

<u>Issues of critical importance in the draft HRM Regional Plan</u>

The draft of the Regional Plan is a lengthy document that contains many issues relevant to the quality of life in our city as well as the maintenance and growth of Halifax. Members of the Backlands Coalition (BC) have highlighted issues below that have special importance to the community that surrounds the Backlands and to the maintenance and viability of these lands as natural infrastructure and habitat for wildlife.

- A) Incorporate the Halifax Green Network Plan and HalifACT into all aspects of the Regional Plan: Make the necessary specific instructions on amendments to the Municipality's planning documents, Regional Plan, Regional Subdivision By-Law, secondary plans and land use By-Laws.
- **B)** Protection for ALL wetlands. big and small: We need accurate wetland mapping that includes the small systems as well as the large, to understand how they work together. All wetlands are important, and each one becomes more important as yet another wetland is lost. Losing them to development leads to loss of wildlife habitat and control of water flow toward the streams that flow through the landscape often to the harbour.

Wetlands are essential elements of the intricate hydrology of the watersheds that make up the region, including Colpitt Lake-Williams Lake, Purcells Pond and Flat Lake-McIntosh Run in the Backlands. Wetlands in the Backlands are typically small and mostly undocumented. Most don't show up on wetland inventories and the smallest wetlands (smaller than 100 square metres in area), have no recognition in wetland policy and regulation in NS or the HRM.

Wetlands are particularly vulnerable to development at the west end of Williams Lake, in the area draining to Colpitt lake and Williams Lake and Governors Brook. This area of the watershed, and above Governors Brook have borne the burden of development, and remaining wetlands have to work harder to make up for the losses. Small wetlands are critical habitat for frogs and salamanders and support the diverse bird life.

C) Taking a watershed approach by both Halifax Water and HRM

The draft Regional Plan is taking the right approach in moving to a watershed approach to land planning and management. The Backlands have more than two separate watersheds. The two largest watersheds are Williams Lake and McIntosh Run. Both watersheds have significant parts that lie outside of the Backlands and both are experiencing significant development pressures on all sides.

The change to planning based on watersheds may change focus of the advocacy efforts of the Backlands Coalition. As well, the change to watershed-based planning will affect the planning of both Halifax Water and HRM that will need to:

- control and direct locations for development
- provide quality habitat and landscape protection for people and wildlife
- protect the features that protect surface and groundwater supply
- ensure adequate stormwater management
- ensure protection of floodplains small and large, incorporating climate change adjusted flood projections into the 100-year flood lines (which are the typical largest flood used for floodplain zoning) along the McIntosh Run, and Governors Brook in particular
- produce accurate mapping of the land, engineered water systems, storm water routes and the hydrology of the watersheds

D) An environmental approach to setbacks on Purcell's Cove Road

The draft Regional Plan proposes a setback of 250m from Purcells Cove Road. Specifically, the draft Regional Plan advises: "re-designate privately owned Urban Reserve lands to Rural Commuter within 250m of the Purcells Cove Road and apply the Open Space and Natural Resource Designation to the remainder of the properties." While the intention of this setback may be to create an area of privately owned undeveloped Open Space land adjacent to the Backlands, the distance of 250 m from Purcells Cove Road would allow development further into the vulnerable and fire prone areas of the Backlands.

This method of determining setback appears arbitrary and does not take into account the characteristics of the land that make it unsuitable for development in HRM – terrain with steep slopes, geology, water supply, wetlands and vulnerable species requiring protection, fire sensitivity, tree cover, and the intricate hydrology of the watersheds and watercourses.

- **E)** Replacement and protection for wildlife corridors. Most of the important wildlife corridors leading out of the Backlands to large areas of Crown Lands such as Terrance Bay Wilderness Area have already been blocked and require remediation, including at Old Sambro Road and Dunbrack and along the Herring Cove Road especially near Long Pond. Protection and reinforcement of the corridors and pinch points that remain must be a conservation priority including those at the west end of Williams Lake/Colpitt Lake and Governors Brook, connecting to the Shaw Wilderness Park, and those connecting the Shaw Wilderness Park to Purcells Pond, Flat Lake and Pine Island Lakes.
- **F)** Fire management and conservation strategy: Recognizing the high conservation value of the fire-adapted Jack Pine-Crowberry Barrens (including the "Whaleback Barrens" now so popular for biking and walking), the innate fire susceptibility of the Backlands because of exposed

bedrock and shallow soils over more than 80% of the area and exposure to coastal winds, and a history of recurrent fires, a combined fire management/conservation strategy for the Backlands is required. Key components of such a strategy might include for example (a) minimizing any further intrusions into the undeveloped lands (b) facilitating FireSmart practices around the settled perimeter (c) mapping and aging of Jack Pine-Crowberry communities & occurrence of fires, development of predictive models and (d) as appropriate, construction of fire breaks and use of controlled burns.

G) Recognize the urgent need for accurate environmental mapping. The Backlands area is under extreme development pressure. There is a need for accurate and complete environmental mapping of the land that includes both large and small wetland areas and to understand how they work together. The maps being used currently are incomplete, vague, and some date back to before amalgamation in 1996.