

Subdivision By-Laws s.10.16

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MCINNES
COOPER

Actual Wildfire Human Safety Risks

- The wildfire life and safety risk in the Renfrew/Monte Vista Rd. area has not been correctly evaluated
- It is actually very small

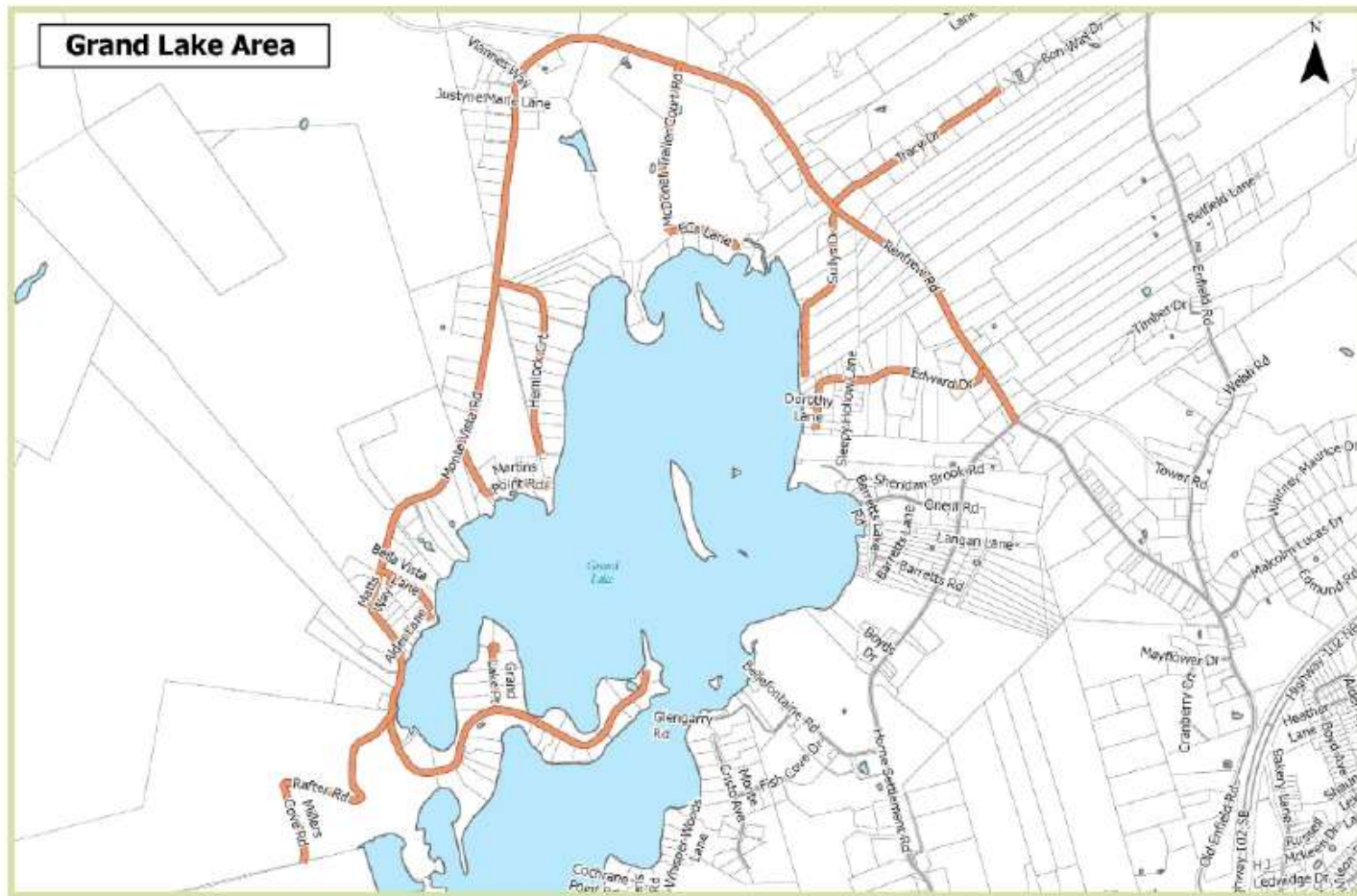
Effects of development bans for a small wildfire life safety risk:

1. Unreasonable restriction on freedom to choose rural residence location
2. Uncompensated taking of development rights
3. Aggravation of housing crisis
3. Loss of perpetual tax revenue
3. Prevents organic rural growth

East Hants should not be one of the most restrictive jurisdictions on the continent

- HRM's Municipal Design Guidelines of 100 lots only apply to lots beyond existing road network
- Jurisdictional scan indicates exceptional nature of the current and proposed East Hants restrictions

Focus on continued improvement of fire prevention,
detection, containment and suppression is a much
better response to wildfire concerns than an extreme
access requirement



I am not addressing second access for:

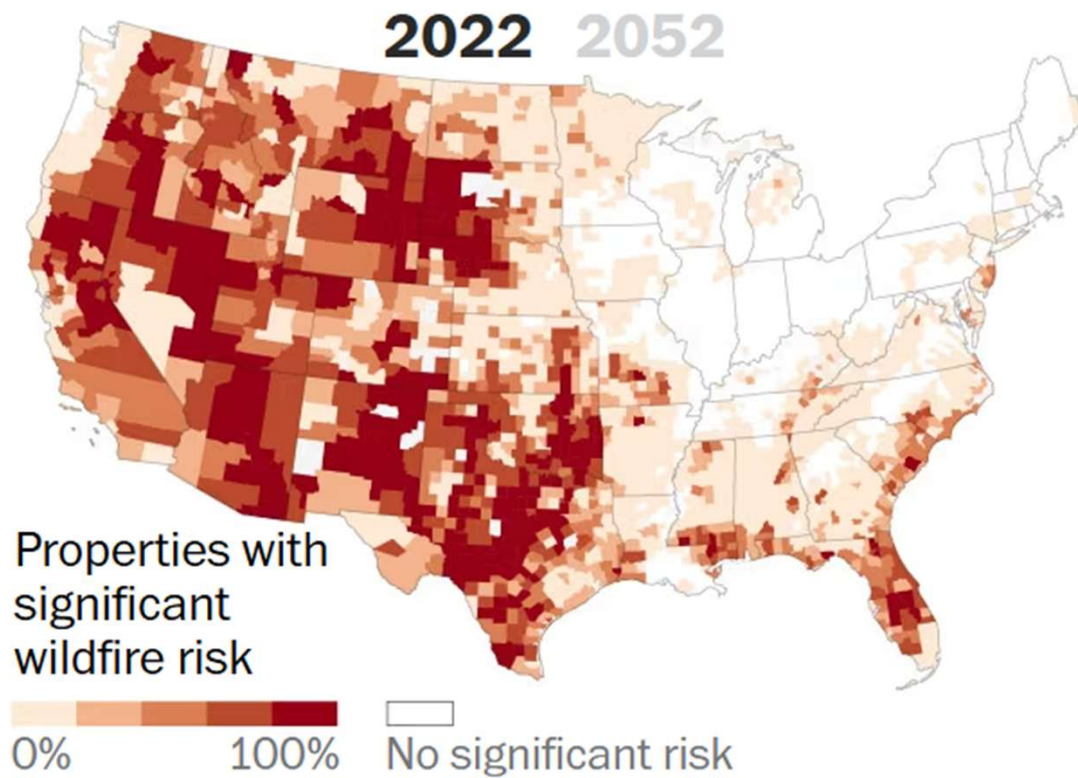
- Urban/suburban subdivisions, or
- Properties in established floodplains

Different considerations may apply

Fundamental freedoms of people to choose a rural location to build upon or live in.

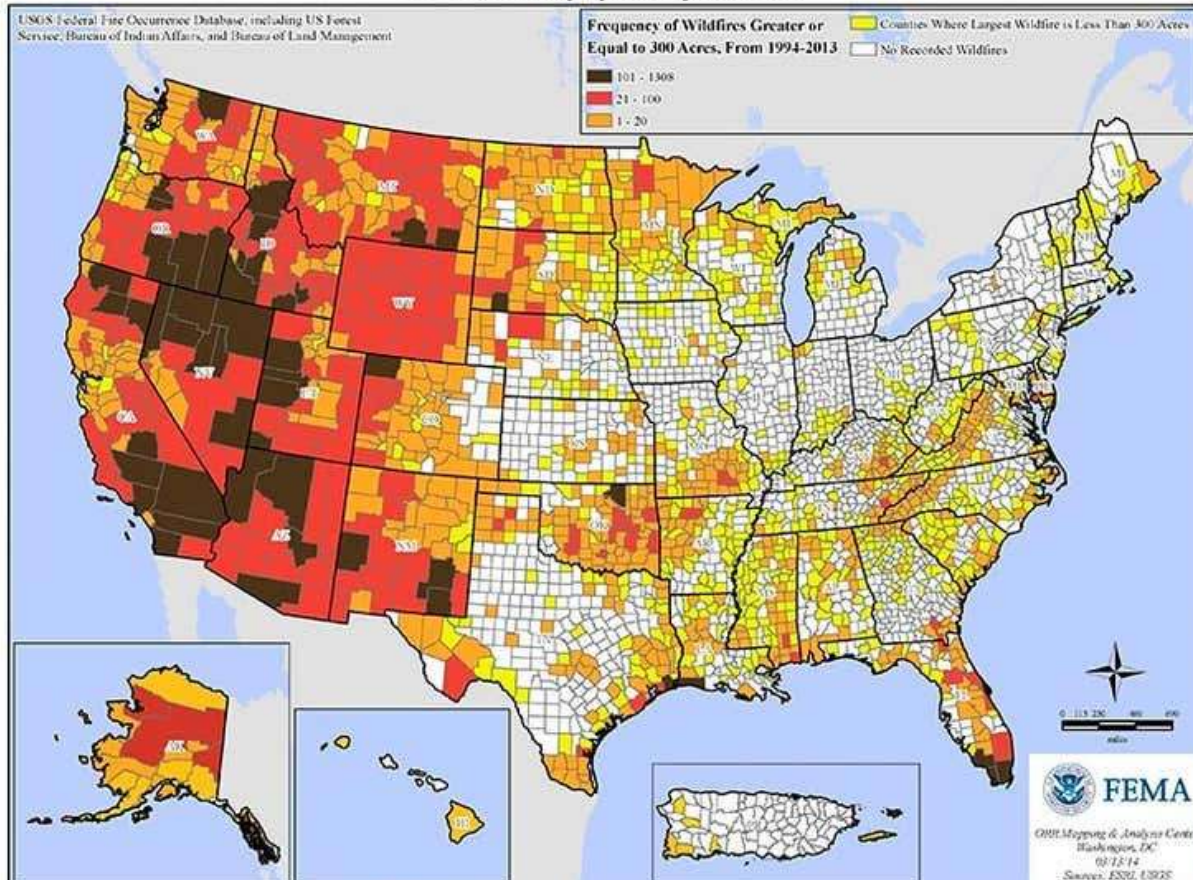
To accept the risk of being more remote from firehalls and hospitals.

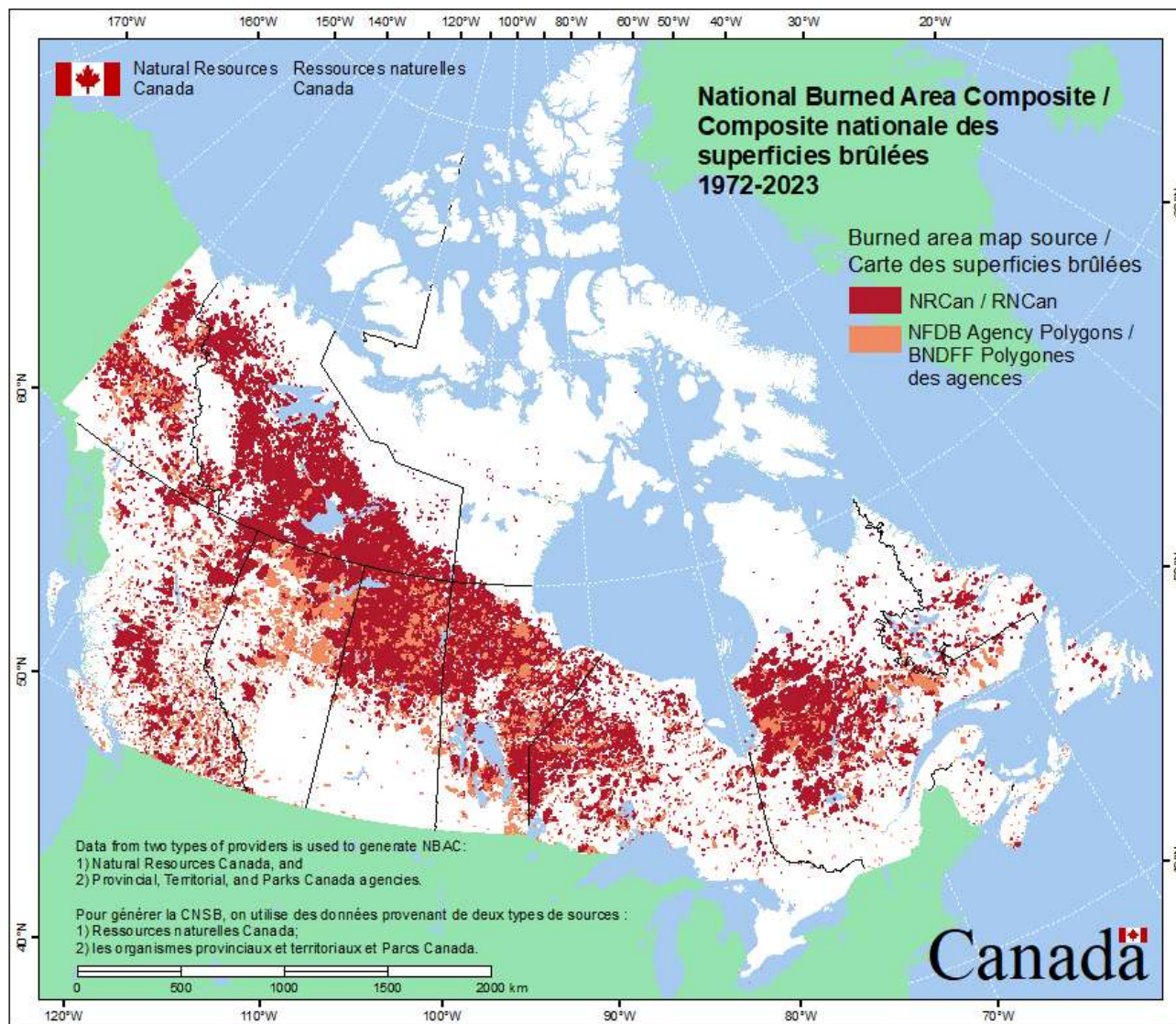
In exchange for benefits like lower cost housing, and less populated, more rural lifestyle.

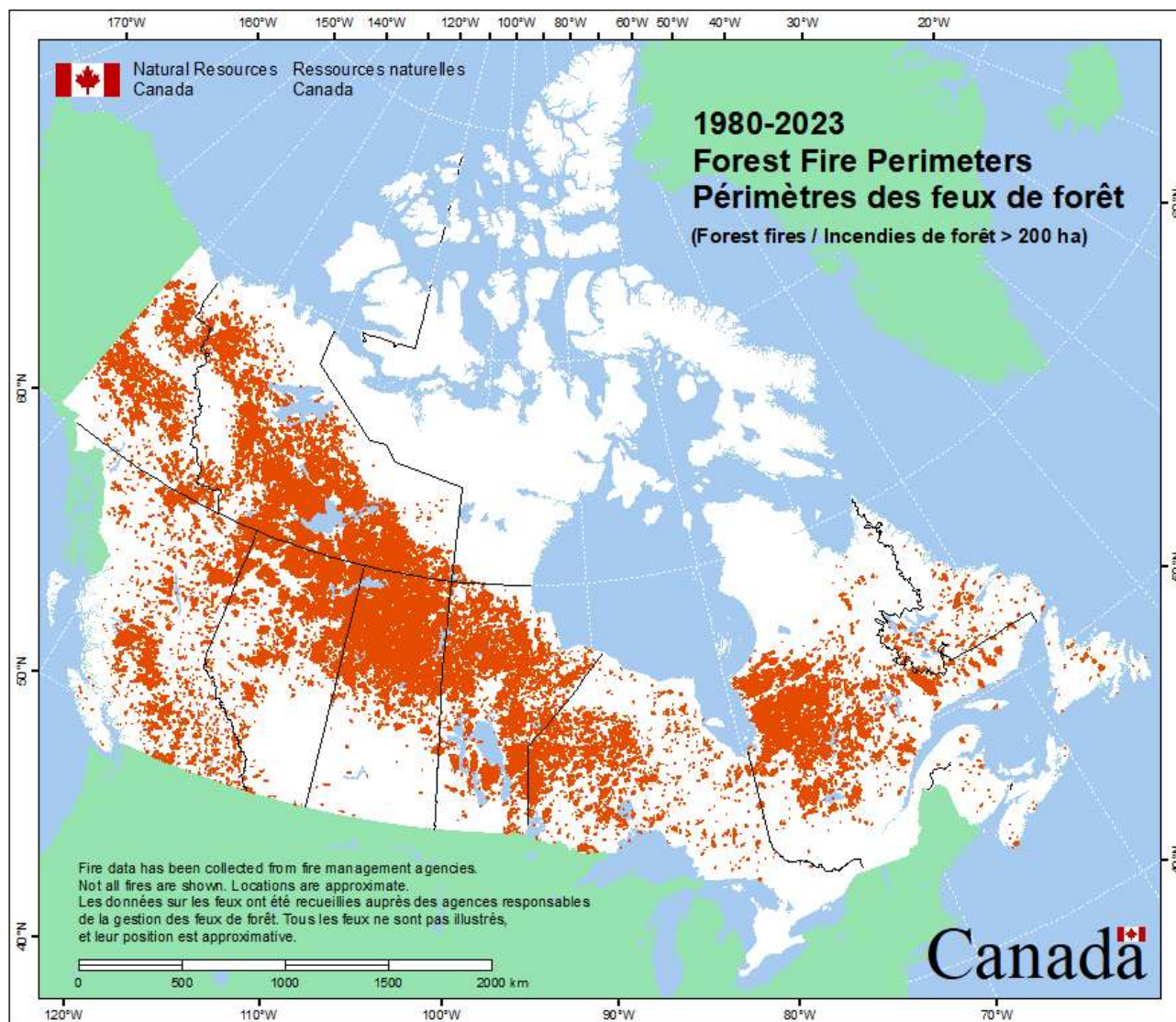


John Muyskens, Andrew Ba Tran, Naema Ahmed and Anna Phillips, "1 in 6 Americans live in areas with significant wildfire risk", *Washington Post*, May 17, 2022.

Wildfire Activity by County 1994-2013







For 11-year period between 2013 and 2023, East Hants:

- Averaged less than 5 wildfires per year
(2.05% of NS fires)
- Averaged about 5.5 hectares of fire area
(1.23% of NS areas)

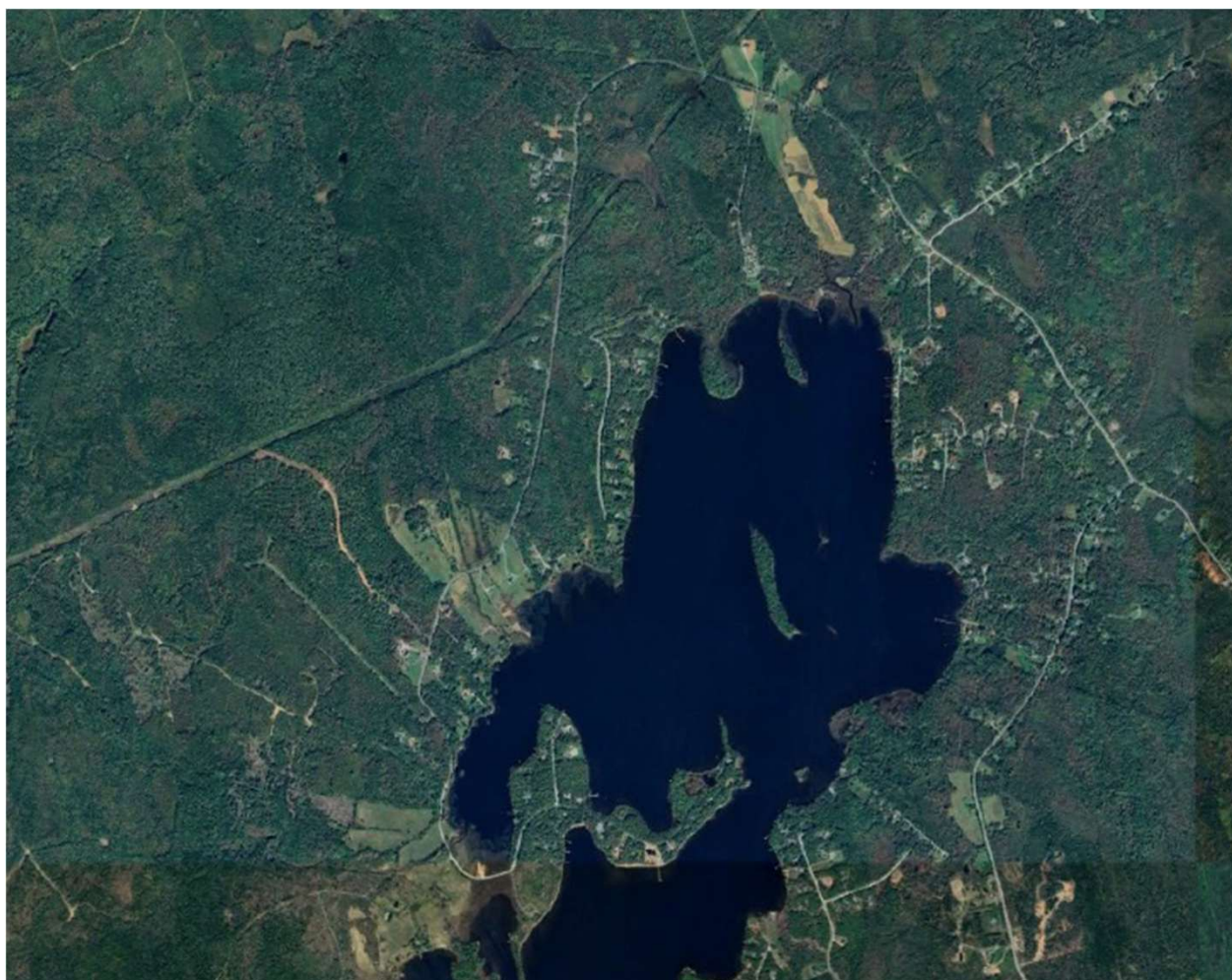
Even though it constitutes 3.35% of land area of NS

Accidental Deaths

- **Driving fatalities** Nova Scotia, 2024: **79**
- **Drowning fatalities** (average of 4-year period) NS: **15**
- **Wildfire fatalities** Nova Scotia: **0**

Grand Lake Area

- Proximity to the lake: accessible by boats from other side
- Large lots with low density
- Fire unlikely to attack all parts at same time
- Good roads with 70/80 kmh speed limits
- Large mowed clearings serve as Firebreaks
- Powerline ROWs serve as firebreaks
- Proximity of DNRR firefighting helicopters based in Shubenacadie



Regulatory Overreach

- Denies people the right to develop their property
- That they have been paying taxes upon at values based on development potential
- Uncompensated loss

Excessive Regulatory Burdens:

- Were already a cause of housing crisis
- Potential residents seeking a place to live affordably do not participate in planning exercises
 - because the harm to them is not from any one regulatory restriction
- Massive tax revenue loss from creation of “no development areas”
- Potentially hundreds of rural dwelling units effectively being banned permanently
- Organic growth and improvement of roads is stopped

HRM's Municipal Design Manual s 2.2.1

(j) ...any lot in a subdivision shall have two or more independent street accesses **to the existing street system** ...

(l) Where, in the opinion of the Municipal Engineer, it is impractical to provide a second access, up to 100 lots containing a maximum of 100 dwelling units may be approved with a single access

Jurisdictional Scan:

Apart from HRM others in NS are not imposing such restrictions

Elsewhere in North America - even in much higher wildfire risk areas - there are few examples identified

East Hants would be at the regulatory forefront

History of s.10.16

- Apparently developed in 2006 as a result of concerns about a large suburban subdivision development – of the type targeted by the HRM Design Manual
- Only applied to Growth areas (GMAs and GRAs)
- 2013 amendment extended it everywhere with minimal analysis and public engagement
- Was not being applied rigorously until after 2023 wildfire prompted direction from Council to do so

A better response to the hazard of wildfires - reduce the hazard by improved:

- Prevention
- Detection
- Containment
- Suppression

- In 2023 Canada's greenhouse gases from wildfires exceeded the greenhouse gases from hydrocarbon consumption for each country in the world except China, India and the USA
- Health impacts of wildfire smoke

Penalty of \$25,000 for breaching DNRR fire bans

DNRR updating its 4 helicopters in 2026

Municipal burn restrictions can be enacted

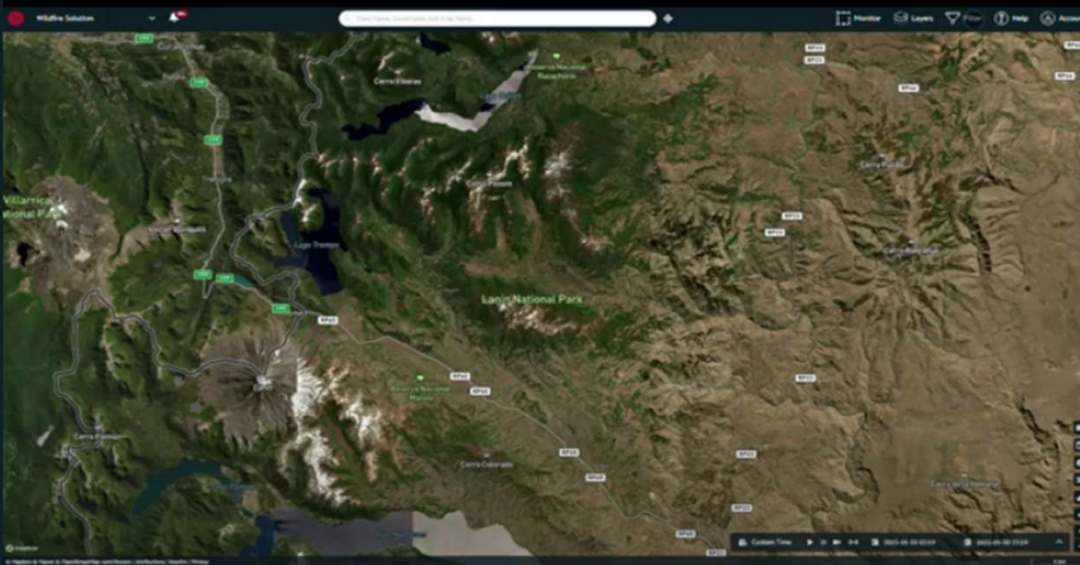
Technology



Wildfire Solution – During (Early detection)



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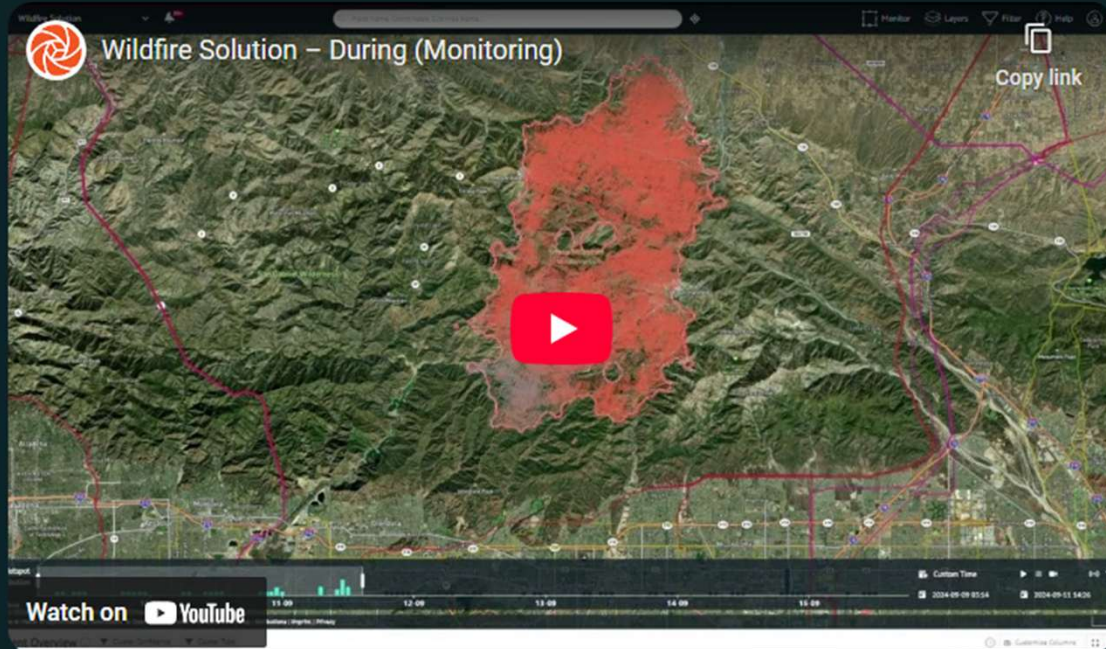


During

Early detection

Receive instant alerts of active wildfires via different notification methods.

- **Data from over 25 satellites:** Get precise detection and capture fires as small as 10x10 meters.
- **Automatic notifications:** Receive instant email, WhatsApp messages, SMS, or in-app alerts within minutes of any new fire detections in your monitored areas.
- **Accurate location & fire area:** Get precise location coordinates, data on fire intensity, and estimates of the affected area.
- **Fire confidence:** Evaluate multiple factors to confirm if a heat anomaly is a genuine fire, reducing false alarms and enabling timely, cost-effective decisions.



During

Near-real-time monitoring

- **Continuous fire tracking:** Monitor the active fire front and its development with regular updates.
- **Fire spread simulation:** Benefit from our analysis of crucial fire drivers such as weather, topography, and fuel to estimate the potential fire spread.
- **Situational awareness:** Stay informed with our customizable Incident Overview, displaying only the data you need for effective decision-making.



What do we seek?

- Repeal of Subdivision Bylaw s.10.16 or
- Amend to restrict it geographically:
 - e.g. to Urban/suburban Growth Areas; or
 - use “existing street network” instead of collector streets as the base to which second access is required and put in a clause recognizing practicality as in HRM Manual s. 2.2.1(l).
- Do not implement similar no development zones in rural areas by means of dwelling unit counts

- Thank you
- Questions?