

Collin's Park Watershed Advisory Committee
c/o 2 Park Ave., Lower Sackville
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Halifax, NS B3K 5M1



Dec. 21, 2022

Honourable Kim Masland,
Minister of Public Works
(via email: publicworksminister@novascotia.ca)

Re: Aerotech Connector Wetland Compensation in Collin's Park Watershed Area

Dear Minister Masland:

On behalf of the Collin's Park Watershed Advisory Committee (Committee), please accept this letter with respect to the Nova Scotia Department of Public Works (NSPW) Highway 102 Aerotech Connector Road Project Wetland Compensation.

As you may be aware, Halifax Water operates three (3) municipal drinking water supply plants within the Shubenacadie River watershed area, as follows: Collin's Park and Bennery Lake drinking water supply plants, which draw their source waters from Lake Fletcher and Bennery Lake, respectively; and the Bomont drinking water supply plant, which draws its source water from the Shubenacadie River. A fourth plant, operated by the Municipality of East Hants, draws its source water from the Shubenacadie River; it is situated between the Collin's Park and Bomont water supply intake areas.

Also within the Shubenacadie River watershed area is the new Highway 102 Aerotech Connector Road. This Road sits within the high-risk Intake Protection Zone (IPZ) of the Collin's Park drinking water supply watershed area that is delineated and defined in the Collin's Park Source Water Protection Plan (2020), developed by Halifax Water.

The Committee realizes that to develop the Aerotech Connector, it is necessary to destroy some of the wetland areas in the IPZ. To compensate for the destruction of these wetlands your department has budgeted for a wetland compensation package. It is understood that 50% of this wetland compensation package has been budgeted to conduct a *Shubenacadie Watershed Environmental Protection Society (SWEPS) Wetland Vulnerability Study – Secondary Wetland Compensation Project Scope (Study)* (see attached) and that the remaining 50% will be diverted to on-the-ground saltwater marsh projects outside of the immediately impacted watershed.

Section 6.6 d) of the Highway 102 Aerotech Connector Road Project, Environmental Assessment Approval (EAA) states that restoration activity within the affected watershed is preferred over conducting on-the-ground work elsewhere, as follows:

6.6 ... The Wetland Alteration application shall include but not be limited to:

d) a Wetland Compensation Plan. Preference shall be given to on-the-ground wetland restoration within the affected watersheds that provide hydrologic, water quality support and/or stream flow functions, if available, followed by on-the-ground wetland restoration opportunities elsewhere in the province.

The Committee strongly agrees with this preference stated in the EAA such that any wetland restoration be applied in the affected watershed area before it is applied elsewhere. Further, the Committee would like the Minister to consider the importance in maintaining all wetlands within this watershed area as

essential components of a healthy drinking water supply. Moreover, the wetlands within the Collin's Park high-risk IPZ hold even greater importance in sustaining the health of this water supply.

The Committee further acknowledges and supports conducting the Study within the affected watershed, which is vital in identifying the criteria for the wetland compensation. However, while the Committee applauds the province's effort to restore salt marshes, we are disappointed that a decision has been made to divert the remaining 50% of the wetland compensation funding, derived from the construction of the Aerotech Connector Road, toward projects outside of the immediately impacted watershed before the Study has determined whether compensation may be applied within the affected watershed area. Once these funds are used to apply compensation elsewhere, the chance to apply compensation within this watershed will be lost.

According to the [Nova Scotia Wetland Conservation Policy](#) (NSWCP), wetlands maintain watershed health by moderating flood waters, slowing runoff rates and minimizing erosion and sedimentation of adjacent lakes and streams. As each wetland is infilled, the need to preserve and protect the remaining wetlands grows exponentially. The Shubenacadie River watershed area is one of the fastest growing development areas of the province. Unlike wetlands in *Protected Water Areas*, where they have added protection as "wetlands of special significance" through the NSWCP, wetlands within the Shubenacadie River watershed do not have such protection, allowing its wetlands to disappear at an alarming rate.

To provide for constructive wetland compensation within the Shubenacadie River watershed area, the Committee strongly recommends the following:

1. Respect the recommendations of the Environmental Assessment Approval and hold 50% of the assigned compensation funding until the Wetland Compensation Study has been completed.
2. Retain the 50% until the Study is completed and if it is determined that all, or some, of the remaining 50% could be applied to on-the-ground compensation projects within the impacted area recommended by the Study, it should be allocated to those projects.
3. Once on-the-ground projects identified in the Study for the impacted area are completed the remaining funds should be directed to compensation projects outside the impacted watershed area identified by the Study.

On behalf of the Committee, I invite you to consider implementing these recommendations to preserve the Shubenacadie River watershed wetlands and protect the water quality of the Collin's Park, Bennery Lake and Bomont municipal drinking water supplies. We look forward to hearing your thoughts and what actions will be taken on these recommendations.

Sincerely,

Dr. Richard Pickrill,
Chair, Collin's Park Watershed Advisory Committee

Attachment: NSECC SWEPS Study Scope

cc: Honourable Tim Halman, Minister of Environment