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Sent: Sunday, March 27, 2022 10:53 AM

To: SPPC <sppc@london.ca>

Cc: Woolsey, Heather <hwoolsey@London.ca>

Subject: [EXTERNAL] SPPC - MTG - April 5 - Draft Climate Change Action Plan - Public Submission

Please accept the following as public feedback / added agenda with respect to this very preliminary (draft) Climate Change Action Plan (CEAP) for review / input and consideration going forward at this 1st milestone.

Mayor Holder (Chair) / SPPC – Council Members / Director – Jay Stanford & team.

MUNICIPAL CEAP PARTNERSHIPS / COST SHARING CONSIDERATION PLEASE

- I get that applying our national climate change policy & directives will spawn unique challenges & application at the municipal levels of all Canadian cities , and the program development , management and administrative costs will be a huge burden on all municipal taxpayers as this process matures . Example – Both the City of Calgary & Ottawa have just green lighted the inception of their programs and are both each hiring 12 full time equivalent to start the process.
- Tax payers in all Municipalities would be better served in a far more cost effective manner with greater opportunities and options going forward if the City of London lobbied and partnered with 4 – 5 other Ontario Cities in sharing these costs and focusing on a unique London only staffing targeted at the components of this joint development that we select to move forward with at a later milestone. All municipal taxpayers will be challenged on CEAP costs going forward and options in reducing other services to pay for this .

GREEN HOUSE GAS (GHG) REDUCTION ACTION PLAN

- My view is that the Federal Government’s every escalating Climate Change Initiatives Fees (Carbon Tax) & policy directives are driving the bus with private corporate , small business owners & home owners in where to best invest in GHG reduction opportunities , at what pace and are well supported by both Federal & Provincial funding & grants . This current LONDON plan is a challenging program overreach when applied to the private sector and may at various CEAP milestones be out of step/ harmony with the Federal level direction.
- The City of London should restrict its action plan role to that of a tour guide and coach on this bus as well as City of London metrics with respect to our private sector progress.
- I fully support most of the City of London’s action plans and priorities within this draft plan , when they are applied only to City of London , London Transit or London Hydro physical fixed or mobile assets .
- **I do not support** any further discussion of developing City of London CIP or CIP like programs to the private business sector or homeowners with “ Bank of London “ type grants or loans to address and support GHG reduction efforts. There are already numerous programs targeting these initiatives (FED & Provincial) across our relative annual income ranges and 75% of home owners can sit down with their Bank Managers / Loan officers and secure a HELOC or Line Of Credit in the \$ 50, 000 range in 10 minutes backed by their massive growth in house value to be used for green initiatives investments. CIP initiatives managed by the City of London usually cost \$1000 in administrative for each \$ 4000 - \$ 5000 distributed on any annual basis, very inefficient.
- I offer a caution to Council on moving forward with mandating only ZERO GHG emission new builds & retrofits after 2030 , as your taxpayers Energy Security Options are fast becoming a priority for many to consider as a back up. Ask Europe & UK , reversing this directive now.

CLIMATE RESILIENCE PLANNING & ACTION PLAN

I am generally supportive with the City of London moving forward with the majority of this portion of the CEAP here, as we mandate growing inward and upward adding to our climate change resilience risks. Please consider focusing on the following here;

- Protecting our City Of London , London Hydro , Water & Sewer , Emergency Response and Health Care Assets from reasonable future risks should be our # 1 priority (wind / hail / flooding etc.). Anyone should see this .
- I am very uncomfortable with partnering ONLY with our local Thames Valley Conservation Authority as a sole source for future flooding plain mapping and directives; as they are in a clear conflict of interest by gaining added annual management revenue & capital costs projects allocated by those new areas to be managed . I don't have an answer here ; but we need to find one.
- Our City of London streets and hardscape cover approximately 15 – 16 % of our current developed surface areas and are quickly becoming the conduits of both our storm water and heat sump Climate Change risks in numerous lower elevation areas (Example – Old East) and highly developed areas like downtown . We are still building new storm water sewers @ 5 year peak rain storm data and continue to invite privately owned hardscape on new and rebuilds to drain to these streets & conduits (every driveway / most parking lots / new casinos) . We really need to focus on our local building code & By Laws to move forward on this to encourage an “ Eat and Manage “ your own water and require porous surfaces / French – passive drainage with respect to private real estate builds and even our own streets. Why are they black – creating a huge heat sump? There are cheap reflective surfacing alternatives available now for existing streets.
- The City of London has long been one of the only Cities in Ontario where your neighbour can install a pool, coach house+ a secondary unit , back fill and hardscape their whole lot and drain their storm water on your – my lot and I have to sue them privately for flooding mitigation and damage issues. We are way behind the curve on By Law enforcement and permit approval here compared to other Ontario cities.

I would appreciate a bit of Council leadership to ask the CEAP leadership team to start to define and apply Rough Order of Adm & Capital Magnitude Costs (\$ ROM) to this action plan as we move forward to the next steps for improved clarity . Other cities are already doing this.

THXS – Chris Butler