



Newfoundland and Labrador  
Environmental Industry Association

**Submission to the City of St. John's  
For Consideration of inclusion in its Municipal Plan**

**November 10, 2014**

The Newfoundland and Labrador Environmental Industry Association (NEIA) commends the City of St. John's for striking an appropriate balance between development and environment in its draft municipal plan – and for recognizing the environment as a critical development asset.

NEIA believes there are additional areas of opportunity which the City should consider for inclusion in its final document. These opportunities are listed below:

### **Climate Change**

The draft municipal plan makes reference to climate change, however only with relation to how the city can mitigate the effects of climate change. The document does not address the city's *impact on* climate change, nor how it can take steps to reduce that contribution. As the largest municipality in Newfoundland and Labrador, the city's contribution to climate change relative to the province's aggregate contribution is likely significant. In order to understand its impact and to what degree measures could influence that impact, the city should endeavour to measure its emissions and then develop and implement an emissions reduction plan. Such a plan could prescribe recommendations in day-to-day operations, city procurement, building design and operations, land use, etc. that would reduce the city's impact on climate change and likely reduce long term costs.

### **Transportation**

Though the draft municipal plan identifies public transportation as a component of community building, the positive effects an effective public transit system has on both the environment and economic development should not be understated. Aside from reducing the number of cars on the road and GHG's, efficient transportation links resources, contributing to the ease of knowledge transfer and idea sharing – and is a factor in the innovative potential of an economy. Strong public transportation encourages economic development along frequently used routes and corridors. Public transportation is an important factor in labour mobility – it contributes to inclusion and the lessening of inequality among urban residents. Though the city is correct in the draft municipal plan in making regional transportation a priority, it should not lose sight of the opportunities for improvement of its public transit operations within the city. The introduction of more direct routes between the city's busiest hubs is one major opportunity for improvement. Only an improved system will encourage increased ridership. In the improvement of its services, the city should pursue permanent provincial government support; the majority of Canadian provinces provide some level of funding to public transportation providers.

### **Green Water Infrastructure**

The net-zero runoff policy recently implemented by the city was an important step in mitigating the environmental damage caused by storm water. However, a popular method to achieve net-zero that has emerged as a result of this policy is the construction of large storage tanks or capture ponds. Though these are two methods of mitigation, there are many other options available to developers which are more economical, bio-diverse, and aesthetically pleasing. The municipal plan, and the subsequent accompanying regulations, should include language promoting the use of green water infrastructure which can range from more efficient landscaping to rainwater harvesting. Green water infrastructure can reduce pressure on sewer systems, save on pipe expenditures, reduce energy consumption, last longer, be more cost effective, and beautify neighbourhoods.

## **Energy Systems**

Reference is made in the draft municipal plan of allowing the use of small-scale wind turbines. It is conceivable that provincial government legislation will be altered to allow for more widespread use of alternative energy systems at both the commercial and private levels. The city should ensure it is prepared for businesses and homeowners who will want to connect to the energy grid through various solar, wind, waste, and geothermal technologies.

## **Waste Management**

The draft municipal plan mentions requiring waste-management design solutions for new multi-storey residential buildings. However, the city should also investigate solutions for *existing* multi-storey residential buildings. Additionally, the city should also require and investigate waste-management design for new and existing commercial buildings. Large commercial property owners in the city, such as East Port Properties, have already set an excellent example in how this can be done.

## **Composting**

Organic material represents up to 30% of what Newfoundland and Labradorians put in their garbage bags. There is an opportunity for the city to extend the lifespan of its landfill, generate new business opportunities within the city, and do the environmentally responsible thing by implementing curbside composting. Though there was a city commitment to curbside composting some years ago, there is no mention of composting in the municipal plan draft. It is understood that much of what the city can do in this regard is dependent on decisions made at the provincial level, however NEIA feels this should remain a stated objective of the city.

## **Brownfields**

The draft municipal plan mentions that vacant sites of known or suspected environmental contamination (brownfields) represent opportunities for the city. As many brownfield sites are privately owned, it is understood that the city does not have control over when and if re-development occurs. However, the city should commit in its plan to (1) specifically identifying each of these sites; and (2) identifying potential partners in remediation / development.