

Comments on the HRM Water Resource Management Study

HRM Waters Advisory Boards

BWAB - Bedford Waters Advisory Board

HWAB - Halifax Watershed Advisory Board

DLAB - Dartmouth Lakes Advisory Board

Bedford Waters Advisory Committee

March 11, 2003

Special Meeting for HRM Water Study

In attendance – Don Lowther, Kevin Dean, Victor Lee, Dr Rae, Lem Murphy, Cedric Pilkington, Len Goucher, Will Matheson

Regrets – Rick Hattin, Doug Murray

Summary of comments:

- Written submission by Rick Hattin
- Additional comments: New Brunswick coastal zone area (A, B, C). Each zone has restrictions and stringently enforced.

Questions:

- 1) Report falls short. Was RFP changed? Two areas of major concern: **coastal water not included** and no **prioritization of policy** (eg. 6-3, 6-4, 7-8, 8-1). These are areas where they suggest that HRM prioritize, as opposed to the consultant doing so in their report. RFP and the study fall short in dealing with recommendations for **effective enforcement**. Overall the report was informative and a good starting point.

- 2) **Recommendations:**

5-1, 5-3, 8-14 Use of the words '***where appropriate***' and no definition. Wording too loose and should be clearly defined.

5-2 Riparian buffer zone should 'not be less than' 20m

5-3 Disagree, unless valid reasons are limited and defined.

5-4 Agree

6-1 Accepted but wording needs tweaking

(A lot of the questions are already answered (ie. Harbour Solutions). All development must have separate sewer and storm water. As old systems are updated 2 lines must be used.)

Effective use of wetlands and natural filtration mechanism.

All serviced development should consist of 3 lines (water, sewer, Storm)

- needs more clarification and criteria

6-2 Accepted

6-3 Delete '**intensive**' in second line. Throughout the study the recommendation for intensive development we find out of place and counter productive to 'community spirit'.

6-4 Clarify bullet 3 and 7.

7-1 Accepted

7-2 Accepted

7-3 Accepted

7-4 Accepted

7-5 Accepted

7-6 Accepted

7-7 Accepted

7-8 Accepted

7-9 **Mandatory that sewer and storm water be on separate lines**

7-10 Mandatory that sewer and storm water be on separate lines. As existing single line systems are replaced and it becomes cost effective (eg. During repairs), dual lines should be installed.

Kevin Dean's notes:

1. Some recommendations (eg. 5-1,5-3,8-14) recommend a policy and then use the words 'here appropriate' provide that the policy does not have to be followed 'where appropriate'. This can lead to the policy being ineffective and the exception becoming the rule unless 'where appropriate' or where exceptions are allowed are clearly defined and limited as much as possible.

If a valid exception that cannot be imagined at this point arises in the future, it can be added to the defined list, only after a stringent process of approval takes place by, say HRM's most senior executives.

2. 7.7 Encourage water conservation devices. It is now required in all new commercial, residential (incl. Apt.) construction. Should it be required by all others by2008...?

3. I did not see any recommendations on enforcement.
 - a. providing that penalties for failure to comply with any law dealing with water resource management be significant enough to act as a deterrent.
 - b. providing that reasonable enforcement resources be put in place; that enforcement should be more aggressive respecting violations and suggestions for effective enforcement methodology.
4. There are recommendations for public education on septic systems (7-4), but is there a recommendation for public education on the overall Water Resource Management objectives and policy to increase public awareness and thus compliance.
5. Study speaks to density being *cheaper* (6-3), but are there not other considerations before increasing density such as the effects (eg physiological) of putting too many people in a small space. In looking at major cities it seems that human concern for each other decreases in high density areas.

Extract March 12, 2003, Bedford Waters Advisory Committee Minutes

4.1 **WATER RESOURCE MANAGEMENT STUDY**

- C Draft minutes prepared by Councillor Goucher of the special meeting held March 11, 2003 on the study were circulated at the meeting.

Councillor Goucher identified problems encountered with the CDs provided.

The Committee re-commenced their review of Table 10-1, Summary of Recommendations at Chapter 8.0 - Stormwater Management.

8-1 **It was recommended that the word ‘adopt’ be substituted for ‘develop’.**

The Committee felt development of such guidelines would be part of the study.

- 8-2 **The Board sought clarification of the cost implications for HRM, i.e. \$75,000 to \$100,000 per watershed. A question was raised as to why HRM would be picking up such costs and not the developer(s).**

8-3 **Agreed with.**

During the discussion, it was felt that there is a need to define sensitive watersheds and give examples of ones that are sensitive or ones which are not.

- 8-4 **Agreed with.** The Committee felt a comment on potential fines should be considered for inclusion.

During the discussion of this item, reference was made to how HRM distributes information to homeowners through water and tax bills, a method which is quite cost effective.

It was felt that severe penalties should be imposed when individuals are found to be dumping hazardous materials into the storm sewers. It was recalled that a by-law was adopted by HRM on sewers not so long ago, but whether it only related to sanitary sewers wasn't known.

8-5 **Agreed with.**

Councillor Goucher noted that the North West Community Council is requesting a by-law change to conform with Bedford's which requires a Grade Alteration Certificate.

8-6 A wording change is recommended in the second to last line of the recommendation, i.e. delete the words 'adjacent to'.

8-7 Take out - redundant.

8-8 **Agreed with**

A comment about the lack of discussion and conclusions associated with the Chapter. The logic for the recommendations is not outlined for Chapters 8 to 10. It should be supplied.

8-9 **Wording change proposed - remove the words 'maintain, or enhance where possible'. Replace with the word 'enhance'.**

During discussion of this item, reference was made to the following:

- C Councillor Goucher felt that no development should be permitted within the 1:20 floodway. He noted that 8-8 states no structures related to human habitation should be permitted whether temporary or permanent.
- C Less than 75% of a structure would have to be destroyed, for redevelopment to be permitted.
- C Why should there be a difference between what can be developed or redeveloped in such locations?
- C Legalities of withdrawing development rights.
- C What is being recommended for redevelopment?
- C What guidelines should be developed in the MPS to deal with such redevelopment? Would the building of new decks be permitted, for example.
- C If a redevelopment takes place, what information would have to be provided by the proponent, for example a hydrological study.

C Reference was made to the Provincial Guidelines which only allow recreational uses in the 1:20 floodway.

8-10 During discussion of this point, **the Committee sought clarification of what the permitted uses are.**

C It was proposed by a member that anything built in a 1:100 floodway should be built under a contract development agreement, so HRM has some control.

C Things such as oil tanks require floodproofing and natural gas installations, associated with permitted uses, should not be allowed.

8-11 **Agreed with.**

8-12 **Agreed with.**

8-13 **Agreed with.**

8-14 **Be removed.**

8-15 **A rewording or restatement of this point is required.**

During discussion the following points were made:

C No definition if 'mixed use' is residential or commercial.

C It was felt this policy is contradictory to earlier policies.

8-16 **Remove this point. Too ambiguous.**

During discussion the following were noted:

C Needs clarification, ie. is a 1:20 floodway being considered or just a 1:100 floodway?

C When you infill, you decrease the floodplain capacity.

C You would not wish to see a 1:20 floodway capacity reduced.

C Points 8-15 and 8-16 appear to be supporting development in a floodway.

The Chair requested that for the proposed June 4th joint meeting of the WABs a map identifying floodplains.

Chapter 9 - Performance Measurements

9-1 **Add to 5th bullet reference to 'by accredited laboratories'.**

Add to 6th bullet 'within week of completion of testing'.

Include a requirement of interpretation of what the test result(s) mean.

9-2 **While agreeing with this point** the Committee would like to know:

C **What are the four physical chemical base parameters?**

C **Why did they chose 50 to 70 sites per year to be tested? How many potential sites in HRM? What percentage of potential sites does 50 to 70 represent?**

9-3 **Agreed to but where do they get \$125,000 annually?**

9-4 **Agreed to.**

During discussion, the following matters were raised:

C Previous concerns that the current guidelines being used in HRM/NS for fecal coliform counts are too high for recreational water quality. Ontario's are 100% more stringent. It was suggested that HRM should adopt a standard similar to Ontario's. What is a realistic number? Mr. Li volunteered to check into.

C Who in HRM will do the proposed reviewing of the water quality monitoring/performance measures data? Someone will likely have to be appointed.

C Referring to point 9-3, it was noted that there is no reference to present standards being used. It was hoped there would be different standards for different uses of a body of water. Also it was felt that when the development of parameters starts, the Committee have an opportunity to provide some input.

Having concluded its review of the recommendations, it was decided to defer the review of Dr. Ray's summarization to a special meeting. Dr. Ray will contact the Secretary as to a good time for him and she will advise the other members. The location will be Councillor Goucher's office above the HRM Information Centre, Moirs Building.

Halifax/Halifax County Watershed Advisory Board
3rd and 19th March and April 16, 2003

1. What is your impression of the overall quality and comprehensiveness of the report?

What the Board did not like about the report:

×

There is very little reference in the report to what is being done locally. There appears to be a lack of recognition of work being done in Nova Scotia related to water standards and water quality.

×

Drinking water not included in the report. At the joint January meeting, HRM staff indicated that drinking water was not included in the terms of reference. Nonetheless, it was felt there was merit to pointing out that the Board feels this is a serious omission.

×

While it is a water resource management study, the concentration appears to be on stormwater, as opposed to taking a holistic view of watershed management.

×

There is a need for definitions of the various levels of sewage treatment. The terms Primary, Secondary and Tertiary provide only relative categories of effluent processing; more precise definitions of the effluent quality being released from these treatment categories would be beneficial.

2. Which recommendations do you agree with?

The Board strongly supports the following recommendations:

7-1 It is recommended that HRM develop a hierarchy of wastewater management forms to be used for new development in designated rural settlement service centres as designated through the Regional Plan.

7-5 It is recommended that erosion and sediment control shall be applied to all development and construction approvals through the development of policy that includes lot level erosion and sediment control.

(The Board feels that provision for a bond, with a significant penalty attached, should be included in the proposed policy to apply erosion and sediment control to all developments.)

While strongly supporting the following two recommendations, the Board suggests the following wording:

8-6 "It is recommended that floodway designation and zoning mapping reflecting the 1:20 Floodway and the 1:100 year Floodway Fringe,(as defined by the Canada-Nova Scotia Flood Damage Reduction Program, for the Sackville River and the Little Sackville River) be developed for all rivers."

8-13 "It is recommended that a proponent for a development be required to complete a hydrotechnical study to determine the 1:20 Floodway and the 1:100 year Floodway Fringe."

(The Board felt that the words "where there is a known floodway" could be omitted)

3. Which recommendations do you not agree with?

8-14 It is recommended that development contrary to these Floodplain Protection policies be considered, provided a hydrotechnical study, carried out by a qualified person, shows that the proposed development will not contribute to upstream or downstream flooding or result in a change to floodwater flow patterns. On the basis of such a study, the rezoning of Floodway Zone lands to Floodway Fringe Zone or to the abutting zone be allowed. Also consider the rezoning of Floodway Fringe Zone to the abutting zone.

(The Board feels that this recommendation would lead to an abuse of the principle related to floodplain protection)

4. Which policies should be given priority for immediate implementation?

5-1 It is recommended that HRM provide protection for lands adjacent to watercourses, wetlands, lakes and coastlines through the use of planning and development controls where appropriate. These would provide riparian buffers to be defined in by-law in riparian areas, shoreline areas and around wetlands in which vegetation will be retained, development, soil removal, excavation and infilling will be prohibited. The intent of the protection of riparian buffers would include the general prohibition of the infilling and channelization of watercourses.

7-8 It is recommended that the existing infrastructure be prioritized by watershed for the purposes of I/I evaluation. The watersheds should then be examined to determine sources of I/I and action plans developed to either eliminate the source of I/I or expand collection and treatment facilities.

7 (A new recommendation) The Board recommends that HRM move towards requiring a 100 meter setback from lakes for on-site septic systems in new developments.

8-1 Pertaining to the recommendation that "the HRM develop stormwater management guidelines to be used throughout the Municipality" the Board felt that the "development of a stormwater treatment methodology for urban areas, (as noted on page 8-14), to mitigate the cumulative impacts of pollutants on receiving water bodies" should be a priority.

7-7 The Board felt that mapping of floodplains should be a priority.

The Board felt a priority to be the establishment of Performance Measurements. As a high priority the following additional recommendation should be included:

"It is recommended that HRM should enact by-laws or other means to mitigate phosphorous entering water courses. Since lawn fertilizers are a prime source of phosphorous that should be an area of immediate attention. (For example the by-law enacted by the City of Minneapolis."

5. The following comments represent the Board's recommendations for improvements/additions to the existing Summary of Recommendations found in Table 10-1.

Chapter 5. Watercourse, Wetland and Coastline Protection

5-1 The Board recommends that the protected lands adjacent to watercourses be given a special designation, such as Conservation Areas. These should not be considered as part of the 5% land set aside in new developments for active recreational space.

The Board would like to see an intent on the part of HRM, to maintain public access to waterbodies and, where feasible, to facilitate the provision of pathways and trails adjacent to riparian buffer areas for passive recreational use.

5-2 The Board recommends that soil types, as well as slopes, should be included in the calculation to establish buffer widths. In addition, the Board supports a 30 metre riparian buffer (as discussed in the text - p. 5-3) rather than a 20 metre buffer.

5-3 The Board recommends that the modification of buffer widths and the infilling of any wetland or watercourse should be considered as negative actions and permitted only under exceptional circumstances. Where the modification of a buffer width or the infilling of a wetland or watercourse cannot be avoided, the concept of no net loss should be employed.

5-4 The Board suggests the following wording for this recommendation:

"It is recommended that, where natural systems have been modified, **HRM should be proactive in remediating watercourse conditions, whenever opportunities arise.**"

5-(An additional recommendation)

The Board recommends that, for the purposes of this document, HRM should adopt the definitions of the Province of Nova Scotia, for watercourses and wetlands. The Board further recommends that all wetlands, not only those over two hectares as required by the Province, should be protected from infilling.

5-(An additional recommendation)

The Board recommends that, in its management of undeveloped lands, HRM should be proactive in conserving forests by protecting immature stands and by harvesting mature stands in a manner that would promote natural regeneration.

Chapter 6. Service Boundaries

6-1 The Board suggests that this policy could be simplified to say:

"It is recommended that HRM should develop policies to concentrate development and population in urban areas and discourage urban sprawl."

7-2 The Board recommends that HRM should be proactive in encouraging individuals to use advanced technology in replacing failing systems by modifying setback restrictions where appropriate - for example, in the case of small lot size or poor soil conditions.

The Board recommends that HRM develop standards related to a mandatory periodic pumping schedule depending on usage (full-time or seasonal), with certification, for on-site septic systems.

7-(An additional recommendation)

The Board recommends that HRM move towards requiring a 100 metre setback from lakes for on-site septic systems in new developments.

7-(An additional recommendation)

The Board recommends that HRM should be moving towards tertiary treatment (as defined by provincial guidelines) for all new sewage treatment plants discharging into fresh water. For existing plants, HRM should be bringing treatment levels up to the tertiary level. The Board recognizes that it may not always be necessary to reach the tertiary level where a sewage treatment plant discharges into open marine waters.

7-(An additional recommendation)

The Board recommends that HRM should develop policy to address the

operation of sewage plants not under their control.

7-(An additional recommendation)

The Board recommends that a policy related to Source Control be included in the document and that there be rigorous enforcement of the by-law provisions.

Chapter 8. Stormwater Management

8-2 The Board recommends that a watershed management plan should be developed for all watersheds in HRM. Where a watershed crosses a jurisdictional boundary, HRM should liaise with adjacent municipalities.

8-3 2nd bullet

The Board has concern with the phrase "are not harmful to the intended use of the receiving waters" and recommends it read: "the volume of sediments and contaminants being discharged into the storm sewer system and eventually into a receiving water do not degrade the receiving waters and shall not exceed current limits under the wastewater discharge bylaw."

5th bullet:

The Board feels that this should read: "developers be required to investigate the cumulative effects of existing and future development on the adjacent watercourses and provide reports to HRM for addition to a database."

8-5 The Board feels that provision for a bond, with a significant penalty attached, should be included in the proposed policy to apply erosion and sediment control to all developments.

8-6 The Board suggests the following wording for this recommendation:

"It is recommended that a Floodway designation in Zoning mapping reflecting the 1:20 Floodway and the 1:100 year Floodway Fringe,(as defined by the Canada-Nova Scotia Flood Damage Reduction Program, for the Sackville River and the Little Sackville River) be developed for all rivers."

8-13 The Board strongly supports this recommendation but suggests that the words "where there is a known floodway" be omitted.

Chapter 9. Performance Measurement

9-1 The Board feels that these recommendations should not only apply to new development agreements, but should also apply to "as-of-right" development plans.

The Board suggests the following modifications to the bullets:

3rd bullet:

"requirement for baseline water quality information pre and post construction as per protocol set out in 9-2."

5th bullet:

instead of procedures "to follow valid methods", this should read: "to be conducted by laboratories accredited by the Standards Council of Canada."

6th bullet:

the following sentence be added after "results to be provided promptly to HRM."
"HRM to ensure that the results are reviewed by a qualified limnologist. Results should also be provided to the appropriate WAB."

(Add additional bullet):

"Since cost will be a factor in determining the level of sampling, analysis and monitoring to be undertaken, HRM should institute a procedure whereby the proponents of new developments can cover part of these costs."

4th bullet: Comment.

The Board strongly supports the requirement for long term monitoring but feels that the use of community volunteers for this task is rarely appropriate.

9-2 The Board suggests that this recommendation should be modified to read:

9-4 The Board recommends that this recommendation be modified to read:
"It is recommended that water quality monitoring/performance measures data be reviewed as it becomes available in HRM on an annual basis and to assess the effect of development as measured against the objective standards established for water quality. These levels should be established prior to development as the target levels to be maintained. Typically, they could include limits for Total Phosphorus (TP) - 10 micrograms/litre, Total Nitrogen (TN) - 300micrograms/litre, and Chlorophyll-a (Ch-a) - 2 micrograms/litre. As established water quality standards/targets are approached, consider further actions to avoid exceeding water quality targets and performance measures."

9-(An additional recommendation) The Board recommends the inclusion of an additional recommendation to read:

"A maximum allowable mean yearly Chlorophyll-a (Ch-a) level should be set for each lake as the 'lake carrying capacities'. These values could be set at 30% maximum over the pre-development mean Ch-a."

**DARTMOUTH LAKES ADVISORY BOARD
MINUTES
APRIL 23, 2003**

PRESENT: Mrs. Audrey Manzer
Dr. Ron Beazley
Mr. Pierre Clement
Ms. Catherine Lunn
Mr. John Osborne
Mr. Robert Bell
Dr. K. Hellenbrand
Dr. Don Gordon

ABSENT: Dr. Hugh Millward (regrets)
Councillor Cooper (regrets)
Ms. Christine Hoehne (regrets)
Ms. Stephanie Bird
Dr. Paul Hines

ALSO PRESENT: Mr. Kurt Pyle, Development Officer
Ms. Lynne Le Boutillier, Legislative Assistant

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1. HRM Water Resource Management Study 3 - 8

2. **HRM WATER RESOURCE MANAGEMENT STUDY**

A special meeting was called of the Board to deal with the above noted study.

The Chair reviewed with the members a letter from Mr. Sheppard, Manager, Environmental Services dated February 25, 2003 which was drafted following staff's meeting with the Chairs of the three Watershed Advisory Boards February 21, 2003.

It was noted that the new deadline for submissions was May 1, 2003. The Board will review the minutes for today's meeting at their regularly scheduled meeting of Wednesday, April 30 to ensure they reflect the Board's desired input concerning the report.

The four areas on which the WABs should focus their comments were reviewed. They are as follows:

- C What is your impression of the overall quality and comprehensiveness of the report? Does this document meet the needs of HRM at this time?
- C Which recommendations do you agree with?
- C Which recommendations do you not agree with?
- C Which policies should be given priority for immediate implementation?

Additional comments may be submitted.

It was noted that a further joint meeting of the WABs is tentatively planned for Wednesday, June 4th and there will be opportunities for further input through public consultation sessions associated with implementation.

WHAT IS YOUR IMPRESSION OF THE OVERALL QUALITY AND COMPREHENSIVENESS OF THE REPORT?

- C Very comprehensive and of good quality.

It was noted that all the comments which the Board members made at the February 26th meeting had been captured. A copy of these minutes will be attached to the Board's submission.

ADDITIONAL COMMENTS:

- C No table of acronyms. There are too many used, especially if a table isn't provided. For example I/I (inflow & infiltration).
- C The recommendations need to be extremely clear. If there is any confusion, the text in the body of the report should be able to clarify.
- C While the Board gives approval in principle of the report, the Board desires to see the final details. It was felt that all the recommendations need to be fine-tuned to better reflect relevant passages in the main text before they become policy. The Board wishes to see any wording of the recommendations before they become policy.
- C Referring to Chapter 5, Watercourse, Wetland and Coastline Protection, it was felt that there should be reference, somewhere in the report, that whoever is responsible, private or public, for ensuring that buffer zones are maintained.

What is to be done with existing situations related to buffer zones? How will existing situations be addressed? They should not be forgotten.

Recommendation that existing buffer zones have to be maintained be added.
New recommendation to read as follows:

All existing buffer zones be maintained and enhanced where possible.

- C There is a need to put some teeth into the enforcement of buffer zone requirements.
- C Where ever possible the Board would prefer public ownership over private ownership of buffer zones.
- C It was felt that references to wildlife habitat appears to have been left out.
- C Error noted in the Cost Implications for HRM section of Recommendation 5-4. The reference should be to Section 5.4.5 not 5.4.4.
- C Chapter 6 - Service Boundaries - Recommendation 6-3, second to last sentence, change word 'draft' to 'tentative'.

When discussing this chapter, it was recognized that there are a number of good recommendations, but concern was expressed about the time line for their implementation. They might not come on stream fast enough. Time is of essence in light of the quantity and speed of development in HRM.

- C Clarification is required of Recommendation 7-10. The Board questioned what the intent was. While it is recognized that clarification can be obtained from the discussion section, the recommendation needs to be more clearly stated.

It was noted by a member of the Urban Development Institute, that the development industry and HRM's engineering department have proposed color coding of the pipes to identify clearly which pipes are for storm water or sanitary sewers. New subdivisions have to pipe storm water separately, but errors have been made in connections.

- C Recommendation 8-2, Stormwater Management - It was felt the recommendation is not reflective of the discussion in the report, i.e. there is no reference to 'more stringent requirements', etc. It is recommended that the recommendation be rewritten as follows:

It is recommended that HRM identify particularly sensitive watersheds and apply a more stringent stormwater management approach.

- C The Summary of Recommendations should better reflect discussion in the main text, as people will tend to more frequently use the summary rather than the main text. (Refer above noted example.)
- C Referring to Section 8 - Stormwater Management there is a need to emphasize the first steps which need to be taken to reduce sedimentation and contamination in terms of the proper procedures to be followed to minimize their release off site. Also, in cases where these procedures don't work well and sediments and contaminants can't be handled on site, there should be some sort of treatment of run off contained in the recommendations, i.e. sediment traps, engineered wetlands, etc.
- C 8-3, bullet 4 - The sentence be changed around to read:
- The importance of natural systems and emerging technologies be considered and emphasized for water resource management.**
- C 8-4 - It was felt that the wording is not clear. It needs to be fine-tuned.
- C Referring to Chapter 9 - Performance Measurement, it was felt that the various elements should be paid for by the developer versus 9-2, which is funded by HRM. Clarification required. It was noted that the cost implications to HRM should reflect \$125,000 in the table. This figure was inserted incorrectly opposite 9-3.
- C Recommendation 9-1 should refer to recommendation 9-3.
Bullet 1 of the recommendation - What standards are being looked at?
Bullet 5 of the recommendation refers to 'valid methods'. What methods are these?
- C Recommendation 9-2 - How do the 50 to 70 sites get selected? A good overall mix of lakes should be included, i.e. ones with residences on septic systems, pristine lakes, lakes with residences which are serviced. There is a need for more clarification of lakes to be tested.
- C During discussion of Section 9, it was noted that a lot of money can be spent on monitoring programs. If such studies are not well planned and the information not used, you are essentially wasting money. There should be staff within HRM who could review all the information. Perhaps a Technical Advisory Committee should be established to overview monitoring plans and recommend improvements. These individuals could be drawn from universities and the provincial government to help HRM staff with their overview.

- C Recommendation 9-4 - What role would the WABs have in the annual review proposed? It would be nice to have a full day, annual meeting at which HRM staff summarized the water quality monitoring results, explained what they meant and plans for the next year. The WABs could make recommendations re priority areas. This would be the ideal set-up.

As an alternative, report cards be generated each year following determination of the objectives. The report cards would identify whether the objectives are being met, and if not, why not.

- C Cost implications for HRM associated with 9-3 and 9-4 should be reflected in the \$30,000.

WHICH RECOMMENDATIONS DO YOU AGREE WITH:

- C the emphasis on buffer zones
- C Chapter 7 - Wastewater Management - Recommendation 7-4 - The Board felt public education associated with septic systems is very important, so people know how to look after their systems. There is a huge need for a public education program dealing with septic systems.

WHICH RECOMMENDATIONS DO YOU NOT AGREE WITH?

While not necessarily disagreeing with the recommendation(s), the Board felt the following recommendations needed wording changes:

- C 5-1 - reads poorly/doesn't read correctly.

Remove the words 'where appropriate' from the end of the first sentence.
Insert the word 'natural' before the word 'vegetation' in the second sentence.
- C 5-2 - replace the word 'general' with 'minimum' in the first sentence. Perhaps in addition to degree of slope, soil types be taken into consideration.
- C 5-3 - the need to state very clearly what 'valid reasons' are. It was noted that in the case of existing lots which might become unuseable if a 20 m buffer zone was required might be a 'valid reason', for example. This criteria should not be left up to Regional Council to decide upon. Perhaps the recommendation should be left out in its entirety.
- C 8-15 - While a mixed use designation is recommended, it was felt that no residential should be permitted.

- C Recommendations 8-9 which relates to redevelopment of existing uses being permitted within the 1:20 floodway appears to be contradictory to Recommendation 8-12. Will this be allowed by development agreement or not? One recommendation says it is permitted by development agreement, the other not at all! Clarification was sought pertaining to these two recommendations. It was noted that there is very little discussion of this section (8-6 to 8-16) in the report's body.
- C Recommendation 8-14, associated with development contrary to the Floodplain Protection guidelines, contains another loophole. Even with a hydrotechnical study carried out by a qualified person indicating no impact, any decision should be at the discretion of Council to allow such an intrusion. It was noted that this would essentially take a property out of the Floodway Zone and rezone it to Floodway Fringe Zone, thus it is essentially a zoning change.
- C others captured in earlier portion of minutes

WHICH POLICIES SHOULD BE GIVEN PRIORITY FOR IMMEDIATE IMPLEMENTATION?

The Board identified the following recommendations as their priority. They are not necessarily listed in order of priority, however.

- C Chapter 5 - Watercourse, Wetland and Coastline Protection
Recommendation 5-1
Recommendation 5-2
It was felt these two recommendations should be given the highest priority.

It was noted that the Board has been emphasizing the need for buffers for many years with respect to watercourse protection.
- C Recommendation 5-4 which relates to restoration of natural systems a priority but a lesser one than the recommendations associated with buffer zones.
- C Very high priority should be given to recommendation 8-1, Stormwater Management. However, the focus should be on all development, including as-of-right development. The Board felt that having standardized guidelines across HRM was desirable. The Board could summarize what it looks for when reviewing an application.
- C Recommendation 8-3, fifth bullet "developers be required to investigate the cumulative effects of existing and future developments on the downstream environment", should be given priority.