May 25, 2010

The Honourable Sterling Belliveau
Minister, Nova Scotia Department of Fisheries & Aquaculture
PO Box 2223
Halifax, NS B3J 3C4

Dear Minister Belliveau:

I am writing you on behalf of the UNSM to provide comments on the State of Nova Scotia's Coast Report released in December 2009.

The UNSM Board of Directors met on May 21, 2010 and agreed to the following points regarding the report:

1. UNSM recognizes that the coastal strategy will be an important document to help sustain our coastline and its associated uses. Municipalities have an important role to play in managing Nova Scotia's coastline because off its legislative powers related to land-use planning.

2. Any provincial regulations developed to sustain the coast need to be done in direct consultation with the UNSM and municipalities.

3. The Provincial Oceans Network (PON), which is represented by a number of provincial departments and organizations, was formed to coordinate a strategic approach to coastal management. A municipal elected official from UNSM as well as UNSM's Sustainability Coordinator (as a non-voting member) should sit on this committee.

4. Municipalities have jurisdiction over coastal development under the MGA. There is significant revenue potential by developing along coastal areas and municipalities recognize the need to balance development, public access and sustainability. The UNSM views the coastal strategy as an important opportunity for all municipalities. With cooperation and funding support from the Province, the UNSM recommends that all municipalities begin to develop a comprehensive coastal management plan that identifies areas for development, public access and protection of sensitive areas (including those prone to flooding or storm surges). In some cases, adjacent municipalities may wish to work collaboratively to develop such a plan.

5. All municipal units impacted by flooding, either along the coast or through inland waterways, should identify high water marks and erosion areas in their coastal plans in order to identify current and future development opportunities and limitations. By proactively planning, municipalities will save money and eliminate or reduce litigation risk. To identify areas of flood risk and erosion will require significant investment in high resolution mapping. Municipalities cannot afford to fund this on their own; such mapping will require significant investment from the Province. Once these risk areas have been identified, municipalities will be responsible for managing development in those areas.

The Union of Nova Scotia Municipalities

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6. Municipalities are responsible for water and wastewater discharge. While municipalities recognize the need to upgrade wastewater treatment processes through the newly introduced CCME regulations, there is huge concern over the ability of municipalities to fund these significant infrastructure upgrades. Even though municipalities have been given thirty years in some cases to meet these requirements, this cannot happen without significant cost sharing from the provincial and federal governments.

7. Increased sustainability of the coast will result in more regulation. It is paramount that if the Province increases regulation along the coast, that they be prepared to strengthen its enforcement efforts and compliance by hiring additional staff.

8. As indicated in the report, Nova Scotia has at least 45 pieces of international, federal, provincial, and municipal legislation that deal with its coastal areas and resources. The complexity of legislation dealing with coastal areas and resources obstructs developing an integrated approach to coastal management. The Province needs to work with its federal and municipal partners to harmonize the multiple laws and mandates, and clearly delineate roles and responsibilities of each level.

The UNSM commends the Province for developing its draft State of the Coast Report which addresses the key issues in sustaining our coastal areas. As the order of government legislated to manage land-use planning, municipalities have a paramount role to play in developing the Province's Coastal Strategy. To this end we ask that municipalities be treated as a partner in this strategy rather than a stakeholder.

The UNSM looks forward to working with the Province to advance the issues highlighted in the report.

Sincerely,

Councillor Clarence Prince
UNSM President

Clarence Prince

cc: UNSM Board of Directors