

RE: Feedback from the Town of Halton Hills Regarding the Province of Ontario's draft Environmental Plan

The Town of Halton Hills is pleased to provide the following comments to the Government of Ontario regarding the draft Environmental Plan that has been posted on the Environmental Bill of Rights (EBR registry) for public feedback.

The Town of Halton Hills has a longstanding commitment to community sustainability which was initially articulated in the town's 2007 Green Plan and led to the establishment of the Office of Sustainability in 2009, the introduction of the Green Development Standards program in 2010, the publication of Imagine Halton Hills – the Town's Community Sustainability Strategy – in 2013, the publication of the Mayor's Community Energy Plan in 2015 to reduce corporate and community greenhouse gas emissions and the creation of a Climate Change Adaptation Plan to increase community resilience and is currently under development. As a result of these initiatives, the Town's corporate energy intensity has dropped by 13% since 2015, all new Town facilities since 2012 have been built to a minimum LEED-Silver Standard, over 100 local businesses, community groups, and individuals have pledged to contribute to the implementation of Imagine Halton Hills through the Sustainability Partnership Program, and over 800 residential units and approximately 180,000 m² of non-residential floor space has been approved for construction in conformance with the Green Development Standards Program. Halton Hills is committed to balancing economic prosperity, cultural vibrancy, environmental health and social wellbeing.

General Comments

Halton Hills is pleased to see the leadership that the Province of Ontario has demonstrated in combating climate change acknowledged throughout the plan and strongly encourages the Province to strive to maintain such a leadership position into the future. We believe that the Province now has a unique opportunity to demonstrate the positive impacts that innovative, non tax-based and free market instruments can have on lowering greenhouse gas emissions at the Provincial scale, and therefore encourages the Province to maintain or enhance the level of ambition in the Environmental Plan compared to the plan it replaces.

Halton Hills is also pleased to see the wide range of subjects covered by the Environmental Plan from climate change mitigation to waste and land conservation. However, the Town suggests that the Plan would benefit from an increased level of specificity. For example, in addition to listing the actions that the Province is committing to implement, the Town recommends that the Province:

- Outline who is responsible for implementing the actions;
- Include an implementation timeline for each action;
- List key performance indicators that will be used to evaluate the plan's implementation; and
- Include a detailed process for monitoring and reporting on the plan's implementation.

GHG Target:

Halton Hills recommends that the Government of Ontario reconsider the greenhouse gas emissions target that is included in the plan because it represents a substantive reduction in Ontario's climate leadership and its ambitions to reduce greenhouse gas emissions compared to the target it replaces, and would essentially cancel the impact of coal phase-out. Reducing the 2030 target from 37% to 30% and moving the baseline from 1990 to 2005 would represent an increase of 30 megatonnes in GHG emissions in 2030 which is roughly the same reduction that phasing out coal achieved. The new target commits the Province to achieving a further 8% reduction over 11 years, whereas previous efforts yielded a 22% reduction over 13 years, which therefore suggests a reduction in momentum at a time when the global scientific community is urging more action rather than less. Therefore, Halton Hills recommends that the previous 37% target be retained and that the action plan be designed around that target. Halton Hills feels that doing so would enable the Province to demonstrate the fact that innovative, non-tax, free market-based instruments can be just as if not more effective in combating climate change than the previous Cap and Trade program.

Carbon Trust Fund:

Halton Hills supports the establishment of the proposed Carbon Trust Fund and encourages the Province to increase the overall size of the fund and to establish a dedicated funding stream to support municipal greenhouse gas emission reduction efforts. The Fund's establishment acknowledges the fact that a successful transition to a low carbon economy will require the active participation of the private sector and enhanced investment levels to spur the development and deployment of low carbon technologies. However, Halton Hills is concerned that the proposed structure for the Fund will lead to a reduced potential for municipalities to access funding compared to the program it replaces. The Municipal GHG Challenge Fund that was established under the previous Cap and Trade program would have provided municipalities with a dedicated funding stream of \$300 million to implement low carbon solutions in their community, whereas the proposed Carbon Trust would make \$400 million available to all public and private sector entities in Ontario, which significantly reduces the potential that municipalities – which control approximately 55% of emissions according to the Federation of Canadian Municipalities – will be able to access equivalent levels of funding to reduce emissions and lower the impact of municipal energy costs on the local tax base. Lastly, Halton Hills encourages the Province to establish a mechanism to replenish and maintain the Carbon Trust Fund beyond the four years that are committed to in the environmental plan as the transition to a low carbon economy will require sustained investments in transportation, energy and infrastructure over the next several decades.

Low Carbon Transportation

Halton Hills strongly supports the public transit infrastructure investments that are mentioned on page 38 of the Environmental Plan and encourages enhanced investments levels. The provision of easy to access public transit has been shown to reduce commuting-related greenhouse gas emissions per individual while simultaneously reducing peak transportation demand on the Province's road network which reduces the need to undertake costly repairs and expansions and therefore directly benefits Ontario's tax payers. Halton Hills acknowledges from a practical standpoint that private vehicles will continue to make up a significant portion of any low carbon transportation system in Ontario and as such continued investments are required to provide the necessary road infrastructure. That said, Halton Hills also strongly encourages the Province to expand the scope of its low carbon transportation actions to stimulate the uptake of low carbon private vehicles (i.e. natural gas, electric, hybrid, hydrogen etc.) as well as the expansion of the Province's active transportation network.

Transportation Demand Management:

Halton Hills recommends that the Province place a greater emphasis on transportation demand management as a practical and low cost solution to reducing greenhouse gas emissions. The ability for an individual to reduce driving distances and their need for driving in general leads to a profound reduction in their personal greenhouse gas emissions but does not require major lifestyle sacrifices or major investments in low carbon technologies. However, the challenges associated with housing affordability – a challenge that is especially acute in the Greater Toronto Area – has a general tendency to lead people to seek housing further away from employment areas which increases commuting distances and emissions. The ability to live, work and play in one community as opposed to several decreases emissions, establishes a sense of place, enhances work-life balance and supports an overall enhancement in health and wellbeing. Halton Hills encourages the Province to include actions in the Environmental Plan and the provincial land use policy regime that support housing affordability as well as the ability to live, work and play in one community. Halton Hills also encourages the Province to include actions that leverage technologies to reduce transportation demand such as the continued expansion of high speed internet infrastructure across the Province. Research conducted by the Intelligent Communities Forum suggests that the provision of high speed internet access provides a whole host of economic and environmental benefits, including the fact that it enables local businesses to access the global market place, supports the growth of the rural economy and enables people to work from home instead of commuting to work.

Financing mechanisms:

Halton Hills encourages the Province to include additional market-based mechanisms to finance energy efficiency and low carbon projects at the municipal level such as municipal revenue bonds. Municipal bonds have been extensively utilized by municipalities in the United States to finance a wide variety of capital intensive traditional and green infrastructure projects. In 2011 the American municipal bond market was valued at \$3.7 trillion but the Canadian municipal bond market was only a fraction of that size, which suggests that additional opportunities may exist to leverage the instrument within Canadian municipalities. Halton Hills views municipal bonds as a particularly suitable instrument for financing energy efficiency projects because the initial costs could be recovered through the energy savings generated by the project which establishes a revenue stream to compensate the bond holders. Halton Hills strongly encourages the Province to include this tool in the Environmental Plan, to ensure that any barriers preventing municipalities from issuing bonds are eliminated, to promote the use of the instrument to municipalities, and to provide municipalities with the training and education necessary to successfully implement the instrument to finance energy efficiency projects that will benefit investors and the community.