

RESOURCE CONSERVATION MANITOBA

Comments on Specific Sections of the CEC's
"Discussion Document Toward a
Comprehensive Environmental Strategy"

SEPTEMBER 2003

Sustainable Land Use (Section 4)

Overall comments

As a general comment on the draft strategy in this area, RCM notes the high degree of overlap with the sustainability provisions of the existing Plan Winnipeg. Instead of continually reinventing the wheel when it comes to developing land use policy, RCM suggests, it is important to implement in practice the plans and principles that have already been proposed, debated and adopted.

Indeed, the items listed below concerning land use are already in the existing Plan, awaiting implementation. (Note that the item titles alone do not do justice to all the positive requirements included in the Plan under each of the items.)

- 1A-01 Promote Downtown Development
- 1A-02 Encourage Downtown Living
- 3A-01 Promote Orderly Development
- 3A-02 Promote Compact Urban Form
- 3A-03 Integrate Land Use, Urban Design and Transportation Planning
- 3A-05 Promote Regional Consistency in Planning and Development
- 3B-01 Promote Vibrant Neighbourhoods
- 3B-02 Guide the Development of New and Existing Residential Areas
- 3C-10 Provide Integrated Transportation Network
- 3C-02 Commit to Transit Improvements
- 3D-01 Commit Foremost to the Maintenance & Renewal of Existing Infrastructure

Plan Winnipeg has already been mandated, and the time has arrived when the City must hold up each of its decisions up to the test of the policies that are already in place. The Discussion Document should make this clear, rather than advocating yet more planning. Instead of waiting to develop a policy (as implied in point 4.1g) for inclusion in the next Plan Winnipeg (several years in the future), the City should have as a high-priority objective the implementation of the sections of Plan Winnipeg identified above. In short, real implementation of Plan Winnipeg ought to be the crux of the Discussion Document on the topic of land use planning.

It may be noted that the current Plan Winnipeg cites indicators, rather than targets. The CEC strategy could usefully improve on that by establishing targets for sustainable development. Further, the City should regularly issue report cards that spell out how well it is doing in meeting the objectives of Plan Winnipeg.

Sustainable Urban Growth (section 4.1)

Regarding point 4.1a: “Integrated transportation” should mean more than just “maximizing public transit opportunities,” worthwhile as that certainly is. As Todd Litman pointed out in his discussion on Smart Growth principles at the CEC’s Open House in June, “the first step to better Transit is better walking options.” Integrated transportation must encompass infrastructure improvements, public education, and corporate and individual incentives to encourage active transportation. Rapid Transit corridors will only be successful in Winnipeg if safe and efficient walking and cycling routes are designated in conjunction with the bus/rail system.

Regarding item 4.1o: The recommendation to work with other levels of government and neighbouring municipalities to develop consistent policy and approaches to sustainable urban growth is absolutely paramount. Winnipeg can set conservative urban growth boundaries and strictly abide by them, but this will not solve sprawl if surrounding municipalities allow residential growth to continue adjacent to the City. Ex-urban development is more detrimental to the sustainability of a city than suburban development because not only are city infrastructure and resources stretched to the limit but the city loses the corresponding revenue from property taxes. Thus, Winnipeg must place a high priority on creating an atmosphere that will attract current and future ex-urbanites to remain within the city. Working with the Province to devise ways of directing growth appropriately will be essential. RCM recognizes the critical role of the Province (as regulator) in this.

Portland, Oregon is often used as an example of a successful ‘smart growth’ city. Portland has established a growth boundary and has increased the quality of life of its citizens by managing growth carefully. However, a short distance across the state line lies Vancouver, Washington, essentially a sprawling bedroom community of Portland. Without strong urban growth boundaries of its own does not provide a high quality of life for its citizens. This example could be repeated in Winnipeg if the City does not have an effective and supported urban growth boundary.

Parks, Open Spaces and Natural Areas (section 4.2)

This section should address the important concept of connectivity of green space. Connecting green spaces creates city-wide greenways that increase opportunities for alternative transportation and also facilitate the mobility of plant and animal species throughout the city.

Trails and Greenways (section 4.4)

Regarding point 4.4f: Such initiatives should incorporate comprehensive plans for safe cycling and walking routes, accommodating both daily commuters as well as recreational users.

Regarding point 4.4h: Progress toward this option would be enhanced by working with Winnipeg workplaces (businesses and government) to encourage the installation of lock-up, storage, shower, and change-room facilities.

Managing the Urban Forest (section 4.6)

Point 4.6e should be strengthened. Quantifying the benefits of urban trees requires more than just canopy analysis; it should measure other ecological services such as soil retention, riverbank stabilization, air purification, water filtration, wildlife habitat, and so on.

Sustainable Public Transportation (section 5.1)

As we have commented previously and in our earlier submission, sustainable land use is a critical issue and should be given priority. It drives many of the other aspects of urban sustainability. Public transportation depends upon population density, which is tied to land use planning. Therefore, the sections on sustainable land use and sustainable transportation should be integrated.

Regarding point 5.1a: The City should lead by example and institute the Eco-Pass program at all of its worksites, providing subsidized Transit for ALL civic employees.

Regarding point 5.1b: By way of educating City employees on the benefits of using public transit, the City should lead by example and provide one FREE month-long Transit pass to ALL civic employees, to provide an introduction to the service and build commitment to the service.

Regarding point 5.1c: One way to shift subsidies away from personal vehicle use is by issuing special permits or preferential parking arrangements for ridesharing vehicles.

Regarding point 5.1d: One concrete form this should take is setting a timeframe and workplan, and dedicating sufficient human and financial resources, to implement the recommendations made in the “Guide to Better Transit for Winnipeg.”

Regarding point 5.1g: This should be expanded to include working not only with other levels of government, but also with community groups and directly with the private sector to develop commuter trip reduction programs.

Transportation Demand Management (section 5.2)

As a general observation for this section, RCM notes that our organization has a growing record of experience since 1998 in public education on sustainable transportation, and in piloting and disseminating practical community-based trip reduction programs (including workplace-based TDM and active and safe routes to school programs). If the City is not going to initiate or manage such programs on its own, it can at least achieve the desired trip reduction benefits and increases in transit use, while realizing significant cost-efficiencies, by supporting such community efforts on a sustained basis.

Regarding point 5.2d: A clear example would be to sign onto rideshare database programs, such as carpool.ca.

Regarding point 5.2e: This should be expanded to include providing the opportunity to share examples of successful TDM programs implemented by other government offices (provincial and federal) in Winnipeg.

Regarding point 5.2g: Working with MPI can also mean ensuring lower insurance rates for vehicles with lower emission levels / greater fuel efficiency, and integrating environmental

and social responsibility issues in Driver Education programs (e.g., importance of fuel efficiency; introduction to cycling rights and responsibilities; etc.)

Regarding point 5.2i: As a priority, this needs to be expanded to include provision of sufficient funding for the annual Commuter Challenge (in which Winnipeg placed first among Canadian cities in 2003). The Commuter Challenge is the highest-profile sustainable transportation and TDM promotional event in Winnipeg and a leading TDM event across Canada. It is a critically important tool for building awareness and participation. In areas where a strong community-based TDM capacity exists (as at RCM), the City should be working to support and extend such programs.

Regarding point 5.2k: This should indicate that, while corridors are sorely needed for both cycling and walking, the two types of corridors should be distinct, affording safe integration of both, while avoiding bicycle/pedestrian interference.

Regarding point 5.2l: This should be expanded to state that the City will develop a promotional campaign, through continued streams of communication with Winnipeg workplaces and the Chamber of Commerce, which shows the economic, health and wellness, and climate change benefits of Transit and the Eco-Pass program.

Finally, active transportation and safety, although not mentioned in the Discussion Document, are key components in sustainable public transport. A sustainable transportation program should not only consider environmental effects but also health effects from accidents, emissions of pollutants and noise, reduced opportunities for physical exercise and the contribution of these factors to urban inequalities. Safety analysis should be undertaken at intersections and sections of streets that have the most accidents in Winnipeg.

Waste Reduction (section 6)

Overall comments

RCM recommends that the City should integrate its public messaging, its participation in community education programs, and its development of waste minimization and resource conservation programs. Citizens and indeed City officials across departments can be assisted in appreciating how individual programs promoting recycling, composting, proper household hazardous waste disposal, use of environmentally friendly products, green procurement, energy conservation, water conservation, stewardship, and other environmental goals contribute to urban sustainability and a reduction in the urban ecological footprint. Otherwise, we see a risk of citizens becoming bewildered by an apparently unrelated series of isolated programs with apparently arbitrary rules and regulations demanding new and unexplained behaviours. Public education on the Strategy itself is one means of achieving this, which again raises the important need to develop and adequately resource a City function (office) that takes a “big picture” look at issues and can support departments in making concrete progress toward sustainability goals.

“Leading by example” (point 6.1d)

The City of Winnipeg has begun to look at the waste reduction potential and benefits of organic diversion and has initiated several useful programs. The following suggestions build on this foundation. (Perhaps these are more in the nature of ‘action plan’ suggestions.)

The “Leaf it With Us” program could be strengthened by distributing reusable containers and having leaf pick-ups as part of the recycling program, or distributing biodegradable bags and continuing to have people drop off their leaves at temporary depots. These steps would help eliminate the process of debagging the leaves at the receiving end, and would also avoid introducing plastics from this source and reduce contamination of the final product.

If the City plans on extending its composting operations, a high-end product would be preferred, as it could become an income generating activity (e.g., selling the finished compost back to residents).

In the future, if other City departments (parks and recreation, cemeteries, etc.) were to establish composting programs, certain guidelines would need to be established so that the quality of the compost would be suitable for horticulture application.

As a companion measure, the City would want to limit chemical applications on its own property, as compost quality may not be suitable if current chemical procedures are maintained. The City could also extend its composting operations to include a compost demonstration site at City-owned greenhouses – to be maintained by the City (leading by example) – and use the areas as an education tool for schools and general public.

The City would then want to optimize the benefits of the above by:

- developing comprehensive collection, processing, and application guidelines for finished compost for City departments.
- actively educating all affected City employees on the long-term benefits of generating and using compost.
- ensuring compliance with these measures.

By-laws and Regulations for Waste Minimization

Unproductive conflicts between the City’s Health Department and the goals of its waste reduction programs need to be addressed and reconciled. These can arise over the management of home composting piles, reflected in complaints by neighbours.

At present, there is no home composting section of the City’s anti-litter by-law or other by-laws, so health officers can interpret existing regulations concerning health nuisances in varying ways. RCM would encourage the City to adopt by-laws that regulate proper composting practice in the backyard setting so as to clarify the issues both for residents and for by-law enforcement officers. Several other cities across Canada have similar by-laws that could be adapted for such purposes.

Special events generate considerable organic waste that ends up in the garbage because there are no facilities. Event organizers require permits from the City in order to stage their event in a City park. Parks and Recreation and other related departments (if not all departments) should integrate waste minimization considerations into their permit and license applications.

Monitoring and Feedback on Waste Minimization

To date (September 2003), approximately 15,000 compost bins have been distributed to Winnipeggers through the City’s truckload sales of composters, a commendable initiative. As

follow-up, it would be useful to dedicate resources to monitoring, feedback and community encouragement, in order that the benefits from investments made in the bin distribution and other composting programs are optimally realized. Activities such as phone surveys, door-to-door visits and congratulatory promotion campaigns will help novice composters stay motivated, feel part of a growing movement, and ensure that they have composting success.

Climate Change and Air Quality (section 2)

On climate change

Climate change is a critical issue for Winnipeg as a prairie community that is vulnerable to the impacts of shifts in temperature and precipitation patterns. This is another area in which existing ENGOs (like RCM) have taken a leadership role in piloting and delivering programs of public education, accompanied by the development of practical opportunities for action by Winnipeggers in their everyday lives. Although RCM does not want to be, or to appear to be, too much self-interested here, it remains demonstrably the case that the City has much to gain through partnerships with community organizations that have the expertise to deliver services and help motivate climate-friendly behaviour among citizens. Again, if the City is not in a position to undertake direct delivery of such programs (perhaps a reasonable position in light of the effective and efficient capacity of the ENGO sector), there ought to be a clear commitment to invest in these community efforts.

On air quality

RCM is concerned that Section 2.2 of the Discussion Document misrepresents air quality issues in Winnipeg by stating that generally this city enjoys excellent air quality compared to other cities of similar size in Canada, and not mentioning indoor air quality. We believe the evidence supports a different view.

Poor indoor air quality is a serious risk to human health that requires attention, particularly in City of Winnipeg public buildings, such as schools, over which City of Winnipeg public health inspectors have jurisdiction.

The statement that Winnipeg has good air quality relative to other locations in Canada contradicts the findings of several studies (See Burnett, Cakmak, and Brook, "The Effect of the Urban Ambient Air Pollution Mix on Daily Mortality Rates in 11 Canadian Cities," *Canadian Journal of Public Health*, 89(3), 152-156, 1998, and <www.hc-sc.gc.ca/hesc-sesc/air_quality/pdf/particulate_matter9.pdf>, page 28). According to data measured from 1992 to 1994, Winnipeg has higher rates of inhalable particulate matter (PM₁₀) than most Canadian cities. These levels of respirable particulate matter are higher than for any city outside the polluted Windsor-Montreal corridor. Winnipeg's particulate matter and annual mortality for PM₁₀ exceeds Calgary, Vancouver, Victoria, Edmonton, Egbert, Ottawa, Sutton, Saint John, Kejimikujic and Halifax for all these factors. When inhaled, fine particles are capable of being deposited in, and could damage the airways of, the lower respiratory tract and the gas-exchanging portions of the lung. Particulate matter tends to be generated from human activities, particularly the combustion of fossil fuels, particularly diesel fuel.

High levels of mortality characterize Winnipeg during episodes of adverse air quality in comparison to other Canadian cities (e.g., Windsor and Edmonton). Winnipeg has an

expected annual mortality of 27.9 per million people from current ambient particulate matter concentrations (PM₁₀).

Leading authorities identify indoor pollution as one of the most serious risks to human health (American Lung Association et al., 1997; Environmental Protection Agency, 2000; Government Accounting Office - US, 1999; Canada Mortgage and Home Corporation, 1993). The presence of higher levels of many pollutants indoors relative to outdoors and the large amount of time spent indoors by the general population means that the potential health impact is large. People spend more than 90 percent of their lives indoors. In the US, indoor pollution is estimated to cause thousands of cancer deaths and hundreds of thousands of respiratory health problems each year (Environmental Protection Agency, 2000).

In light of the foregoing, the discussion document should include commitments to (a) systematically and comprehensively measure indoor air quality in City of Winnipeg facilities; (b) identify and implement measures to improve it, as required; (c) adopt bylaws within the range of municipal authority regulating indoor air quality and the practices that degrade it; and (d) advocate steps by the Province to act with similar purpose in areas of provincial jurisdiction.

Wastewater (section 7)

Sustainable solutions for Winnipeg's wastewater treatment operations remain a high priority, as illustrated by the two rounds of Clean Environment Commission hearings in January and April of 2003. The plan put forward by Water and Waste left many citizens unconvinced. Winnipeg's environmental strategy needs to push this issue beyond the proposed 'end-of-pipe' solutions mentioned or alluded to in the Discussion Document.

In addition to leading by example, the City must encourage and support citizen engagement in alternative wastewater disposal methods. RCM supports initiatives that promote green rooftops, graywater recycling, and composting toilets not only for the City but for the public as well. Demonstration and education sites remain critical tools, as do incentives for those willing to innovate.

Education must remain a critical component of any search for sustainable solutions to wastewater issues. There is currently no programs offered in the City, other than the useful piece on conservation carried out by Fort Whyte. Partnerships with ENGOS to develop and implement a comprehensive wastewater education program should include sustainable funding arrangements for initiatives in the classrooms, tours of the treatment plants and field visits to sites on the river. An understanding of our urban water cycle is missing here, and must be addressed through ongoing education.

Regarding the collection and treatment of wastewater, we recommend that the City:

- move to a Pollution Prevention approach that is central to all planning for commercial, industrial and residential development.
- establish ongoing and systematic documentation of both the influents and effluents in Winnipeg's three wastewater treatment plants. This information should be made available to the public via the City website.
- update the sewer by-law to improve influent quality

- establish an ongoing proactive public participation program that is deliberative and interactive.

CONCLUSION

There is much more scope for strengthening the CEC document, areas where RCM would want to add its voice in support of resource conservation and sustainability measures. (Section 3 on energy conservation is just one example.)

RCM will want to take up some of these issues in future discussions with the City. The Board of RCM commends the Civic Environmental Committee for preparing the draft environmental strategy paper. We look forward to future participation in its further elaboration and implementation.

Winnipeg
September 2003