

ArnieBrown2006jul y21. txt

From: Arnie Brown [arniebrownsympati.co.ca]
Sent: Friday, July 21, 2006 3:23 PM
To: limnes@chebucto.ns.ca
Subject: Russell Lake

Good Day Shalom:

I have been following your work (albeit sporadically, until the last year), regarding lakes & rivers in Nova Scotia and the conditions of same.

You have done extensive evaluations on waterways in this province sir, and I'm seeking your valued opinion specifically on Russell Lake.

I want to preserve Russell Lake, which is as you know, a valuable community resource, and have requested through my councillor that HRM set an APPROPRIATE PHOSPHORUS THRESHOLD LEVEL, as recommended in the Canadian Environmental Qualities Guidelines, and supported by the Canadian Council of Ministers of the Environment (CCME).

As you probably know, the CCME level IS REQUIRED under any current HRM development. So my question to my councillor was.... "WHY has the CCME recommendation not been established by HRM to date???"

There has been ample time to do so.... but HRM in their infinite wisdom have delayed doing the proper thing in making this recommendation, and have seen fit to let development continue. In my humble opinion this is not acceptable.

As you are aware, the Russell Lake Residents Association (RLRA), has been lobbying the Dartmouth Lakes Advisory Board (DLAB), and the Harbour East Community Council (HECC), to act in a prudent manner and get the threshold level set as recommended by CCME, and as described in the Regional Plan.

I'm appalled that HRM Environmental Staff have suggested that the Phosphorus levels be set at a significantly higher level than those recommended by the National Guidelines. Where does this kind of thinking come from???. I'm unable to comprehend the wisdom used to arrive at this kind of thinking, and as a matter of fact I am VERY concerned.

Shalom, I have not had any formal training in biology, and will admit I'm influenced by people like yourself, who are highly regarded as a knowledgeable person, by your peers on this subject, along with those people that formulated the Canadian Environmental Qualities Guidelines, and supported by CCME's guidance framework.

What is HRM's Environmental Staff's justification to ignore the suggested phosphorus threshold levels, as recommended by these national guidelines, and make them significantly higher???

I see no excuse for HRM staff to advocate a higher level, and disregard CCME's guidelines, and have written and strongly recommend to my councillor that HRM follow CCME's guidelines as required under the current HRM development plan. His reply was, "my understanding of the CCME phosphorus guidelines and the Environment Framework it is based on provides for a flexible, adaptable approach and I am comfortable that the staff recommendations to the DLAB complies with the CCME process".

I'm not comfortable with that convergence sir, and have revisited the CCME guidelines, and am unable to find any justification for his statement.

Could I impose on you Shalom to provide me, in layman's terms please, data that I can use to dispel that comfort zone he has.

Thank you for hearing my concerns sir, and I look forward to your valuable opinions.

Arnie Brown

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