



MANITOBA ECO-NETWORK

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Manitoba Eco-Network Comments on ‘A Green Transportation Strategy for Manitoba’

The Expert Advisory Council to the Climate and Green Plan (EAC) is developing options, recommendations and advice for the Government of Manitoba to tackle the challenge of transitioning to a low carbon system for transportation and infrastructure in the province. The EAC prepared a consultation paper entitled [‘A Green Transportation Strategy for Manitoba’](#) to gather feedback from experts and stakeholders. MbEN attended a consultation event held on July 9th, 2020, and submitted the following written comments on July 21st, 2020.

How should we define “green transportation and infrastructure” in terms of reducing GHG emissions?

“Green transportation” should be defined as “transportation that produces limited GHG emissions and supports a transition away from burning fossil fuels”.

“Green infrastructure” should be defined as “infrastructure that supports a transition away from burning fossil fuels, urban design/settlements with more density, and carbon sequestration through nature-based solutions”.

What opportunities and challenges do you see in reducing GHG emissions in the transportation sector in Manitoba?

Opportunities for reducing GHG emissions in Manitoba’s transportation sector include:

- Hydro-electricity - Manitoba is fortunate to have considerable hydro-electric generation capacity and with the Keeyask project coming online we will have low-cost, dependable electricity resources. Although hydroelectricity is not a zero-carbon generation source, we should displace as much transportation fossil fuel use with electrification as possible.
- Major bus manufacturing centre – Manitoba is home to one of North America’s premier public transit manufacturing companies. Manitoba should become a hub for public transit electrification research that leverages local technological expertise, challenging climatic conditions, an emerging bus rapid-transit system in Winnipeg and low-cost electricity. Innovations such as grid micro-storage, regenerative braking and transit optimization could result in more effective transportation services with lower GHG emissions.
- Centralized population – With the majority of Manitobans living in or near Winnipeg, investments in reducing consumer GHG emissions in the ‘last mile’ will have a significant payoff. Supporting the City of Winnipeg to enhance alternative modes of transportation will reduce idling and therefore emissions of commercial traffic. Smarter designs at the urban-rural interface (e.g. park and ride, enhanced truck routes and bypasses) will also reduce wear-and-tear on infrastructure.
- Electric transportation grids – Consumer and fleet electric vehicles are here to stay, so supporting electrification of service stations with rapid charger infrastructure is necessary. Popularity of hybrids for fleet vehicles (e.g. taxis) will decline in favour of full-electric fleets only when there is a sufficient network of rapid charging or top up stations.



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- Working with local governments and crown corporations will be necessary to reduce barriers.

Challenges for reducing GHG emissions in Manitoba's transportation sector include:

- Manitoba's small population – Manitoba has a small, widely-dispersed population and changes at the political/economic level are more often influenced by national/international political trends than by advocacy efforts at the grassroots level.
- Manitoba's dependence on equalization payments – Manitoba is a poorer province in the confederation and dependent on equalization payments, therefore finding financial resources for new programs, especially environmental programs, is a challenge.
- The need for Provincial leadership – It will take innovative leadership to prepare Manitoba for a prosperous, resilient and sustainable 21st century, and long-term thinking/modelling/investment are required to realize the province's potential.
- Existing infrastructure gaps – Across Manitoba, but notably in Winnipeg and other urban centres, infrastructure is planned and constructed with a bias towards automobiles and at the expense of other, less carbon-intensive forms of transportation.

What are feasible options to reduce and or replace fossil fuels with active transportation and low carbon transportation energy options in Manitoba?

Feasible options for reducing or replacing fossil fuels with active transportation and low carbon transportation options in Manitoba include:

- Electrifying and expanding the public transit system to interface with commuters and residents outside cities, making it a friendly, low-cost alternative to driving and parking in our cities.
- Creating an intra-provincial bus/public transportation system that improves intercity access in Manitoba without needing a personal vehicle.
- Promoting use of electric vehicles in Manitoba by increasing number of charging stations and other supporting infrastructure.
- Introducing subsidies for the purchase of electric vehicles for use in commercial fleets.
- Introducing a pilot subsidy program for the purchase of electric vehicles for personal use that captures a full range of electric and hybrid vehicles (not just high end models).
- Expanding the mix of energy produced by Manitoba Hydro to include more solar and wind and placing a moratorium on new mega dam construction.
- Subsidizing small-scale renewable energy production at the community level, particularly in Indigenous communities.
- Improving walkability in cities, especially in Winnipeg and Brandon's Downtowns by working with cities to improve indoor walkways and signage standards, and to support alternate modes of transportation and reduce surface parking.
- Providing more financial support for desperately needed bikeway system improvements.
- Building and supporting the operation of a micro-transport system in Winnipeg.



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- Introducing free transit service options. Access to transit services is an important factor in alleviating urban poverty and makes communities safer and more accessible while also contributing to a societal shift towards more sustainable transportation practices.

What can each of us do to encourage individuals, small and medium-sized enterprises, larger industries, and others to reduce transportation-related GHG emissions?

The Government of Manitoba should take a leadership role in the reduction of transportation related GHG emissions, as the success or failure of a transportation sector is based upon network effects. It should not fall on the general public or other organizations to be the main facilitator of this much needed change. A reduction of transportation related GHG emissions can be encouraged by:

- Increasing funding to organizations who focus on changing societal habits and behaviour (e.g. Green Action Centre, Functional Transit Winnipeg, Climate Change Connection, Trails Manitoba, Bike Winnipeg, Winnipeg Trails Association).
- Updating and improving Manitoba's education curriculums at all levels to improve understanding of sustainable transportation options and the UN Sustainable Development Goals.
- Reviewing and improving the provincial transportation network with a focus that extends beyond conventional roads and municipal grids.
- Pursuing a more aggressive carbon levy that incentivizes meaningful GHG mitigation efforts at the industrial level and behaviour changes at the personal level, while ensuring that lower income Manitobans do not face additional financial strain.

What are the technologies and or sectors that Manitoba could pursue to advance a greener transportation system?

The technologies Manitoba can pursue to advance a greener transportation system include:

- Third-generation biofuels.
- Machine learning-enhanced transportation route optimization.
- Cold weather battery efficiency.
- Extreme weather road/surface efficiency.

What is the appropriate role for government in terms of greening transportation and infrastructure in Manitoba?

The Government of Manitoba should take a leadership role in the reduction of transportation related GHG emissions and provide support (political and economic) to municipal governments.

- Support inter-municipality alliances (like the Winnipeg Metro Region) to develop regional transportation planning frameworks that reduce redundancy, save money and improve local services.
- Improve guidance for municipal-provincial transportation planning interfaces such as the Perimeter Highway interchanges.
- An important role for the Government of Manitoba is to facilitate changes to existing laws and policies that impact the transportation sector. This includes:



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- Increasing the gas tax to appropriately fund conventional road infrastructure (at 14% it is currently one of the lowest provincial gas tax in Canada). Road hazards cost motorists and fleets money on repairs, and large lifecycle GHG emissions from parts and service.
- Repealing Bill 44, *The Public Utilities Ratepayer Protection and Regulatory Reform Act*.
- Amending *The Efficiency Manitoba Act* to include targets for fuel efficiency and transportation GHG reduction.
- Amending *The Environment Act* and the *Classes of Development Regulation* to classify urban housing/suburb settlements as a development requiring an Environment Act Licence and environmental assessment.
- Repealing *The Biofuels Act* and halting the expansion of first generation biofuels production. Instead, government support should be given to appropriate-scale second generation biofuel implementation and third generation biofuel research that focuses on the delivery of low-carbon fuels for non-transportation uses (e.g. propane heating alternatives).

Another important role for the Government of Manitoba is to make changes to the economic incentives and barriers that impede a transition to a more sustainable transportation system in Manitoba. This includes:

- Providing more money to the City of Winnipeg and the Winnipeg Metro Region for implementation of the Winnipeg Climate Action Plan and improvements to public transportation and green infrastructure.
- Halting any provision of subsidies to the first generation biofuel industry.
- Changing the calculation of vehicle registration fees to consider fuel efficiency. The additional funds that would become available could be used to offer rebates for the purchase of electric vehicles.
- Restore the PST to its original amount and use some of the revenue for increasing GHG mitigation and environmental protection programs as well as off-setting financial impacts to lower income individuals and families.

Finally, the Government of Manitoba should be leading by example and collaborate with other levels of government in the transition to a more sustainable transportation and infrastructure system. This includes:

- Installing more electric charging stations.
- Converting a portion of the government and crown corporation fleet to electric vehicles.
- Supporting the City of Winnipeg and the Winnipeg Metro Region in the implementation of the Winnipeg Climate Action Plan, including contribution of financial resources.
- Working with the Federal government and Municipal governments to allocate funds from the federal carbon tax to GHG reduction initiatives and ensuring lower income families/individuals are not impacted by energy poverty.
- Lobbying the Federal government, in collaboration with other Provincial governments, to fund annual operational costs of public transportation systems.



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- Keeping Manitoba Hydro a public Crown Corporation and encouraging Manitoba Hydro to work with community partners to diversify Manitoba's energy profile.
- Requiring the submission of a publicly available report to the legislature, at regular intervals (e.g. 2-4 years) on the programs the Provincial government has developed and is implementing to support the reduction of GHG emissions in the transportation sector.

What are the top three priorities to reduce transportation related emissions in Manitoba?

The top three priorities to reduce transportation related emissions in Manitoba are:

- Increasing the use of electric vehicles for private and public transportation.
- Amending provincial laws and policies to better support the reduction of transportation related emissions.
- Providing funding and economic incentives to organizations and municipal governments to support the reduction of transportation related emissions.

Do you have any other feedback on the Green Transportation Strategy?

Scope of Strategy

Overall, there does not seem to be a focus on any particular solution. There is a need for a focused strategy with clear identification of the priorities and plans for implementation. There also appears to be an emphasis on potential strategies that will work best in Southern Manitoba so there is a need for more development of solutions that will be effective in rural and northern Manitoba, not just in urban areas.

Consultation Process

MbEN has found the consultation process for the Green Transportation Strategy challenging for a number of reasons. The limited notice that was given by the EAC about their consultation sessions did not provide adequate time to properly evaluate the contents of the consultation paper and solicit input from MbEN members. The limited time that our organization was given to provide comments and the limited format in which such comments could be provided (survey) has also significantly restricted the feedback that we were able to provide.

We were disappointed that the EAC has limited their consultation to stakeholders and explicitly directed that the consultation paper was not to be made public. While we appreciate the opportunity to participate in the more streamlined stakeholder consultation process, there is a need for a much broader (with a much longer consultation period) public consultation to be undertaken with opportunities for members of the public to provide both written and oral feedback. If we had the time, we would have provided scientific evidence to support our policy recommendations and the format restricted our ability to provide evidence for our statements through detailed citations.