



November 3, 2020

Mayor Kennedy Stewart
& Councillors
City of Vancouver

RE: CLIMATE EMERGENCY ACTION PLAN SUPPORT, IMPLEMENTATION, RISKS AND GAPS

Your Worship & Members of Council,

I am writing to congratulate the City on its leadership in advancing the climate action agenda. I urge you to support these important recommendations. I also urge you to manage some risks associated with implementation and fill some important gaps.

CLIMATE EMERGENCY ACTION PLAN LEADERSHIP

The CEAP is a decisive effort that demonstrates the seriousness every level of government should take in addressing climate action. Renewable Cities commends the ambition and recommends support. The Plan's leadership stands out in four areas:

1. **Building & EV Technical Acumen:** The City's vision and initiative is having a powerful impact on transforming the marketplace far beyond its borders, notably in new building construction.
2. **Land Use Integration:** Land use establishes the foundation of energy intensity in a community. It is the paramount authority of a municipality. Smart land use has the greatest potential of any sector for advancing or retarding progress on so many key priorities: ecological integrity and resilience, mobility, congestion management, civic infrastructure cost management, equity, affordability. It is also the biggest gap in most community climate action plans. Placing a climate lens on a City Plan, neighbourhood plans and housing and development policy is commendable.
3. **Equity & Affordability Acknowledgement:** Climate change impacts are inequitable. Mitigation and adaptation measures should reduce these inequities. Affordability is a central dynamic in these inequities. Housing and transportation are households' largest expenditures and largest GHG sources. Integrating affordability into climate action will be decisive in cost effectively advancing both agendas. The City's acknowledgement offers great promise.
4. **Resource-Based Community Solidarity:** Prefabricated wood building construction has immense potential to drive deep carbon reductions in the City and beyond. The City's recognition that the strategy can strengthen the economies of forest-dependent communities can play a vital role in growing a low carbon economy across B.C. Protecting and restoring the ecological integrity of our forests—under threat from climate change—is similarly recognized and equally important.

The City of Vancouver is a flagship jurisdiction. We're hopeful that leadership in these four areas will inspire others, notably the provincial government. While its targets are similarly bold, the B.C. government's policy and implementation efforts lack rigour and will frustrate progress of the City of Vancouver, other B.C. municipalities, and the province as a whole in meeting targets necessary to avoid the most serious and devastating consequences of climate change.

CLIMATE EMERGENCY ACTION PLAN RISK MANAGEMENT & GAP ANALYSIS

As well as the City's leadership, there are notable risks and gaps associated with some of the Climate Emergency Action Plan implementation considerations. These risks and gaps are not foregone conclusions as a result of adopting the CEAP, but they should be addressed in policy, planning and implementation.

Managing Risks - Pushing Carbon, Congestion and Economic Activity Beyond the City

While the objectives and ambitions are laudable, there are risks associated with some of the policy directions under consideration.

Mobility Pricing Innovation

Mobility pricing should be central in meeting several objectives:

- driving deep GHG reductions
- managing congestion
- reflecting the real costs of infrastructure use
- not exacerbating inequities

While bold, establishing a congestion charge around the metro core risks undermining each of these objectives. Over the last 20 years, some regional land use and transportation trends that have contributed to the the biggest growth in GHGs—personal transportation—specifically:

- A growing share of jobs are outside of the Metro Core. (If jobs were concentrated in major employment nodes, this could be good. However, a large share of jobs are in widely dispersed business parks that are not served and cannot be cost effectively served by good transit.)
- A growing share of the City's workforce is travelling outside the City for work. The fastest growth in employment areas is more than 25 km from downtown and widely distributed.
- Average commuting distances are steadily growing, despite plummeting occupancies in almost most single family neighbourhoods in the City and region.

While it may reduce congestion and carbon in the City, establishing a congestion charge uniquely in the Metro Core could exacerbate these trends, potentially increasing congestion and carbon in the region, inadvertently sustaining widely distributed employment and residential growth, and undermining economic vitality in the City.

Yes, it is true that congestion charges in central business districts have been and are successful in many places around the world. Good mobility pricing design demands thoughtful consideration of the local and regional context. Central business district congestion charges are effective for monocentric urban regions. While historically monocentric, employment in Greater Vancouver has become increasingly polycentric.

Moreover, congestion charges were historically focussed on relieving congestion chokepoints. Contemporary mobility pricing objectives must consider the entire regional carbon and congestion context.

A distance-based mobility pricing regime with strong considerations for equity is likely the best approach to address multiple objectives in the region; however, further analysis is necessary.

Recommendation: *Further analysis, including spatial modelling, is necessary to optimize an effective mobility pricing regime. This must be undertaken regionally and ideally provincially. As well as addressing equity and fair infrastructure utilization costs, it is essential to consider carbon and congestion regionally, and, in fact super-regionally. The fastest growth in personal transportation carbon is in our super region, i.e. the Upper Fraser Valley and Sea-To-Sky Corridor where large shares of the workforce are commuting to downtown Vancouver and Metro Vancouver's polycentric employment nodes.*

Parking Policy Reform

The City's willingness to consider bold new approaches to parking policy is commendable. Free or subsidized parking and parking oversupply has strongly shaped our automobile dominated urban land form with immense implications to human health, affordability, quality of life, as well as climate and congestion.

Some parking policy reforms can have overwhelmingly net positive impacts and simultaneously better address infrastructure use and equity with few negative consequences, e.g. increasing on-street parking prices and restrictions in residential areas. However, 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 unique vulnerabilities of people with mobility concerns should also be considered, notably in employment and service precincts.

Recommendation: *The City's bold ambition in parking policy innovation is encouraged. While there are many parking policy reforms where the balance of impacts are overwhelmingly positive, further analysis, notably by location and employment area type, are necessary to mitigate the risks of unintended consequences, particularly in employment and service areas with less abundant transit and active travel options.*

Mind the Gap - Land Use Innovation & Equity Integration

The City's acknowledgement of land use, equity and affordability is commendable. However, it appears that some immensely important opportunities are being omitted.

Accessory Dwelling Unit Innovation

The plummeting drop in household occupancy and surging growth in one and two person households has many implications, notably contributing to the affordability crisis, carbon intensive housing stock and alarming rates of social isolation. In the City of Vancouver, 40% of households are occupied by just one

person, a disproportionate share of whom are seniors. Covid-19 has further exposed the vulnerability of seniors living alone and the immense mental health implications.

There are huge untapped opportunities for addressing climate change, affordability and social isolation by deepening the City's efforts in diverse types of accessory dwelling units such as secondary suites, laneway housing, additions and home sharing. These opportunities are greatest in single family neighbourhoods where bold zoning reforms can increase the number of units permissible on single family parcels. Floor area limitations can be based on the number of units that are available and the affordability of these units.

Similarly, in the multi-family sector, incentivizing lock-off suites to maximize adaptability of units for rental and the dynamism of families as they age.

Zoning innovations, however, are inadequate to fully realize this potential as many people—notably seniors—have barriers to becoming landlords or becoming home share hosts. Building the capacity of non-profit housing providers to facilitate home sharing and manage rental units (e.g. secondary suites and laneway homes) should be integrated into climate, housing and seniors' policy.

Recommendation: *The City builds on its leadership in accessory dwelling units with bold new policy innovations that increase housing supply and manage affordability in traditional single family neighbourhoods, and work with the province and non-profit housing providers to build capacity for managing secondary suites and home sharing programs on behalf of seniors to address affordability, climate change and social isolation.*

Deep Transit & Land Use Planning Integration

This region has solid transit leadership but it is also inadequate and taxpayers and transit riders get a poor return on investment. The biggest barrier is municipal land use planning integration. Sixty percent of Greater Barcelona's population is within 1 km of rapid transit. It has a 60% transit mode share. Greater Vancouver has 20% of its population within 1 km of rapid transit and a 20% mode share.

The City will only meet its ambitious modal split targets, short term GHG reduction targets and rental housing targets if more residents are situated proximate to high quality transit. The City of Vancouver has rapid transit stations, valued today at ~\$30 million, that are 20-30 years old and have experienced negligible changes in land use. Low and medium income households use transit at much higher rates than high income households. There is significant untapped potential for increasing affordable housing next to high quality transit, specifically:

- MURB rental, social and market housing can be integrated, adjacent to or on top of bus interchanges and bus depots. This should be evaluated as a long-term source of revenue for TransLink.
- Zoning innovation is necessary around rapid transit stations, notably underutilized ones whose land use regime has negligibly changed in the 20-30 years since these stations have been built. Zoning reforms should consider diverse approaches for effectively managing land lift and maximizing rental.

Recommendation: *As part of City Plan and Transit Action Plan updates, analysis should be undertaken to identify the potential and diverse opportunities for intensifying around major transit hubs, notably underutilized rapid transit stations, to meet rental housing targets and modal shift targets.*

We urge you to support the Climate Emergency Action Plan and undertake further analysis to mitigate risks and fill important land use and equity gaps.

Respectfully,



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