

MANITOBA ECO-NETWORK

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Re: MbEN Comments on Draft CentrePlan 2050

The Manitoba Eco-Network appreciates the opportunity to provide comments on the draft *CentrePlan 2050*. Although the comment period should have been longer, especially with the rescheduling of the open house, we commend the City on providing a variety of different ways for the public to engage on this topic. Several of our staff members were able to attend the first open house and enjoyed seeing residents interacting with the displays.

Overall, the draft *CentrePlan 2050* seems like a positive move forward for the City of Winnipeg. There are clear plans to undertake work that supports climate change mitigation, adaptation, and resilience, and creating a greener Downtown area. However, we suggest that more action could be taken in some areas, including:

- Commitments, including funding, to the maintenance of green infrastructure,
- Incentivising deep energy retrofits and net-zero ready buildings, and
- Partnerships with local grassroots environmental organizations and support for community-based environmental/climate work.

Further details are also needed about the alignment of this plan with other policy and legal commitments, such as the *Community Energy Investment Roadmap* (CEIR).

Climate Change Mitigation, Adaptation, and Resilience

The draft *CentrePlan 2050* includes a range of positive plans and actions to address the challenges faced by residents living in Downtown Winnipeg due to the ongoing climate crisis. This includes:

- developing dense mixed-use neighbourhoods,
- implementing the rapid transit network,
- completing the cycling network,
- planting more trees to reduce the urban heat island effect,
- adaptively re-using existing buildings,
- connecting to rivers and riverbank ecosystems,
- enhancing the pedestrian environment, and
- installing green infrastructure to reduce stormwater runoff. (Draft CentrePlan 2050, 17)

In particular, we appreciate the inclusion of measures to improve riverbank protection and plans to ensure residents living within inner-city neighbourhoods have the same access to greenspace and climate supports as suburban citizens (e.g., assessing investment required to meet the target of 30 m² of greenspace per person).

However, if the City of Winnipeg wants to become a "leader in climate change mitigation, adaptation and net-zero emissions" (Draft *CentrePlan 2050*, 100), more actions and details need to be added to the final version of the Plan.

For example, the City seems to be taking steps to apply the *Community Energy Investment Roadmap* (CEIR). However, some of the language used in the CentrePlan document is confusing and does not seem to align with the approach reflected in CEIR. For example, the five big moves identified in CEIR that need to be made by the City of Winnipeg when it comes to emissions reduction include: "buildings, transportation, local renewable energy, water, and waste." (CEIR, 26) In the draft *CentrePlan 2050*, there is reference to CEIR and the five big moves needed to facilitate emissions reduction in the City of Winnipeg. However, the language used is noticeably different:

- Guide development and municipal investment;
- Guide urban design, land use, and transportation decisions;
- Coordinate actions and municipal investments among City departments;
- Encourage strategic business and residential development; and
- Identify opportunities for collaboration and partnership with external stakeholders and the private sector. (Draft CentrePlan 2050, 15)

While these five actions could result in positive results in terms of climate mitigation, adaptation, resilience, and emissions reduction, it is not clear how these actions connect with the "big moves" identified in CEIR. Further clarification is needed in *CentrePlan 2050* to identify how the draft plan directly aligns with CEIR and other environmental commitments made by the City of Winnipeg.

There are also a number of other commitments made in the Draft *CentrePlan 2050* that could be beneficial in terms of climate resilience and a transition to net-zero emissions, depending on how the proposed actions are implemented. More details are needed in the final version of the Plan. For example, getting rid of excess parking lots could help reduce the urban heat island effect, but it depends on how those parking lots are redeveloped. For some parking lots, like the lot next to the Granite Curling Club, redevelopment can pose environmental dangers, such as increasing the risk of riverbank erosion. Such risks should be considered alongside potential climate benefits when redevelopment plans are being assessed for approval.

MbEN would also appreciate more details about the City's plans to increase greenspace in Downtown Winnipeg. For example, it would be helpful to include more details about the City's plans for greenspace in the Higgins & Main area. Will there be a meaningful study and strategy about the existing and potential greenspace in the area? Would all inner-city greenspace receive equitable levels of care and maintenance over time?

MbEN also encourages the City to include more details about access to shade for all residents, including those who are unhoused. Unhoused residents have an especially high need to access shaded areas to protect their health and safety in high temperatures. This should be a priority when implementing plans to increase livability and climate resilience of the Downtown area.

We also encourage the City to ensure their proposed plans in Downtown Winnipeg are appropriate for Manitoba's climate, particularly our harsh winters. For example, municipal actions to encourage green roofs have been very successful in milder climates but will likely face additional challenges when implemented in Winnipeg. MbEN encourages the inclusion of a broad range of alternatives for proposed climate mitigation, resilience, and adaptation actions. This includes alternatives to tree cover to green Downtown spaces and increased shade, due to the difficulties of tree survival in urban areas.

Finally, MbEN would also like to see more commitments to collaboration and partnership with local environmental grassroots organizations, ENGOs, who are leading community-based environmental and climate work. This includes commitments to funding such community-based work. For example, MbEN is very interested in the City's plan to conduct a climate risk and vulnerabilities assessment for Downtown Winnipeg. This seems like an excellent opportunity to increase the City's connections to local environmental organizations and create new community partnerships. There are a range of other potential opportunities within the draft *CentrePlan 2050* that encourage and facilitate community connections with local environmental organizations.

What is Missing from CentrePlan 2050

MbEN feels there have been some opportunities missed in the draft CentrePlan 2050. Additional actions and plans need to be added to the final Document in order to adequately address:

- The Improvement and development of weather protection infrastructure. Any enhancements to the pedestrian environment should focus on making the environment safe, inviting, and accessible, which includes weather protection mechanisms.
- The need for streetscaping requirements in urban areas to include the development of green infrastructure throughout the area, not just in the areas designed for entertainment and tourism.
- The need for more cooling centres in Downtown Winnipeg.
- The installation of ground source energy (e.g., if a road needs to be repaved, or other underground infrastructure gets updated, then ground source energy should be installed).
- The lack of public washroom facilities in the Downtown area. More access to public washrooms will facilitate pedestrian traffic and encourage people to spend more time downtown. When there is not adequate public access to washrooms, it also often falls to environmental caretakers to clean up public defecation sites, in addition to their other work. The lack of public facilities is both a social and environmental problem that needs to be addressed in the Downtown area.

There is also a need for more specific policies and actions focused on facilitating building retrofits. There seems to be a lot of emphasis on new green buildings, but less focus on revamping existing buildings. There is a need for more mechanisms in *CentrePlan 2050* to

encourage building deep energy retrofits. For example, MbEN would like to see a specific action focused on developing a plan to transition existing buildings off fossil fuel and achieve substantial reductions in energy and peak demand for electricity. There should be specific incentives for buildings to become net-zero ready now, not decades in the future. We recommend working with knowledgeable organizations like Sustainable Building Manitoba and Efficiency Manitoba to identify further opportunities for incentivising retrofits and ensuring all buildings in Downtown Winnipeg are net-zero ready as soon as possible.

Finally, there is a need to support the City's actions and plans to improve and expand green infrastructure by adding specific commitments in *CentrePlan 2050* to the maintenance of Downtown green infrastructure. For example, what is the City's plan to water green infrastructure in times of drought? Healthy greenspace is needed most in times of drought, which is also when it is most difficult to protect the greenspaces and infrastructure. Resourcing needs to be consistent and support longevity and growth of experience within the greening workforce to protect this investment. If we take care of our greenspace, the greenspace will in turn take care of us.

Overall, the draft *CentrePlan* 2050 signals a positive step forward for the City of Winnipeg in improving the liveability and greening of the City's Downtown area. MbEN is encouraged by the City's plans to undertake work to facilitate climate change mitigation, adaptation, resilience, and improving green infrastructure. However, further details are needed about the City's plans to maintain green infrastructure, encourage building retrofits, and create more shaded areas in the Downtown area, among other actions as identified above.

We look forward to seeing the public feedback gathered by the City on the draft *CentrePlan 2050* and revisions made to the final Plan. MbEN welcomes future opportunities to engage with the City of Winnipeg to ensure the implementation of new legal and policy measures supporting sustainable development and the protection of the environment for the benefit of current and future generations.

Sincerely,

Heather Fast, B.A., J.D., LL.M. Policy Advocacy Director