change) and doesn't account for cumulative impacts of human activity in the City of London under climate change to the Natural Heritage System, particularly to Environmentally Significant Areas and to Species at Risk. Language should be added to the CEAP to acknowledge the ecological importance of conserving the indigenous landscape on which London is built.	
2	Question	N/A		What is EEPAC's role in the further development and implementation of the CEAP following the discussion primer phase? Will EEPAC have an opportunity to review a draft of the CEAP, including plans for implementation, before being finalized?	
3	Question	N/A		How does the CEAP intersect with other guiding documents such as the official London Plan and the updated Environmental Management Guidelines?	
4	Question	N/A		Who serving on the Climate Emergency Action Plan team is responsible for matters concerning natural heritage?	
5	Comment	N/A		Experts are required to help provide data and necessary resources for designing and implementing plans effectively and quickly. This could include experts from institutions such as Western University and environmental consulting companies. EEPAC could help to contribute to sourcing relevant expertise.	
6	Comment	N/A		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.	
7	Comment	N/A		The CEAP must address four main interconnected topics for conserving natural heritage: ecological conditions, development, gas emissions, water resources.	
8	Comment	N/A		London should follow the example of the Waterloo Region Climate Action Strategy which contains real, concrete objectives.	https://www.engagewr.ca/waterloo-regions-climate-action-strategy
9	Comment	How We Green, Actions 1-2		we need to define the anticipated effects of climate change on natural heritage. For example, increased extreme hydrologic events will increase flooding and have serious impacts on land, property and people. The resulting overflow will increase the transport of nutrients and contaminants to river systems. Plans for mitigation	

10	Question	How We Green, Actions 1-2		What is the practical significance of distinguishing between natural heritage (NH) in urban and rural areas?	
11	Question	How We Green, Actions 1-2		Measures to improve resilience in rural and urban areas need to be more clearly defined. What is resiliency? We recommend including a clear definition. This would allow 'resiliency targets' to be measured and evaluated.	
12	Question	How We Green, Action 2		It is unclear what is meant by NH resiliency in rural areas. For example, does this refer to actions like preventing agricultural runoff from croplands entering the Thames River and its tributaries, keeping watersheds and waterways/water bodies clean through proper watering & fencing systems for livestock, preventing/minimizing drainage of wetlands for agriculture, other, or all? These points should be made explicit for both rural and urban resiliency.	
13	Comment	How We Green, Action 3		To measure change and model possible warming scenarios, we need to start with an assessment of baseline (existing) conditions - including canopy coverage, carbon sequestration by natural heritage, how many wetlands exist in London, what condition they're in, and the area of land they cover, etc. EEPAC can suggest how to identify these baseline conditions; a framework could be developed by assembling and organizing the City's already available/applicable information from various sources such as the London Plan and supporting documentation. Completed studies may include, but not be limited to: Class Environmental Assessments, Environmental Impact Studies and Subwatershed Studies; and various completed (ecological terrestrial and water quality) monitoring programs. Documentation of baseline conditions should include, but not be limited to, Natural Heritage System inventories, environmental/ecological conditions, terrestrial and water resources encompassing the Natural Heritage System, major functions performed by the Natural Heritage System, individual features of environmental/ecological systems, overall system conditions and health. All this information is very important and critical for the City to be able to accurately measure, compare, report and mitigate the effects of climate change on the Natural Heritage System. Where data are deficient, EEPAC may recommend further studies be undertaken.	
14	Comment	How We Green, Action 3		We do not necessarily require another land use study to model carbon sequestration, which could take several years. Sufficient data on land uses might already exist. Instead, we should begin by focusing on consolidating and using data we already have to inform targeted planting and conservative land use towards a goal of improving sequestration city-wide. e.g., ensuring the city has adequate minimum forest cover +/- planting plans to meet minimum standards by a certain date (2025? 2030?). This could save money and also help the City meet climate goals sooner.	

15	Question	How We Green, Action 3		What is our baseline CO2 carbon budget? How will increasing natural landscapes and ecosystems increase CO2 sequestration? To be successful in meeting our reduction of GHGs we need an understanding of the London carbon budget today (baseline) and where additional reductions in CO2 can be made. High impact actions should be prioritized based on available data.	
16	Comment	How We Green, Action 3		The natural heritage system provides other benefits for climate change mitigation beyond CO2 sequestration. For example, increased vegetated cover will also increase evapotranspiration and reduce temperatures. Increased vegetation cover can reduce runoff and flooding. These additional benefits should be considered and evaluated in the CEAP.	
17	Comment	How We Green, Action 3		<p>“Green features” - wetlands, woodlots, etc. should be assessed for carbon sequestration and land cover cumulatively, not separately. Metrics should include any and all ecological and environmental features within and, if possible, outside the Natural Heritage System (e.g. agricultural lands). To support this, the City should take inventory of different land cover types to establish baseline conditions. Note that quantifying sequestration by different cover types may require different protocols or parameters.</p>	<p>An Analysis of Present and Future Carbon Storage in the Forests of the Credit Valley Watershed (2010) https://cvc.ca/wp-content/uploads/2011/01/CVC-CarbonStudyFinal.pdf</p> <p>Wetland Mapping in Ontario's Boreal Forest (2018) https://boreal.ducks.ca/wetland-mapping-boreal-forest/</p>

18	Comment	How We Green, Action 3		<p>For modeling various scenarios under warming conditions, look at Global Circulation Models including parameters such a weather conditions, changes in temperature, environmental conditions, the extent of the natural heritage system. These models could be applied at a City-wide level.</p>	<p><u>The State-of-the-Art of Urban Climate Change Modeling and Observations (2020)</u> https://link.springer.com/article/10.1007/s41748-020-00193-3#Sec7 <u>Ontario Climate Data Portal</u> https://lamps.math.yorku.ca/OntarioClimate/ <u>Presentation: High Resolution Regional Climate Modelling in Support of Climate Change Adaptation in Ontario (2018)</u> http://www.climateontario.ca/doc/RAC2018-2021/JohnLiu-Webinar-2018September6_FINAL.pdf</p>
19	Comment	How We Green, Action 4		<p>The CEAP's focus on the natural heritage system's contribution to CO2 sequestration seems to be specific to only trees. The CEAP must account for meadows, tall grass prairie, wetlands etc. that also sequester carbon. Language in the CEAP could be made more inclusive, and additional measures could be added to factor in the roles of natural landscapes besides forest.</p>	
20	Question	How We Green, Action 4		<p>Are changes to the urban forest strategy being considered in light of climate change? Will the Urban Forest Strategy be implemented as it is currently written?</p>	

21	Question	How We Green, Action 4		When qualifying "under-utilized agricultural land", should consider whether the land is arable. The City of London has an Urban Agriculture policy and part of which includes using unused agricultural land for urban agriculture. How would reforestation dovetail with this policy?	
22	Question	How We Green, Action 4		Does "under-utilized agricultural land" include agricultural land within the urban growth boundary slated for development? If so, what would be the effects of cutting down the trees when the land is developed? What involvement of development companies is proposed as part of the CEAP? As significant landowners, they should be included.	
23	Comment	How We Green, Additional Actions		In light of climate change altering growing conditions for plantings, the City should revise its list of approved plantings to include ONLY native species that will tolerate increasingly extreme conditions (e.g., drought, flooding). There are numerous species currently approved for city plantings that are classified as introduced/invasive and create needless competition with native species. The City should consult advisory committees and local ecological authorities (e.g., UTRCA, Reforest London, Thames Talbot Land Trust) about shifting species ranges as a result of climate change when updating the list of approved plantings.	https://www.cbc.ca/news/canada/london/reforest-london-asks-city-halt-planting-invasive-species-1.4223182
24	Comment	How We Green, Additional Actions		London could use existing ecological inventory data already collected in EIS or EA work to produce biodiversity maps of the Natural Heritage System as a way of tracking habitat degradation and shrinkage, and preventing further loss of biodiversity.	
25	Question	How We Green, Action 5		This is vague; Which First Nations (FN) are participating, on what lands, and who is funding this work?	
26	Comment	How We Green, Action 5		Collaborating with FN should include Indigenous peoples living within the City of London, not just FN on reserves or outside the urban boundary.	
27	Comment	How We Green, Action 5		Effective collaboration requires relationship building. Does City of London currently have good relationships with First Nations in the region and if not, this must be addressed and remedied first and foremost (this is to say, are the foundations for successful collaboration in place? This is essential and may require additional consultation and engagement with FN, depending on FN communities' views of their current relationship with the City).	
28	Comment	How We Green, Action 5		EOPAC thinks that collaboration with First Nations is very important but the CEAP needs to be clear on how it will be implemented. We suggest that moving forward, implementation of the CEAP should include First Nation representation in this area to work together with EOPAC/other City committees to look for the best ecological restoration strategies to protect the natural heritage system.	

29	Comment	How We Green, Action 6		Should consider synergistic effects of human activities and climate change. For example, storm water ponds have become a popular way to treat stormwater. Periodically these ponds need to be cleaned. If precipitation increases, contaminants and nutrients entering these pools potentially increases. How will climate change affect maintenance requirements for these systems to protect the waterways? (e.g. cost, frequency of cleaning)	
30	Comment	How We Green, Action 6		To prevent significant property damage and liability, the City should identify new floodplain lines under climate change conditions and establish new, adequate buffers around those floodlines for proposed new developments and for proposed renovations/additions/rebuilds to existing developments near the Thames and its watershed. This should be a priority.	
31	Comment	How We Green, Actions 1, 2, 6		The City should adhere to floodplain lines based on the 100 and 250 year storm (regional storm) when approving development	
32	Comment	How We Green, Action 6		Plan to pursue all necessary updates to floodplain lines and infrastructure per existing subwatershed studies within a period of approximately 5 years, including Dingman Creek Subwatershed Study.	
33	Comment	How We Green, Action 6		Riparian zones should be restored, maintained, enhanced & managed wherever possible to mitigate flooding.	
34	Comment	How We Green, Action 6		Restrict expansion of existing impervious surfaces near the Thames; for example road and trail widening.	
35	Comment	How We Green, Action 6		Wastewater treatment plants in London are old and potentially deficient. In light of extreme rainfall events anticipated under climate change conditions, EEPAC supports upgrades to these facilities where needed per studies already undertaken by the City.	
36	Comment	How We Green, Action 6		All 6 wastewater treatment plants in London should assess anticipated impacts to their operations under climate change conditions as is being done currently at Adelaide and Greenway PPCP	
37	Comment	How We Green, Action 2, 6		Prevent drainage of swamps/wetlands wherever possible. Look into improving erosion control strategies and drainage of agricultural lands into local watercourses. Look at use of different vegetation types that can be used to remove chemicals from field runoff.	
38	Question	How We Grow, Actions 1-2		How will the CEAP be integrated with City policies for maintaining existing and approving new development? How will development proposals be viewed through a climate lens?	
39	Question	How We Grow, Actions 1-2		How will transportation links for new development be considered and implemented through a climate lens?	
40	Comment	How We Grow, Action 2-4		EEPAC recommends the use of bird friendly building design. The City has yet to adopt requirements for bird-friendly glass materials to be used in new site plans, but EEPAC recommends the City do so as soon as possible.	

41	Question	How We Move		Will road widening projects be viewed through a climate lens? (e.g. considering Scope 3 emissions as part of the impact of each project)	
42	Comment	How We Move		Charging infrastructure for electric vehicles needs to be made available city-wide (and must be adequate to service/support projected growth in electric vehicle usage).	
43	Comment	How We Move		Focus on public transportation improvements & development of active transportation infrastructure to reduce single-person vehicle use & thereby reduce emissions.	
44	Comments	How We Prosper		The current objective for 2050 is to reduce CO2 by 30% by sequestering CO2 and GHG emissions. How was this quantity justified? Is this enough? If it is, how do we do it as there is no technology yet available?	