



November 16, 2020

Mayor Kennedy Stewart
& Councillors
City of Vancouver

By email

Your Worship & Members of Council:

**RE: CLIMATE EMERGENCY ACTION PLAN ADOPTION
THE BUSINESS CASE FOR ACTION & HURDLING MINOR OBSTACLES**

I am writing to [follow up on my letter to you last week](#), urging support of the Climate Emergency Action Plan and rigorous analysis to strengthen implementation.

I am, once again, urging you to support the Plan. A number of concerns have been raised. These are important to acknowledge! They should not detract, however, from the overwhelmingly positive course being set by the CEAP recommendations. Please find below:

- A. The Business Case: the CEAP manages inaction costs & transforms marketplaces
- B. Hurdling Minor Obstacles (Mobility Pricing, Parking & Costs): maximizing benefits, resilient recovery

A) THE BUSINESS CASE: THE CEAP MANAGES COSTS, MAXIMIZES BENEFITS & TRANSFORMS MARKETS

There are two compelling reasons to support this Climate Emergency Action Plan: a plan that will serve citizens and business in the City of Vancouver and have cascading positive effects far beyond its boundaries.

1. **Managing Inaction Costs, Maximizing Benefits:** The cost of climate change inaction will make COVID-19 costs pale by comparison. Climate change impacts and the costs of adaptation and emission reduction grow with every year of delay. This CEAP begins a decisive shift to addressing multiple diverse benefits with an increasingly integrated agenda.
 - **Within a couple of years, COVID will be a history lesson that will hopefully allow us to mitigate future costs. It is not unreasonable, in contrast, to expect climate inaction to result in regular price tags into the hundreds of million per annum within decades in the City of Vancouver alone** with some combination of projected impacts, e.g.: extreme precipitation episodes, private and public infrastructure damage from sea level rise and wind events, forest fire-induced air pollution, heat wave mortalities, local and global food production disruptions, insect infestations, etc. The course correction price to meet IPCC's steep 2030 and 2050 emission reduction targets, allowing us to avoid the most catastrophic private, public and human life costs, has grown steeply as a consequence of delaying serious action for 30 years. It is time for serious action in the public interest.

- **For cities, smart climate action can yield huge benefits: human health, mobility, civic infrastructure deficit management, and even more affordable housing and transportation.** In contrast to earlier City Climate Plans, the CEAP has begun a transition to more fully take advantage of these broad-based benefits. The greatest arena for maximizing these benefits lies in Big Move #1 which will be more wholesomely addressed through land use planning such as the Vancouver Plan. Not only does smart land use planning maximize benefits, it also offers some of the lowest—often negative—cost solutions. This is discussed below, under "Resilient Recovery."

2. **Accelerating Market Transformation: The City is exercising leadership and transforming the marketplace. This is driving senior government changes and further reducing costs.** The City's energy efficiency building bylaws have had a decisive influence over the world's most innovative, new construction energy policy framework: B.C.'s Energy Step Code. This is changing construction sites across B.C. and reverberating through senior government corridors in other parts of Canada. This leadership will bring down the operational and full life-cycle cost of operating homes and buildings. It is also helping drive growth in prefabricated building construction, which will further reduce new construction costs. **The City of Vancouver is a flagship city. As it has in the past, I am optimistic the CEAP will compel the B.C. battleship and the federal behemoth to make course corrections, further reducing the cost of action.**

B) HURDLING MINOR OBSTACLES (MOBILITY PRICING, PARKING, COSTS): RESILIENT RECOVERY

A number of concerns have been raised by civil society and members of Council. These are important to acknowledge. They should not detract, however, from the overwhelming positive course being set by the CEAP recommendations. Below are approaches to managing some of these important concerns.

1. Mobility Pricing: Effective & Equitable

- **Potential Amendment: Replace Recommendation D with:** *"THAT Council direct staff to evaluate diverse options for transport pricing implementation at local and regional scales, exploring diverse alternatives to the Metro Core congestion charge. Solutions should not impact City businesses unfairly, increase inequity, and increase carbon and congestion regionally."*
- **Context - Managing Regional Carbon, Congestion, Equity:** As discussed [in my earlier letter](#), an area-based congestion charge in the Metro Core could inadvertently increase carbon and congestion regionally by accelerating distributed employment and residential growth across the region (see [Stats Can, Commuting 1996-2016](#)). This is the major driver of:
 - reverse single passenger vehicle commuting from downtown to isolated employment areas
 - surging growth in personal vehicles (currently rising at 2x the rate of population growth)
 - steadily growing commuting distances, and the
 These trends are big contributors to the rapid growth in personal transportation carbon and congestion (the region's largest and fastest growing sub-sector). On top of the risk to carbon, there are risks to the City's economic vitality and equity.

2. **Financial Framework: Managing Costs & Mainstreaming Resilience**

- **Potential Amendments: Strike in recommendation V** "as a roadmap to", acknowledging this important analysis, but that it can and should be supplemented.
- **Supplement recommendation W** with, "...; and explore diverse options to manage short and long-term implementation costs that move beyond some of the more traditional, high-cost traditional approaches and offer systemic solutions to complex problems, providing a roadmap for the City and other local and senior government jurisdictions for a genuine resilient recovery."
- **Context - Mainstreaming Resilient Recovery: The CEAP's COVID-19 Statement omits consideration of the CEAP opportunity to help drive a resilient recovery: socially, ecologically and financially.** The CEAP is a commendable major course correction. There are, nevertheless, immense untapped opportunities for deeper systemic solutions that address multiple policy objectives and move beyond some traditional high cost, technical fixes e.g.
 - There are several alternatives to sub-surface SkyTrain to UBC, amongst the world's most capital-intensive form of transit. As well as the initial ultra-high cost, it will put a burden on future councils and future generations for the ultra-high cost of upgrading and replacement, undermining intergenerational inequity—a central objective the City's CEAP is intended to address. The City has potential to negotiate additional transit *and* housing support for exploring integrated approaches.
 - Addressing deep carbon reductions in residential buildings, housing affordability and surging rates of social isolation laid bare by COVID will be tremendously costly if they continue to be addressed as isolated problems or largely ignored (i.e. social isolation). These challenges are fundamentally related.
 - 40% of CoV HHs are occupied by just 1 person (a disproportionately large share are seniors who are also experiencing loneliness at much higher and growing rates)
 - 30% of CoV HHs are occupied by just 2 peopleThere is immense untapped potential to integrate problem solving and fundamentally address the rapidly changing demography and its fundamental mismatch with traditional housing approaches, building on City leadership in housing innovation, and exploring, e.g.
 - The role of non-profit housing providers in managing secondary suites and facilitating home sharing on behalf of solo seniors.
 - Further policy innovations that incentivize development of accessory dwelling units and small housing development, and protect long-term affordability.
 - Some of the biggest opportunities for Big Move #1 (walkable neighbourhoods) and Big Move #2 (active travel/transit) are land use policies around underutilized SkyTrain stations and transit exchanges. They have great potential to address housing and transportation affordability. It would be difficult to imagine meeting CoV's bold targets for mode split, rental housing units, 2030 carbon reductions without advancing these solutions. These can be addressed through land use planning such as Vancouver Plan. These are near zero cost!

3. *Parking: Huge Costs with Current Policies, Big Benefits with Bold Actions*

- **No Amendment:** The proposed recommendation has sufficient flexibility for deeper analysis and policy development.
- **Context - Big Benefits with Bold Actions:** Parking subsidies and parking oversupply has strongly shaped our automobile dominated urban land form with immense cost to human health, affordability, quality of life, tax burden, as well as climate and congestion. Transforming parking policy has potential to generate benefits in each one of these areas. At the conservative cost of \$3000 per square metre, a 12 square metre parking stall has a \$35,000 market value that is overwhelmingly a subsidy in residential areas.
- **The City has a history of parking policy innovations that have yielded net positive benefits.** As well as central to establishing Vancouver as North America's car sharing capital, supportive parking policy innovations made an immense contribution to managing carbon, congestion and addressing equity. While imperfect, the West End parking policy has played an important role in enabling the area to already exceed the CEAP's city-wide 2030 transportation mode share targets while supporting many of those aforementioned priorities. [[West End Usual Trip Mode Share](#): walking: 30%; cycling: 15%; transit: 30% (work) to 73% (school); car: ≤25%]. Building on this history of innovation can yield even greater benefits.
- **Some parking policy reforms, notably in commercial areas that aren't well served by transit and active travel options, may have some of the same consequences as a congestion charge around the central core** (noted above), i.e. driving growth (notably employment growth) to widely distributed parts of the region and undermining local economic vitality. Robust consideration of the regional parking policy implications in peripheral commercial areas should be considered.

We commend the City's leadership and urge you to support the Climate Emergency Action Plan, making amendments to mitigate risks that have been raised by and to Mayor and Council.

Respectfully and appreciatively,



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