RE: Clean Air Council Member Feedback to the Province of Ontario's City of Toronto Act and Municipal Act (MA) Five Year Review

As was highlighted in the Province of Ontario's Municipal Legislation Review Public Consultation Discussion Guide, climate change is one of the most significant challenges of our time. Clean Air Council member municipalities have been leaders in taking action on climate change and in involving their communities in developing mitigation and adaptation plans and actions.

The Clean Air Council is a network of 27 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area. CAC members work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions.

Many studies have demonstrated that investments in low carbon communities could generate wider economic, social and environmental benefits in the form of improved levels of equality, health, education, employment, innovation, productivity, mobility and environmental quality. They could also create new revenue streams and reduce the need for government expenditure. Many of these opportunities need to be realized by local governments, but there is a significant and important role for provincial and national governments to create enabling policy frameworks that empower municipalities to invest and innovate towards advancing these lower-carbon communities.

As such the Clean Air Council would like to commend the Province of Ontario for reviewing three key elements of Ontario's municipal legislative framework: the Municipal Act (MA), the City of Toronto Act (COTA), and the Municipal Conflict of Interest Act. While the government is required by legislation to review the MA and the COTA every five years the, Clean Air Council[1] is pleased to have been consulted for its feedback. It is a positive development that the Province has implemented a Climate Change lens into the reviews to better identify opportunities the Acts present to enabling municipal leadership and capacity on climate change and community sustainability.

As both the Province of Ontario and Ontario municipalities want to ensure the long-term prosperity and livability of our communities, the Clean Air Council members would like to provide some of their input on the following discussion questions:

[1] Municipal staff representatives on the Clean Air Council (CAC) were consulted in the preparation of this submission to reflect the priorities and directions of the member municipalities, but direct endorsement of this document by Municipal Councils was not sought due to the limited time frame of consultations. Many municipalities are also preparing their own independent submissions. CAC representatives are the municipal change agents within leading climate change action municipalities and have been working collaboratively across the region for the last 15 years to support and enable progress on clean air and climate change actions. The consultations were facilitated by the Clean Air Partnership, a charitable environmental organization that serves as the secretariat for the Clean Air Council. CAC Municipal and Public Health Unit members include: Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, East Gwillimbury, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Oshawa, Peel Region, Pickering, Richmond Hill, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Whitby, Windsor, York Region.

Question # 1: Has your local council integrated climate change considerations in its policies, programs and decision making processes?

Clean Air Council members have been working collaboratively on the development and implementation of clean air and climate change actions within their municipalities and sharing the resources developed and the lessons learned with others since 2001. The Clean Air Council identifies and promotes effective initiatives to: reduce the occurrence of air pollution and greenhouse gas emissions and their associated health risks; and find opportunities to better integrate climate change impacts and resilience into municipal decision making.

The Clean Air Council works on the very simple premise that if one jurisdiction undertakes a clean air and climate change action, it makes sense to share their experience and lessons learned with other jurisdictions. In this way it helps to promote and raise the bar for the implementation of actions that will lead us to lower carbon and more healthy and livable communities.

Priority Clean Air Council clean air and climate change actions and their implementation status are within CAC member municipalities is provided in **Appendix A: 2015 Clean Air Council Inter-Governmental Declaration on Clean Air and Climate Change**.

Question # 2: What tools do municipalities need to address climate change mitigation and adaptation?

- **Land Use and Growth Management Policies and Plans:** Efforts to better manage urban growth such as those within the Growth Plan for the Greater Golden Horseshoe; the Niagara Escarpment Plan; the Oak Ridges Moraine Conservation Plan; the Greenbelt Plan and the Provincial Policy Statement are instrumental in encouraging dense, transit-oriented, walkable and livable communities. Based on lessons learned thus far, however, significant improvements can be made to these frameworks that would better enable local action to pursue the goal of growth management, community livability and increased financial, social and environmental sustainability. As that is beyond the scope of the consultation on the Acts please see the attached **Appendix B: Clean Air Council Member Feedback to the Province of Ontario's Land Use Planning Review** for more input on recommendations**. Additional Land Use Recommendations are also attached via Appendix C: Clean Air Council Member Feedback to the MOECC's Climate Change Discussion Paper.**

- **Knowledge Sharing and Network Building:** Facilitating knowledge sharing within and among municipalities on climate change actions, policies, and innovation is a fundamental component of informing and inspiring action. Co-ordination between municipal departments ("horizontal integration") and between local, regional and provincial networks ("vertical integration") is critical. Building the capacity and ability for local governments to share and build on each other's experiences and lessons learned will reduce the need for local governments to have to recreate each other's efforts and better enable them to build on each other's work and results. Allocation of resources to enable that peer-to-peer knowledge sharing and network building will be essential to achieve scale and to build upon success.

- **Municipal Act requirements for municipalities to incorporate the development and implementation of climate change action plans/targets/reporting into their Official Plans** would greatly facilitate the uptake of climate change considerations, consultations, and plans into the municipal mandate and structure, (similar to what was done in British Columbia with their Green Communities Act).

- **Integrating Climate Change into Business as Usual:** It is important for local governments (as well as all levels of government and the private sector) *to identify and implement a mechanism for integrating a "climate change mitigation and adaptation lens" to policy development, funding, infrastructure processes and decision making*. However in order to support and enable that ability, it is imperative that tools be developed and shared in order to inform that "climate change lens".

- Some tools that would advance this effort include (but are not limited to):

  General Climate Change Tools:
  - Educational Tool: Embed references to climate change and its municipal implications within the Municipal and City of Toronto Act. Support with education and outreach tools/programs.

  Climate Change Mitigation Tools:

  - Energy Data Tool: Support for municipalities in the provision and compilation of energy data and development of energy and greenhouse gas emissions inventories.
  - Open Data Tool: Increasing access and availability of open data on energy, greenhouse gas emissions, and other sustainability factors.
  - Enabling Tool: Enable municipalities to undertake programs to move to a low carbon economy. Support economic development of innovation products supportive of a low carbon economy such as the provision of municipal support for community energy such as renewable and district energy systems.

  Climate Change Adaptation Tools:
  - Resilient Building Tool: Create a Building Code that integrates climate change as outlined in the Minister's MMAH Mandate Letter from the Premier, *"…moving Ontario forward as the North American leader in climate-resistant and environmentally efficient construction".*
  - Information Tool: Climate information provided to municipalities to enable appropriate infrastructure assessment and design to address climate change vulnerabilities and impacts.
  - Financial Tool: Infrastructure funding sources to enable climate change considerations into decision making especially those related to appropriate planning, building and construction, and stormwater systems including pipe and overland flow components.
  - Emergency Planning Tool: Emergency preparedness support to ensure municipal preparedness includes preparedness for extreme weather events such as wind, rain and ice storms and extremes of heat, humidity and smog.

- Risk Mitigation Tool: Enable municipalities to protect against climate change risks and liabilities by preparing climate change strategies and policies with associated implementation programs.

Question # 3: Are you aware of any challenges and/or barriers that your council is facing in implementing initiatives related to climate change?

- **Advancing the mandate for local governments to act on climate change:** Municipal action on climate change would be strengthened if the General Principles section of the Acts would expand on the current purpose by adding "*improve the environmental well-being of residents through actions to mitigate and adapt to climate change*".

- **Clarifying municipal authority to adopt mandatory green development standards:** Greater clarity within the Acts *to acknowledge the authority of municipal governments to adopt and implement mandatory green development standards* would enable increased adoption of actions aimed at increasing building energy efficiency, community sustainability actions and other environmental priorities within new developments.

- **Enabling increased authority on the part of municipalities to enact by-laws, policies, and/or programs respecting climate change mitigation and adaptation in order to more effectively enable actions,** such as, but not limited to, reducing greenhouse gas emissions through increased waste diversion, improving energy and water efficiency and ensuring greater resiliency of infrastructure and buildings.

- **That the Section 108 in the City of Toronto Act** regarding green or alternative roof surfaces be **included in the Municipal Act** and enable municipalities to pass green/cool roof bylaws to achieve such purposes of energy and water conservation, habitat creation, and urban heat island mitigation.

- **Increased recognition within the Municipal Act/City of Toronto Act of Urban Forests and Natural Areas as a community service and asset that provides significant ecological services and value and be factored into municipal asset management .** For example a number of Clean Air Council members have undertaken iTree Studies that have identified the significant ecological services provided by urban forests and a scan of their various Clean Air Council Urban Forestry actions is available at: http://www.cleanairpartnership.org/files/Urban_Forestry_Scan_March_2012_1.pdf.

  In addition the TD Economics Report available at: http://www.td.com/document/PDF/economics/special/UrbanForests.pdf has identified the significant value of the ecological services provided by Toronto's urban forest.

  Increased recognition of the ecological value provided by green infrastructure such as natural areas to protect watershed management, improve stormwater management, provide communities with increased resilience and protection from extreme weather impacts within the Municipal Act/City of Toronto Act would better enable municipalities to enact programs

and policies such as those identified within the Clean Air Council Report Natural Capital and Why it Matters.

- **Increasing climate change as a municipal mandate through increased recognition within the Municipal and Toronto Acts that municipalities are required to advance the development and implementation of climate change action plans/targets/reporting.** Similar to what was done in British Columbia with their Green Communities Act. This requirement could be implemented within the Planning Act but recognition of this mandate would strengthen and better enable progress and engagement with all municipal departments if also identified within the Municipal Act and the City of Toronto Act. It is important to ensure that this requirement is attached to a provincial program that provides capacity and support for municipalities to advance this requirement (for example, the provision of community greenhouse gas inventories) and that it be placed on those municipalities above a certain size (for example, above 50,000 population) where the greatest opportunity for mitigating greenhouse gas emissions occurs.

- **Enable financing of commercial, institutional and industrial sector entities within the Local Improvement Charge section of the Municipal/City of Toronto by clarifying that this would not be considered "bonussing" if this financing will support Council approved environmental objectives.**

- **Increased recognition within the Municipal Act and the City of Toronto Act of the municipal role in advancing community energy planning.** Community Energy Planning is a comprehensive, long-term plan that helps to define community priorities around energy with a view to explore how energy is and could be used, generated, and delivered in the community now and into the future) would better enable municipalities to identify and act on local energy generation opportunities. This increased recognition would better enable increased momentum for the creation of holistic and integrated community energy plans that identify opportunities to better meet local energy needs in the most efficient, cost-effective and resilient way possible.

- **Enable increased flexibility for municipal property tax opportunities to be better aligned to actual costs associated with the municipal provision of services.** At present the municipal tax base is based on Market Value and Property Assessment data which is not directly related to actual costs associated with servicing a property. Increased flexibility to address this misalignment between municipal revenue and expenses will enable increased progress towards ensuring the long-term prosperity, livability and financial sustainability of our communities.

- **Enable municipal ability to identify and enact fees that municipalities determine will enable them to meet their financial, social and environmental sustainability goals.** (For example this could include but not be limited to parking related, fuel efficiency related, licensing of delivery in zones fees).

APPENDIX A:CLEAN AIR COUNCIL 2015 – 2018 INTER-GOVERNMENTAL DECLARATION ON CLEAN AIR & CLIMATE CHANGE

PREAMBLE

In 2001, the Clean Air Council (a network of municipalities and health units from across the Greater Toronto, Hamilton and more recently Southwestern Ontario Area) was established to work collaboratively on the development and implementation of air pollution and climate change mitigation and adaptation actions. The Clean Air Council is based on the premise that municipalities benefit from actions to reduce energy use in order to save money and limit emissions; make the movement of people and goods more efficient; and make communities more healthy, livable, competitive and resilient.

The Clean Air Council was created in response to strong scientific evidence linking air pollutants to various illnesses and breathing problems when in 2000 the Ontario Medical Association declared air pollution "a public health crisis". More recently the World Health Organization has classified air pollution as a carcinogen and the Intergovernmental Panel on Climate Change (IPCC) stated that the warming of the climate system is unequivocal and that human influence on the system is clear. In addition, the central findings of a 2015 report by the Lancet Commission on Health and Climate Change highlights the many health and social benefits of action on climate change, stating that action to address climate change could be “the greatest health opportunity of the 21st Century”.

Synergistic actions that address air pollution and climate change enable communities to address the two problems with common solutions. The creation of lower carbon communities that are more efficient, sustainable and resilient are one of the main tools that will enable us to tackle the joint challenge of air pollution and climate change and foster our communities’ competitiveness and livability.

Clean Air Council members work collaboratively to tackle air pollution and climate change through agreed upon priorities; tracking, analyzing and determining the outcomes of actions; and bringing experts and practitioners in the various activity areas together to share experiences and lessons learned.

There are many benefits to a collaborative approach to addressing air quality and climate change issues. Having multiple jurisdictions and multiple disciplines at the same table enhances networking and the exchange of resources and information. It ensures that no one group is working in isolation, and that efforts are not unnecessarily duplicated. Inter-governmental and inter-regional cooperation also provides an opportunity to leverage scarce resources for research, outreach and other air quality and climate change

mitigation and adaptation initiatives. Working together, the Clean Air Council enables members to achieve far more with fewer resources and reduced risk.

THE GOALS OF THE CLEAN AIR COUNCIL ARE TO:

- Address air quality and climate change challenges through a dynamic network that expands knowledge and encourages practical and successful policies and actions;
- Promote a better understanding of air quality and climate change problems and opportunities among municipalities, public health and policy makers to improve their ability to address these problems in an economically effective way;
- Explore opportunities for joint initiatives to reduce air pollution and greenhouse gas emissions and increase climate change adaptation and resilience actions;
- Develop and report on progress of Inter-governmental Declarations of Clean Air and Climate Change;
- Track and monitor the implementation and transfer of clean air and climate change actions across the jurisdictions; and
- Liaise with municipalities in Ontario, Canada and internationally, and with organizations that have compatible mandates to share best practices for reducing air pollution and greenhouse gas emissions and increasing community livability and resilience.

ACKNOWLEDGING AND THANKING the City of Toronto, Clean Air Council member jurisdictions, provincial, federal and other partners for providing financial and in-kind support for the Clean Air Council work program and assistance in developing, implementing and reporting on progress on actions listed in the various Clean Air Council Inter-governmental Declarations on Clean Air and Climate Change.

ARTICLE 1 – STATEMENT OF COMMON UNDERSTANDING & COMMITMENT

1. Evidence based research has linked air pollution levels commonly experienced in southern Ontario to premature deaths, hospitalizations, increases in chronic heart and lung diseases including lung cancer, and acute respiratory and cardiovascular diseases. Even a small increase in air pollution elevates the risk of health impacts, particularly among those who are most vulnerable and sensitive to air pollution such as young children, older adults and those with pre-existing respiratory and cardiovascular illnesses.
2. Climate change scenarios project an increased risk from extreme weather and other climate-related events in Canada such as floods, drought, forest fires, increased air pollution and heat waves – all of which increase health risks to Canadians.
3. Research has also indicated that air pollution has a detrimental impact on terrestrial and aquatic ecosystems.
4. Air pollution, through health effects, environmental degradation, building and property damage, adversely impacts the economy and quality of life.
5. Land use and transportation planning decisions that encourage sustainable urban development can have multiple benefits on air quality and human health.

6. Transportation is the most significant source of emissions that contribute to both air pollution and climate change. Building energy use is also a major contributor.
7. Air pollution and climate change are two atmospheric problems sharing common sources. For example, fossil-fuel combustion is a key contributor to air pollution and climate change, producing smog precursors and greenhouse gas emissions.
8. Municipalities are fundamental to achieving local, community based emission reductions since they have significant influence on development, land use and transportation decisions that shape the pattern of energy use within communities. Municipalities are also the order of government closest to citizens and can most easily engage households and businesses to implement local projects to reduce emissions. Municipal contributions to Ontario and Canada's air pollution and greenhouse gas reduction targets must be considered an essential element to achieving long-term and cost effective emission reductions.
9. Increased recognition and authority from provincial ministries and federal departments regarding the municipal role in influencing community air pollution and greenhouse gas emissions is needed to enable municipalities to meet air pollution and climate change opportunities and goals and create the livable, healthy, resilient and competitive communities Ontarians desire.
10. Public health units, which operate either within a municipal governance structure or report to a stand-alone board of health, have a mandate under the Ontario Public Health Standards to increase awareness of the health impacts of air quality and climate change; and to use a health equity lens to address impacts to our most vulnerable populations.
11. Addressing reductions of major air pollutants and greenhouse gas emissions requires collaboration between all orders of government, sectors and jurisdictions. By sharing the best practices from jurisdictions across the GTHA, southwestern Ontario and beyond, we can support one another in achieving improvements in air quality and climate change at a local and regional level for the benefit of all.
12. Understanding the value of ecosystem services to human health, CAC members aim to improve the health of their residents and their communities via their collective efforts and an ecohealth[1] approach, to reduce pollution and greenhouse gas emissions, manage invasive species, and protect urban forests, green space, natural heritage systems, watersheds and biodiversity.
13. CAC members recognize that they are making decisions that will impact their communities for decades to come and that it is of vital importance to factor in how future climate conditions may affect their community and identify and act on opportunities to build resilience into decision making.
14. CAC members' commitment to undertaking actions to make their communities more efficient and livable will reduce air pollution and greenhouse gas emissions and reduce their contribution to smog and climate change and its associated health, economic and ecosystem effects.
15. CAC members commit to monitoring and reporting on their progress and outcomes achieved related to present and past CAC declaration actions.

[1] **EcoHealth** is an emerging inter-disciplinary field of study researching how changes in the earth's ecosystems affect human health. EcoHealth examines changes in the biological, physical, social and economic environments and relates these changes to human health.

ARTICLE 2 – SIGNATORIES TO THE CLEAN AIR COUNCIL INTER-GOVERNMENTAL DECLARATION ON CLEAN AIR AND CLIMATE CHANGE

Ajax, Town of
Aurora, Town of
Brampton, City of
Burlington, City of
Caledon, Town of
Clarington, Municipality of
Durham, Regional Municipality of
East Gwillimbury, Town of
Halton, Regional Municipality of
Halton Hills, Town of
Hamilton, City of
King, Township of
London, City of
Markham, City of
Mississauga, City of
Newmarket, Town of
Oakville, Town of
Oshawa, City of
Peel, Regional Municipality of
Pickering, City of
Richmond Hill, Town of
Simcoe Muskoka District Health Unit
Toronto, City of
Vaughan, City of
Whitby, Town of
Windsor, City of
York, Regional Municipality of
Government of Ontario

ARTICLE 3 – CALL FOR FUTURE CLEAN AIR COUNCIL ACTION

While greenhouse gas emissions have been reduced and air pollution has improved in Ontario over the past decade, the Clean Air Council ensures that commitments made under this and past Inter-governmental Declarations supports continuous improvements on air pollution and climate change issues.

The Clean Air Council members commit to advancing the development of a long-term collaborative process between municipal members and province of Ontario ministries and federal government departments to advance the actions and policies listed below in order to: help further reductions in air pollution and greenhouse gas emissions, better prepare for climate change, share information, and where possible, to share resources and undertake appropriate research and actions.

The members of the Clean Air Council commit to work collaboratively to develop healthy, lower carbon and sustainable communities in accordance with the following priority action areas[2]:

1. Continuous improvement related to implementation of corporate energy conservation, green procurement and green fleets plans.
2. Incorporation of future climate and extreme weather conditions into municipal decision making and identification of opportunities to increase community resilience.
3. Development and implementation of active transportation and transportation demand management into transportation planning, policy and decision making.
4. Identification and integration of health evidence into transportation, land use, climate change, and natural spaces planning decisions.

[2] The numbering sequence does not correlate to a prioritization of Declaration Actions.

5. Increase and strengthen recognition of municipal authority to implement community green development standards based on performance metrics that are monitored, reviewed and updated on an ongoing basis.
6. Continuous efforts towards encouraging public engagement and facilitation of community actions on municipal environmental, climate change, clean air and sustainability priorities and efforts.
7. Identification and prioritization of opportunities to better manage green infrastructure to meet community infrastructure, health and ecosystem service needs.
8. Development of a community objective for energy use and planning that recognizes the role energy plays in local economic development, energy security and resilience, addressing air pollution and climate change, and building healthier and more resilient, livable and competitive communities.
9. Integration of sustainability considerations and opportunities into all municipal strategies, plans, departments and council reports.
10. Work with the Province of Ontario and the Government of Canada on the implementation of an Air Quality Management System to ensure continuous improvements in air quality by incorporating interventions and policies that address emission reduction opportunities and reduce air pollution exposure in order to protect the health of residents.

ARTICLE 4 - PROGRESS REPORT ON PAST CLEAN AIR COUNCIL DECLARATION ACTIONS

1. **Monitor progress on the implementation of community Active Transportation and/or Complete Streets Plans and Policies to create a modal shift from single occupancy vehicle use to active transportation.**
   - Approved Active Transportation Plans: Ajax, Aurora, Brampton, Burlington, East Gwillimbury, Halton Hills, Hamilton, Markham, Mississauga, Newmarket, Oakville, Region of Peel, Richmond Hill, Toronto, Vaughan, Whitby, York Region
   - Active Transportation Plans in Progress: Clarington, Halton Region, London, Oshawa, Pickering

2. **Monitor progress on the implementation of corporate and community green development policies and practices and identify results and best practices.**
   - Approved corporate green development policies/standards: Ajax, Burlington, Caledon, East Gwillimbury, Halton Region, Halton Hills, Hamilton, London, Markham, Mississauga, Newmarket, Oakville, Pickering, Richmond Hill, Toronto, Vaughan, York Region
   - Corporate Green Development Polices/Standards in Progress: Aurora, Brampton, King, Region of Peel
   - Approved community green development policies/standards/incentives: Brampton, Caledon, East Gwillimbury, Halton Hills, Hamilton, Markham, Mississauga, Pickering, Richmond Hill, Toronto, Vaughan, York Region
   - Community Green Development Policies/Standards/Incentives in Progress: Ajax, Aurora, Burlington, Clarington, London, King, Oakville, Oshawa, Region of Peel

3. **Community Energy Inventories, Plans and Reduction Targets.**
   - Community Energy Inventories undertaken: Ajax, Brampton; Burlington, Caledon, East Gwillimbury, Halton Hills, Hamilton, London, Markham, Mississauga, Oakville, Oshawa, Region of Peel, Richmond Hill, Pickering, Toronto, Vaughan, Windsor
   - Approved Community Greenhouse Gas Reduction Targets: Ajax, Burlington, Caledon, Halton Hills, Hamilton, London, Markham, Mississauga, Oakville, Oshawa, Region of Peel, Pickering, Richmond Hill, Toronto, Vaughan
   - Community Greenhouse Gas Reduction Target in Progress: Brampton, Windsor, York Region,
   - Approved Community Energy Plans: Burlington, East Gwillimbury, Halton Hills, London, Oakville (update planned for 2016), Toronto
   - Community Energy Plans in Progress: Markham, Vaughan, Newmarket, Windsor

4. **Increase the implementation of renewable energy purchasing or production.**
   - Green Energy Purchasing: Aurora (2008-12), Caledon, Hamilton, Mississauga (2008 -2013), Oakville, Region of Peel, Toronto, Vaughan, York Region
   - Green Energy Production: Ajax, Aurora, Brampton, Burlington, Caledon, Halton Region, Halton Hills, Hamilton, London, King, Markham, Mississauga, Newmarket, Oakville, Region of Peel, Pickering, Richmond Hill, Toronto, Vaughan, Whitby, Windsor, York Region

5. **Develop and implement Community Action Plans outlining actions aimed at reducing energy use and mitigating air pollution and climate change.**
   - Approved Community Action Plans: Ajax, Brampton, Burlington, Caledon, Durham Region, East Gwillimbury, Halton Hills, London, Markham, Mississauga, Oakville, Region of Peel, Pickering, Richmond Hill, Toronto, Vaughan, York Region
   - Community Action Plans in Progress: Clarington, Hamilton, King Township, Markham (Bayview Glen Neighbourhood Action Plan), Whitby, Windsor

6. **Monitor and Report on progress related to the implementation of Community Action Plans.**
   - Approved Community Action Plan Implementation Progress Reports: Ajax, Burlington, Halton Hills, London, Mississauga, Oakville, Region of Peel, Toronto, Vaughan

7. **Develop and implement corporate Green Procurement Policies that increase the implementation of environmental, energy efficiency zero-waste and sustainable criteria in purchasing, lease and contract decisions.**
   - Approved Green Procurement Policies/Procedures: Ajax, Brampton (Energy Star and EcoChoice label criteria), Burlington; Caledon, Halton Hills (sustainable procurement procedure), Halton Region, Hamilton (life cycle costing policy), London (built into purchasing policy), Pickering (built into purchasing policy), Oakville (green procurement procedure), Toronto (green procurement procedure), Windsor, York Region
   - Green Procurement Policies in Progress: Aurora, Brampton, Clarington, Markham, Mississauga, Region of Peel, Oshawa, Richmond Hill, Vaughan, Whitby

8. **Develop Urban Forestry Plans that identify actions aimed at increasing, protecting and maintaining the urban forest.**
   - i-Tree/Urban Forest Studies undertaken: Ajax, Burlington (street trees), London, Markham, Oakville, Region of Peel (in partnership with Brampton, Caledon and Mississauga), Pickering, Richmond Hill, Toronto, Vaughan, Whitby, York Region (including financial support for York municipalities)
   - i-Tree/Urban Forest Studies in Progress: Aurora
   - Approved Urban Forestry Plans: Ajax, Burlington, London, Mississauga, Oakville, Oshawa, Region of Peel, Toronto, Vaughan
   - Urban Forestry Plans in Progress: Richmond Hill, York Region
   - Approved Infestation Plans: Ajax, Aurora, Burlington, Hamilton, London, King Township, Markham, Mississauga, Oakville, Oshawa, Pickering, Richmond Hill, Toronto, York Region
   - Infestation Plans in Progress: Region of Peel

9. **Develop municipal urban agriculture strategies that minimize barriers and actively promote and support increased urban food production.**
   - Approved Community Gardening Policies: Brampton, Burlington, Clarington, Hamilton, London, Markham, Mississauga, Oshawa, Toronto, Vaughan, Windsor
   - Community Gardening Policies in Progress: Richmond Hill
   - Approved Urban Agriculture Plans: Toronto
   - Urban Agriculture Plans in Progress: Hamilton

10. **Develop Local Food Procurement actions and policies that set local food targets for day cares, long term care centres and/or municipal cafeterias and food services.**
    - Local Food Procurement Policies in Place: Halton Region, Markham, Toronto

11. **Develop Climate Change Adaptation Plans and integrate climate change adaptation into existing and future municipal plans, in order to identify potential climate change risks and incorporate short term and long term opportunities for increasing community resilience into decision making.**
    - Approved Climate Change Adaptation Plans: Ajax, Durham Region (corporate), Oakville, Region of Peel (in partnership with Brampton, Caledon and Mississauga), Toronto, Windsor (corporate)
    - Climate Change Adaptation Plans in Progress: Ajax (Implementation Plan), Durham Region (community plan and working collectively with local area municipalities), Hamilton, London, Vaughan, York Region.

12. **Develop a Green Fleets Action Plan that identifies actions aimed at reducing emissions through municipal vehicle purchases, operations and behaviours and to support the transfer of lessons learned and actions.**
    - Green Fleets Plans Approved: Ajax, Brampton, Burlington, Halton Region, Hamilton, London, Markham, Mississauga, Oakville, Toronto, Vaughan, Windsor
    - Green Fleets Plans in Progress: Clarington, Halton Hills, Richmond Hill, Whitby, York Region
    - Green Fleets Progress Reports Approved: Brampton, Hamilton, Mississauga, Oakville, Toronto
    - Green Fleets Progress Report being developed: Ajax, London

13. **Build collaboration with community partners to engage them in supporting the development and implementation of Actions Plans and share lessons learned with Clean Air Council members on how to develop and foster community partnerships.**
    - Community Climate Action Funds in Place: Ajax, Caledon, Halton Hills, London (Active & Green Communities – pilot program), Markham, Oakville, Pickering, Toronto
    - Community Climate Change Action Funds in development: Vaughan

APPENDIX B: RE: Clean Air Council Member Feedback to the Province of Ontario's Land Use Planning Review/Our Region/Our Community/Our Home Discussion Paper and EBR Registry # 012-3256

The Province of Ontario has enacted four provincial land use plans that work together in order to:

- maximize the use and value of existing infrastructure and assets,
- manage growth and reduce traffic congestion, air pollution and greenhouse gas emissions,
- protect the natural environment and agricultural lands; and
- support the Regions' economic development and financial sustainability.

The four Plans are the:

- Growth Plan for the Greater Golden Horseshoe (GGH)
- Niagara Escarpment Plan
- Oak Ridges Moraine Conservation Plan
- Greenbelt Plan

As these four Plans are presently under review, the Clean Air Council has undertaken a consultation process within its membership representation to provide feedback and input into how the above Plans (and other associated land use planning mechanisms, such as the Provincial Policy Statement and ministerial mandates including climate change and regional transportation planning) can improve the implementation and achievement of the policy objectives identified above[1].

The Clean Air Council (CAC) is a network of 26 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area[2]. CAC members work collaboratively on

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[2] CAC Municipal and Public Health Unit members include: Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, East Gwillimbury, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Peel Region, Pickering, Richmond Hill, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Whitby, Windsor, York Region.

the development and implementation of clean air and climate change mitigation and adaptation actions.

CAC members commend the Province of Ontario for the leadership it has displayed in developing the various Plans under present review and for protecting southern Ontario's natural capital, advancing policies aimed at supporting the building of more sustainable and efficient communities and its commitment to reducing greenhouse gas emissions. It's important to recognize the tremendous effort that has taken place over the last few years as local and regional municipalities amended and defended their Official Plans in order to bring them into conformity with these Plans. The CAC members encourage the Province to stay on course with the Plan's direction and commend the Province for undertaking a review and consultation process in order to identify opportunities for possible Plan implementation improvements.

One of the key priorities identified in the consultation was the need for increasing inter-ministerial coordination and collaboration in order to identify conflicts between provincial ministerial plans, mandates and actions and opportunities to enhance the complementariness of various provincial ministerial plans, goals and policies to achieve increased synergies. Increased coordination and collaboration between Ministry of Municipal Affairs and Housing, Ministry of Environment and Climate Change, Ministry of Health and Long Term Care, Ministry of Transportation, and Ministry of Energy is of particular importance. In addition, increased collaboration between municipalities and the various provincial ministries will need to be significantly increased in order to ensure the above goals are achieved and that we have the best opportunity to meet our climate change opportunities and goals and create the livable, healthy, resilient and competitive communities Ontarians desire.

Clean Air Council (CAC) members have a strong desire to work in greater partnership with the Province of Ontario and in particular with the above mentioned Ministries in order to further our ongoing collaboration and ensure that the synergistic policy goals between these ministries and CAC member jurisdictions are realized.

What follows is a summary of the feedback and input where consensus amongst CAC member representatives was achieved.

Q#1: How can the plans better support the long-term protection of agricultural lands, water and natural areas?

- Increase the ability of the Plans to ensure consideration of the natural environment in planning decisions so that requirements aimed at protecting, expanding and integrating natural heritage systems are applied and given equal weight to other planning considerations.

- Plans should provide greater impetus for the development of municipal and regional Natural Heritage System Plans and the integration of those regional and municipal

Natural Heritage Plans with provincial Plans.

- The province should support municipalities in ensuring that ecosystem fragmentation is adequately considered in land use planning decisions and that provincial interest in protecting natural heritage and functioning forest ecosystems is safeguarded.

- Natural heritage policies within the various Plans should be made consistent with the strongest levels of protection being provided. This increased consistency would eliminate confusion and complexity associated with interpreting multiple Plans with differing protections and policies and how they apply to lands in close proximity.

- The province has significant landholdings adjacent to the Greenbelt Area. Since these are already public lands, a review of these should be undertaken to evaluate the potential to include them as protected areas, corridor linkage areas, ground and surface water protection, as well as buffer areas for key natural heritage features.

- While private land is already eligible to be included in a municipal request to expand the Greenbelt provided it meets the Growing the Greenbelt criteria, the expansion of programs such as TRCA's Greenlands Acquisition Project and other such conservation land securement programs should be expanded in order to provide increased incentive and encouragement to designate priority private natural heritage lands under greenbelt protection.

- The Greenbelt Plan should require Official Plan's to recognize urban river valleys (URVs) and the important ecological and hydrological functions that they provide to the Greenbelt; and to strengthen the external connection policies to address the importance of the URV and adjacent lands to the long term health of the Greenbelt.

- The province should speed up the process of wetland identification and evaluation and ensure that Provincially Significant Wetlands are incorporated into municipal official plans.

- The Plans should prohibit new infrastructure such as highways, transit lines, airports, railways, gas and oil pipelines, sewage, power transmission and telecommunication lines in Provincially Significant Wetlands, open spaces, natural core areas, natural heritage and hydro-geologically sensitive areas unless there are no reasonable alternatives and it has been demonstrated that there will be no negative impacts on their ecological functions.

- The Plans (especially the Growth Plan) should explicitly use and increase references to the language of ecosystem services and/or natural capital.

- Develop stronger asset understanding, governance and market parameters for natural capital. For example, assist municipalities in developing asset management plans for their green infrastructure assets, and integrate natural capital assets into land use

development decision making and carbon market mechanisms. A further example is by promoting the use of cost-benefit analysis tools that quantify the risks and benefits associated with various land use options. Please refer to the following Case Study: Town of Aurora's: The Economic Value of Natural Capital Assets.

- More action and progress needs to be made on the Growth Plan commitment that states that the provincial government will work with municipalities, producers of aggregates and other stakeholders to: increase transparency on supply and demand assumptions and projections; identify significant mineral aggregate resources for the Greater Golden Horseshoe (GGH); develop a long-term strategy for wise use and conservation; give municipalities more say in the siting of pits and quarries; develop a new mechanism to quickly screen out inappropriate proposals that should not proceed; and identify opportunities for recycling and coordinated approaches to rehabilitation.

Q#2: How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?

- All infrastructure projects should also be required to meet the same requirements as other forms of development in terms of identifying its compliance with the Growth Plans policies and goals. The Plans should require a sustainable planning lens and direction to issues related to public infrastructure and transportation planning. It should be a requirement that ecosystem service impacts, heritage system protection and greenhouse gas emissions are considered and factored into the infrastructure decision making processes.

- To better integrate infrastructure funding, smart growth and climate change goals, the following initiatives and policy changes should be considered:
    - Develop a "green screen" on major infrastructure investments and loans based on criteria such as consistency with growth plan objectives, integration with land use and other planning objectives, and delivery of reductions in GHG emissions.
    - Encourage smart infrastructure loans and investment by ensuring that provincial infrastructure loans support projects that reduce GHG emissions and/or advance the Province's stated objectives on land use planning or transit
    - Prioritize provincial infrastructure loans to support the construction of municipal energy efficiency and renewable energy systems.
    - Include consideration of relative GHG emission impacts of major projects and alternatives to these impacts within the terms of reference of major infrastructure projects' environmental assessments.
    - Consider changes to the Development Charges Act to require funding for Transportation Demand Management measures in all development applications
    - Integrate health equity into infrastructure funding applications in order to prioritize infrastructure investment to meet the needs of our most vulnerable populations.

- Increased efforts, tools and monitoring is needed to promote alignment between land use and transportation planning that focuses on high activity nodes/corridors in order to ensure that the densities able to support cost effective transit are achieved. The Provincial report "Performance Indicators For the Growth Plan for the Greater Gold Horseshoe" found that 43% of major transit station areas that could be measured had densities below the recommended 50 people and jobs per hectare needed to support transit. More than half of measured areas had existing stations, and the other half had planned stations. [3]

- Promote sustainable transit through higher, transit supportive, density targets for greenfield development, as per recommendations presented in the "Improving Health by Design in the Greater Toronto-Hamilton Area" by Medical Officers of Health in the area. Specifically, the report discussed that: "The Growth Plan identifies that a potential majority, up to 60%, of new developments may be greenfield developments, which are to achieve a minimum density target of 50 people and jobs per hectare. According to the Transit Supportive Guidelines, this density can typically only support basic transit service with a bus every 20 to 30 minutes, yet these Guidelines state that there is a need to "plan for a level of transit coverage and service which is competitive with average automobile commuting times, including time walking to and from transit service. Essentially, there needs to be enough people living in an area to support the efficient placement of services that can be reasonably reached by walking or cycling."

- Maintain direction for planned intensification and better tie the Growth Plan to transit funding mechanisms by creating a better transit funding formula/dedicated funding source to build the transit envisioned in Metrolinx's *The Big Move* by implementing any number of the tools outlined in Metrolinx's *Investing in our Region*. This would enable the transit infrastructure to catch up with the transit-oriented planning that now exists from the Growth Plan on down to municipal OPs.

- Encourage public and private sectors to have mandatory Transportation Demand Management (TDM) plans and encourage employers to consider formal telework and carpooling policies and work with organizations to implement TDM practices (i.e.: Smart Commute).

- Provide incentives to municipalities to plan walkable and transit supportive communities.

- Ensure planning for bicycle networks is coordinated across and within the Province. Regional and local municipalities, conservation authorities and other levels of government need to coordinate planning to ensure existing and planned infrastructure

[3] Ministry of Municipal Affairs and Housing. (2015). Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006. Queen's Printer of Ontario. Pages 10-11. Retrieved from http://www.mah.gov.on.ca/AssetFactory.aspx?did=10849

to support bicycle networks is efficient and well connected. A variety of cycling facilities and traffic calming measures is needed to encourage cyclists of all ages and abilities. Facilities should be context sensitive and work to create a comprehensive cycling network that meets both recreational and utilitarian needs. In order to increase cycling mode share and reduce injuries dedicated and separated facilities are encouraged where possible.

- Require integrated watershed management plans that integrate municipal water management and stormwater management plans with conservation authority plans. These Plans should be developed, implemented, monitored and updated through a cyclical process and a multi-stakeholder approach that is kept up to date and is responsive to local needs.

- Invest in applied research and development to test and implement innovative green infrastructure solutions. The potential of green infrastructure to deliver cost-effective solutions can be multiplied by developing appropriate technology and processes, particularly in relation to transportation, energy, agriculture, the design and functioning of our cities, and boosting the bio-economy.

- Integrate green infrastructure into provincial policy to ensure the support of green infrastructure projects by updating policies, standards and guidelines that factor in performance results achieved from green infrastructure and Low Impact Development (LID) interventions and foster and enable successful measures via relevant funding mechanisms, licensing and approvals.

- Policies 3.2.5 (8) of the Growth Plan notes that, "municipalities are encouraged to implement and support innovative stormwater management actions as part of redevelopment and intensification". This should be expanded to include Greenfield developments.

- Require financial planning that supports the full cost recovery of water, wastewater and stormwater infrastructure, considers the life-cycle cost of the infrastructure, incorporates climate change considerations, and plans for the long-term.

- Encourage businesses to employ a comprehensive economic and environmental footprint analysis to assess and compare green versus gray infrastructure and the co-benefits of green infrastructure solutions.

- Provide incentives to encourage the adoption of green infrastructure in greenfield, infill and redevelopment projects.

- The province should support and enable municipal efforts to more accurately calculate and account for growth costs. Development costs should be better aligned and associated with different land uses and growth areas within a municipality rather than

averaged across a municipality.

- Require increased transparency related to subsidization of specific land uses within the development fee structure.

Q#3: How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?

- The Plans should strengthen their support and requirements for expanding local food production in urban and suburban areas as a means to address climate change mitigation, climate change adaptation and other public health issues, as well as economic development. Local food production will help reduce the impact of climate change on Ontario's food supply, reduce emissions from the transportation of food to processing plants and markets, create local jobs, enhance access to a dependable and affordable supply of nutritious food and improve the overall resilience of our cities. Urban agriculture is an important component of the province's growth, health, climate change and economic development strategies.

- Support Public Health Ontario and other agencies to undertake research on a province-wide environmental health tracking system that collects and analyzes indicators of environment and human health. Such a system can help identify linkages and support policies to protect human health and inform land use planning. Examples of indicators include; levels of active transportation, neighbourhood level air pollution and public transit usage.

- The requirement for health impact assessments should be introduced in plans, as well as in the Planning Act.

- Factor public health into cost-benefit analysis of public and active transportation.

- Increase support for affordable housing through increasing availability of interconnected, mixed use communities with a range of housing options, as well as integrated and sustainable public transit. Currently, Places to Grow directs municipalities to establish and implement minimum affordable housing targets in accordance with Policy 1.4.3 of the Provincial Policy Statement and to develop a municipal housing strategy. However, there is evidence to suggest that housing affordability and high real estate costs are pushing people to live further than their ideal location. Consider also strengthening municipal planning tools such as inclusionary zoning, legal secondary suites and incentives to develop good quality affordable rental units. Furthermore, consider the extent to which better data and indicators on housing affordability can be developed in a way that could be directly linked to the policy targets.

- Ensure that Growth Plan density and intensification targets align with Ontario Ministry of Transportation Transit-Supportive Guidelines that minimum density thresholds for

areas within a 5-10 minute walk of transit support different types of transit service

- While the Plans contain broad statements about incorporating walking and cycling into land use and transportation planning, measurable action can be improved by providing municipalities with clearer direction and specific benchmarks.

- Incorporate Complete Streets policy language within the Plans and strong, direct language to ensure that municipalities plan streets for walking and cycling.

- Ontario's Cycling Strategy should be implemented with aggressive targets and funding envelopes.

- In coordination with municipalities, the province should develop a consistent process and program to collect data on pedestrians and cyclists.

- Enable and ensure mechanisms that provide stable capital and operating funding for public and active transportation.

- Enable open source transportation trip data to be more widely accessible in order to identify opportunities to improve transportation opportunities.

- There is the need for a marked increase in support for electric vehicle/low carbon infrastructure and other green technologies (especially within the transportation sector and thermal energy needs) to enable these technologies to have the ability to reduce environmental impacts. A multi-stakeholder and regional approach to addressing these infrastructure challenges is recommended.

- Adopt regulation and programs to retire old diesel heavy duty vehicles and engines.

- Ensure that the goals of the four plans align with the goals/implementation plan of Ontario's Trails Strategy.

- Encourage innovation and technological research in urban goods movement delivery (e.g. transportation information systems, last minute goods delivery vehicles, transit links for goods movement).

- Enable policies, funding and/or incentives for the establishment of an eco-roof program in municipalities to support and encourage the installation of green and cool roofs; especially in urban areas where the urban heat island effect is a concern.

- Increase the recognition and authority of municipal governments to adopt and implement mandatory green development standards that would enable them to increase the adoption of actions aimed at increasing building energy efficiency and community sustainability actions within new developments. This can be achieved by incorporating green development standards in Provincial Plan documents, the Planning

Act and/or in support of the Planning Act (i.e.: in support of Section 41) through a guideline document.

Q#4: How can the plans better support the development of communities that attract workers and the businesses that employ them?

- Involve the Ministry of Environment and Climate Change to ensure that industrial development balances the economic and business needs of our communities with ensuring that incompatible uses do not negatively impact sensitive populations in terms of air quality, noise and other environmental issues.

- For communities to be complete and support health, density needs to coexist with land use mix, employment areas, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work and school, can be conveniently reached by walking, cycling or public transit, the car will remain the default mode of travel.

- Redevelopment of urban areas and retrofitting existing building stock can contribute to ongoing increases in green jobs and local economic development while also aligning with the intended direction of the Growth Plan to build complete communities, lower green house gas emissions, improve mobility, promote the cost-effective use of infrastructure and improve overall energy efficiency of the built form.

Q#5: How can the plans help address climate change?

- Greenhouse gas (GHG) emissions need to be factored into infrastructure development decisions. Require transportation and infrastructure options to factor in GHG impacts and opportunities to minimize GHG emissions. The GHG emissions calculations should factor in lost carbon storage capacity.

- Infrastructure and development proponents should be required to offset GHG impacts through enhancements to the greenbelt forest and/or other ecological enhancements (e.g. tree planting). Additional opportunities may be presented as the province implements its carbon cap and trade system.

- Support for enhanced protection and planting of urban forests and green space is an essential component of a climate change strategy. Ontario's urban forests and green spaces are a unique tool equipped to address both emission reduction and climate change adaptation. Urban trees and green spaces help mitigate climate change by directly sequestering carbon and reducing energy use and its associated carbon emissions. They support climate change adaptation by providing the backbone of our cities green infrastructure that reduces flooding and moderates urban temperature, thereby further reducing energy use.

- The majority of lands suitable for new trees are privately owned, therefore increasing support for planting urban trees by funding programs that help homeowners and community groups plant more trees and forests would contribute significantly to community livability, resilience and competitiveness as well as air pollution and greenhouse gas reductions.

- The province should develop a coordinated urban forest strategy to protect urban and heritage trees, working together with municipalities, ENGOs and local agencies.

- Implement mandatory urban tree canopy targets for municipalities.

- Develop a rigorous assessment of the likely impact of the implementation of recent planning initiatives, including updates to the land use Plans under review at present as well as revisions to the Planning Act and PPS, on future GHG emissions relative to business-as-usual scenarios.

- Density targets and land allocations should be reviewed and updated to reflect their necessary contribution to supporting the achievement of the province's GHG reduction targets.

- Identify additional policies and planning initiatives to achieve the reductions in GHG emissions needed to meet the Province's GHG emission reduction target. The need to address building energy use in existing building stock and transportation are of the utmost priority.

- Develop tax shifting policies that reward smart growth planning and climate change goals, and discourage unsustainable planning and development.

- Conduct a review of existing infrastructure funding arrangements (e.g., development charges, land transfer tax rebates, funding formulas for schools and hospitals, and so on) and the incentives they provide with respect to the location of future development, and the appropriateness of those incentives given the goals contained in provincial growth and climate change plans.

- Explore opportunities to use Ontario's Building Code to stimulate and increase innovation towards the goal of achieving net-zero new construction, increasing energy efficiency, reducing GHG emissions and improving outdoor and indoor air quality.

- The plans should increase momentum for the creation of holistic and integrated long term community energy plans that integrate and recognize opportunities to build a more cost effective and resilient energy system by better integrating community electricity and thermal energy into the overall land use planning process. The Growth Plan can include direction to require community energy plans, including the assessment of district energy for large-scale development and/or Secondary Plans.

- By establishing an energy benchmarking and disclosure requirement for large commercial and multi-residential buildings, the province, utilities, municipalities and other stakeholders will have the capacity to design smart policies and programs and monitor their effectiveness. It will also encourage a culture of conservation in the building sector, market pressure for performance improvement, while providing consumer and investor protection. The existing provision in the Green Energy Act requiring energy disclosure at time of sale should also be for single-family homes.

- Expand the Energy Conservation Leadership Act, to further municipal development of community energy plans. Updates to the Act should also be used to remove barriers to Combined Heat and Power (CHP), renewable energy development and conservation measures.

- Consider providing standardized climate change vulnerability assessment tools to municipalities and key sectors to determine risks and areas of opportunity. The Ministry of Health and Long Term Care has developed a Climate Change Health Vulnerability Assessment and Adaptation Guideline for health units across Ontario. The Ministry of Environment and Climate Change is developing climate and health models to support the health vulnerability assessment. These examples highlight the value of cross-sectoral collaboration in the development of tools to assess climate change impacts, and in the implementation of action plans to build resiliency.

Q#6: How can the implementation of the plans be improved?

- Providing increased recognition that matters of local urban structure are un-appealable would enable improved implementation of the Growth Plan. This could be achieved by modifying Policy 2.2.2(1) of the Growth Plan to give added weight to local OPs and/or modifying proposed Section 17(24.5) of Bill 73 [un-appealable matters] to provide increased recognition that matters of local urban structure are un-appealable.

- The inclusion of Policy 4.2.4 of the Growth Plan, A Culture of Conservation, provides specific direction to municipalities to incorporate policies in their official plans to support sustainable principles and strategies. This policy should be continued and expanded to include climate change so as to encourage municipalities to incorporate these issues in their land use planning.

- It is important that the various provincial ministries work in coordination to integrate various provincial plans and identify synergies and conflicts between the various, plans, policies and actions. The Big Move and the Climate Change Action Plan need to be aligned with these plans. In addition, the Great Lakes Protection Act and Invasive Species Act are upcoming pieces of legislation that should be considered in the context of the Growth Plan and Greenbelt policies. The Ontario Biodiversity Strategy is also

currently being updated and should also be integrated.

- Section 5.3.4 of the Growth plan indicates that sub area assessments for the identification of natural systems will be completed by the Ministry of Infrastructure (now Ministry of Economic Development, Employment and Infrastructure) together with municipalities and other stakeholders. If these assessments have not yet been completed, they should be prioritized in order to align with the new 2014 PPS requirement that municipalities define natural heritage systems (not solely features).

- The Plans should increase their transparency regarding growth projections and assumptions used, land budgeting, implementation progress, and alignment between provincial, regional and municipal Plans.

- Demographic details, to the extent possible, should be provided in conjunction with population projections in order to allow municipalities to better calculate future services and land requirements. For instance, a shift from younger families to seniors may lead to different requirements in housing types.

- Improving the collection and reporting of key performance indicators such as location efficiency to transit, housing diversity and proximity of dwellings to amenities among others, would provide greater clarity on the progress of Plans towards the policy goals of using existing assets, managing growth, supporting human health, protecting natural heritage and agricultural lands, as well as mitigating and adapting to the changing climate. While the key performance indicators should be developed in consultation with municipalities and other key stakeholders, it should be made clear who is ultimately responsible for the collection, tracking and reporting of selected key performance indicators. For example the Ministry of Municipal Affairs and Housing developed a draft performance monitoring framework with indicators to measure performance of the Greenbelt Plan. This performance monitoring framework could be expanded to align with relevant plans including The Big Move.

- Reinvest carbon fee revenue into community efforts that achieve the identified land use policy goals while investing in cost effective greenhouse gas reduction actions.

- Expand the municipal revenue base beyond property taxes, development charges and user fees, and provide municipalities with greater flexibility to experiment with structural reforms of their development charges and property tax systems to promote redevelopment, infill and other sustainable urban development patterns.

- Increase the gas tax contribution to municipalities by the Federal and Provincial governments or allocate other sources of stable revenue to support the operating costs of new and existing transit services.

APPENDIX C: RE: Clean Air Council Member Feedback to the Province of Ontario's Climate Change Discussion Paper. EBR Registry Number 012-3452.

The Clean Air Council (CAC) is a network of 26 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area[1]. CAC members work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions. The CAC is proud to have the Province of Ontario as a CAC member. We are excited to work together to develop and implement an updated Climate Change Action Plan that will enable Ontario and CAC member jurisdictions to jointly achieve our greenhouse gas reduction and community sustainability targets.

CAC members would like to congratulate the Province of Ontario for its efforts to reduce greenhouse gas and air pollution emissions and protect natural capital through policies and actions such as the:

- Coal fired electricity generation phase out;
- Recognition and protection of southern Ontario's natural capital assets through the Greenbelt, Oak Ridges Moraine and Niagara Escarpment policies and legislation;
- Support for enabling community efficiency, mobility and livability through the Places to Grow, Provincial Policy Statement and Big Move; and
- Movement towards developing a more sustainable and resilient electricity and infrastructure system through the Green Energy Act and Green Bonds.

Comments Related to Carbon Pricing

CAC members[2] support the Province's leadership in sending a clear signal that emitting carbon has a cost. In addition, CAC representatives expressed a preference for a pricing mechanism that would apply to as broad a share of Ontario's emissions as possible. Ensuring emissions from as many sectors as possible are captured within the selected carbon pricing system will be integral to enabling municipalities to be more efficient and effective partners with the Province towards the achievement of ambitious greenhouse gas emission reduction targets.

CAC municipal members offer the following principles that the Province could consider in the development of a carbon pricing mechanism:

[1] CAC Municipal and Public Health Unit members include: Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, East Gwillimbury, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Peel Region, Pickering, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Whitby, Windsor, York Region.

[2] Municipal staff representatives on the Clean Air Council (CAC) were consulted in the preparation of this submission to reflect the priorities and directions of the member municipalities, but direct endorsement of this document by Municipal Councils was not sought due to the limited time frame of consultations. Many municipalities are also preparing their own independent submissions. CAC representatives are the municipal change agents within leading climate change action municipalities and have been working collaboratively across the region for the last 15 years to support and enable progress on clean air and climate change actions. The consultations were facilitated by the Clean Air Partnership, a charitable environmental organization that serves as the secretariat for the Clean Air Council.

- **Effective:** ensuring the price signal is adequate to achieve its desired emission reduction targets.
- **Encompassing:** ensuring it has broad coverage across Ontario's emission profile; that it has a predictable progression to support decision making by affected parties; and that it is monitored and evaluated on an on-going basis and has a strong emphasis on continuous improvement (e.g periodic reviews and increasing stringency).
- **Efficient and Complementary:** that it has low transaction costs, is easily implemented and complements other greenhouse gas reduction measures.
- **Fairness and Equity:** provides clear benefits for the public and wider economy, recognizes early adopters of carbon reduction actions, and does not overly burden vulnerable communities and populations. The carbon financing strategy should consider and address impacts and opportunities on all communities (both small and large, and urban and rural) and enable vulnerable communities and populations to better manage the costs resulting from carbon pricing via programs and services that better enable them to reduce their use of energy sources subject to a carbon price.
- **Transparency and Accountability:** ensures clarity regarding who pays, where the revenues go, who makes decisions, and how.
- **Awareness and Engagement:** It is essential to build public understanding of the need to: ensure action to mitigate and adapt to climate change; move towards a low-carbon economy in order to ensure Ontario's environmental, social and economic sustainability; and the role pricing carbon plays in achieving these goals.

Comments Related to Advancing Provincial and CAC Municipal Synergies and Collaboration

It is very heartening that many CAC members have adopted the same greenhouse gas reduction target as the Province. CAC member municipalities represent over half the population of the Province. The Climate Change Discussion Paper states that almost 55% of Ontario's greenhouse gas emissions come from buildings, transportation and waste. As such, enabling municipalities to reduce their community's greenhouse gas emissions is key to achieving the Province's and CAC member municipalities' clean air and climate change goals. Municipalities and the Province need to be key partners in climate action if we are going to achieve the ambitious goals we have set for our communities. Through increased coordination and collaboration between provincial ministries and municipalities, we will have the best opportunity to create the livable, resilient and competitive communities Ontarians desire.

It is also important to increase awareness of the need to integrate natural capital's ecosystem services, green infrastructure and climate change adaptation and resilience into decision making at all sectors of society. We owe it to future Ontarians to ensure that the decisions that are being made now value and enhance ecosystem services and factor in likely future weather. This will provide future generations with the natural capital and infrastructure they will require to better manage extreme weather challenges.

Clean Air Council members commend the Province of Ontario for the leadership it has displayed in reducing greenhouse gas emissions, protecting southern Ontario's natural capital and advancing policies aimed at supporting the building of more sustainable and efficient communities. **Clean Air Council members have a strong desire to work in greater partnership with the Province of Ontario to further our ongoing collaboration**.

A list of possible actions for consideration by the Province in developing its Climate Change Action Plan is attached (Attachment 1). It lists some of the more specific actions that could facilitate low carbon, sustainable,

resilient and livable communities, and an economy that thrives through participation in low carbon economic opportunities. Clean Air Council members have expressed interest in exploring these with the Province.

Like the Province, CAC member municipalities have taken a strong leadership position on actions to mitigate and adapt to climate change. Attached you will find the 2014 Clean Air Council Declaration Progress Report that outlines the actions and targets achieved by CAC municipal members (Attachment 2).

The experiences of the CAC members has shown that while coordination within and among municipal departments and provincial ministries is challenging, it is a key factor in identifying misalignments and furthering successful implementation of various plans and policies. The Clean Air Council municipal members are **very interested in developing a long-term collaborative process that brings together Clean Air Council member municipalities with the various Province of Ontario ministries** in order to explore and advance possible carbon-reduction actions. Clean Air Partnership is able to serve as the facilitator of the on-going collaborative efforts.

For more information on the Clean Air Council and to advance the long-term collaborative process between Clean Air Council member municipalities with the various Province of Ontario ministries please contact Gabriella Kalapos, at gkalapos@cleanairpartnership.org or 416-338-1288.

Attachment 1: Additional perspectives and possible climate change strategies and actions that the Clean Air Council members would like to share and explore further with the Province include but are not limited to the following:

Transportation; Active Transportation and Public Health

- Invest in, foster and support public and active transportation opportunities that will achieve community liveability, business productivity, emissions reductions and public health objectives. There is a need for increased funding as well as strengthened policies in this area.
- Provide stable capital and operating funding for public and active transportation.
- Factor public health into cost-benefit analysis of public and active transportation.
- Enable open source transportation trip data to be more widely accessible to identify opportunities to improve transportation opportunities.
- Increase support for electric/low carbon infrastructure.
- Adopt regulation and programs to retire old diesel heavy duty vehicles and engines.
- Encourage innovation and technological research in urban goods movement delivery (e.g. transportation information systems, last minute goods delivery vehicles, transit links for goods movement).

Land Use; Buildings; Energy

- **Support the energy efficiency market through training, capacity development, programs and possibly incentives to build the market; and financing tools (e.g. conservation targets, mobilizing capital, securing loans, on-bill financing, local improvement charges) to capitalize on that market.** The energy efficiency retrofit market offers an enormous opportunity for Ontario to build its low carbon economy and to reduce greenhouse gas emissions and Ontarians vulnerability to energy price increases; yet market barriers have limited the uptake of these measures. Opportunities to increase energy efficiency retrofit uptake via requirements, policies, disclosure information and market mechanisms should be explored and enabled.
- Review existing legislation (e.g. Planning Act, Places to Grow Act; Growth Plan) for opportunities to strengthen more sustainable communities.
- Explore opportunities to use Ontario's Building Code to stimulate and increase innovation towards the goal of achieving net-zero new construction.
- Increase the recognition and authority of municipal governments to adopt and implement mandatory green development standards that would enable them to increase the adoption of actions aimed at increasing building energy efficiency and community sustainability actions within new developments.
- Develop a holistic and integrated long term energy plan that integrates and recognizes the opportunities to build a more cost effective and resilient energy system by better integrating electricity, thermal energy and land use planning.

- Identify and act on opportunities to use vehicle and equipment efficiency labeling/standards/incentives/fees to move the market away from energy wasting products.
- Work with the federal government and regulators for greater flexibility as it relates to mortgage underwriting rules and risk tolerance for energy efficiency.
- Enable policies, funding and/or incentives to advance the implementation of permeable and porous surfaces, bio-retention and Low Impact Development (LID) within the right-of-way.
- Enable policies, funding and/or incentives for the establishment of an eco-roof program in municipalities to support and encourage the installation of green and cool roofs; especially in urban areas where the urban heat island effect is a concern.
- Create a less onerous Renewable Energy Approval process for biogas fuel renewable energy facilities by allowing existing Environmental Compliance Approval's (ECA's) for the anaerobic digestion facility to remain in place.
- **Examine the pros and cons of implementing the provision mandating home energy efficiency disclosure contained within the *Green Energy Act, 2009*.** Home energy literacy encouraged through the mandatory labelling of home energy efficiency helps homeowners understand the differences in operating costs between energy efficient and energy inefficient homes and can significantly increase the residential home energy efficiency retrofit market.
- Require energy reporting and disclosure for large buildings.
- Mandate a province-wide standardized and comprehensive electronic bill reporting system to include all LDCs (Natural Gas, Electricity and Water) and their clients.
- Explore additional opportunities to advance energy disclosure and labeling and integration of data (e.g. energy data and Municipal Property Assessment Corporation (MPAC) data to better inform bench-marking and energy reduction opportunities).

Air, Health and Climate Synergies

- **Undertake focused communications and awareness raising to inform the public that climate change is a health issue** (e.g. air pollution and respiratory and cardiovascular health, heat stress, infectious diseases, flood management and mold control, water quantity and quality concerns) and that they can take individual action to protect their health and support policies to mitigate and protect themselves from climate change impacts.
- Air pollution places a significant toll on the short and long-term financial viability of our health care system. **Increase the inclusion of short and long term health impacts and benefits to cost benefit analyses of greenhouse gas reduction strategies.**
- **Prioritize carbon reduction actions that achieve co-benefits.** Co-benefits can be realized for health, ecosystems and the economy by linking climate change policies with those for air pollution control (e.g. actions that reduce fossil fuel combustion; encourage efficient use of land and foster transit and active transportation options).

Green Infrastructure & Natural Capital

- Current policy, planning, finance and development practices grossly undervalue the contribution that natural capital and green infrastructure makes in our communities. This results in suboptimal infrastructure investment, unnecessary expenditures on grey infrastructure, and communities that are far less healthy and sustainable than they would be otherwise. **Develop a Plan that calls for the development of natural capital and green infrastructure inventories and asset management and for how it is should be factored into decision making.**

- Enhance support for tree planting efforts, providing policies, funding and/or incentives to support tree protection, maintenance and planting.

Community Resilience

- The Ontario Building Code (OBC) needs to better integrate present and likely future weather information into updates rather than simply focusing on outdated historic weather records. **Identify opportunities to incorporate resilience opportunities and address requirements for improving Ontario's resilience to extreme weather events into the OBC.**

- Support the development of a Regional Resilience Strategy. For example engage a broad multi-sectoral Resilience Group (critical sectors could include: buildings, transportation, public health, electricity, energy, telecommunications, food/agriculture).

- Increase and enable collaboration on resilience capacity building, future weather modeling, flood plain and flooding mapping, information and data sharing; and best practices.

- Work with municipalities to identify priorities for financial support for resilience.

- Build regional capacity for a Regional Resilience Hub that clusters capacity, skills, technology, know-how and implementation expertise.

- Advance the incorporation of climate change mitigation and resilience into educational curriculum, professional requirements, and skills training.

- Progress has been made on a number of the 59 recommendations highlighted in the November 2009 *Adapting to Climate Change in Ontario: Towards the Design and Implementation of a Strategy and Action Plan*, **a review of that Plan and a priority setting exercise on the additional recommendations where additional progress needs to be made would be a worthwhile endeavor**.

- Recognize the inter-generational debt and inequality being placed on future generations by not adequately investing and/ or delaying action on resilience actions.

- Integrate an "adaptation lens" to funding and infrastructure processes as part of the Long-Term Infrastructure Plan (LTIP). Translate changes to the LTIP into the Ontario Provincial Standard and Highway Bridge Design Code.

- Work with municipalities, public health units and community partners to engage and raise the awareness of Ontarians on the need to increase action on resilience opportunities.

Local Food and Food Security

- Food cultivation and production is a major contributor to Ontario's economy and **increased research to better understand the economic and environmental benefits of fostering Ontario's local food economy and opportunities to better meet local and export food markets in a lower carbon manner need to be explored and enabled.**

Waste

- Provide regulation and support for an organics program in a similar way as has been approached for recycling programs.
- Consider a landfill ban for organics.
- Work with municipalities, public health units and community partners to engage and raise the awareness of Ontarians on opportunities and benefits of reducing food waste and keeping organics out of the landfill waste stream.