



*Sandy Lake - Sackville River Regional Park Coalition
115 Farmers Dairy Lane, Bedford, Nova Scotia, B4B 2C9
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February 15, 2023

To: Nova Scotia's Provincial MLAs and Premier Houston,

Re: Sandy Lake Special Planning Area, NS Housing Task Force

We want to make you aware of the following concerns about the housing task force's role in what might happen at Sandy Lake, Bedford. We appreciated the candor of Ms. Elliott-Lopez, CEO of the task force secretariat, in our meeting with her and task force representatives on February 28th, and in her subsequent letters to community and ourselves.

The responses make it very clear to us that the mandate of the task force is to "expedite development projects". However, this extremely narrow mandate ignores the reality that we have been living. The world's attention and all three government levels are recognizing that business as usual is how we got into this climate crisis and risk of eradication of life on Earth through biodiversity loss. Business as usual will only exacerbate the problem. Presumably, no one intends the task force to ignore the reality of the world situation.

Recently, a developer who wishes to develop Sandy Lake Special Planning Area requested a five-year extension to one of their other development projects due to external forces such as locating adequate materials and labour. Housing objectives can not be achieved in the time frame desired. Why would the province continue to push ahead to sacrifice biodiversity and the climate change mitigation strengths at Sandy Lake when the whole world recognizes the importance of protecting areas like this?

It is perplexing that anyone would ignore the values recognized by the city in the 2022 McCallum report on Special Planning Area Sandy Lake, 'The Sandy Lake Ecological Features Assessment'

(<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf>).

We request that your government remove Sandy Lake Special Planning Area from the list of special planning areas, and support its role, recognized since 1971, as a functioning ecosystem by expanding the regional park to include the remaining subwatershed, for the good of all.

We provide the appendices below to enable your government to incorporate a fuller perspective of Sandy Lake Special Planning Area. If you require more elaboration, we would be more than pleased to meet with you in person, online, or by phone.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter N Regan".

Walter N Regan

A handwritten signature in black ink, appearing to read "Karen L H Robinson".

Karen L H Robinson

Co-chairs Sandy Lake-Sackville River Regional Park Coalition of 31 groups

cc: Mayor Savage and City Councillors, Halifax CAO O'Toole, Kate Greene, Provincial Housing Task Force

Sandy Lake - Sackville River Regional Park Coalition Member Groups:

Sandy Lake Conservation Association

Sackville Rivers Association

Agropur Cooperative Dairy Bedford Plant

Beechville Lakeside Timberlea Rails to Trails

Canadian Parks and Wilderness Society - Nova Scotia Chapter

Canoe/Kayak Nova Scotia

CAPE NS (Canadian Association of Physicians for the Environment)

CARP Nova Scotia Chapter

CP Allen High School's Cheetahs for Change

Cole Harbour Parks and Trails Association

Ecology Action Centre

Five Bridges Wilderness Heritage Trust

Friends of Blue Mountain Birch Cove Lakes Society

Friends of McNabs Island Society

Friends of Nature

Halifax North West Trails Association

Kingswood Ratepayers Association

Lucasville Community Association

Lucasville Greenway Society

McIntosh Run Watershed Association

Mountain Bike Halifax

Nature Nova Scotia

Nova Scotia Bird Society

Nova Scotia Salmon Association

Nova Scotia Wild Flora Society

St. Margaret's Bay Stewardship Association

The Halifax Field Naturalists

The Neighbourhood Association of Uplands Park

The Turtle Patrol

Trips By Transit

WRWEO / The Bluff Wilderness Hiking Trail

APPENDIX 1



Background and Clarifications relevant to the Provincial Task Force on Housing's Sandy Lake Special Planning Area

The goal of this letter and its appendices is to have government remove Sandy Lake Special Planning Area from the list of special planning areas for housing, and support its role, recognized since 1971, as a functioning ecosystem by expanding the regional park to include the remaining subwatershed, for the good of all.

The provincial government's fast-tracking housing plan for 9 "Special planning areas" especially puts at risk decades of effort by citizens to preserve Sandy Lake, Bedford. It is indeed special. Its subwatershed through to the Sackville River was identified in 1971 by a joint federal-provincial-municipal project as an extremely rich ecological unit worth preserving for all time.

One thousand acres are already Regional Park, but 1800 essential acres remain unprotected. Wild Atlantic Salmon have returned to Sandy and Marsh lakes through the Sackville Rivers Association's 35 years of work. **Building in the sensitive Sandy Lake/Marsh Lake subwatershed would increase potential for flooding downstream in Bedford and degrade the park's immense natural assets.** The area is even more important now than in 1971 to counter climate change and biodiversity loss and as an important wildlife corridor to the Chebucto Peninsula.



2020 park planner's proposed Sandy Lake-Sackville River Regional Park

Part One: The Letters

I co-chair with Walter N. Regan a coalition of 31 organizations listed with this document, the Sandy Lake-Sackville River Regional Park Coalition. I have resided at the lake since 2016, but have been working to protect the area since 2013. I studied Biology and Psychology at Acadia University, and I was immediately aware of the values of this place when it was introduced to me in 2010. I know this amazing Sandy Lake ecosystem is worth fighting for. My life's work included consulting for all levels of government to find solutions to various school environmental health and safety issues. I learned that when the will is there, solutions can be found.

I received a response letter from Ms. Elliott-Lopez of the provincial housing task force on January 10, 2023 via email. (*See Appendix 2*)

The letter voiced appreciation for our coalition's presentation of February 28th 2022, but so far, we have seen no evidence that what is referred to as our "context and important information about the area" has been applied. We are seeing instead that the Task force process does not include community input in any meaningful way. For example, the Deloitte Report of October 2022 only included contractors, developers and the like, and did not include knowledgeable community stakeholders or academics. And the letter the task force sends to citizens who have sent concerns to the task force is a stock reply that refers in no way to their actual letters. Rather, as in the letter to me, it states partial facts that merely underscore the task force mandate. That mandate, being, as Ms. Elliott-Lopez expressed in our February 2022 meeting, *"I know nothing about trades. Our goal is to expedite development projects."*

Let us take an example email to the task force that reads, *"Dear Mr. Premier, I have been going to Sandy Lake since I was a child and now I take my children. A few years ago someone cut the trees on the hill on the other side of the lake and made everything brown and flat over there. It is turning green again now, but I have been told now you want to put houses there. Please don't do it. That will hurt our park, the animals and plants and the lakes."*
Sincerely, Jan"



Part of clear cut as seen from Sandy Lake Lions Club Beach

The responses that I have seen to letters like this from the task force, starting in June 2022, up to this past week, and including the January 10th letter to me, is this stock text:

“The proposed residential development lands near Sandy Lake Park were first identified as a growth area in HRM when its regional plan was developed in 2006. The regional plan was reviewed in 2014, and the Sandy Lake area was once again identified as a future growth area. The lands near Sandy Lake Park that are slated for residential development have been owned by the developer since 2014.

Special planning areas must still undergo any required environmental studies or other permitting requirements. Once again, thank you for your email about the proposed residential development near Sandy Lake Park.

Please be advised that future comments about special planning areas should be made at

<https://www.halifax.ca/about-halifax/regional-community-planning/regional-plan/special-planning-areas>.”

(See Appendix 2)

Please put yourself in the place of that citizen receiving that task force response in reply to her letter. She felt unheard and disregarded.

Here is a sampling of other people’s comments sent to me:

“We received replies from the Housing task force today. They are empty, short-sighted brushoffs with only the minimum of relevant facts - those that blindly support development.”

“The TF response forgets to mention the long history of this as an intended park, and the documents that consistently led community to believe the park was eventually coming.”

“I am wondering if there is anything I can do to tell the HRM Housing Task Force what I think of their email sent out today This response is tone deaf. I am located in Cape Breton and have a full-time job, but please let me know if there is anything I can do. Volunteer my time, sign a pledge, scream from a roof top etc.”

“Well. Actually it's been identified as a regional park since 1971. And now one of our last, local salmon lakes, Sandy Lake, has algae from existing development. So the proposal is to pave over paradise, kill the salmon and the lake. Does not have my support.”

“I guess that we're all going to get this form letter/email. Interesting that they don't go back into the history of when it was to be protected.

I think that they’re going to discover that NO response would have been better than this!”

I have seen many letters that were sent and received. **What we have come to realize is that the task force’s mandate makes it difficult if not impossible for the task force to have productive communications on anything other than the singular focus of expediting development projects.** The people who have been writing to the task force, to the Premier, Mr. Lohr, and others, are not writing to foster housing development, and so they receive the repetitious response that focuses on the government’s goal of developing at Sandy Lake.

This process may be an attempt to satisfy a requirement for responding to citizens, but the response is an invitation into a revolving door of unsatisfying cut-out replies that come nowhere near being adequate for the concerns that are wholeheartedly being expressed by people whom the government is elected to serve.

This also points out the importance of true public consultation. Whether it is through the city’s process or the provincial government, there must be true public involvement and consultation.

The present task force housing process and mandate have to be changed to include all stakeholders or give the city back the authority to make housing decisions using its inclusive processes, but with the province assisting the city as a good partner would.

Perhaps you know that at COP27 this year the World Health Organization featured the One Health initiative which is a “collaborative effort of multiple disciplines working locally, nationally, and globally, to attain optimal health for people, animals and our environment.” The One Health collaborative priority promotes the importance of having all stakeholders at the table when decisions of significance are examined and made. Better decisions are made that way.

Please have the province fix the process to make the outcomes better for what is a complex and real situation beyond the singular priority of increasing housing - something to meet the needs of citizens, governments, and developers, while preserving this important area from housing.

Part Two: The Sandy Lake Situation

To quote part of the task force’s stock response to citizens’ letters:

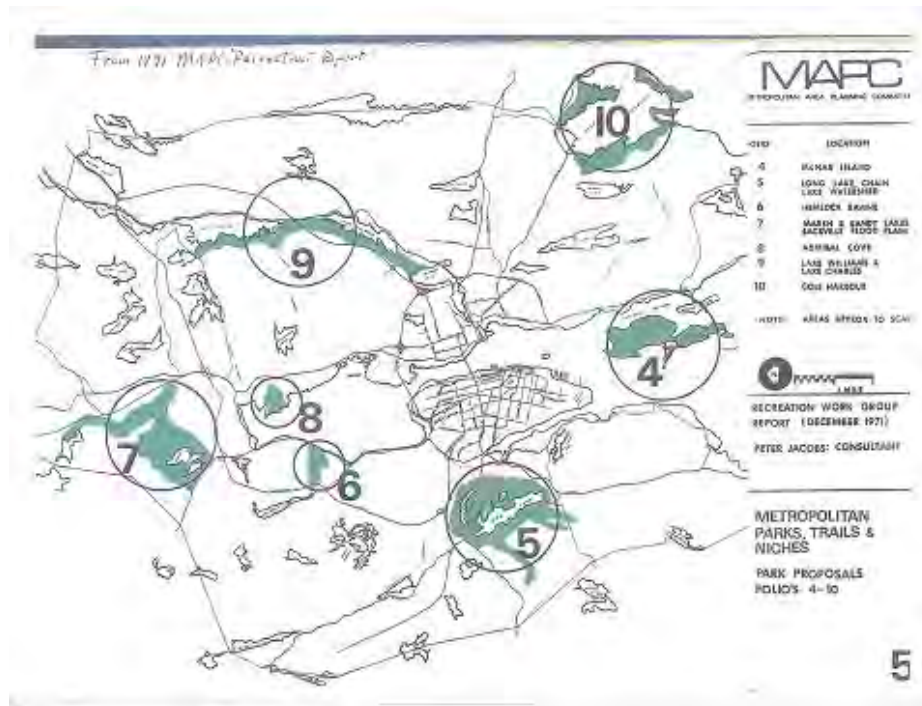
“The proposed residential development lands near Sandy Lake Park were first identified as a growth area in HRM when its regional plan was developed in 2006. The regional plan was reviewed in 2014, and the Sandy Lake area was once again identified as a future growth area. The lands near Sandy Lake Park that are slated for residential development have been owned by the developer since 2014.”

This response is not taking into account the full situation at Sandy Lake.

Because so many citizens have pointed out their frustration and anger, only to have it exacerbated by the stock response, I have been asked to send the task force at least some of the missing facts.

For generations, people have preserved natural ‘jewels’ around the world, from the early Philadelphia parks and Central Park in New York to the network of municipal, provincial and federal wildlife parks across Canada. The entire Sandy Lake-Sackville River subwatershed is one of those jewels.

We mentioned in our February 2022 meeting with the housing task force representatives that the area’s longest-standing best-use has been as regional park, starting in 1971 with the federal-provincial-municipal biological study that identified “7 jewels in the crown” in Halifax Dartmouth that must be preserved as regional parks for all time. See the 1971 Dean Report and the 1971 and 1979 MAPC (Metropolitan Area Planning Committee) reports. The Sandy Lake-Sackville River ecological unit was one of that impressive list, and it has only ever been partially protected. It remains highly vulnerable with 1800 acres still needing protection.



On the far left, Sandy and Marsh Lake Sackville Flood Plain (the first of several names)

The area has gone from being on a list of 7 amazing assets to now being one of 9 areas fast-tracked for housing. How could something as awful as that have happened?

The area's story did not begin in 2014 as is implied by the stock response, *"The lands near Sandy Lake Park that are slated for residential development have been owned by the developer since 2014."*

While their ownership did begin then, there is a long history of this as an intended park, plus documents that consistently led community to believe the full-sized park was eventually coming.

The area was under the jurisdiction of the County when the park was first chosen. It became part of the Town of Bedford in 1980. At amalgamation it became part of HRM. The Town of Bedford and HRM have continued to acquire park land.

As recently as 2022, 11 acres were acquired, plus 45 acres from a lumberman in 2021, and 160 acres west of Marsh Lake in 2015 from a developer. Those 160 acres were owned by the previous developer who sold the ~ 500 acres to Clayton in 2014, as noted in the stock response. They sit just above the ~ 500 acres, and share a boundary.

However, there is a relevant story leading up to the 2014 purchase.

Major Error #1

Local citizens were excited by the 1971 Regional Park plan. While its 1979 conceptual park plan was being developed in the mid-1970's, respected local resident Mrs. Pender of the Pender lumber company, offered to the park the 500+ lands west of Sandy and Marsh Lakes, the lands we are discussing here, for free. **Had that been accepted, we would not be having any of these current difficulties.**

The historical documents show that all the levels of government had to agree on the gift. The county warden, Mr. Settle, vetoed that offer because he wanted Twin Cities Dairy to make the Sandy Lakeside its new home. The plan was to dump dairy effluent into the lake, something not compatible with lake welfare. The dairy historian has confirmed this, and that they had needed to move away from the highly populated Windsor Street because the plant operations were noisy and a traffic and pedestrian hazard due to their big trucks coming and going day and night. Dairy management has told us that additional housing in the area will affect their current operations.

The story of the dairy's settling at Sandy Lake is an interesting one, but in the end, local biologists worked with the dairy to prevent processing effluent from being piped into the lake. The huge pipes that were built were never used, and biologists saved the lake from a political decision.

The dairy is a good neighbour. It donated 6 acres beside the lake to the park in 1992, it actively works with our organization to mitigate harm from stormwater runoff, and Agropur/Farmer's Dairy was the second group to join our coalition to save Sandy Lake.

The developers who owned the Pender lands prior to the current owners, Mr. Armoyan and his wife, met with our group in 2014, apologized for cutting old growth forest beside the lake in 2013, and said they would work with us. We helped them stop incursion onto their lands by off-road vehicles. The next thing we knew, the 160 highly ecologically valuable acres west of Marsh Lake were offered to the park as a trade for parkland dedication debts owed by Armco, and were added to the park. The rest was sold to Clayton, as the stock response notes, in 2014. Those previous developers recognized the area's natural unit was worth preserving as one of "7 jewels in the crown of Halifax Dartmouth".

When our group first met in 2018 with the current developers, they heard the facts and offered to trade their ~500 acres of Sandy Lake land to protect this park. The developers gave us two years to convince the city to find a good trade, a "win-win" they called it, and they put it in writing via email to the city. We are very grateful for that, and that two retired city planners told us they could easily find that trade if the city would give them the job.

The point is that even the developers (both the current and the previous owners) were willing to help save the lakes and park, but they needed the city to partner with them on that.

And the dairy and two lumber companies (In the '70s and again in the '80s the Pender's offered 500+ acres, and Barrett's 45 acres in 2021) offered their lands to the park for free or for a reduced cost in order to benefit the community.

With that in mind, let me take you back before 2014 again.

Major Error #2

In the 1980's, according to the minutes of the Bedford Town Council, the Penders' lawyers offered their 500+acres again to the park, but this time for sale. Again, it was turned down. But there is another even more unfortunate event that happened during the tenure of that same Bedford Town Council.

The task force's stock response to citizens states erroneously that *"The proposed residential development lands near Sandy Lake Park were first identified as a growth area in HRM when its regional plan was developed in 2006."*

Actually, all the park lands to the west/northwest of Sandy and Marsh lakes were rezoned from park land to development in 1982 by that Bedford Town Council in a tie-breaker vote. No biologists were consulted to determine if such a rezoning of existing park lands might harm the remaining parklands.

Citizens did speak up. Bedford Mayor Cosman and the park-supporting councillors went on to pass a bylaw to attempt to preserve the area in hopes that a park plan would evolve eventually. Sept 26, 1983, Bedford Council passed the zoning bylaw to restrict any new construction to a minimum 5-acre lot on a publicly serviced road that is publicly serviced as of October 9, 1991. This zoning protected the lake from in-fill development ever since, and is still in the 2016 Bedford Land-use By-laws. However, with the zoning change, developers did begin to buy land.

It was that political decision to rezone half the park, made without biologists help, that was carried from 1982 into the 2006 first Regional Plan (RP) and then to the 2014 RP review. (See Appendix 3)

However, two sections of those Regional Plans contain conflicting and confusing parallel intentions for Sandy Lake. If citizens were concerned about their evolving park, a search of the RP parks section would find positive plans for park expansion. Yet, if they happened to look in the RP development section, they would find another trajectory toward housing. Those I have talked to tell me they were not even aware of the zoning change that had happened in 1982, let alone that they needed to look deeper into the RPs. While awaiting their regional park, checking the park section confirmed it was coming eventually.

And, further evidence that the park was coming was that land for the park was still being acquired by Bedford and then by HRM:

- On July 22, 1985, a 50/50 purchase by the Province and Town acquired 236 acres for Sandy Lake Park and 61 for Admirals Cove Park for \$700,000 from McCulloch and Co.
- In 1986, CMHC gave its 1000-acre Jack Lake lands to the province. The large public housing development they were planning for Jack Lake would not happen because of the need for expensive highway interchanges and the **extensive mitigations required to prevent environmental damage to Jack, Sandy and Marsh lakes.** (Jack Lake Environmental Report, 1986, <http://sandylake.org/1986-jack-lake-environmental-evaluation-final-report-2/>).



Note: This 1986 document recognized that irreparable damage could be done to the park and lakes by a housing development on the east side. State of the art interventions would be too expensive and might not succeed.

Why is it so hard now to have decision-makers recognize what housing on the sensitive, tributary-bearing west side of the lakes' watershed would not be similarly or even more damaging? Scientists tell us that even with state of the art precautions the lakes and ecosystem would still decline.

- In 1992, the 6 acres were given to Bedford by Farmers Dairy specifically for public parkland, with a covenant requiring the land be used only for public parkland, no buildings, and no travel over the lands or parking, no motor vehicles of any kind.
- In 2006, the province in turn gave the ~1000 Jack Lake acres, minus 50 acres, to the municipality for the park.
- Those 50 acres were considered for a prison, but eventually joined the park instead.
- Other acquisitions were noted earlier in this document, and we are told by staff and Council that acquisitions for the park are ongoing.

Other aspects

In 2013, citizens had just discovered that there was a problem. A developer had cut 300 acres of forest west of Sandy Lake. No matter what the RP had been saying in the park section, the expected completion of the park unit was not coming! They reignited the long efforts. However, it became apparent the will was not strong enough yet in Council. The park's history had been lost to most. Most were only just becoming aware that Sandy Lake-Sackville River regional park was supposed to be bigger. **To keep the remaining park and lakes high ecological value intact, the remaining watershed lands need to be kept as part of the park as the 1971 biologists had provided.**

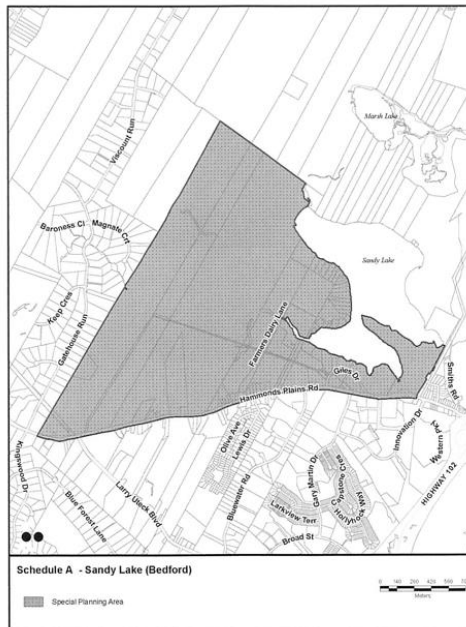


The Sandy Lake-Sackville River Regional Park Coalition formed around this Mission Statement:

“To preserve and protect over 2800 acres of wildlife and aquatic habitat surrounding the Sandy/Jack/Marsh Lakes and Sackville River area as Sandy Lake Sackville River Regional Park for historical, cultural, conservation, educational, and recreational use.” One thousand acres are now in public ownership as the Jack Lake Regional Park. The remaining 1,800 acres are under immense development pressures and need to be protected to maintain the integrity of the Sandy Lake to Sackville River watercourse and as a critical wildlife corridor between the Chebucto Peninsula and central and eastern mainland.

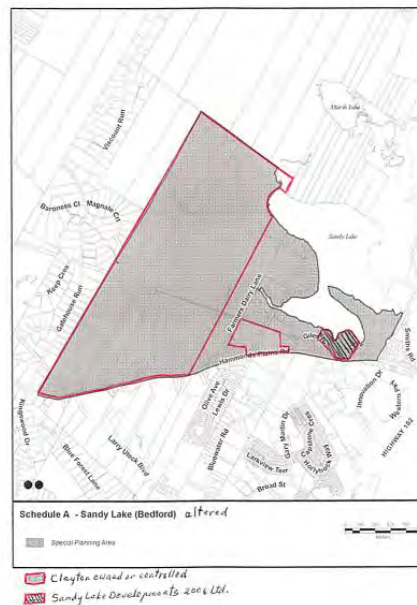
Schedule “A”

Map of Sandy Lake Special Planning Area



Schedule “A”

Map of Sandy Lake Special Planning Area



Special Planning Area, Housing Task Force, March 2022

Clayton controlled properties plus 2nd developer

The current developers who purchased the lands west of Sandy Lake in 2014 must have felt it was a good risk, since the lands were zoned for future development. I would argue that the developer is as badly affected as the park has been by that 1982 error in judgement. This underlines why we need to look for a win-win in preserving these valuable park lands. But what if perhaps developers were in the background encouraging Bedford to rezone the privately-owned park land because they were buying the lands that Bedford had just turned down? Nevertheless, that purchase is called land speculation, and the city has, until now, had the final say over where and how it should grow, all things considered, including when new circumstances come to light.

However, sometimes all things are not considered, partly because the province has taken over housing, but largely because biologists are not always at the table, even for parks.

Also of concern is the way city documents have been worded so far. Ecological issues tend to be “considered” while development issues are worded more strongly. In city decisions, development goals have tended to take precedence over environmental issues, and mitigations such as minimal and unregulated buffers have been thought to be enough environmental protection. A notable example of the shift in values is the recent motion to increase protective buffers at Sandy Lake that reflects that buffers are being increased in size and function around the world. This motion is to be found later in this document, p. 16-17, as part of the McCallum report on Sandy Lake.

To the city’s credit, time and resources go into creating direction shifts in order to respond to emerging conditions and research. The city and citizens have worked together to address climate change, increase biodiversity, establish large parks in the cities, address pollution, create complete communities...and developed planning guides such as the Halifax Green Network Plan and HalifACT. These and others provide new guidance for aspects of how the city can best grow. Change is coming. With real risks from planet degradation, documents such as these point out the importance of preserving valuable undeveloped land for protection, especially is a case like this in the Sandy Lake subwatershed.

When new principles and approaches are determined there is always an adjustment period. Projects that were started before can be caught in-between. What do we do about them? Proceed with the old rules or adjust to fit the new? Yes, Sandy Lake hadn’t made its way off the city’s development list yet, but sober second thoughts were definitely happening. And it is not an ordinary piece of land. <https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf> and: <http://sandylake.org/wp-content/uploads/2021/04/WildlifeCorridorCharretteReport.pdf>

In August 2015, when the 160 acres were acquired from Armco and returned to the park, the staff report that added those lands, called, ‘Off-site Parkland Dedication Request – Marsh Lake Lands, Bedford’ contained the rationale for protecting land west of Sandy and Marsh lakes.

The staff who authored that document told us that **it is the same rationale the city could use to acquire the rest of the developer’s lands west of the lakes. That the lands are all highly valuable to the park.** Here is the link to the document:

<http://legacycontent.halifax.ca/council/agendasc/documents/151006ca81i.pdf>

Here is the pertinent text from page 3:

“Staff has been assembling lands at Marsh Lake since 1999, first following direction set out in the former Town of Bedford’s MPS policy and then in the 2006 Regional Plan. If these lands were

currently available for sale on the open market, staff would be recommending to Regional Council, independent of this request, that they be purchased using the funding from the Park Land Reserve account.

...Conclusion *In keeping with the policies of the Regional Plan, the Marsh Lake lands are highly desired for regional park purposes.*

...COMMUNITY ENGAGEMENT

At the September 15, 2014 meeting of North West Community Council, a petition was received from the Sandy Lake Conservation Association supporting that the Municipality expand the park lands surrounding Marsh Lake and Sandy Lake to create a regional park and wilderness area. Staff responded with an Information Report to Community Council indicating that planning and land acquisitions for the Regional Park were continuing.”

“The subject lands at Marsh Lake are immediately adjacent to municipal lands being assembled for Jacks Lake Regional Park. The Jacks Lake Regional Park is identified in the Halifax Regional Plan as one of six (6) regional parks to be created over the life of the plan. The park's focus is to:

- 1) provide a Regional Near Urban Wilderness Park adjacent to the Bedford /Sackville Area;*
- 2) protect representational Acadian Inland forest habitats;*
- 3) provide water quality protection of Sandy Lake, Jacks Lake and Marsh Lake;*
- 4) provide access to and protect the ecology of the Sackville River; and*
- 5) provide continuity of a wilderness corridor along the Sackville River stretching from the 102 highway at Bedford to the Pockwock Municipal Watershed.*

Staff have conducted field work on the Armco Marsh Lake lands and assessed them in terms of the above objectives. The Armco lands:

- add 160 acres of desirable forested recreation lands to the Jacks Lake Regional Park land assembly. The lands help create a loop trail around Marsh Lake and have the potential to provide low impact access to undeveloped sections of the Sackville River with desirable aesthetic value;*
- host a variety of successional Acadian forest types including complexes and ages which are near to being classed as rare old growth forest as well as former industrial forest;*
- offer a buffer to Marsh Lake from future development, helping to protect water quality and habitat within the Sackville River watershed;*
- extend from Marsh Lake to the banks of the Sackville River and add another ½ km of shoreline protection for the watercourse;*
- protect habitat presently functioning as an un-official wildlife corridor extending from the Bicentennial Highway at Bedford along the Sackville River to Hants County. This corridor's viability is presently ensured by public ownership of the lands associated with Jacks Lake Regional Park, the Dept, of National Defence Rifle Range, the former Sackville Landfill and the Pockwock/Tomahawk Watershed lands. The Halifax Green Network Plan, currently underway, will be recommending that this corridor be one of several key wilderness corridors penetrating into the urban area to be incorporated into land use and park planning.*

ENVIRONMENTAL IMPLICATIONS

This land will serve as a positive move to protect and preserve high value ecological lands associated with the Sackville River Corridor.”

To underline the facts so far:

- **Biologists first identified the Sandy Lake-Sackville River area as an ecological unit, and citizen biologists had helped preserve the lands from harm time and time again.** (There are many examples, such as saving the beach’s natural berm and aquatic breeding grounds from being flattened, demonstrating that installing a motorboat launch instead of a canoe launch would increase potential for forest fires on inaccessible forested shores, researching and proposing Parks Canada trailhead toilets that prevented the clearing of a large area of old growth forest for a septic field, and more...)
- **Lumber companies and developers were willing to help save the lakes and park, but they needed the city to partner with them on that.**
- **City staff provided the city with the 2015 report that interpreted the Regional Plan with regard to Sandy Lake-Sackville River, and provided the rationale to enable them to acquire the valuable subwatershed west of Sandy and Marsh lakes by trade or otherwise.**
- **The ‘crossroads events’ in 1974 when the Pender gift was turned down, and that evening in 1982 when Bedford Town Council voted to rezone one side of the park land to allow housing, without the help of biologists, took the park unit’s welfare into dangerous territory because the lands and waters west of Sandy Lake and Marsh Lake are essential to the health of the park.**
- **HRM has acquired 216 acres for the expanded park since 2015.**

The developers are not unaware that the city has been acquiring land for the park. That was clearly demonstrated this past summer when two property purchases were being quietly negotiated by the city, and suddenly the developer, Shaw, offered twice the price and bought them. These properties are crucial to close the gap between the 160-acre acquisition and the existing Sandy Lake Park. Now, they need to be acquired from the developer along with the lands to the west and the small piece seen on p. 11.



Shaw’s surprise purchase 2022. Blue areas are park land

Biologists are back:

Biologists have reconfirmed the area's ecological value, and the importance of preserving the remaining watershed as an ecological unit. The lakes and the ecological values of the existing park through to the Sackville River will be harmed by any further development in its Sandy Lake subwatershed.

In June 2017 I called retired Dalhousie professor and preeminent scientist, Dr. David Patriquin, to see if he could come to Sandy Lake and determine if, after all these decades, Sandy Lake had maintained its ecological value. He replied that he was too busy for another 2 years, but that he would take a quick look that Saturday. He was so stunned by what he found in this previously unknown-to-him area that he made it his priority. He made 27 excursions by the end of that September, bringing with him experts in old growth forests, soils, mushrooms, lichens, and more. His findings continuing, and are documented in his *Sandy Lake and environs website*: www.sandylakebedford.ca

See Dr. Patriquin's *Summary of A Report on the State of Sandy Lake February 23, 2021*:
<http://versicolor.ca/sandylakebedford/waters/lakes/sl-report-summary/>

In March, 2020, The Natural Wonders Consulting Firm completed a 2-year survey:
<http://sandylake.org/avian-and-species-at-risk/> In summary, the proposed park has 11 habitats, at least 23 avian and non-avian Species-At-Risk on Federal and Provincial lists, along with an amazing number of old growth forest stands, part of the less than 1% still remaining in the province. **After reading this report, Dr. Patriquin remarked, "Is there any other equivalent area in HRM?"**

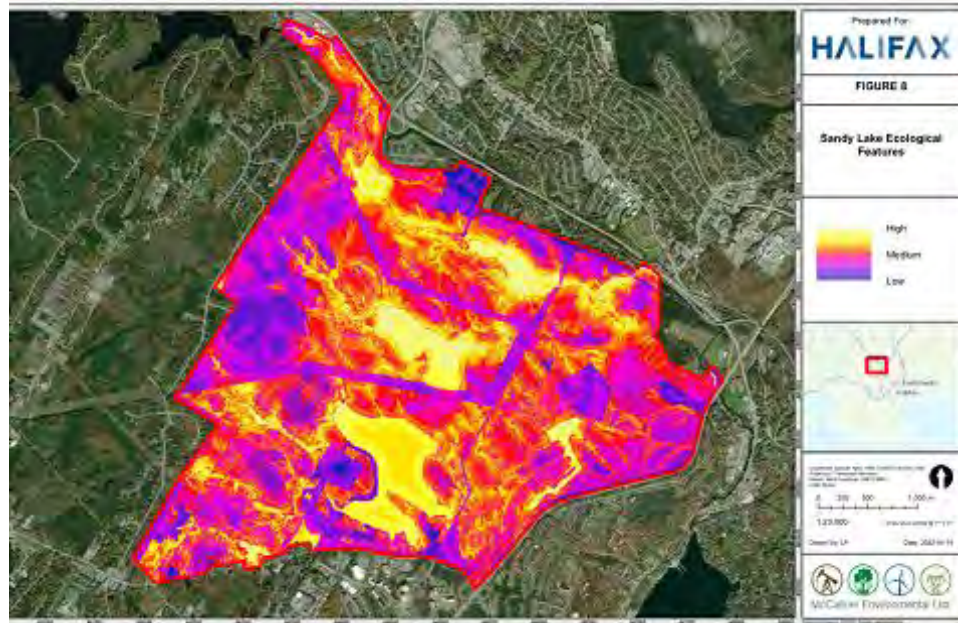
As you saw in Appendix 3, below, HRM's 2014 Regional Plan had called for a park boundary study for the area. The community continued to request such a study. In the meantime, in 2020, a professional park planner was commissioned by the community to conduct a Park Planning Study:
<http://sandylake.org/sandy-lake-sackville-river-regional-park-2020-planning-study-2/>

Then in 2022, Council funded 'The McCallum Study'. The **'Sandy Lake Ecological Features Assessment'** was released July 8th, 2022 and presented to City Council on the 12th. Council voted **unanimously to accept it.**

Council also passed an amended motion that day which added strength to the protection of watercourse and wetland buffers and to wildlife corridors. **This underlined the councillors' new awareness that this is a valuable area deserving protection so it can continue to provide important natural assets for all.**

The study was accompanied by an HRM staff report. Go to:
<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf>

Note that all major tributaries to Sandy Lake, that feed into the entire system, cross the lands to the west. Sandy Lake and the whole system will suffer right through to the Sackville River if the watershed is further degraded.



The study's heatmap, from page 38 of the report, shows that the highest scoring areas of ecological significance (shown in bright yellow) are associated with lakes, streams, wetlands and riparian areas, and are all over the study area.

Also, McCallum stated at least twice that *"The medium (orange) values represent areas of mature forest and habitat that are important to avian species at risk as well as important corridor areas..."* and *"Areas beyond the concentrations of medium to high valued ecological condition may still be important for consideration and possible protection as supporting lands for the continued integrity of the areas of high ecological/environmental values. These lands may also have an important role for broader landscape and ecological connectivity, which also needs to be addressed."* (P. 34 under Summary & Recommendations, paragraphs 2 and 3).

The McCallum report also identified an additional endangered lichen the previous studies had not found. That brings the known list of species at risk and other notable wildlife to 16. So far, **the area has an astounding 11 habitats and 16 SAR and at least 24 species of interest. It has magnificent stands of old growth Acadian Forests that support species that can only live where there are old growth trees.**

Overall, the study verifies the scientific work that has been conducted over the decades since the late 1960's. Most importantly, Council's amended motion added "at least" to the text so that recommended buffers and corridors will be at least the recommended sizes of 100 m buffers around watercourses, and 50 m buffers around wetlands.

"That Halifax Regional Council direct the Chief Administrative Officer to:

1. Incorporate the analysis and findings of the Sandy Lake Ecological Features Assessment in the planning and development of Sandy Lake Park.

2. Review and use the findings of the Sandy Lake Ecological Features Assessment in the background studies being undertaken for the Sandy Lake Special Planning Area, including organizing the form and location of development to best protect **at least**:
 - a. the suggested widths for important corridors,
 - b. the suggested riparian and watercourse buffers, and
 - c. the identified areas of predicted old or mature forest.
3. Explore the use of conservation easements as part of the Sandy Lake Provincial Special Planning Area background studies to manage ecological features or corridors that extend outside of the conceptual park boundary.
4. Assess how to best organize land use and green infrastructure as part of the Sandy Lake Provincial Special Planning Area Background Watershed Study to mitigate any downstream impacts to the Sackville River and Sackville River Floodplain.”

That day, before Council voted, a senior staff person told Council that the developers had just told the city that, should Council enforce the “at least” wording regarding buffers and wildlife corridors, they were concerned that their lands at Sandy Lake may not be developable.

Therefore, Council and the province must take the decision that the lands in the Sandy Lake subwatershed and Sandy Lake water quality are worth saving and should be acquired for the park. This is another strong reason to remove the Sandy Lake Special Planning Area from the provincial list.

Other studies:

The Halifax Green Network Plan, passed unanimously in 2018, identifies the Sandy Lake area as having these important and essential corridors, and also identifies the dual values for the Sandy Lake area – It is valuable ecologically, but has also become valuable for housing since developers own the lands and have applied for development. Which value will take precedence?

(https://www.halifax.ca/sites/default/files/documents/about-the-city/regional-community-planning/HGNP-Final%20Report_20180726_updated.pdf)

On Sept 24, 2019, City Council passed an **amendment to the Regional Plan’s conservation design development agreement policies to specifically reference the Important and Essential Corridors shown on Map 5, Green Network Ecology Map, contained in the Halifax Green Network Plan.**
<https://www.halifax.ca/sites/default/files/documents/city-hall/regional-council/190813rc1512.pdf>

“BE IT ENACTED by the Halifax Regional Council of the Halifax Regional Municipality that the Regional Municipal Planning Strategy for Halifax Regional Municipality, is hereby amended as follows:

1. Amend Policy S-17(k) of Section 3.4.1., Conservation Design Developments, by deleting the text shown in strike out and adding the text shown in bold as follows:

(k) connectivity of natural networks, including trails, is maintained with any open space on adjacent parcels ~~and trails and natural networks~~, as generally ~~shown on Map 3~~ (sic.) illustrated by the Important and Essential Corridors shown on Map 5, Green Network Ecology Map, contained in the Halifax Green Network Plan, as amended from time to time;”

Remember, Council's amended motion to the McCallum Report of 2022 added "at least" to the text so that recommended buffers and corridors will be at least 100 m buffers around watercourses, and 50 m buffers around wetlands.

Ducks Unlimited Canada has recently done WESP surveys of several of the wetlands in the area <https://sandylake.org/ducks-unlimited-wetland-assessment-report/> . **They designated Marsh Lake as a 2021 'Treasured Wetland', with partnering NS Departments of Natural Resources and NS Department of ECC, and they continue to feature it in their programs. If development were to happen west of Sandy Lake, Marsh Lake will also be harmed, right through to the Sackville River. How can the provincial government justify damaging its own Treasured Wetland?**

The 2021 Nova Scotia Crown Share and Legacy Trust Wildlife Corridor Charette Report: <http://sandylake.org/wp-content/uploads/2021/04/WildlifeCorridorCharretteReport.pdf> identified important and essential wildlife corridors including within the proposed Sandy Lake-Sackville River park area, and also identified concerning pinch points that need to be kept open to protect viability of the wildlife in the Chebucto Peninsula and Blue Mountain - Birch Cove Lakes' proposed national urban park. This includes important corridors through Bedford West Subareas 12 and 1, which are also slated for development. Our efforts for Sandy Lake-Sackville River include wildlife corridors through this Sandy Lake-Sackville River area and extend down through the neighboring areas and up through to the mainland. **It is urgent to negotiate good wildlife corridors through Sandy Lake-Sackville River and Subareas 12 and 1 to Blue Mountain-Birch Cove Lakes and the Chebucto Peninsula now that the final master planning process has begun in Subareas 12 and 1.**

On January 24, 2023, Council accepted a staff report regarding incorporating the Wildlife Corridor Landscape Design Charette Report within the Halifax Green Network Plan.

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/230124rci05.pdf>

On August 14, 2018, at the release of the 2017 Sackville River Floodplain Study, Phase Two, Mr. W. Alexander replied to a question about why the Sandy Lake area was not included in the study. He answered that **the city provided them with the scope of the study and, since Sandy Lake was not included in the scope, the city must therefore not be planning to develop at Sandy Lake for 100 years. Development at Sandy Lake would potentially increase the already troublesome flooding in Sackville and Bedford.**

The study is available at: https://www.halifax.ca/sites/default/files/documents/business/planning-development/FinalReport.SRFS_Phase2_12April2017.pdf

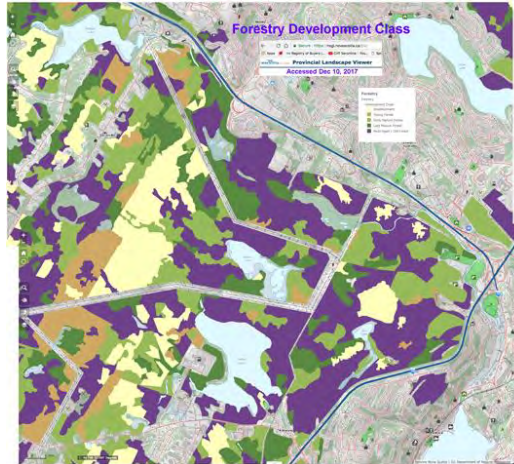
What changed to cause development to happen now instead of in 100 years? In the upcoming environmental studies a thorough floodplain study needs to be done.

We have a 4-page list of **additional scientific studies** done by university researchers, students, agencies, and government departments in the Sandy Lake area between 1971 and 2020. (*See Appendix 4*) Studies are ongoing.

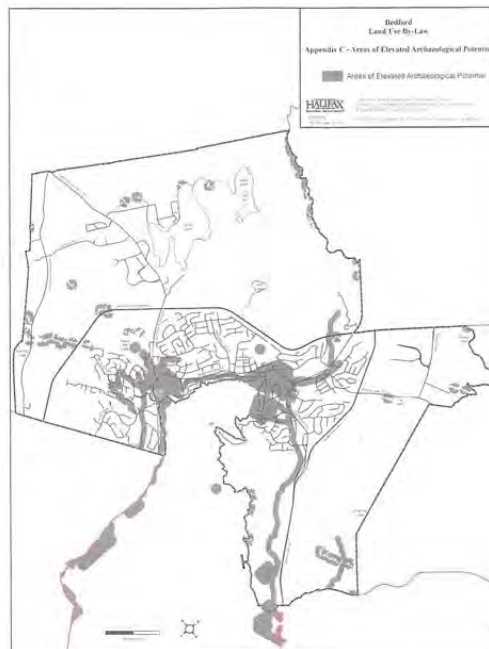
Just as important are the conclusions of these studies regarding the value of the Sandy Lake area, as quoted in *Appendix 5*.

Other values:

The NS Department of Natural Resources has a map of old growth forests in the Sandy Lake-Sackville River area. Sandy Lake has a high percentage of old growth forest especially as compared to the general NS map where less than 1% of the province's forests are old growth. There are species that can only live in old growth forests.



The Bedford Land Use Bylaw, 2016, indicates areas of archaeological interest for First Nations historical use west/northwest of Sandy Lake, along the streams and along the Sackville River:



From Bedford Land Use Bylaw 2016

The Sandy Lake Multi-Stakeholder Security Committee to protect the habitats and species in the Sandy Lake-Sackville River area:

Committee Representatives from: Sandy Lake Conservation Association (SLCA), City Parks, Halifax Police, NS Power, DND Rifle Range, Halifax Water, RCMP.

Additional Support as needed from: NS Dept. of Natural Resources and Renewables, Wildlife officers, NS Dept of Environment & CC, NS Department of Public Works

As a result of the deliberate killing of four nesting painted turtles (on endangered species list) in the summer of 2020, and pictures and reports of road-worthy vehicle rallies within the sensitive park lands, the SLCA organized Sandy Lake-Sackville River area stakeholders, starting in the spring 2021, to curb illegal activities such as use of motorized vehicles, hunting, lighting fires, illegal camps, tree cutting, and harm to wildlife. City By-law P-600 provides enforceable park-protection for city parks, including Sandy Lake Park. Sandy Lake-Sackville River is one of few using the by-law effectively.

Sandy Lake Security Committee Summary to the Fall 2022:

1. NS Dept. of Natural Resources and Renewables wildlife officers produced a report on illegal access points into the park and are assisting with enforcement.
2. City Parks installed NO ATV signs in key locations throughout the park and power trails which provided Halifax Police with what they needed for enforcement. For, example, since the new Smith's Rd signs were posted there have been no reports of OHVs entering the park from there.
3. City Parks also installed 'No Hunting' signs in key locations and removed hunting blinds on park property.
4. NS Power upgraded its gate on the 102 Highway to prevent illegal vehicle entrance there and it continues to make a huge difference. The NSP rep reports that the barriers at the 102-entrance area are inspected frequently with no signs of anyone trying to move them.
5. The NS Department of Public Works worked fast to approve the plans for that upgrade of the 102-entrance gate to NS Power's substation inside the park.
6. NS Department of Public Works augmented the work done by NS Power at their Highway 102 gate by adding "no parking" signs along that section of highway. This was because some had begun to park on the highway shoulder, something that is prohibited for safety reasons.
7. Halifax Police and RCMP are actively enforcing the no parking and no motorized vehicles signs, responding to reports of illegal fires and vandalism in and around the park. City Police plan an education program and a Parks Patrol Program city-wide .
8. Community members are encouraged to assist by reporting P-600 infractions, license plate #s, location, time, pictures.
9. The NS Jeep Club is helping inform other OHV groups that riding in the park is illegal. City Police followed up with education program.
10. December 7, 2021, DND released a Public Service Announcement on several platforms. PSA also went from DND to local city councillors and politicians to be circulated to citizens to reduce the risks of folks entering the DND properties and

prevent the accompanying damage that occurs to the park. The DND properties have an extensive shared border with the park, and also along a section of Sackville's Old Sackville Road.

Public Service Announcement

Members of the public reminded of restricted access to Bedford Rifle Range property

December 7, 2021 – Halifax, N.S. – Department of National Defence / Royal Canadian Navy The Bedford Rifle Range is an operational, outdoor Canadian Armed Forces (CAF) small arms range located within the Halifax Regional Municipality. The 250-hectare property provides a safe, controlled area in which CAF personnel and authorized law enforcement agencies can receive qualification or requalification training for safe use of small arms (weapons designed for individual use). This range does not conduct any experimental testing of new weapons or ammunition for the Department of National Defence (DND).

Members of the public are reminded that the entire Bedford Rifle Range property is a controlled access area for reasons of safety and security, meaning that no individual may enter without first obtaining permission from a designated authority at the range.

Trespassing on this property by foot or via an off highway vehicle for any reason, whether it be for recreational purposes or otherwise, poses significant safety risks to the individual.

Active shooting using live ammunition is the most prominent risk to anyone accessing range property without permission, as safety arcs vary for different weapons and ammunitions.

Additionally, there are various species at risk which inhabit range property and the neighbouring Sandy Lake-Sackville River Regional Park; by limiting range activity to that of authorized users only, we can minimize disturbances to these species and their natural habitats.

All Bedford Rifle Range activities are planned, conducted and managed in a safe and controlled manner in accordance with National Defence policies and standards. By avoiding unauthorized entry onto range property, community members can play their part to ensure our operations remain as safe as possible for our members and the greater community.

11. Local city councillors and area politicians circulated the PSA to citizens.
12. DND has also increased the number of “No Trespassing” and “Danger” signs around the fence perimeter, repaired the fence and increased monitoring including cameras which are also used to provide police with information on NS Power and park lands that are within the range of the cameras.
13. May 10 2022: DND released second PSA (They removed 11 deer blinds last fall and do regular boundary security checks. The PSA references support of similar security for the park's wildlife and habitats. See earlier PSA of Dec 7 2021.)
14. Agropur/Farmers Dairy assisted SLCA in placing No Motorized Vehicles sign at unauthorized ATV trail off Farmers Dairy Lane.
15. Halifax Water installed ‘No Motorized Vehicles’ signs at entrances to their water roads in Sandy Lake-Sackville River area. Halifax Water's new sign on their gate off Farmers Dairy Lane is working. Reports of OHVs there have stopped. Previously, we would hear reports weekly.

The opportunities for outdoor recreation, education of school children, and for scientific research are already being well used here. We must keep them. To appreciate the wealth that is here we invite each of you to go for a guided walk with us this spring or summer.



Holding spotted salamander eggs

Active education programs using the park's outstanding natural assets:

- Sandy Lake Academy sits on Sandy Lake, beside the Lions Club Beach. It is one of seven private schools in the province operated by the Seventh Day Adventist church. Environment is one of the schools' 4-pillars of education. Because of the outstanding environmental assets around Sandy Lake Academy, students are brought from the other 6 schools for special programs on environment. Our coalition and the Academy assist each other's efforts to protect the lake and educate students using the area's rich natural assets, including in the peninsula's stand of huge white pine called 'The Cathedral' because of its awe-inspiring majesty.
- A new French-speaking outdoor nature school is looking to make Sandy Lake Park its home.
- Charles P. Allen High School's Environment Club and Cheetahs for Change are partnering with biologists from the Sandy Lake-Sackville River Coalition and Ecology Action Centre for school programs. The Cheetahs are a coalition member group.

- Outreach to other area schools is ongoing, and two new schools are being built in the area.
- Our coalition biologists offer frequent guided nature walks for the public and groups of all ages.
- Many groups conduct their own events in and around the lakes and area – trail runners clubs, canoe/kayak clubs, mountain biking, bird watching, plus recreational skiing, fishing, ice-fishing, snow-shoeing, paddle boarding, and more.
- The city operates lifeguarded recreational swimming and swimming lessons at the Lions Club Beach.

- Citizen scientists, and professional scientists both enjoy and study the natural assets readily available in this rich Sandy Lake-Sackville River area.



The quality of the existing park, its ability to allow such diverse educational and research values, will only remain if the lands to the west are preserved in public ownership to protect the present park's natural assets.

Earlier Groups caring for the Sandy Lake area:

- SANDY LAKE AREA RATEPAYERS ASSOCIATION (SLARA)
- SANDY LAKE WATERSHED CONSERVATION MANAGEMENT ASSOCIATION
- SANDY LAKE AREA RESIDENTS' ASSOCIATION
- BEDFORD LIONS CLUB was central to creation of the public beach and amenities

Note: There may be others, but NS Registry of Joint Stocks lists these.

One elder community member told us that in the mid 1970s his father sat him down to say, "Son I've been watching out for this lake for a long time, and now it is your turn." The son went on to act time and time again for 35 years, alone and as part of several groups that came and went. He was a biologist at Dalhousie University (and his father had been long time head of the NS-SPCA). He told us that he simply got worn out eventually. Not so much from the amount of work, although that was substantial, but from the discouragement that too many did not see what was at risk here and get down to the business of preserving the full area as regional park.

The SANDY LAKE CONSERVATION ASSOCIATION (SLCA) formed when the 300 acres of forest were cleared in 2013. Only then did the community learn that the previous group was inactive, worn out. Members of the previous group joined the SLCA and continue to help. As president of the SLCA, I co-chair the coalition of 31 organizations and businesses.

We must not forget the 35 years of dedicated work by THE SACKVILLE RIVERS ASSOCIATION led by my co-chair Walter Regan. This organization provides tremendous community-building as citizens from Sackville/Bedford and other communities rally around the efforts, volunteering immense amounts

of time to bring the Sackville River back to life and bringing wild Atlantic Salmon back into the system. The system includes Sandy Lake, where Salmon spawn and over-summer in its cold deep healthy lake. **Wild Atlantic Salmon are being seen and caught in Sandy Lake again. Hundreds of grilse were seen last spring at the entrance to Peverill's Brook by Dept of Natural Resources officers.**

Biologist Karen McKendry, coalition representative from the Ecology Action Centre, worked 11 years for the NS Nature Trust, and traveled all over NS to see properties with rare species and ecosystems, to evaluate if they were worthy of Nature Trust protection. She tells us Sandy Lake-Sackville River has more Species at Risk than any of the places she assessed across NS, which aligns with every study done about Sandy Lake since 1971, and it is a major reason she chooses to work so hard in this coalition to help us save this place. (at least 24 avian and non-avian Species-At-Risk on Federal and Provincial lists.)

Another strong member of the core steering team is Mary Ellen Donovan, who was city solicitor in her long career in City Hall and who now represents the Friends of Blue Mountain – Birch Coves Lake Society in our coalition. The two parks depend on each other for continued viability from wildlife connectivity and biodiversity through to the Chebucto Peninsula.

The community is speaking not only for the human-centric reasons of access to nature and recreation, but also because nature has no voice of its own and doesn't get to vote. The lake has made it clear to scientists that it has already compromised and can't compromise any more. The Laws of Nature are real. The lake and system are a biological force operating under the Laws of Nature.

In a conversation with retired parks planners in 2019 we learned about the Laws of Nature as they apply to Sandy Lake-Sackville River. (*See Appendix 6*)

Then what happened?

In a few short years, the awareness that the conundrum at Sandy Lake-Sackville River exists was finally being seen by decision-makers in HRM. But suddenly, before protection could be reached, a housing crisis was declared in Nova Scotia. Sandy Lake's future had not yet been decided because the Regional Plan review was underway, and the developers applied for development. So, it was included on the list of properties given to the province to be considered for housing. It was in Tier-2, not Tier-1, of the provincial housing task force's selection report of January 6, 2022, yet somehow it was chosen by the task force as one of 9 Special Planning Areas to be fast tracked first - that is, ahead of other Tier-1 options.

Whether it is the city or the province with the authority, the Laws that bind Nature have not changed, and the ecological unit must be protected. We must preserve this area.

What now?

Here is a solution: In his Op-ed article in the Chronicle Herald, retired Dalhousie professor, researcher, and author, Richmond Campbell, proposed a win-win for all involved.

<https://www.saltwire.com/atlantic-canada/opinion/richmond-campbell-halifax-area-land-swaps-could-reconcile-rapid-housing-environmental-goals-100748721/>

The win-win for all is a land trade.

In 2018, as I described above, the developers offered to trade their west of Sandy Lake ~ 500 acres to the city if the city would seek a win-win land trade. The president of the company told me that even though they were not eager to do so, they have done this before for communities and they were willing to do it here. Retired city staff told us finding a viable trade was completely doable. If the developers entertained the possibility of trading in 2018, then the province should interest them in this win-win option now.

With the outcomes of COP 27 and COP 15, we know the importance of choosing to protect highly valuable areas that contribute to countering the dual threats from biodiversity loss and climate change. Sandy Lake - Sackville River is indeed one of these outstandingly valuable areas that must be preserved. **Every biological study that has been done on this entire area has concluded that this is a highly valuable ecological area for everything from climate health to attracting new citizens to Halifax.**

None have advised that development would be good for the area. Instead, scientists warn us that if more development occurs in the watershed, lake quality will inevitably decline, and along with it the species it can support. The lifeguarded swimming area will face closures from algae blooms and the lake will become inhospitable again for the wild Atlantic Salmon that have returned.

Please note all of the examples mentioned in this appendix, of effort and commitment toward preserving this ecological unit by citizens, scientists, organizations, clubs, all levels of government, businesses and more. Large amounts of time and money have been invested in this special place.

As Planner B said in Appendix 6, **“Do you want all that to be for nothing? You've made decisions based on protecting water quality. Here's why (decision-makers) were protecting water quality’. Whether they know it or not, this is why. It was not to please residents’ views. It was for the ecological system.”**

When the province made its announcement on March 25th, the 50 years of progress that citizens and others have worked for to preserve this ecological unit for the good of all suddenly ground to a halt, and the area entered a fast-track toward development. One of the 7 jewels became one of 9 fast-tracked housing areas.

We still have a chance to get it right. Development has not yet happened. Its value as an ecological unit has increased, not decreased, for a host of reasons including those that didn't exist in 1971. It will continue to be a functioning, remarkable, ecological unit if it is allowed to remain undeveloped.

This situation is in your hands

Political decisions in the past led to the present situation. The provincial government and the premier have the power to correct mistakes that happened in 1974 and 1982, and recently.

This valuable lake and park must not be sacrificed to solve the housing crisis. The housing crisis is real, but so are the outstanding and long-recognized ecological values of the Sandy Lake area. Barriers can be overcome if the will is there.

We trust that you can see this is a rare circumstance. We look to you, the MLAs of this province to recognize this situation is in your power to solve. We ask you to champion this park expansion to include the remaining watershed for the good of all.

Long after the housing crisis is behind us, the city will continue to grow with new housing areas. We must find a way to keep the Sandy Lake area intact and protected, and develop other areas.

Consequently, **on behalf of all who wrote letters to the task force and the public of Nova Scotia, we are asking the Nova Scotia Government to please remove the Sandy Lake Special Planning Area from the housing task force's list, and to preserve this area.**

In the process, please enable the developers to build needed housing in another location that does not put this long-valued park at risk. A win-win can be found.

Then, let us all celebrate together for having found the win-win, for having picked this jewel up and placed it back within the crown.

Sincerely,

A handwritten signature in black ink, reading "Karen Robinson", enclosed in a thin black rectangular border.

Karen Robinson

Co-chair, Sandy Lake Sackville River Regional Park Coalition, with assistance from the Sandy Lake-Sackville River Regional Park Coalition team of scientists and community representatives

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APPENDIX 2



14th Floor N, Maritime Centre
1505 Barrington St.
PO Box 702 Station Central
Halifax, NS B3J 2T3

housingtaskforce@novascotia.ca

January 10, 2023

Karen Robinson
karen.robinson@casle.ca

Dear Ms. Robinson:

Re: Proposed residential development near Sandy Lake Park

Thank you for your email regarding the special planning area designation that accelerates development near Sandy Lake Park.

I appreciated the presentation delivered by the Sandy Lake – Sackville River Regional Park Coalition earlier this year. It provided a great deal of context and important information about the area.

The proposed residential development lands near Sandy Lake Park were first identified as a growth area in HRM when its regional plan was developed in 2006. The regional plan was reviewed in 2014, and the Sandy Lake area was once again identified as a future growth area. The lands near Sandy Lake Park that are slated for residential development have been owned by the developer since 2014.

Special planning areas must still undergo any required environmental studies or other permitting requirements.

Once again, thank you for your email about the proposed residential development near Sandy Lake Park. Please be advised that future comments about special planning areas should be made at <http://www.halifax.ca/about-halifax/regional-community-planning/regional-plan/special-planning-areas>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vicki Elliott-Lopez".

Vicki Elliott-Lopez, CEO
HRM Housing Task Force Secretariat

APPENDIX 3

Regional Plans 1975 to 2015: Find the Sandy Lake Mistake

Objectives for Regional Parks, as outlined in the 2014 Regional Plan, are “*to preserve significant natural or cultural resources, and to be large enough to support both ecosystem protection and human enjoyment at the same time.*” (Page 57) Historical documents show the importance of including the Sandy Lake watershed within the park. If anything, its importance has elevated with the closing-in of development on all sides of the watershed, with the need for recovery of growth in the 300 acres of forest that were cut down in 2013, the Wildlife corridors to the Chebucto Peninsula, and its strong contributions to biodiversity and prevention of climate change.

All Regional Plans since the 1970s state the intent to create a regional park at Sandy Lake and to acquire lands for that park. However, a mistake was made. Park land was arbitrarily zoned for development in 1982 by Bedford Town Council. Housing development is now a serious risk to the watershed that protects the entire park. We have an opportunity to intercept harm now.

1975 Halifax-Dartmouth Regional Development Plan defines and separates regional parks and development areas and identifies seven unique areas to become regional parks: Hemlock Ravine, Schubencadie Canal system, McNab’s island, Admirals Cove, Cole Harbour/Lawrencetown Beach, Long Lake/Chain Lake, and **the Marsh and Sandy Lakes, Sackville Flood Plain.**

1982 Halifax-Dartmouth Regional Development Plan states concerns about urban sprawl, and a shift from “*development at any cost*” toward quality of life. Metro has not been harmed by the industrial revolution, and has clean lakes and clean air. **Page 20-21 describes regional parks using similar descriptive words still found in the 2014 RP, and the seven proposed regional parks are again listed.**

1982 Bedford Town Council votes in a tie-breaker to rezone about half of the park land around Sandy and Marsh Lakes below the Sackville River for future housing. Mayor Cosman and the park-supporting councillors find a way to protect the area through what is now known as the “5-acre bylaw”.

2004 Town of Bedford Municipal Planning Strategy Environmental Policies:

“Policy E-18: It shall be the intention of Town Council to identify the Sackville River as a conservation corridor because of its importance as a salmon fish habitat and its significance as a natural amenity to the community, and to work towards improving the quality of water in the Sackville River, in cooperation with appropriate agencies.”

“Policy E-20: It shall be the intention of Town Council upon the adoption of this plan to undertake an in-depth environmental study of the Sandy Lake watershed which will include input from the N.S. Department of Environment as well as area residents, and shall examine present water quality, watershed land use practices increased rates of sedimentation, and the development of a recovery and protection program for Sandy Lake if warranted by the study.” This was never done.

2006 Regional Plan identifies six areas for **future growth (housing) in HRM:** Bedford South, Morris-Russell Lake, Bedford West, Port Wallis, **Sandy Lake** and Highway 102 west corridor adjacent to Blue Mountain - Birch Cove Lakes Park.

- 2006-2010 Kingswood North is built west of Sandy Lake. Developers are land-banking.
- 2009 Developers submit applications for developing Sandy Lake west.

- 2009 CBCL Cost of Servicing Study to proceed, developer proposes oversized sewer pipe.

2011 Halifax Regional Municipality MPS for Bedford “Town Council shall continue working towards the establishment of major parks at Admiral’s Cove, **Sandy Lake**, and within the Waterfront Development Area (Policy P-6)” “...policies P-8 and P-9 indicate Town Council’s intentions to designate future parkland within the Jack Lake assembly...” p.126 “...the future development of existing open space is now seen as a higher priority than the acquisition of additional open space. Exceptions to this would be land acquired in relation to subdivision development, land for neighbourhood parks, specialized land for linkages or unique sites, **and Sandy Lake.**” p.128

(Note: Jack Lake assembly refers to Sandy Lake-Sackville River. The area has had at least five names interchangeably used since 1971)

2014 Regional Plan (RP+5) “The primary objective of a Regional Park is to preserve and protect significant natural or cultural resources. The essential feature of a Regional Park may include, but not be limited to, open space, wilderness, scenic beauty, flora, fauna, and recreational, archaeological, historical, cultural and/or geological resources.” p.26

“HRM intends to create additional Regional Parks at various locations throughout HRM including the Blue Mountain Birch Cove Lakes, Feely Lake, **Jacks Lake**, Second Lake, and Porters Lake.” p.28

(Note: Jacks Lake refers to Sandy Lake-Sackville River. The area has had at least five names interchangeably used since 1971.)

2.2.7: E-11 “(a) coordinating and managing a program to research, identify and designate potential natural areas, systems and distinct landscapes, natural corridors and critical ecosystem linkages, and significant natural habitats to guide future development (see Map 5, Significant Habitats and Endangered Species and Appendix C: Species at Risk in HRM 2013);

(b) coordinating and managing a program to research and identify potential public open space parks and corridors for the provision of quality open space for recreational and social development, restoration of natural corridor and urban ecosystem function, greenway networks to connect communities and provide mobility options and significant natural habitats to guide considerations of future development;

(c) establishing selection criteria, investment and management guidelines for public open space lands, infrastructure and sustainable natural open space management strategies;

(d) examining criteria for classifying and developing HRM parks including comprehensive criteria for designating regional parks;

(e) assessing opportunities to further the development and establishment of management plans for the 1975 Regional Park System, the new Regional Parks proposed under this Plan, and other areas identified for their potential as regional parks;

(f) developing an evaluation methodology and criteria for determining land capability and functionality in meeting standards for the delivery of public open space services, open space conservation, community development and growth management;

(g) developing a system of interconnected public and natural undisturbed open spaces throughout HRM to include HRM parks, coastal areas and watercourse shorelines, water route and land-based greenways as illustrated on the Trails and Natural Network Map (Map 3), multi-functional streets, environmental and cultural conservation areas, schools, natural corridors, habitats as well as other public and community facilities;

(h) establishing a green-way network that includes a variety of corridors such as linear parks, hiking trails, nature trails and scenic loops;

(i) including a comprehensive planning approach for the retention of coastal and freshwater lake access and incentives for the protection of watercourse buffers;

“Policy E-12 – HRM shall prepare a Greenbelting and Public Open Space Priorities Plan and preserve connectivity between natural areas and open space land, to enable their integration into sustainable community design, to help define communities, to benefit the municipality’s economic and physical health of its people and to reflect and support the overall purposes of this plan.”

(Note: All of these points are directly relevant to Sandy Lake-Sackville River Regional Park.)

2015 Halifax Municipal Strategy for Bedford: The wording is exactly the same as in 2011, but the pages are 122-125. *“...shall continue working towards the establishment of major parks at Admiral’s Cove, **Sandy Lake**, and within the Waterfront Development Area (Policy P-6)” ...Policies P-8 and P-9 indicate Town Council’s intentions to designate future parkland within the **Jack Lake assembly**...”* ...” the future development of existing open space is now seen as a higher priority than the acquisition of additional open space. Exceptions to this would be land acquired in relation to subdivision development, land for neighbourhood parks, specialized land for linkages or unique sites, and **Sandy Lake**.”

The Sandy Lake and area is clearly still seen as important park land, but at the same time the Regional Plan still has the watershed that protects those park assets on a parallel path toward housing. Protecting the Sandy Lake watershed from development is critical to the health of the entire park/watershed through to the Sackville River floodplains that have increased risk of flooding homes and businesses if housing is added at Sandy Lake. We have a mistake to correct.

APPENDIX 4

A Collection of Studies done in the Sandy Lake Area 1971-2020

The studies listed add to the Ecological, Recreational and Cultural knowledge of the area.
We did not do a complete article search. This list is compiled from information we had at hand.

1971, *Natural Environment Survey: A Description of the intrinsic Values in the Natural Environment Around Greater Halifax-Dartmouth*. Dean P. and D. Lister, Canadian Wildlife Service, Dept. of Indian Affairs and Northern Development, Dept. of Fisheries and Forestry. Identified 7 important natural areas to preserve in Greater Halifax-Dartmouth. <http://sandylake.org/1971-pb-dean-environment-report/>

1971, MAPC (Metro Area Planning Committee) *Recreation Work Group Report*. Proposed 7 Regional Parks for Hfx-Dartmouth. (McNab Island, Long Lake, Chain Lake watershed, Hemlock Ravine, Marsh and Sandy Lakes, Sackville Flood Plain, Admiral Cove, Lake Williams & Lake Charles canal complex, Cole Harbour. <http://sandylake.org/1971-mapc-recreation-report-on-7-regional-parks/>

1972, MAPC *Water Quality Survey for Selected Metropolitan Lakes*. Description, lake and water quality.

1973, *Natural Land Capability: Halifax-Dartmouth Metro Area*. NS. Dept of Municipal Affairs.

1974, *Ecological Reserves in the Maritimes: Region 7: NS. NB. PEI. Halifax*. Canadian Committee for the International Biological Programme – Conservation Terrestrial Communities Subcommittee.

1975 Halifax-Dartmouth Regional Development Plan defines and separates regional parks and development areas, including the 7 proposed regional parks.

1979, July, Hfx Dart MAPC *Regional Parks Report*, by Parks Advisory Group, identifies 7 proposed Regional Parks – the same as in 1971 but with more detail and Marsh and Sandy Lakes, Sackville Flood Plain park name changed to Sackville River Regional Park. It includes Sandy, Marsh and Sackville River corridor as before, but with a protective buffer around the area. The boundaries and conceptual maps contain half of Jack Lake as part of the buffer area. <https://sandylake.org/wp-content/uploads/2018/02/1979-Halifax-Dartmouth-Regional-Parks-Full-Report.pdf>.

1982 *Bedford Zoning Bylaws* created to protect land around particularly Sandy Lake from development

1983, Water quality study of Sandy Lake and Bedford Town. Detailed Area Study of Sandy Lake area.

1984, *Natural History of Nova Scotia*. Simmons, L. et. al. NS Department of Education and Department of Natural Resources.

1984, *An Experiment On The Feasibility Of Rehabilitating Acidified Atlantic Salmon Habitat In Nova Scotia By The Addition Of Lime*. W.J. White, W.D. Watt, C.D.Scott, Department of Fisheries and Oceans. (At a time when the entire southern end of the province was losing fish because of acid rain from the US northeast, the scientists dumped industrial levels of limestone into the lake to learn about adjusting pH.)

1986, *Jack Lake Environmental Evaluation Final Report*. CMHC and NS Dept. of Housing. Contains a detailed environmental assessment. <http://sandylake.org/document-gallery/>

1986, *Canadian Wildlife Service, NS Wetlands Atlas*. Environment Canada.

1988, *Sackville River Historical Research- Environmental Planning V*, NS. Coakley, M., College of Art and Design, Halifax.

1988, *Main Sackville River Watershed Project*. Koenig, M., Environmental Planning, NSCAD.

1989, *A Draft inter-Municipal Planning Strategy for the management of the Sackville River Basin*. Environment Planning Studio IV, NS College of Art and Design, Halifax.

1989, *The Scenic resources of Nova Scotia: A Macro-Scale Landscape Assessment*. Millward, H. and Dawn Allen, Dept. of Geography, Halifax.

1990, April 23, Reconvened session Bedford Town Council: Recreation Advisory Commission requests “environmental study of the sandy Lake watershed area” before use of the Bluewater Lot is developed.

1990, *Assessment of Atlantic Salmon (Salmo Salar, L.) Habitat in the Sackville River, NS, 1986, Canadian Manuscript Report of Fisheries and Aquatic Sciences No. 2059*. Cameron, J.D., Fisheries and Oceans Canada, Halifax.

1990, *Correspondence and reports from the Sandy Lake Area Residents association with the Bedford Water Advisory Committee*, Feb. 25.

1992, *A Quiet Place in the white Man's world*. Edwards, T., Bedford Magazine, October, p.6.

- 1993, *Hammonds Plains the First 100 Years*. Evans, Dorothy Bezanson, Bounty Print Ltd.
- 1993, Summary: *Parks and Protected Areas Systems Planning*. Lynds, A., NS Dept. of Natural Resources.
- 1994, *Towards the Identification of Environmentally Sensitive Areas for Environmental Management: A Case Study in the Sackville River Watershed, Nova Scotia*. Rhea D. Mahar thesis. Sandy Lake is rated as the second most valuable Environmentally Sensitive Area between Bedford Basin and Mt Uniacke. Old Quarry Corridor of the Sackville River is third. <https://smu.ca/academics/departments/rhea-d-mahar.html>
- 1994, *Field Surveys*. Mahar, RD.
- 1995, *Sandy Lake Vegetation Survey and Trail Design*, for the Town of Bedford to aid in and complete the trail design and layout for the area. Basic Elements Ecological Enterprises.
- 2001, *Environmental Inventory of Sandy Lake, Marsh Lake and Jack Lake*. DalTech and NSCAD Environmental Planning: This was a study of the environmental attributes of the Sandy Lake, Marsh Lake, Jack Lake area “that impact water quality, to analyze the information, and to develop a synthesis of this knowledge to understand how to maintain water quality in the valued habitats of wetlands and watercourses.”p.ii <https://cdn.dal.ca/content/dam/dalhousie/pdf/faculty/architecture-planning/school-of-planning/pdfs/studentwork/SandyLake/environment01.pdf>
- 2001, February, *Sandy Lake Park Environmental Review*. EDM Consultation Report
- 2002, *Issues of Urban and Rural Fringe*. DalTech and NSCAD Environmental Planning: This study based on Sandy Lake, Bedford, had three objectives: “1. To review and document the pressures for growth in the urban/rural fringe locally and nationally, and to consider the key approaches being used to respond. 2) To examine demographic and economic trends in the urban/rural fringe of HRM. 3) To examine land use and transportation patterns on the urban/rural fringe of HRM.” P.1 <http://sandylake.org/wp-content/uploads/2018/02/2002-NSCAD-Issues-of-Urban-and-Rural-Fringe.pdf>
- 2002, *Sandy Lake Community Profile*. DalTech and NSCAD Environmental Planning: This study explored the impacts of development on a community located on the urban fringe. It researched urban growth pressures, demographics, land use patterns (both historical and current), transportation patterns, and community perceptions of the landscape of Sandy Lake, Jack Lake, and Marsh Lake area. <http://sandylake.org/wp-content/uploads/2018/02/2002-NSCAD-Sandy-Lake-Community-Profile.pdf>
- 2002, *A Water Quality Analysis*. DalTech and NSCAD Environmental Planning: This report, created by senior Environmental Engineering students from Dalhousie University in 2001-02, involves the examination of Sandy Lake and surrounding area creation of baseline data including dissolved oxygen, pH, total suspended solids, a bathymetric map of the lake, total and fecal coliform, as well as other water quality parameters. <http://sandylake.org/wp-content/uploads/2018/02/2002-DALTECH-A-Water-Quality-Analysis.pdf>
- 2002, *Suggestions for managing Development*, DalTech and NSCAD Environmental Planning: This study integrates the information found in the Urban Fringe document and examines the outcomes of different types of development and consequences of each on the Sandy Lake area. <http://sandylake.org/wp-content/uploads/2018/02/2002-NSCAD-Suggestions-for-Managing-Development.pdf>

2002, *Policy Review and Recommendations*, DalTech and NSCAD Environmental Planning. (This document is missing.)

2004 Bedford West development Subwatershed Management Plan. Contains ecological information on the Sandy Lake area.

2014, October, Sandy Lake Conservation Association *Response to AECOM report*, to accompany the August 2014 *AECOM Sandy Lake Watershed Study* (both were posted on the HRM website) www.sandylake.org

2015, August, *The Off-site Parkland Dedication Request* contains a Conceptual Map for acquiring 160 acres of watershed west of Marsh Lake and the city's rationale for acquiring watershed west of Sandy and Marsh Lakes. <http://legacycontent.halifax.ca/council/agendasc/documents/150804ca1114.pdf>

2016, *Bedford Land Use Bylaw* - Archaeological sites identified on lands west of Sandy Lake, Jack Lake, tributaries, and Sackville River. Also includes 1983 5-acres on public road ongoing bylaw.

2018, *HRM Flooding Study (National Disaster Mitigation Program)* Base of Bluewater Road is one of three areas listed as needing mitigation for significant flooding.

August 14, 2018 *Halifax Green Network Plan* is passed unanimously by Halifax City Council. SL-SR have 3 important corridors at the pinch point of the Chebucto Peninsula, and Sandy Lake is a large sub-watershed of the Sackville River Watershed, which is one of the five major natural corridors in HRM.

August, 2018 *Sackville River Floodplain Study Phase 2*. The city must not be planning to develop Sandy Lake area for 100 years because it was not included in the scope of this study.

2019, Sandy Lake-Sackville River area's old growth Ash trees are to be included in a new undergraduate honours study on Ash tree vulnerability in the urban forest.

2020, January, *Sandy Lake – Sackville River Regional Park Planning Vision*.

2020, March, *Avian and Species at Risk Surveys of the proposed Sandy Lake-Sackville River Regional Park*, Natural Wonders Consulting Firm.

2017 - ongoing, *Forests and Surface Waters of Sandy Lake & Environs (Bedford, Nova Scotia): Studies and surveys of the Sandy Lake - Sackville River Regional Park area*.

APPENDIX 5

Quotes from Studies and Reports: The Sandy Lake area is identified as a unique natural area worth protecting - 1971 to the present

- 1971, April, P.B. Dean, *Natural Environment Survey: A Description of the Intrinsic Values in the Natural Environment Around Greater Halifax –Dartmouth*, classified Sandy Lake and Marsh

Lake as a Category 1 area: “...consists of natural assets that are unique in the Halifax-Dartmouth area or important on a regional or provincial scale. This category includes important wildlife habitats and ecologically rich or fragile areas.” p.6 Dean Report

“Since this lake and its surroundings comprise one of the finest landscape units in the metro area, a large parcel of land has been suggested to protect the lake from adverse development and so that public access and use may be assured. This lake was designated Class 3 for recreation in Canada Land Inventory Recreation Capability Survey and as such received the highest rating of any inland site around the metro area.” P. 49 Dean Report

“This area should be reserved immediately for public use before it is irreparably damaged by adverse developments ... Since the land need not be developed (for park) immediately, considerable flexibility is available in bargaining with owners. It should be emphasised that this is a prime park land-nature reserve site in an excellent landscape setting.” p. 50

- **1971, MAPC Re-creation Report:** “...to preserve for urban use and enjoyment an unusually clear fresh water lake as well as a productive marsh habitat for wildlife.” P 57-58

- **1994, Towards the Identification of Environmentally Sensitive Areas for Environmental Management: A case Study in the Sackville River Watershed,** Rhea D. Mahar: Sandy Lake rated second out of forty environmentally sensitive sites in the Sackville River Watershed, between Mount Uniacke and the Bedford Basin.

“Sandy Lake, nearest Bedford is one of the finest lakes in the study area. Rolling hills with mature white pine, hemlock, spruce, maple, birch, and beech overlook the sandy beaches.” p. 44

- **2002, DalTech and NSCAD Environmental Planning Departments produced six reports that studied environmental attributes of Sandy Lake related to potential development pressures:**

“Years of minimal development have allowed the lake to maintain its natural quality and most of its wildlife species.” P. 33, Sandy Lake Community Profile

“Because the outflow from this watershed joins the Sackville River, which is currently being restored as a spawning area for Atlantic Salmon, water quality in this watershed has an influence beyond its boundaries. The wetlands in this watershed help buffer the Sackville River from flooding, and the Jack Lake bog helps maintain water quality and water levels in Paper mill Lake in Bedford.” P.1

“Sandy Lake is a source of drinking water and a recreational area for swimming and fishing.” The mature tree stands are aesthetically pleasing and “may be a seed source to expand forest diversity.” p. 1, Environmental Inventory

- **2015, Off-site Parkland Dedication Request.** “This land will serve as a positive move to protect and preserve high value ecological lands associated with the Sackville River Corridor.”

- **2017 - ongoing, Forests and Surface Waters of Sandy Lake & Environs (Bedford, Nova Scotia):** Studies and surveys of the SL-SRRP area. Dr. David Patriquin states, “I view Sandy Lake and Environs as they were viewed in 1971: an asset to all of Halifax municipality, indeed to the whole province. I see it as a very special place, complementing not replicating other major natural assets of Halifax.” www.sandylakebedford.ca

- **2020, Avian and Species at Risk Surveys of the Proposed Sandy Lake-Sackville River Regional Park.** *“Continued maintenance of this area as natural habitat is also essential for maintenance of water quality, aquatic habitat and flood amelioration in Sandy Lake to Sackville River watercourse and for the Sackville River system itself.”* p. 13

APPENDIX 6

A conversation with retired planners about Sandy Lake - Sackville River - 2019

Planner A: “The entire proposed park has ecological value. **Sandy lake is an essential part of this system that protects the rest of the entire park/watershed through to the Sackville River and basin. If Sandy Lake is not protected, the entire system suffers.** The entire area needs a special analysis to determine the proper boundary of the park.

In a proper assessment, topography is the start, then vegetation and so on. Protection needs to be based on a rational scientific approach. Look to protect wetlands and also wildlife connectivity. Property lines are not considered. It has to be an ecological approach. That's where the watershed comes in, both the Sandy Lake sub watershed and the main Sackville River watershed.”

Planner B: “The city is taking steps that show it is serious about this regional park - documents from as far back as 1970 identify it as a valuable place for a regional park. The city has acquired property recently and has plans to acquire more. **They must not ignore the west of Sandy and Marsh lakes just because someone failed to see the consequences of what they were doing and allowed the area to be rezoned for development.**

What are the key assets? Sandy Lake is one. Sackville River another. Marsh Lake, the streams, the rich drumlins, old forests, diverse species, endangered plants and fauna.... To repeat, the entire proposed park has ecological value. **Sandy Lake is an essential part of this system that protects the rest of the entire park/watershed through to the Sackville River and basin. If Sandy Lake is not protected, the entire system suffers.”**

Planner A: “In conducting the special analysis to determine the proper boundary of the park, understanding there are several layers to a park boundary.

1. Sandy Lake and the other major assets are within the body (all vegetation, Sackville River, Lakes, brooks, and so on). Some interaction is permitted to a carefully determined degree, depending on topography, land quality, etc.
2. A buffer which allows more interaction with the public. Ideally it is also within the park boundary (If we don't protect the buffer, it is a matter of time before it disappears and harm to the essential assets happens.)
3. Then there is the impact area boundary which may go into residential or even commercial areas. Use the authority of city to impose regulations on the existing development or industrial area on the way the run off is treated before it reaches the park.

Including the watershed in the park plan will allow for real protection of the richest assets in the centre. **In the Regional Plan review this time round there is a change from the past. Regional Parks used to be all about people not connection. Sandy Lake will be first, one of these first, to be viewed with connectivity as part of it, how the park will be utilized and how it ties in with the Green Network Plan connectivity.”**

Planner B: “You've already used up the rivers capacity to absorb run off, so wetlands need to be taken out of development to protect the watershed. Protect wetlands first. There is already compromise on the lake with existing development.

The feeder streams into Sandy Lake get relieved on their way if they are protected. Those three feeder streams come through already developed areas, and are already needing relief when they reach the lake. It becomes even more important to clean them before the lake as they cross the buffer.

Sandy Lake is at the edge of quality already from the industrial area and housing and the highways. The entire watershed must be part of the plan for park because **outside the park boundary DOES interact with the park.**”

Planner A: “Conduct research with university students on how to mitigate the run off from Kingswood North now, and other areas such as Bluewater Road, to clean the water to enhance Sandy Lake water quality. There are projects for several departments with each contributing components.

The protection of developers lands west of the lakes, where the feeder streams and drumlins are, and control of what can happen on this land, is critical. Ownership is the best way. Developers’ assertions that they can protect water quality in lakes they build around hardly deserves comment. Lake quality always go down. Habitat is altered and lost. Systems are destroyed. Some argue that birds will not be harmed because they can fly away. This is not true. Most birds are territorial and anywhere they go is already inhabited.

Developers will tell you they can control what goes into the streams. They will tell you they can use sediment ponds and retention and other controls, but it is a natural process and way too expensive to really control.”

Planner B: “The Green Network Plan (HGNP) is based on environment/ecology first not people first, but the HGNP is high level and existing ecological maps in NS are very poor. So, you need to show the old and new documentation and all the ground-truthing that’s been done at Sandy Lake to show why this place is worth protecting. Map 13, the Conceptual boundary is subject to ground truthing, and that applies to regional parks too. It says so in the document.

The HGNP has a watershed approach. **The entire Sackville River Watershed is very important, with Sandy Lake as part of that greater system. View it regionally. It is a regional park for a reason. Sandy Lake is part of a regional network of protection concept. Blue Mountain Birch Cove Lakes and Sandy Lake are part of those big systems to be preserved. This is the kind of place to put effort to protect. It is Worthy.**

Protection should happen all along this system. Need to understand it differently to see how its place in the system is important. This is an Important Natural Corridor and the city has created commitments in the green Network plan. **Sackville River is the spine of this watershed network. Protect the Sackville River. The watershed slope around Webber Lake needs protection. The other priority is water quality of feeder bodies including Sandy Lake. You can only control what happens if it is publicly owned.**

Sandy Lake is in the HGNP because of connectivity to the Sackville River and the Chebucto Peninsula. Stepping stone corridors are even more important to enhance now, because in the HGNP the visible link on the Google Map is already being eclipsed by development. That makes the stepping stones even more important to Blue Mountain Birch Cove Lakes and the Chebucto Peninsula. And protecting essential and important corridors that remain.

The key is the Sackville River, everything that contributes to the Sackville River. To protect the Sackville River, acquire the necessary components - direct components and up water attributes. If you don't, these problems get larger. For example, Paper Mill Lake is already compromised. Building above what's already there will compromise the feeder reservoirs. That means you have to treat the water between the layers. It will cost more, and you will not be able to satisfy the requirements of your constituents because it will be unreachable to the municipal and provincial coffers.

Sandy lake is not entirely developable land. Challenges on the site are many. The city has already told smaller developers up the road they can't develop, so how can they say yes here?

The Sobeys piece is very attractive land for the park. Development of that piece will be extremely difficult because Smith's Road makes it extremely difficult to access. Smith's road can't be upgraded and development would require two exits. But developers might make a play for Jack Lake lands behind it. Still, access is difficult because roads must be a hundred and fifty meters from the highway exit.

They are planning homes for 16,000 people at Sandy Lake. 16000 people is 8,000 cars. 5000 cars at peak times. Hammonds Plains Road is not configured to carry so much volume. The exit upgrade has helped the current overuse but not solved it. Same for the upgraded part from the BMO to the highway. And there are limitations too where Hammonds Plains Road hits the Bedford Highway, which is totally overcrowded. Also there are developments existing in the watershed where we need to change our stormwater management because they are having a negative role on the overall system, and Uplands Park sewer system needs to be replaced."

Biologist: "More development upstream equals more flooding downstream. Already properties are of lower value in the Bedford floodplain and little Sackville River. The recent CBCL floodplain report was the first time ever that climate change was figured into their assessment. It calculated a 70% increase in runoff for 100 Year storms. So Bedford Place Mall and Superstore would be under three feet of water, almost all of Union Street. The report was accepted. We don't need three feet to be unviable. only one foot. The report did not include an evaluation of the effects of future development of Sandy Lake. That is a huge oversight. At least make flooding no worse.

Do no additional harm. That equals no further development on the Sackville River, plus allow natural processes that exist to take care of it. And augment it by vegetating clear cuts. Try to change 70% run off to 25% just by vegetating.

At Sandy Lake the 200-acre clear-cut has plants that are young and aren't functioning completely yet. So, foster them and let them grow. **It needs to be in your modeling plan to let them grow. It protects runoff into the lake. protect it within the park plan. Then do legislation to ensure it doesn't happen again.**

So far Sandy Lake has turtles. One of 3 lakes out of 22 that used to in the region. Turtles are an indicator species. Bad decisions equals no turtles. But we must see the entire system, not just turtles. **Sandy Lake is uniquely rich. It is the beginning of the rich interior - the biome of fertile soils, river valleys that reach the interior. Sandy Lake has that richness and diversity as it has been fed by the Sackville River, and it goes both ways. From a gravity perspective the water flows down but from the biodiversity perspective it flows the other way, back up the river from the reservoirs. It runs back and forth. If it is degraded up here it affects downstream, and vice versa.**

Drumlins are rich. West of Sandy Lake has big ones. They usually have bogs at the bottom and good stands of trees and are a refuge for animals and plants if you just leave them alone. **Those drumlins west of Sandy Lake could help with connectivity to BMBCL just because of their richness.** Even with some stepping stone corridors below."

Planner B: “With respect for the HGNP and for all of this, the city will be compelled to require a thorough analysis before there is any discussion about development.

The document with the 160-acre acquisition is about protection of the Sackville River. **Council voted for that to protect the Sackville river.** Council took one step. Now let's take the next step.

The city has already been acquiring park land based on this approach- for example the 160 Acres. Some councillors likely don't know they have that approach, but that overall 160-acre plan gave them the solution for gaining 160 Acres and it helped also to achieve the city's Green Network goals. It made people happy. Read the 160-acre report. This is why we should acquire those lands. Those principles still hold true.

The city has done things consistently to enable things to happen such as preventing the dairy from dumping effluent in the '70s, acquiring 160 Acres, and others, all to protect the lake. You have to ask them, **“Do you want all that to be for nothing? You've made decisions based on protecting water quality. Here's why you were protecting water quality”. Whether (decision-makers) know it or not, this is why. It was not to please residents' views. It was for the ecological system.”**

Planner A: “Residents work hard to protect an area because they're the ones who noticed the potential harm. That's where politicians get confused. They think residents are fighting for their backyard. It will be a task to find land to trade for Sandy Lake, but it can be done. It is right to ask for staff to look for options.

Educate councillors and the people. **Tell the developer we don't want to fight with you. Offer them the elements they need. Tell them we want them to be successful because it is true. If we work together this plan will help the municipality deliver something it can't deliver otherwise.”**

Planner B: “People kill lakes. The City has a responsibility not only to protect, but to enhance, all elements of the quality of the park...to protect the Sandy Lake system including Sackville River and all the critical components of the park'.”



‘The Cathedral’, Sandy Lake, Bedford



Sandy Lake Bedford. Nunn photo