

# **INFORMATION ITEMS**

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**Week Ending March 9, 2018**

## **REPORTS**

1. None

## **INTERGOVERNMENTAL CONSULTATIONS**

1. Watershed Planning Guidance

## **CORRESPONDENCE**

1. Memo to Mayor and Council re: Response to the Province's Guideline on Community Emissions Reduction Planning
2. City of Guelph Response to Intergovernmental Consultation re: Proposed CycleON Action Plan 2.0

## **BOARDS & COMMITTEES**

1. None

## **ITEMS AVAILABLE IN THE CLERK'S OFFICE**

1. None

Provincial/Federal Consultation Alert							
Title	Ministry	Consultation Deadline	Summary	Proposed Form of Input	Rationale	Lead	Link to Ministry Website
Watershed Planning Guidance EBR # 013-1817	Ministry of the Environment and Climate Change (MOECC) and Ministry of Natural Resources and Forestry (MNRF)	April 7, 2018	<p>The Province is seeking feedback on its draft Watershed Planning Guidance, which will help municipalities in implementing provincial direction related to watershed and sub-watershed planning.</p> <p>Watershed Planning Guidance supports the implementation of policy amendments to the four provincial land use plans (Growth Plan for the Greater Golden Horseshoe, Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan, Greenbelt Plan) which strengthen requirements for watershed planning. It also supports the Provincial Policy Statement which identifies the watershed and subwatershed as the ecologically meaningful scale for integrated and long-term planning.</p> <p>The draft Watershed Planning Guidance contains the following information to help municipalities and planning authorities to carry out watershed planning:</p> <ul style="list-style-type: none"> <li>• Overview of watershed and subwatershed planning, including policy context, key principles, process and components of a watershed plan.</li> <li>• Direction on carrying out effective and meaningful engagement.</li> <li>• Indigenous interests and considerations in watershed planning.</li> </ul>	Staff comments will be submitted on the online Environmental Registry (EBR) and provided to Council via the Information Package following the consultation deadline.	<p>Staff input is considered appropriate and will be consistent with the City's position regarding land use planning.</p> <p>If interested, Council and the community can submit comment's directly to the Environmental Registry</p>	Planning, Urban Design and Building	<a href="http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTMzOTI3&amp;statusId=MjAzNzEw&amp;language=en">http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTMzOTI3&amp;statusId=MjAzNzEw&amp;language=en</a>

			<ul style="list-style-type: none"><li>• How to prepare elements of a watershed and subwatershed plan</li><li>• How to use watershed and subwatershed planning to inform land use and infrastructure planning and decision-making.</li></ul>				
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# MEMO

DATE March 9, 2018

TO **Mayor and Council**

FROM Cathy Kennedy

DIVISION Strategy, Innovation, and Intergovernmental Services

DEPARTMENT Office of the Chief Administrative Officer

**SUBJECT Response to the Province's Guideline on Community Emissions Reduction Planning**

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Staff brought to Council's attention in the January 12, 2018 Consultation Alert that the Ministry of Environment and Climate Change was seeking feedback on a draft Guideline on Community Emissions Reduction Planning. This Guideline will help municipalities to complete greenhouse gas inventories and develop community emissions reduction plans. Moreover, it will also support actions on climate change and Growth Plan policies.

The purpose of the Guideline is two-fold:

1. Provide implementation support to Growth Plan, 2017, policy 4.2.10 which requires municipalities in the Greater Golden Horseshoe to incorporate climate change policies in their municipal official plans and encourages them to complete greenhouse inventories, set targets, and develop emission reduction strategies; and,
2. Support municipalities in conducting community energy and emissions planning under the Municipal Action Plan Program (name and program details still being developed) under the Five-Year Climate Change Action Plan.

The City's Climate Change Office indicated in its Consultation Alert that it was intending to submit comments to the Province in order to ensure that the Community Energy Initiative (CEI) will be in compliance with the guideline, along with the Official Plan and any other relevant policies and plans. Compliance may be an eligibility requirement for new funding programs created for the purposes of distributing the proceeds from the Cap and Trade system.

Staff had an opportunity to meet with stakeholder groups to provide input into two joint submissions to the Province. The attached submissions were coordinated by the Clean Air Council (CAC) and the Quality Urban Energy Systems of Tomorrow (QUEST).

As a result of the inclusion of staff's comments into the joint submissions, a City-initiated response is no longer necessary. The Consultation Alert will, therefore, be removed from subsequent Council Information Packages.

**Cathy Kennedy**  
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March 2<sup>nd</sup>, 2018

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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 Area<sup>1</sup> 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

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<sup>1</sup> 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 program<sup>2</sup>.

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

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<sup>2</sup> 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.

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 priorities<sup>3</sup>.

**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.

**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.**

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

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 # 7: 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.



Quality Urban Energy  
Systems of Tomorrow

March 2, 2018

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Dear Ms. Watt,

RE: EBR Posting 013-2083, Guideline on Community Emissions Reduction Planning

QUEST – Quality Urban Energy Systems of Tomorrow and the Community Energy Plan (CEP) Implementation Network (formerly QUEST ON Municipal Working Group) commend the province for its support of Community Energy and Community Emissions Reduction Planning and the development of this comprehensive Guideline to Community Emissions Reduction Planning (the Guideline).

QUEST is the voice of the Smart Energy Communities marketplace in Canada. Smart Energy Communities benefit from improved energy efficiency, enhanced reliability, lower costs, and reduced greenhouse gas emissions. As an influencer, connector and educator, QUEST supports governments, utilities & energy providers, the real-estate sector, and solution providers to grow the Smart Energy Communities marketplace.

QUEST has been supporting communities as they develop Community Energy Plans and work towards becoming Smart Energy Communities for the past 11 years, and we appreciate that this effort has been recognized in the Guideline.

The CEP Implementation Network is a QUEST Working Group that brings planning practitioners from communities across Ontario, including municipal practitioners from 15 local governments, together to share lessons learned and transfer knowledge to advance the community energy planning process in the province.

**Board of Directors/  
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We are pleased to see that the Guideline includes many of the suggestions and approaches identified in the Community Energy Implementation Framework<sup>1</sup>, developed through the multi-year Community Energy Planning: Getting to Implementation in Canada! initiative<sup>2</sup>, and supports a planning ethos of “reduce, improve, switch”, which is inline with QUEST’s guiding technical and policy principles for Smart Energy Community development.<sup>3</sup>

The following content and language recommendations are presented for your consideration in the Guideline:

**Recommendation 1: Highlight the 3-level approach at the start of the document, and ensure a French version is available.**

The level of detail in the Guideline is applauded, however it may be overwhelming to municipalities new to Community Energy and Emissions Reduction Planning. Consider highlighting the *3-Level of Complexity Approach* at the start of the document in the *Guide For Readers* section to provide additional clarity.

A french translation should also be available for Ontario’s Francophone communities.

**Recommendation 2: Clarify language around planning processes and government programs, and offer one program for Municipal/Community Energy Planning**

In the Executive Summary and Introduction Sections, the Guideline makes reference to the Municipal Action Plan Program. If there are further details on the Municipal Action Plan Program, they should be included. There is some confusion around what is currently offered via the Municipal Energy Plan (MEP) Program (particularly as the MEP language supports a “Municipal Energy Plan”, and not a “Community Energy and Emissions Plan” or “Community Emissions Reduction Planning” as this guideline references), and how this could be different from a forthcoming Municipal Action Plan Program.

Offering two separate programs for community energy and emissions planning (Municipal Energy Plan Program and Municipal Action Plan Program) will add administrative, marketing, programming, and reporting burdens to municipalities, and confusion to broader community stakeholders. We strongly advise maintaining one program, to avoid duplication and redundancy.

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<sup>1</sup> The full Community Energy Implementation Framework, which identifies 10 strategies for successful CEEP implementation can be found here: <http://framework.gettingtoimplementation.ca/how-to-use-the-framework/>

<sup>2</sup> Details and Resources on the Getting to Implementation Project are found here: <http://gettingtoimplementation.ca/>

<sup>3</sup> QUEST’s Principles can be found here: <http://www.questcanada.org/thesolution/principles-smart-energy-communities>

**Recommendation 3: Highlight stakeholder engagement throughout the document, and provide additional guidance with case study examples.**

Municipalities have a leading role in the development and implementation of a CEEP, however ongoing stakeholder engagement is the critical element of the process - more so than the technical aspects of GHG accounting and modelling. The success of the planning process is dependent on the cooperation and collaboration among community stakeholders, such as (but not limited to) the electric and natural gas utilities, economic development organizations, conservation authorities, and neighboring local governments. This is particularly relevant for the implementation of initiatives that are jointly led or outside of a municipality's jurisdiction.

Electric and natural gas utilities play a key role in data access and sharing, target setting, and project and programming implementation. They also have existing energy retrofit programs that can be leveraged by the CEEP, and are often involved too late in the new development process, which prevents new approaches to development and encourages status quo.

Furthermore, energy planning is a critical and established process undertaken by utilities, as well as the Independent Electricity System Operator (IESO). It is paramount that municipalities work closely with local utilities to ensure the CEEP process aligns with utility distribution and conservation planning, and that they become familiar with and participate in the IESO's regional planning process.

This ongoing effort of cross-sectoral collaboration and engagement should be expanded upon in the Implementation section and in table 45. The Community Energy Implementation Framework<sup>4</sup> offers several strategies and case studies on how municipalities can implement actions and projects through engagement. The Guideline will further benefit with the inclusion of engagement templates and approaches tailored to the existing legislative and governance framework for Ontario, which highlight the different opportunities and approaches for an upper tier, lower tier, or single tier municipality. These templates could be added to Appendix 8 (not that currently in Appendix 9, the Guideline references figure 33 and 34, however these figures are not present in the document).

Language should also be added to Task 5.3 - Integration regarding the importance of alignment with other energy planning stakeholders, and utilities should be added as key participating stakeholders on the tables and charts throughout the Guideline.

Lastly, as implementation is ongoing and the CEEP process varies from one community to the next, the relative percentages listed in Table 56 are misleading.

**Recommendation 4: Allow for a flexible, iterative, and non-linear approach to planning**

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<sup>4</sup> <http://framework.gettingtoimplementation.ca/strategies/strategy-7/>

For municipalities new to the CEEP process, it is difficult to get council and the broader community on board with the plan and its vision. Starting with one project, and seeing results/getting community buy-in, justifies the rationale for a more comprehensive plan (with an inventory, target, and additional initiatives).

In addition, considering actions at the inventory stage improves the efficacy of the planning process, particularly with progress reporting. If the actions in the plan do not match the data available for a community to collect, progress reporting becomes impossible. Completing a customized screening or situational analysis that is tailored to assess the conditions and priorities of each community, and then determining what data needs to be collected to meet those priorities, will enable implementation, monitoring, and reporting success.

#### **Recommendation 5: Emphasize transparency in the CEEP process**

Encourage municipalities to emphasize transparency throughout the CEEP process, particularly with the processes and methodologies around modelling assumptions, metrics, and scenario development. This will make it easier for future updates to the plan, specifically if a new consultant or staff member is leading the revised effort.

#### **Recommendation 6: Add QUEST's additional resources to Section 8**

QUEST and its research partners have developed the following resources to support community energy planning and implementation, which can be included as additional resources:

1. [Readiness Survey](#)  
A self-evaluation tool that allows you to assess the extent to which your community has the factors in place to implement a Community Energy Plan.
2. [Community Energy Implementation Framework](#)  
Ten strategies to help communities move their plans from a vision to implementation. Strategies support the entire process, and are useful for municipalities at all stages.
3. [Smart Energy Atlas](#)  
A spatially-based resource of policies, plans, programs, resources, and projects across Ontario
4. [Ontario Energy Community of Practice](#)  
A series of 4 training modules and webinars relating to CEEP development and implementation in Ontario, developed and delivered in partnership with the Clean Air Partnership with funding from the MOE and IESO
5. [Community Energy Planning in Ontario: A Competitive Advantage for Municipalities](#)

A primer developed with support of the MOE on Community Energy Planning in Ontario, with an emphasis on economic development

6. [Community Energy Planning and Data - An Assessment for Small and Rural Municipalities](#)  
A resource developed with funding from MOE to support rural and small communities with the MEP process, particularly with developing baseline inventories and data.
7. [Community Energy Planning: The Value Proposition](#)  
A Getting to Implementation resource highlighting the environmental, health, and economic benefits of Community Energy and Emissions Planning
8. [Integrated Community Energy Solutions \(ICES\) Municipal Policy Toolkit](#)  
A toolkit of policies for municipalities to consider in their CEEPs, for land use, transportation, buildings, infrastructure, waste, and water & sanitation
9. [Advancing Integrated Community Energy Planning in Ontario: A Primer](#)  
A guide to the CEP/CEEP process for Ontario communities
10. Towards Planning Alignment (in development)  
QUEST and the Clean Air Partnership are currently working on a report on best practices for alignment between CEPs, IESO Regional Planning, and utility distribution and conservation planning. This resource will be available early 2019.

This CEP Implementation Network convenes monthly to share best practices and explore regional cooperation relating to the CEEP process. Consider adding this group as a resource, as well as individuals to contact for help or for more information. The group can be contacted at [info@questcanada.ca](mailto:info@questcanada.ca)

#### **Recommendation 7: Link CEEPs with adaptation planning**

As more communities responding to and preparing for the impacts of extreme weather events, integration with adaptation planning is important to consider. Adding language and examples in the Integration and Co-Benefit sections can support this alignment, such as in Appendix 6 on co-benefits as well as in Appendix 10 as a key criteria example.

In addition to the recommendations on the language and content for the Guideline, the CEP Implementation Network encourages the Ministry to consider the following as next steps to support Community Energy and Emission Reduction Planning in Ontario:

#### **Consideration 1: Investigate opportunities to improve and standardize data access and collection**

Access to data for community energy and emissions planning is a known issue in Ontario. To effectively plan for and report on a CEEP, community energy planning practitioners are required to dedicate considerable effort, resources, and costs.

To address this, the MOECC is well placed to consider engaging with municipalities, utilities, the Ministry of Energy, the Ministry of Transportation, and the IESO to discuss the potential of a Province-led basic energy and emission inventory, using the approach developed in BC as a model<sup>5</sup>. This will be particularly helpful for small and rural municipalities, with limited resources for community energy and emissions planning. Municipalities further along in the process can use this data as a starting point, and explore opportunities tailored to their community to delve deeper into their inventory and planning initiatives.

Furthermore, consider further engagement with municipalities to address barriers to transportation data and provide best practices to collecting this data.

**Consideration 2: Provide additional guidance for BAU scenario and target setting development, based on provincial policies and programs and differing land use contexts**

MOECC is in a leadership position to support a consistent approach to BAU development by providing municipalities and making public a list of updated emission coefficients reflecting the estimated impacts of provincial policies, such as (but not limited to):

- Cap and trade
- Building code changes (GJ/M2 or T CO2e/GJ/M2)
- Fuel/vehicle standards (L/100km or T CO2e/100 km)
- LTEP influence of electricity supply (T CO2e/MWh)

The proposed municipal target-setting method based on per capita emissions targets is fair in theory but often impractical in practice, due to the vastly different energy and emissions profiles associated with differing land use contexts (urban, suburban, rural, industrial). To address this, provide target setting guidance to communities that reflect their unique characteristics.

**Consideration 3: Consider a flexible funding approach to support communities with CEEP implementation**

Several municipalities are in the process of updating their existing plans, but have found the current MEP funding is insufficient to support the amount of work required for plan updates. MOECC is in a leadership position to support the MEP program to encourage the development and update of comprehensive plans.

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<sup>5</sup> <https://www2.gov.bc.ca/gov/content/environment/climate-change/data/ceei>

There are existing tools that can support CEEP development, target setting, and developing CEEP initiatives, however they are currently cost-prohibitive and/or out of date. Broadening the scope of the Challenge Fund to provide funding for the use and update of decision making support tools, in addition to capital projects, will support CEEP implementation.

Lastly, CEEP implementation is an ongoing process that requires community-wide engagement and collaboration at an unprecedented scale. Funding for capacity building and multi-stakeholder collective impact initiatives will support the development of cross-sectoral projects - where transformational, community-scale GHG reductions, aligned with provincial GHG targets - are to be found.

We thank you for considering these recommendations, and look forward to working with your Ministry and others to advance Community Energy and Emissions Planning and the transition of Ontario's communities into Smart Energy Communities. We also welcome the Ministry to participate in the monthly CEP Implementation Network meetings.

QUEST and participants of the CEP Implementation Network would be pleased to discuss these recommendations, as well as our ongoing work to support the transition towards Smart Energy Communities, further in person with the Ministry.

Sincerely,

Brent Gilmour MCIP, RPP  
Executive Director, QUEST

Alex Benzie  
Lead, Ontario Services, QUEST

Cc: Michael Brophy, Manager of Programs and Partnerships, Ministry of Energy

Submitted March 6, 2018 via EBR online portal.

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**Re: City of Guelph response to the proposed CycleON Action Plan 2.0**

The City of Guelph is pleased to provide input to the CycleON 2.0 plan. Our Bicycle-Friendly Guelph cycling master plan (2013) has a goal to be a leading bicycle-friendly community with a 3% daily trip mode split by 2022. We are working toward achieving these goals by providing quality connected infrastructure, educational outreach, promotional events and activities, and enforcement in order to make our community safe, accessible and enjoyable by bike.

Guelph supports the five focus areas of the CycleON 2.0 plan, and has some specific suggestions for strengthening this plan to make it meaningful and impactful to Ontario communities. These are organized under the following five headings.

**1) Design Healthy, Active and Prosperous Communities**

The City of Guelph supports the recommendations to design healthy, active and prosperous communities. Specifically, guidelines for e-bike use are essential. E-bikes vary greatly in their design speeds, physical size, and function. An updated clearer definition of what constitutes an e-bike, as well as where and when they are permitted to operate, needs to be included in the Highway Traffic Act. This update should consider specific details on how e-bikes may or may not be treated differently than human-powered bicycles within public rights-of-way. Guidance is also needed for municipalities to enact appropriate bylaws to govern e-bikes on off-road multi-use trails to ensure the safety of other trail users and infrastructure. Particular attention to the different user groups of e-bikes, and the different types of e-bikes is required. We support Share the Road Coalition's proposal for a provincial roundtable on e-bikes to discuss these issues. We also support their proposal to consider pricing incentives for pedal-assist electric bicycles and bike-share systems to enhance all-ages and abilities access to cycling in Ontario.

City of Guelph staff are highly engaged in Active and Safe Routes to School locally. We are very encouraged to see some alignment amongst several Provincial ministries in supporting active school travel with new funding opportunities and policy announcements in recent months. Active school travel by bicycle is a major unmet opportunity that requires coordination amongst the Ministries of Education, Health and Transportation in order to achieve meaningful impacts. A collaborative approach could identify opportunities and eliminate barriers arising from current practices in school boundary-setting, school

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transportation funding, school siting and site planning, physical literacy and road safety, and healthy living initiatives. CycleON 2.0 should collaborate with Green Communities Canada in these efforts.

Additionally, the City of Guelph supports the development of guidelines and tools for cycling infrastructure in school zones. These guidelines should include recommendations for slower speed zones within at least 500 meters of schools. Guelph has had success implementing reduced-speed school zones (40 kph on arterial roads during a.m. and p.m. school hours, and 30 kph all day on local and collector roads). Extensive literature demonstrates that decreased operating speeds protect vulnerable road users from serious injury or death.

Finally, the City of Guelph supports the province-wide celebration of Bike Month without replicating existing initiatives. Celebrating travel by bicycle is an important piece in building a culture of cycling, as demonstrated by other regions such as the Cyclovias in South America and Car Free Sundays in the United States.

## **2) Improve Cycling Infrastructure**

The City of Guelph supports the recommendations made under improving cycling infrastructure. Guelph is very grateful to be a recipient of the Ontario Municipal Commuter Cycling Program funds for 2018-2020 and federal Public Transit Infrastructure Funding that supports first and last mile trips by active modes. Guelph strongly recommends establishing consistent annual funding for municipalities to build and maintain all-ages and abilities cycling infrastructure.

We would also strongly encourage the Province to include cycling infrastructure in all applicable highway construction projects within the proposed province-wide cycling network and /or municipal cycling and active transportation plans, following current guidance provided through Ontario Traffic Manual Book 18, NACTO or other relevant leading practices in highway active transportation infrastructure design.

In developing Minimum Maintenance Standards for cycling infrastructure, the Province and partners should recommend setting maintenance response expectations (time to respond) equal to or better than those for vehicle travel lanes in order to encourage cycling as a year-round accessible form of transportation.

## **3) Make Safer Highways and Streets**

It is our opinion that most of the points listed under this section refer more to education than actual safety improvements. The CycleON 2.0 should include some street design principles for bicycle-friendly highways and streets. The fast evolution of cycling infrastructure is leaving Ontario municipalities scrambling to meet diverse user group expectations in constrained spaces. For example: guidance is needed regarding the interaction between AODA expectations and multi-use boulevard facilities or boulevard cycle tracks; intersection design, protected intersections; "mixing zones" at intersections where off-road cycling infrastructure and sidewalk infrastructure meet; signalization; and minimizing the dependency on regulatory signage for enforcing safe behaviours.

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On the educational front, the City supports the recommendations included. We would specifically like to see educational materials included in the recurring license renewal mail-outs to all licensed Ontario drivers. These mail-outs are also an opportunity to provide important updates to all drivers on new types of infrastructure and how to use them safely and respectfully, such as boulevard paths, roundabouts, cross-rides and bike boxes. The content should not be specific to people driving cars, but should also include information on using these facilities as pedestrians and people riding bicycles.

The City of Guelph would also support inclusion of funding opportunities for school boards and/or local police services to offer cycling skills training in schools such as Bike Rodeos or simplified CAN-Bike courses for children and youth.

#### **4) Promote Cycling Awareness and Behavioural Shifts**

The City of Guelph is encouraged to see a recommendation to develop an integrated multi-channel marketing and awareness campaign. It is our hope that a coordinated communication effort by the Province will complement local efforts to educate the general public and promote cycling, particularly for utilitarian purposes, in our communities. Monitoring and tracking progress on attitudes and behaviour change is welcomed and more specific metrics throughout the strategy to collect data and monitor progress on all recommended actions are encouraged. Some statistics that would be useful to collect regularly include: economic development attributed to cycling tourism, number of transportation trips made by bike as a function of investment in infrastructure, greenhouse gas emission reduction estimates, data on collisions involving cyclists, and estimated impacts to provincial health care costs as the cycling for transportation increases in popularity.

#### **5) Increase Cycling Tourism Opportunities**

The City of Guelph is hosting recurring and new cycling events each year that grow in popularity. We hope to continue building our image as a staging place for cycling tourism. We are supportive of the recommendations under this category, particularly for the establishment of a Cycling Tourism Trails Infrastructure Fund that may be helpful in filling in missing links between neighbouring jurisdictions to provide a continuous cycling network. We strongly agree that a coordinated approach with RTOs and hospitality industries is beneficial to promoting cycle tourism, and would include Ontario by Bike as a key partner in those discussions.

We look forward to seeing how CycleON 2.0 evolves and welcome future opportunities to participate in fostering a positive culture of cycling in Ontario.