

CLIMATE EMERGENCY ACTION PLAN

Feedback from Trees & Forests Advisory Committee

Date: Mar. 22, 2022

The Trees & Forests Advisory Committee strongly supports the adoption of the Climate Emergency Action Plan. Climate change will be one of, if not the, greatest challenges of our time, and it is imperative that we see swift and unprecedented action by all levels of government to combat it.

General Feedback:

- 1) The proposed first milestone of 2030 is far too late and setting targets for someone else to achieve can hardly be called leadership.

We recommend, first and foremost, that Council adopts a series of milestones to occur every four years, rather than every five to ten, such that *every* single City Council, from here through to 2050, will be responsible for ensuring London achieves its climate change mitigation and adaptation goals.

- 2) The urban forest is London's largest piece of "green infrastructure". Helping the urban forest to adapt and be resilient in the face of a changing climate, as this is difficult to do, should be a greater part of this workplan and should be fully staffed and fully funded. The Veteran Tree Incentive Program is an example where the City funded a successful urban forest program focused on preserving current urban forest in private property.
- 3) If you were to take only the CEAP as a guide, this is apparently the (very!) rare sort of emergency in which no one will actually die, and which taking action could only make us better off than business as usual.

The language is so focused on "opportunity" that one does not come away with any sense that there is a *real* emergency here at all, or the incredible devastation climate change will wrought.

This cheery optimism in the face of what is, without question, an existential threat to countries, communities, lives and livelihood around the world – quite arguably, the most challenging threat to humanity since the dawn of recorded history – was off-putting. If the CEAP hopes to inspire widespread public participation, it will need to effectively convince the public of the severity of the crisis, and not sugar-coat things so much.

The constant refocusing of crises in terms of economics rather than human life and moral imperatives is also disheartening.

- 4) One of the biggest challenges of the climate emergency – the challenge of scale – isn't really reflected well in the CEAP. A lot of focus is on the *diversity* of programs and initiatives currently on offer but doesn't communicate much about the level of ramping up that is going to be required. The focus should also include systematic change in areas such as development plans, roads, transit and green space.

It is not enough to visit a few hundred homes or change a few thousand people's driving habits, and many of these initiatives would take upwards of 100+ years to reach all Londoners at their current rate. That sense of aggressive focus on scale is needed, both in the flavor of the text, the proposed metrics, and, we would recommend, program-specific targets for each initiative.

For example, the city must communicate to developers that plan approvals must require – Low Impact Development designs, green energy designs especially for medium and high-density buildings, tree preservation plans to preserve existing canopies and a tree planting strategy.

- 5) Governments set goals for specific programs, and when they don't get achieved for any number of reasons, they don't tend to adjust sufficiently to compensate. We simply cannot afford failure when it comes to climate change, so part of the plan must include strategies for how the City will compensate when one or more of its programs do not achieve what was planned. The CEAP needs to be designed to be fool-proof.
- 6) Some parts of the plan emphasize community leaders and volunteers (see Section 11.4: "How the People Should Lead"). We need plans that don't depend on the altruism of saints or volunteers, but rather involve the population as a whole. Communities develop and depend on "community leaders" only when government isn't doing its job. We've seen widespread failure of environmental efforts not because of a lack of "community leaders" (there are many in the environmental sector!), but because government consistently fails to step up to the level required to address environmental issues. "The people" shouldn't have to lead critical environmental action, the government should: exactly the same as government does with urban planning, health care, education, defense, and so on. *We elect governments to be our leaders. Please, lead.*
- 7) Similarly, we'd like to see the City maximize what it does within the legal space available to it, and not wait for the provincial or federal government to undertake programs first when it would be allowed to pursue them itself.

- 8) Discussion about London businesses seems to conflate goal setting with actual action. It is odd that the list of “actions” taken by local businesses is described almost entirely in terms of goal-setting. This may speak to a need for a way to track actual action by businesses.
- 9) CEAP seems to have entirely depended on non-randomized surveying, which is academically fairly indefensible. (Page A-7). Understanding what a few thousand Londoners who care about the environment enough to participate in surveys, etc. think tells you nothing about what the rest of the population thinks, and since the majority of these programs (and indeed, the whole of Work Plan 2) depends on creating behaviour change among the majority of the population, a randomized sampling method should have been used. This doesn’t mean the City’s ultimate course of action should be different (climate action is still needed whether people understand that or not), but the view of our “starting point” with the general public is almost certainly unduly optimistic. Random sampling should be used from now on.

WORKPLAN-SPECIFIC FEEDBACK

WORKPLAN 1: Engaging, Inspiring and Learning from People

- 1) “Purpose of the Workplan” section: “Personal and employee action – accelerating understanding of how to shift high carbon behaviours like single occupant vehicles to lower carbon behaviours like walking, cycling and transit.”

Given the current zeitgeist and opportunities being created by society’s collective experience during the pandemic, we recommend remote work needs to be in this list. In fact, “remote work” as a proven strategy for reducing emissions felt missing from much of the CEAP.

- 2) There are far too many items in this work plan focus in on “working with” and not enough about scaling what’s already being done. (I.e., it again seems to be emphasizing the diversity of potential initiatives, partnerships, etc., rather than how to leverage those opportunities to achieve the scale of transformation that climate change requires).

WORKPLAN 2: Taking Action Now (Household Actions)

- 1) Again on the topic of scale: the metrics in Work Plan 2 focus too much on “Number of.....” as opposed to percentage of total households. We recommend a refocusing on percentages.

- 2) Will there be targets given for each initiative or metric at some point? The CEAP doesn't seem to present any thresholds for what will constitute success / failure. How will the City know if, for instance, 10% of households taking some particular action is "enough"?
- 3) We would recommend adding a public outreach campaign to eat less meat. Meat production and its impacts on the climate cannot be ignored.

Homeowners should be encouraged to reduce the size of their mowed lawns and encourage plantings that assist in climate change mitigation and adaptation such as growing their own food, planting pollinator gardens, trees, etc. And strengthening and enforcing the Landscaped Open Space by-law (Zoning By-Law Z.-1-97465) to prevent the clearing, erosion and conversion of backyards to unauthorized parking spaces especially in Near Campus Neighbourhoods and/or over-intensified neighbourhoods often located the Core. This would assist in the 'greening' of Core residential areas.

WORKPLAN 3: Transforming Buildings and Development

- 1) We strongly support reducing or eliminating parking minimums as a way of reducing GHG emissions, (Workplan 3 – Transforming Buildings and Development Workplan - Item 2A).

We recommend this be taken a step further by pursuing opportunities to reduce parking in existing developments for example pursuing de-paving projects, strengthening the Landscaped Open Space By-law which would prevent backyards being used as parking. We need to protect 'interior block' green space as this presents the best opportunities for continuous tree planting away from roads and road salt.

- 2) We strongly support 2B: "Review and provide options to reduce, restrict, or phase out fossil fuel as the primary source of heat in all new buildings in London as of 2030". We would also like to see the development of community-oriented, mixed-use and walkable Net-Zero neighbourhoods within London.
- 3) For Item 2D: "Review and incorporate climate change considerations into development application reviews, such as development-specific transportation demand management and energy management, including presentation of proposed development alignment with London's climate action goals and outcomes in staff reports", we recommend adding minimum requirements or incentives for tree planting in new residential yards during the development process. There already are requirements for tree loss and replacement but it is a flawed approach. It should really be about building around existing trees.

- 4) For Item 2I: “Review and strengthen requirements for pedestrian, transit, and bike network access within the Zoning By-law” we recommend going beyond ensuring mere “access” to actually setting quantitative standards for pedestrian and cyclist network connectivity, continuity, and modal separation.

Similarly, we recommend exploring encouraging “greenway” developments (e.g. Wildwood Park in Winnipeg, Radburn) as a way of creating better active transportation networks and preserving wildlife corridors.

See: https://en.wikipedia.org/wiki/Wildwood_Park,_Winnipeg and <https://web.archive.org/web/20150310231933/http://www.greenwayneighborhoods.net/>

- 5) We recommend banning drive-thrus in residential areas through zoning and relegate them to major corridors.
- 6) We recommend the City actively explore how to retrofit neighbourhoods with the poorest-connectivity active transportation networks (e.g. sidewalks and trails) so that improvements aren’t main solely in new developments alone, even if this means gradually securing easements or even properties for creating cut-throughs over time.
- 7) Trees regulate climate systems on a global scale and biodiversity. The pros and cons of different construction materials with respect to climate change adaption and mitigation must be carefully considered.

WORKPLAN 4: Transforming Transportation and Mobility

- 1) We reiterate the need for promoting remote work to be a part of the CEAP’s transportation plans. People who only have to make a work trip twice a week are likely to be far more willing to forego the convenience of a car than someone who has to go in five times a week.
- 2) By far one of the biggest correlates of car travel is car ownership – i.e., once a person has paid the fixed cost of owning a car and the monthly insurance on it, they can only reduce their per km cost by driving it. So reducing the need for car ownership in the first place is key, and needs to be more explicitly present as a goal within the CEAP.

We also recommend adding support for, or creation of, carshares to the list of actions needed to support active transportation. People are less likely to feel the need to own a car if it is easy to borrow one when they really need it.

- 3) It is not clear if Item 5.C.IV: “Review and provide options for the Vehicle-for-Hire By-Law to mandate the use of electric vehicles or other zero emission vehicles including municipal scan, applicable jurisdiction, implementation benefit, and

complexity analysis “would apply to carshares. If so, we would recommend *against* actions that favour EVs over convincing people not to buy a car in the first place. (I.e., if regular people can own gas vehicles, carshares should be allowed to as well so as to reduce the cost of the share and thereby help eliminate car trips). In lieu of regulation, additional incentives for carshares to adopt EV technology is recommended.

- 4) We strongly support 7A: “Continue to review and provide options for alternative road designs that preserve existing mature street trees when roadway reconstruction projects are initiated “as well as 7B “Prioritize the importance of street trees in providing shade for pedestrians.”

We reiterate an earlier recommendation made to PEC that London formally adopt a Shade Policy to help ensure active transportation networks and play areas have sufficient shade, something which will only become more important as temperatures increase.

We also reiterate the need for London to explore burying more of its electrical lines so as to allow the planting of taller tree species offering more shade, at least on one side of each road. Many of the species being planted under hydrolines today are simply too small to offer much by way of shade.

- 5) We recommend adding as a metric the % reduction in number of in-town trips taken as a result of remote work
- 6) As with workplan 3, we recommend setting quantitative minimum standards for pedestrian and cyclist network connectivity, continuity, and modal separation.
- 7) With respect to the expected result of “Increased Active Transportation and Transit”, we would like to see “reduced trips” as a part of that result. The implication of the “expected result” as it is currently stated is that *modal shifting* is going to be everything, but it doesn’t have to be. And if anything, experience over the last couple of years – where remote work has been a huge success while shifting folks to transit has largely failed for decades – says it shouldn’t be. Remote work *works*, and it is much easier to sell people on working from home than adding an extra 30+ minutes a day to their commute by choosing to travel by bus or foot.
- 8) We recommend a moratorium on road expansions, except where the road is being expanded to allow for more public transit.
- 9) We recommend the enforcement of the Idling Control By-law to reduce emissions.

WORKPLAN 5: Transforming Consumption and Waste as Part of the Circular Economy

- 1) We recommend that the idea of “right to repair” be discussed within the context of the circular economy. There are great opportunities for job creation and waste reduction if we can make this kind of cultural shift.

WORKPLAN 6: Implementing Natural and Engineered Climate Solutions and Carbon Capture

- 1) The overview of the workplan should acknowledge the fact that our existing natural heritage system faces severe impacts from a changing climate itself: changes that nature, and especially trees, by and large, are far less well-equipped to deal with than humans. Trees will be one of the principal victims of climate change.

For instance, there are species like tulip-tree which are currently at the northern limit of their range in London today. By 2070 or so, under high emissions scenarios (RCP 8.5), their “preferred” range will have moved up to Labrador... but the trees will not. Every tree on the planet is very shortly going to be trying to grow in a climate it is not adapted to, with devastating impacts.

Meanwhile, other kinds of species that are mobile, such as insects, will be more easily able to adapt to changes in range. This has been seen in B.C., where the mountain pine beetle was able to start surviving through the warmer winters and so dramatically expanded its range. As a result, around 57% of all of B.C.s pine trees have died... the main cause of its “tinderbox” conditions these past several years.

As such, it is recommended that:

- i) The City be estimating and factoring in climate impacts on London’s tree cover (longer growing season, but more droughts: risk of major pests decimating things)
 - ii) The City actively but carefully pursue a system of assisted migration for newly planted trees, incorporating individuals of trees from the northern States which are genetically better adapted to the climate we will have in the decades ahead.
- 2) We strongly support all of Item 2 (“Advancing Tree Planting”)
 - 3) We recommend the City explore programs and marketing campaigns aimed that helping people to see their yards as a space where they can help to mitigate climate change

- 4) We recommend setting a target for carbon sequestration by the landscape and updating policies, targets within the municipal Tree Planting Strategy, etc. in order to meet it – with the appropriate funding
- 5) We would suggest adding the Tree Planting Strategy to list of resources for Work Plan 6.
- 6) With respect to carbon capture & storage, the committee feels that carbon storage is not a solution to the climate crisis and creates and complicates the further problem of storage, while failing to address the root of the problem, which is dependence on fossil fuels. Eventually fossil fuel supply will be exhausted and therefore it is imperative that the focus remains on a fossil fuel free future. All mandates and plans should be focused on this end goal while using sustainable and long lasting practices such as 'greening' to offset immediate impacts.
- 7) It is recommended that the City further strengthen the private tree protection by-law, and, in particular, the protections accorded to small woodlands.

WORKPLAN 7: Demonstrating Leadership in Municipal Processes and Collaborations

- 1) We strongly support the “Master Accommodation Plan for Alternative Work Strategies” on page 109, however we recommend the City make remote work by London employers (not just the municipality!) a more “front and centre” part of their plan to reduce automotive trips. This idea should be packaged, branded, and actively promoted to London employers as a way they can help our community achieve its climate change mitigation goals.

The City should then work to encourage other levels of government and other municipalities (perhaps through the Federation of Canadian Municipalities) to explore doing the same.

If an aggressive “work from home” program proves to have an impact on the amount of leasable space required within London for office or other work, then we would recommend a program to convert that excess space into much-needed affordable housing, effectively killing two birds with one stone.

- 2) We support the push for carbon accounting process to be implemented (item 9)
- 3) We note that “increased engagement” items in this workplan focus on engagement with other municipalities and First Nations: we recommend there be plans for active lobbying of the province and federal government to support local needs as well.

WORKPLAN 8: Adapting and Making London More Resilient

- 1) With respect to reviewing ways for City of London employees to reduce GHG emissions from their commute (item 2), we would recommend the City explore hosting its own car share for employees so as to again reduce the feeling among employees that they need to own a car in the first place.
- 2) We strongly support item 3C (“Explore potential for striving to achieve ‘no net loss’ carbon sequestration capacity requirements for greenfield development”)
- 3) We support 3D (“Enhance the resiliency and connectivity of the natural heritage System through ecological restoration with a focus on potential naturalization areas (including those identified on London Plan Map 5 - Natural Heritage))
- 4) We wish to add that there is far more space left for planting in private yards than in London’s open space network, and so tree planting in yards, as well as the creation of other features aimed at natural heritage protection (e.g. pollinator gardens) needs to be a part of the plan as well.
- 5) With respect to the remaining plantable space within the open space network, we strongly recommend a clear directive to city staff to maximize planting within the network. Any space that is not actively being used for another purpose (e.g. sportsfields, playgrounds, stormwater ponds, etc.) should be planted with trees.
- 6) The plan should also stress minimizing removals of mature trees from parks and around SWMs (see recent case of the extensive removals at Mornington SWM).
- 7) We would like to see food security addressed as a resiliency measure by enhancing opportunities for backyard vegetable gardens and mandating open green space in new development to include communal gardens and community food projects (e.g. Seattle Inner City Orchards, youth planting projects).
- 8) With respect to academic research, the sciences have already made many of the impacts of climate change clear. It is time to act and while there is merit in developing academic learned programs on the subject of climate change it should not be a priority for the City of London itself. Other institutions can contribute this way. Public outreach is far more important than university courses on climate change and the city should focus on talking to its residents.