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Subject: Sandy Lake Special Planning Area – Public Engagement

Hello Melissa,

Thank you for the open house opportunity to view and comment on the plans being considered for the Province's Sandy Lake Special Planning Area.

The Sandy Lake Conservation Association (SLCA) does not support any development at Sandy Lake because of the already precarious water quality situation there, and because the park's assets would be put at serious risk.

This response is to you, to the feedback process, but also to the Provincial decision-makers who are demonstrating in our interactions that they need to know more about Sandy Lake's situation.

We ask the Province and the city, but also the developers, to come together to protect the valuable ecological assets at Sandy Lake-Sackville River by expanding the existing park to encompass all of the lands and waters needed to preserve the ecological assets and functions of this outstanding area.

That request is based on multiple studies over the years, but congealed in a 2020 study by a retired city parks planner which identified the boundary that would best preserve the park assets, and would also provide park access for the surrounding communities. It is the same boundary used by the McCallum report commissioned by the city to identify important environmental aspects needed to protect the park assets. Looking back, it also aligns with the 1971-79 MAPC park plan which identified the fact that what happens in the tributaries and extended watershed of Sandy Lake, the headwaters of the system, will affect the balance and welfare of the entire system through to the Sackville River.

We ask the Province to remove Sandy Lake from the SPA list and fulfil its future as an outstanding regional park for the good of all. Please put the needed housing elsewhere, especially

since there are other options that would be less expensive to develop than this greenfield which requires full servicing.

About development decisions:

We recognize a need to make sure Provincial decision-makers are aware that Sandy Lake was only listed as an 'area for consideration' for future development in the 2006 Regional Plan. While ongoing communications from the Province more than imply that they believe that it was 'destined' for housing in the 2006 plan, that has never been what we understood.

More often than not, lands that are owned by developers usually do get developed when circumstances are right. Some are not developed. However, might that assumption be the root of the Province's swift designation of Sandy Lake as a fast-tracked SPA? That the Province didn't understand what actually goes into making decisions on how areas result in being developed?

Is the Province aware that developers can be quite relentless in their efforts to convince decision-makers to allow their projects to proceed? Until the Province decided to remove authority for SPA decisions from the city, the city had the difficult job of maintaining the city's goals for what, when, and where developments were approved. **Theirs was the responsibility to make sure the city was planned by planners and not by developers.**

To illustrate this, is the Province aware of the 2018 letter from the city's head planner to the Sandy Lake developers, clarifying that the city had no need to consider housing at Sandy Lake for at least another 15 years? We were assured that Sandy Lake was not a priority to look at even in 2018, let alone in 2006, and the city had good reasons for that. For one thing, the housing crisis was just the opposite at the time. Another reason could be that a significant conflict had to be sorted out. More on that in a minute.

Certainly, past landowner/developers had been requesting to be allowed to develop at Sandy Lake for several years. The prior owner told SLCA that he was so angered at being told 'no' again that he "Stood on the steps of City Hall and made the call, 'Cut the trees'." (After our meeting, he did something very kind. He enabled the city to acquire 160 of his prime park acreage.)

Years later, 2020, we were told that by applying for secondary planning at the opening of the Regional Plan Review, the current landowning developers were able to activate a process to evaluate Sandy Lake for development.

About 2 years later, the Province requested that the city provide a list of areas being looked at for development. However, instead of recognizing the areas listed were 'being examined' the Province seemed to assume it was a list of what the city was planning to develop. Our communications with city councillors at the time found that most were as surprised as we were that Sandy Lake was suddenly chosen to be fast-track developed. That isn't how the normal process works.

Sandy Lake is clearly an area that would be a candidate for not proceeding. However, now, with strong pressure from the Province, Sandy Lake is getting fast tracked. It looks like irresponsible “building at all costs” to those who know the nuances of development decisions and of the Sandy Lake situation. But even now, it is not too late to do right by this special park that seems to be in a perpetual tug of war.

With a highly valuable park at risk, this is a special situation requiring special attention and, likely, unusual actions. Decades of work and investments by citizens, organizations such as SLCA and the Sackville Rivers Association, and by the city, to build a strong, workable regional park will be for nothing should the Province choose to go ahead with housing in the Sandy Lake watershed.

SLCA has been requesting that Sandy Lake be removed from the SPA list, allowing it to revert to an ‘area for consideration’ as described in the 2006 RP, to be processed through HRM planning only. **However, we now ask the Province to remove it from the SPA list and work with all to build the outstanding regional park that had been intended since 1971 to be preserved for all time.**

More about the situation:

1. Compromise is often seen as a solution, but in this case that would be disastrous for the lakes and park. Decision-makers in Bedford Town Council were apparently not aware of that when they voted by a close margin in 1982 to zone about half of the previously intended park lands, crucial parts of the functioning ecological unit, for future housing. Reliable sources from that event confirm that no biologists were consulted before the decision was taken, a decision based on a belief that the lands were merely real estate. Again, it is not too late to fix that error, with the will to do it.

Further, in the 2006 and 2014 Regional Plans the Sandy Lake area was shown in two sections of the RP as having dual, competing, values. It was highly valued for its park assets in one section, but another section noted it had been rezoned for possible future development. Several citizens told us later that they didn’t think to look in the development section. Why would they when they’d already found their answer in the park section? The park was still coming.

This conflict was also mapped in the Halifax Green Network Plan values map, along with recognition for the need to resolve the conflict.

The city’s head planner assured us they were seeing the conflict and would resolve it in the 2020 Regional Plan.

2. Both City Council and planning staff have demonstrated strong interest in acquiring the lands needed to preserve the park, but the power of one person can veto. Here are some examples.

In the 1970s a local family offered about 500 acres west of the lake to the municipality for the park, for free (These are now the developer-owned lands in the SPA). The community was eager to build the park. The county warden vetoed the gift because he was instead building the Bluewater Road businesses park and a dairy was looking to relocate from downtown and to dump their effluent into the lake. (By the way, the dairy was convinced not to use the pipe they built. They have been a good neighbour. There are lake-health challenges the community and dairy work together to resolve, such as salt runoff from the parking lot.)

We were told by a planner involved with the 2015 Conceptual Map document which Council had used to acquire the 160 acres for the park, that the text of the document provided Council with the rationale for acquiring the rest of the lands west of Sandy Lake. We were puzzled when, instead, Council agreed a few years later, in-camera, to make the 2015 map its conceptual map to guide park land acquisition east, south and north, but ignoring the west. This, despite the planners' clarification that the map had been drafted for a completely different purpose – to acquire 160 acres for the park, not to delineate a conceptual park. We were advised by a different planner to try to shine a light on the fact it had not been intended to be a conceptual map for the park - that the text provided instead the rationale to use to acquire land to the west of the lakes as the important 'next step'. The map that looked like "hands off the west" began being used as the park's conceptual boundary in secret. Our group learned by chance after hearing the stated goal of the councillor responsible for the area was that the city was using that map, and he was instead working to have the development proceed in exchange for having the developer pay for half the cost of upgrading Hammonds Plains Road. Essentially, that would be trading park values for a road that everyone knows needs to be fixed. Note that the extreme costs to the city and taxpayers for the current proposed sprawl development were not included in this simple calculation where a park was considered a good price to pay.

As well, Council's strong motion of July 12, 2022 to strengthen the buffers, old growth forest, and wildlife corridor protection (McCallum study) was a clear sign that the city was working to resolve the values conflict and to protect the park if warranted. That motion was included verbatim in the RFP (and we understand also in the contract) for the Stantec LSA studies. It shows up several times in key city documents such as in the Feb 4 and April 29 2025 declassified in-camera reports. That alone is evidence of strong support for park expansion and protection by Council and planners. So why does it not show up in the LSA or the developer's plans? Who had the veto power over Council there?

It is unusual for an area to have the advantage of a site-specific study of environmental assets, but the Sandy Lake area has this. It appears, however, that it is not being used. As just noted, the McCallum Report made strong points that special actions, large buffers, and other extraordinary environmental protections are needed in the watershed of Sandy Lake in order to protect the current, smaller, park, all supported by Council. However, if we view the developers' maps that we have seen so far, minimal attention to riparian buffers, wetland and stream protection, or to wildlife corridors are apparent. Business as

usual, ordinary building regulations, will not end well for a sensitive lake and system through to the Sackville River. Wild Atlantic Salmon have returned to their traditional spawning place and summering home, Sandy Lake, thanks to 35 years of work by the Sackville Rivers Association. They will not stay in a lake that has inhospitable water quality.

We interviewed several retired and current Halifax planners, removing identifying info so they could talk freely. There is a lack of continuity from removing identifiers, but there is much to be learned here: <https://sandylake.org/talks-with-scientists-and-planners/>

3. It was a surprise to see how different the developers' plans were at the open house - different from their plan used to guide the Stantec background studies. The new map has at least 12 stream crossings (bridges or culverts) and more for foot crossings. So much for protecting the headwaters, tributaries and wetlands that feed the lake, goals stated by Council, by the McCallum Report, and the Stantec Report. Plus, a highway runs through the entire area, through the tributaries, and disrupts any semblance of honouring wildlife corridors. It makes no sense to take a proposed park area that has been identified as important to wildlife movement in the HGNP and in the Wildlife Corridor Charrette, and instead put a highway through. It is almost as if the new map was part of a card game where the developer knows he can make a rash bid, knowing the casino owner has his back. In this case, the Province that wants housing more than anything else.

Of course developers can build successful developments, places for people to live. That usually involves compromises and sacrifices. But Sandy Lake is an extraordinary case. Given the latest "bid" map, to continue the analogy, it is as if even the developer knows as we do that they can not develop at Sandy Lake and still preserve the park and lakes' outstanding biodiversity. So make the wild bid.

An example from the wild bid: The 12-year-old trees that are regenerating in the 300 acres of the 2013 clear-cut (part of the developer's property west of the lakes) are not junk trees - they make up the full suite of Wabanaki/Acadian Forest species. They are once again serving the lake and system's ecological needs. However, the lake has not yet recovered from the excessive wood-chip nutrients that have been rotting at the mouth of Karen's Brook since the 2013 clear-cut. That cut was done with all the Forestry regulations to protect streams and waterways, yet the damaging impact on the lake water can still be seen and measured. To propose to cut them again, and also cut into the sandy drumlins in the face of the 2013 evidence, seems pure insanity if the lake and park are important at all.

Conclusion: The evidence is strong that the conflicting values are indeed irreconcilable. Put housing elsewhere and give the people's park its logical and long-sought future. Five decades of effort to secure this park, and citizens are prepared to fight for it.

Detailed Request:

Because SLCA also recognizes the similar issues and the connectedness with the neighbouring BMBCL park, both being key parts of the Halifax Green Network Plan, SLCA requests that the city and Province:

- Remove Sandy Lake SPA and Highway 102 W Corridor (BMBCL) from the Special Planning Areas list. (See the HGNP and websites for details of how the two parks depend on each other ecologically)
- Give both parks the time and attention they need to come to fruition before deciding on development near or on the boundaries of the parks.
- Expand Sandy Lake Regional Park the further 1700 acres to complete the protective park boundary.
- At BMBCL the Province and the City should work with interest groups and developers to incorporate land into the national urban area that has been identified for more than 20 years as the preferred park boundary.
- Any development in either proposed parks should not interfere with wildlife corridors. Also act upon maintaining connections between the two parks, the Mainland, and the rest of the Chebucto Peninsula.
- Before development decisions are made, complete all environmental and traffic surveys, as well as floodplain surveys for the surrounding communities and adjacent parks.
- Include in the reports and planning process the environmental research from local community experts, scientists and planners, and make it all public.
- Release "What We Heard" reports about the public feedback on both the Sandy Lake and Highway 102 West Corridor Special Planning Areas as part of the process and before any decisions are made.
- Prioritize development and housing solutions in areas that are within the Urban Service Boundary. Develop brownfields rather than developing potential park lands. There are other lands that could be developed that make much more sense. Sandy Lake will be expensive in too many ways, both ecologically and by requiring taxpayers to fund expensive urban sprawl.

Closing:

There are decades of information, efforts, studies, toward building the Sandy Lake Regional Park. Too much to include here. Do reach out if you have questions. The best decisions are made using all of the relevant information.

We can't fault developers for seeing an opportunity to make housing. They are in business. That is what they do. But their Sandy Lake lands are so much more than real estate to the citizens who value the quality of the park, especially to those who worked for decades to protect it. Do not confuse this with nimby accusations that are used to question the motivations of people who live near areas of concern. A federal, provincial, municipal project identified Sandy Lake-Sackville River as a rich ecological unit to be protected as Regional Park for all time. Citizens should not be faulted for working toward that goal.

In 2018 the developers met with SLCA, saw the situation, and offered to trade their Sandy Lake lands for other lands if we could convince the city to find that trade. Planners told us they could easily find that trade if the city would give them the job, but we learned later that even though the developers made their offer in writing, it was never brought to Council, not even in-camera. Who was responsible to do that? Again, one person.

That was a tragic end to a golden opportunity, but it is not too late. The lands are still intact. The young trees are still growing. The old growth too! Streams are flowing. Salmon are in the lake. Everything worth protecting is waiting for the expansion to complete this ecological gem of a park. It is not too late.

What happens will determine whether the current Sandy Lake Regional Park continues to be a rich, vibrant asset that we can all enjoy and be proud of, or whether it will become a piece of geography, a “park” with poor ecological assets and algae blooms at the beach.

One voice can change the direction of the park’s future. Mr. Houston, your voice can save Sandy Lake.

We request that HRM and the Province recognize that this serious situation is also a great opportunity. Choose to protect the park above all else. Convince the developers again to work together to find the win-win that we all can celebrate. It has been done before. It can happen at Sandy Lake.

Sincerely,

Original signed

Karen Robinson, President

For the Board of Directors, Sandy Lake Conservation Association (SLCA)