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RE: EBR Registry # 013-2083 on Guideline on Community Emissions Reduction Planning

The Clean Air Council (CAC) is a network of 28 municipalities and health units from across the Greater Toronto, Hamilton and Southwestern Ontario Area¹ who 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 member.

Clean Air Partnership serves as the secretariat for the CAC. Clean Air Partnership is a charitable environmental organization whose mission is to work with municipalities and their partners to create sustainable, resilient and vibrant communities by undertaking efforts to improve air quality, reduce greenhouse gas emissions, increase resilience to extreme weather and climate change impacts and enable increased participation in the low carbon economy.

The CAC commends Ontario's Draft Community Emissions Reduction Planning Guide for Municipalities in recognizing the significant role municipalities play in advancing Ontario's greenhouse gas (GHG) reduction efforts. The CAC is also very pleased that the Province is advancing the policy direction (p. 11) needed to ensure that Ontario is an active participant in the emerging low carbon economy. It was appreciated that the Guideline referenced the work of the CAC in advancing innovation in community climate and energy planning (p.42).

The Clean Air Council thanks the MOECC for providing a mechanism to help bring consistency and advancement to municipal knowledge of the climate action planning process through this Guideline. It is very important to remember however that the Guideline in itself will not be able to attain the ambitious goals and outcomes it aims to achieve. Collaborative and ongoing efforts to increase municipal capacity, identify and address barriers, ensure implementation resources, as well as increase monitoring and

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

reporting expectations will be instrumental in ensuring that climate action planning process results in implementation progress. Only then will Ontario municipalities achieve significant movement towards the low carbon transformation that will make our communities better places to live and make Ontario more economically competitive and resilient.

The policy direction of the Province outlined in the Growth Plan and Climate Change Action Plan will help advance municipal climate action planning and implementation of GHG reduction actions. The CAC commits to working with the Province to advance those existing Plans (e.g. CCAP & Growth Plan); policies (e.g. Ontario Building Code, Home Energy Labelling, Home Energy Retrofit Programs and Financing, etc.); and the ongoing and supported collaboration that is imperative to helping municipalities advance GHG reduction opportunities within their communities.

Please see below for recommendations related to this draft Guideline but also next step actions that will be necessary to enable the implementation of Climate Action Plans.

Recommendation # 1: Ensure consistency and alignment between MOECC's Municipal Action Plan Program (MAPP) with the MOE's Municipal Energy Plan program (MEP).

This will reduce duplication and confusion, and increase the likelihood that actions will meet the requirements of different programs. It would also be beneficial to align MEP and MAPP with the FCM Partners for Climate Protection (PCP) program (with almost 80 Ontario members). It is clear that the Guideline has tried to align the various programs. The three identified streams balance consistency and flexibility between the different planning and implementation programs that municipalities access. It would also be of value to ensure that consistent communication occurs between MOECC, MOE and FCM to ensure each is aware of program changes that affect consistency/alignment between their various programs. Alignment between these Programs will also help ensure that municipalities can better understand the various priorities to consider through their planning process (ex. ghg reductions, reducing congestion, advancing distributed energy, energy and cost savings, etc.); their prioritization of the various priorities; and how they can support and/or undermine each other. If possible it would be of significant value to review how MAPP and MEP programs can be brought into alignment and how funding streams can be brought together to reduce the matching funds requirement for the alignment of the MEP/MAPP program².

Recommendation # 2: MOECC should take the lead in working with other Ministries (e.g. Ministry of Energy, OEB, IESO, Ministry of Municipal Affairs and Ministry of Transportation, Privacy Commission) to facilitate municipal government access to data to streamline the energy and emissions inventory process as well as emission reduction opportunity identification.

Municipalities spend significant human and financial resources on data acquisition. This could be significantly reduced if there was improved access to data from provincial ministries and electric and gas utilities. For example, the Ministry of Energy/OEB could require utilities to report annual energy use at a municipal scale as opposed to the current utility-level, streamlining access to utility energy use data for all Ontario municipalities and relieving utilities of many individual municipal data requests. Cross collaboration will also enable municipalities to work with the IESO and their utility(ies) to integrate

² Since the start of the MEP program, Federation of Canadian Municipalities' Green Municipal Funds (GMF) or the Municipal Climate Innovations Program (MCIP) was available to be used as matching funds. Those funding streams are not presently available for Plan funding to Ontario municipalities and as such, matching contributions could slow uptake on climate action planning in Ontario, especially for smaller jurisdictions.

energy demand forecasts and local renewable energy capacity considerations into their Climate Action/Energy Plans.

Another opportunity to streamline data access would be for the Ministry of Transportation to share data on vehicle ownership, type of vehicle and mileage reporting. At present only municipalities with sufficient resources purchase this data from third party providers. In addition, access to mileage information is not available for purchase and as such, mileage figures are based on inaccurate estimates and assumptions, thus reducing their ability to inform inventories and possible interventions.

In addition, data collected by MOE via the Large Building Energy and Water Reporting and Benchmarking requirement would inform municipal energy use and emissions reduction opportunities within the large building commercial sector if it were made available.

Another option to increase the efficiency of the inventory process would be to emulate British Columbia's example of the [Community Energy and Emissions Inventory](#) where the Province of BC provided municipalities with an indicative inventory of energy use, greenhouse gas emissions and supporting indicators at the community level.

It would also be of value for the Guideline to draw attention to the value and need to increase planning alignment opportunities between the CCAP and the Growth Plan but also the Long Term Energy Plan (LTEP), IESO Regional Electricity Plans, Utility CDM and DSM Plans, and Community Climate and Energy Plans. This alignment will increase opportunities for each of the Plans to support and enhance each other, while reducing occurrences where they can potentially conflict or undermine their various efforts and priorities³.

Recommendation # 3: Target setting can be improved by helping municipalities understand how federal and provincial policies affect future energy and emissions scenarios (undertaking the scenario calculations at the provincial scale and then sharing those scenarios with municipalities).

If municipalities better understood and could calculate how policies such as the Clean Fuel Standard or Vehicle Fuel Standards affect future emissions scenarios within their communities, this could provide confidence in setting more ambitious local targets.

Undertaking this analysis provincially would enable municipalities to visualize the trajectories of emissions reductions from policies that will be implemented at other levels of government; thereby allowing for the adoption of more ambitious community level GHG reduction targets. This will also increase understanding of the importance of those higher level policies and actions. The capacity to undertake that analysis at the municipal scale is inefficient, and beyond the capability of most municipalities due to resource constraints. It would of course be important to share methodology and assumptions to ensure transparency and to enable municipalities to understand how the assumptions used speak to their local circumstances.

For municipalities that are within the Growth Plan region increasing alignment between the Climate Change Action Plan target timeline and the Growth Plan population growth timeline would help municipalities align their population growth estimates with GHG targets. For example, the Growth Plan has population growth projected to 2041, while the Climate Change Action Plan has estimations for 2050 and 2080 related to target dates.

³ QUEST and CAP are working to develop a Planning Alignment Primer that can serve as a future resource to advance this action area.

Recommendation # 4: Capacity building and support on Task 4.2 Scenario Development; 4.3 Modelling and Task 4.4 Analysis of Co-Benefits would help all Ontario municipalities, but especially smaller municipalities.

Undertaking the above identified tasks is a challenging and expensive step in the Climate Action Planning process. Working with municipalities to share experiences and results of that work would be of significant value, enabling more resources to be allocated to the implementation of GHG reduction actions. While no two communities are the same, there are many similarities in the climate actions outlined in climate action plans. As such, it would be of significant value to allocate resources to these tasks so municipalities can understand what these actions mean to their local economic, social and environmental priorities. Advancing this effort in a more collaborative manner would also better enable municipalities to understand how their local circumstances and ghg reduction opportunities can inform their target setting. For example, guidance for scenario suggestions and calculations for municipal archetypes would be of significant value (i.e population growth municipalities versus stable population municipalities; rural, suburban, urban; and other municipal archetypes that may be able to inform ghg reduction opportunities and calculations to inform target setting). It would of course be important to share methodology and assumptions to ensure transparency and to enable municipalities to understand how the assumptions used speak to their local circumstances.

The undertaking and sharing of scenario, modelling and co-benefits analysis can provide significant value to municipalities in helping them identify their local ghg reduction opportunities. It can serve as a complement to municipal use of granular scale data collection and analysis, which is a significant challenge to municipalities due to the privacy issues and the challenge of aligning Statistics Canada, MPAC, and utility data sets.

Recommendation # 5: Provide within the Guideline sample Official Plan Climate Change Policies.

The guidelines could be enhanced by adding additional guidance on the type of Climate Change mitigation and adaptation policies that should be incorporated in Official Plans. It would be useful if the Step 5: Implementation is expanded (or a new resource section is added) to contain policy examples or model policies that could be incorporated into municipal Official Plans. Samples of Policy language could be geared towards providing sample language provided within the Guideline or examples from municipalities of various types (regional, local, single tier, rural, urban, suburban, etc). The Guideline could be significantly enhanced through the inclusion of a scan of the type climate change policies that municipalities across Ontario have in place in their Official Plans.

Recommendation # 6: Implementation support such as the Municipal Challenge Fund is imperative to ensure Climate Action Plan development translates into Climate Action Plan Implementation.

This draft Guideline provides guidance for municipalities to develop Climate Action Plans; however any Climate Action Plan must result in the implementation of climate actions. Securing funding support for community climate actions is extremely challenging using the existing property tax base, and unless supports such as the Municipal Challenge Fund (and similar such funds available from other governments or agencies) are available to Ontario municipalities; their ability to turn planning into action is significantly undermined. Without the reinvestment of cap and trade funds, resources for implementation of community climate actions will be significantly compromised. The Province should consult with municipalities on how to ensure the reinvestment of Ontario's cap and trade funds results in cost effective GHG reduction actions, while also ensuring it sets in place a mechanism to ensure progress towards the long-term transformative actions that will move Ontario to our 80% by 2050 GHG reduction goal.

In addition, promoting and sharing financing and implementation case studies would help to raise the profile of the climate change action value proposition. The CAC would welcome the opportunity to work with MOECC and other Ministries to develop/inform mechanisms that would provide the greatest likelihood of advancement from climate action planning towards climate action implementation.

Recommendation # 7: Increase the recognition of the important role stakeholder engagement plays in ensuring Climate Action Plan implementation throughout the document.

While Stakeholder engagement is referenced within the Guideline and there is a section dedicated to stakeholder engagement in Part C – Resources; the significant role and importance stakeholder engagement plays in ensuring the greatest likelihood of implementation success leads to the recommendation to increase the profile of stakeholder engagement within Part A and Part B of the Guideline. This would help to ensure that stakeholder engagement opportunities are advanced throughout the Climate Action Plan process and will increase the profile for how the stakeholder engagement process is embedded in each of the climate action stages (Inventory, Target, Plan, Implementation, and Progress Reporting). Ensuring this integration of the human dimension into the climate action planning process will increase the likelihood of stakeholder engagement being an integral component that is able to support and enhance buy-in and implementation success.

Recommendation # 8: A similar Guideline is needed to inform Municipal Adaptation Planning and speak to opportunities for integrating climate change mitigation and adaptation planning.

This draft Guideline is extremely helpful in providing municipalities with a process for climate change mitigation planning and the flexibility to ensure that local needs and capacity are considered. A similar guideline for climate change adaptation planning, and opportunities to address mitigation and adaptation simultaneously would be extremely helpful for Ontario municipalities.