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Sandy Lake-Sackville River Regional Park Coalition

RESPONSE to the DRAFT REGIONAL MUNICIPAL PLANING STRATEGY of JUNE 2023

October 24, 2023

Thank you for the invitation to comment on the Draft HRM Regional Plan, 2023. And thank you for your work to make our city all it can be.

We write this document with two main goals in mind. One is to further assist the city in its creation of plans and documents that chart the path to serve the city and its people well. The other is the main focus of our organization. That is, to preserve the valuable suite of ecosystems that is the Sandy Lake-Sackville Regional Park area, with the knowledge that doing so will also serve the first goal to benefit the welfare of our city and its citizens.

In this document you will find:

- A. Our Coalition's top 3, high-level recommendations that should be reflected in the final Regional Plan
- B. Further elaboration on our top 3 recommendations including detail around how the recommendations would be implemented in the Regional Plan
- C. Detailed comments on specific wording (present or lacking) in the draft Regional Plan

A. The Coalition's Recommendations

1. Expand Sandy Lake Regional Park to fully protect the area, and stop the plan to fast-track sprawl development next to Sandy Lake.
2. Implement the actions in the Halifax Green Network Plan, which would benefit the Sandy Lake – Sackville River area and beyond.
3. Incorporate recommendations the Coalition submitted previously, which will help put the health of the environment and people as top priority in planning in HRM.

B. Recommendations – Further Detail

1. 1.1 Expand Sandy Lake Regional Park towards the 1971 vision for the area (co-created by the City of Halifax), including through acquisition or other form of protection of an additional ~1800 acres of land by HRM and through other forms of land conservation. This work should be guided by the McCallum Environmental Consulting report about the conservation values of the area, and the substantial body of work about the environmental features of the area. These support the fact that the headwaters on the west side and the south side of Sandy Lake must be protected in order to reduce the risk of damage to the lake that would be caused by development in the area. For a multitude of reasons, we are all better off with an expanded park that includes these sides of Sandy Lake instead of housing development in that sensitive area.

1.2 Stop advancing the west side of Sandy Lake as suitable for development. Remove it from the list of Future Serviced Communities Growth Centre in the draft Regional Plan. There was never any rationale provided by HRM for why the area should be a Growth Centre, and the new draft Regional Plan articulates a different vision for HRM than the old plan. The land west of Sandy Lake can provide much more benefit to Haligonians as a park than it can as a suburban sprawl development. Development in this area risks damaging the good qualities Sandy Lake Regional Park already provides.
2. Implement all of the 79 actions in the Halifax Green Network Plan (HGPN). The HGPN (passed in 2018) is an HRM Priority Plan that has been very slow to be implemented. Of the 79 actions in the Plan, 33 state that they will be implemented through changes to the Regional Plan during this Regional Plan review (other tools, like bylaw changes, are needed to implement some of the actions). The time is now to implement these actions, which HRM committed to, and which if implemented would better care for areas like Sandy Lake Regional Park and its surrounding lands and waters.

3. Incorporate the rationale, justified recommendations submitted by our Coalition during previous engagement periods for the Regional Plan Review. Our Coalition has submitted multiple, detailed, well-researched recommendations for changes to the Regional Plan. We see that some of them have not been addressed in the draft Plan. In many cases, our recommendations benefit people, wildlife, and water beyond the Sandy Lake – Sackville River area. We strongly encourage you to examine how all of our recommendations could be acted upon in the Regional Plan or related tools like bylaws and include what has been missed in this Regional Plan draft. Please read the background information and examine carefully the appendices and each of the requests and their rationales in Sections A, B, and C of the SL-SRRP Coalition’s 2 submissions to the RP Review:
<https://www.sandylakecoalition.ca/rpsubmission>

C. Changes to the draft Regional Plan (RP)

Overall, in the draft RP there is much to be celebrated! For example:

- We are pleased to see language in the draft Regional Plan which reinforces the Priority Plans, and helps the Centre Plan.
- We support creation of a new **Conservation Zone**
- We support policies **CI-1** and **CI-2** and the creation of a **Regional Parks Priority Plan**.
- Policies **RP-1** through **RP-5** we support for using the green network plan to shape where new development happens and for focusing growth in already serviced areas to create complete communities.
- We support **RP-13** to focus growth 90% in the “urban area”, avoiding urban sprawl. It is important not to include Sandy Lake as urban. It is near the service boundary but its natural home lies with its strong ecological assets.
- We support policy **RP-21 The Open Space and Natural Resource Designation** to identify the green network as it relates to both public and private land. Use the HGNP as an overlay zone when making development decisions.
- It appears that HRM is trying to find ways to include both private landowners’ property rights and conservation needs. This is welcome, but needs fine-tuning as seen in comments below.

However, there remain significant issues we believe could be addressed in the Regional Plan that too frequently turn up in practice. Please see Appendix 1 (Solving the Disconnect) for examples and, we hope, the opportunity for real progress through addressing these and other points in this Regional Plan review.

As well, there are specific requests we made in previous engagement periods on the RP that are not addressed in the current draft. We provide one example below, and more in our suggested changes to text in the draft RP.

Example: We were promised that the next round of RP engagement would deal with a particular confusing situation in the previous RP, and in the HGPN, where Sandy Lake was described as both a future growth area for development, and also for park expansion. The HGPN mapped an overlap over the Sandy Lake Park area showing conflicting values for development and also for parkland.

This conflict began in 1982 when Bedford Town Council decided to zone a portion of the park land unit west of Sandy and Marsh Lakes for future housing, thus opening the way for developers to begin buying up properties on speculation. No biologists were consulted when this decision was made. Citizens continue to point out that this was a grave error on the part of the town council. Thus, we are all still in the difficult situation where the area has dual values that are incompatible. We continue to work to make sure that decision-makers recognize this error and will now find a win-win-win to preserve this valuable ecological unit for all the right reasons, as demonstrated repeatedly in studies over 50 years (See Appendices 2 through 6) starting with the Dean Report of 1971 through to the McCallum Report of 2022 and since. This action to save this park unit will need to be deliberate.

So far, we have seen no information or explanation as to why specifically Sandy Lake is designated a growth centre. **Please provide credible reasons for why Sandy Lake was and is still designated as a growth centre** in the face of all the evidence that its value is much greater as a natural system. The original rationale seems to have been because the Pender family's generous offer to provide the lands west of Sandy Lake to the park were turned down by the then-county warden. If the county and later, Bedford, were not seeing the biological values that were identified in 1971, then we would guess that making the lands available for development made sense to them. Then, in 2006 it seemed that the decision was around servicing, not using an environmental lens. It is difficult to go back on this, but HRM and the Province have the ability to right this wrong, and the city and individual councillors have the ability to voice their support for protecting this valuable ecosystem for the city and its citizens. (See Appendix 7 backstory)

***The Sandy Lake-Sackville River Regional Park Coalition supports the Regional Plan review submissions of the Our HRM Alliance and that of Sandy Lake-Sackville River Regional Park Coalition Co-Chair Walter N. Regan** <http://sandylake.org/wp-content/uploads/2023/10/2023-REGIONAL-PLAN-submission-Walter-Regan.pdf>

Below are our selected comments on the text of the draft Regional Plan. Some are identified to underscore our support of the Mr. Regan's points and of the Alliance. Others are [our additional comments \(in blue text\)](#) added in the order that the topics appear in the RP draft.

Chapter 1: Introduction

1.2 Regional Vision and Principles

1.2.3 Principals

Add: “Prioritizes the protection of open space, wilderness, natural beauty and sensitive environmental areas”

Add: “Shall, as a critical component of environmental management, restore degraded aquatic and terrestrial habitats and wildlife corridors”

Environment, Energy, and Climate Change need to be priorities in 2023. Development must now take its turn, not lead, and fit in around environmental needs, or there will be little for the next generations.

Work with the Province to have them understand that all of the objectives in this section, including these suggested ones, are important.

1.6.1 Key Terms

If you wish to keep these descriptions of “may”, “shall”, and “shall consider”, it is important to create policy that places the priorities of environmental concerns, community concerns, and development concerns at least on par with each other. We must do much more than just consider environmental aspects of city decisions. They are essential now to continuation of life on earth. Putting off the actions to change this wording and its clear intent to protect the environment until later would put off dealing with the problem and compound the “death by a thousand cuts”. The time for action is now.

Chapter 2: Planning for Our Region:

Policies **RP-1** through **RP-5** we support for using the green network plan to shape where new development happens and for focusing growth in already serviced areas to create complete communities.

RP-10 add “while respecting and prioritizing environmental issues and concerns”

Also, The Bedford Land Use Bylaw currently contains a bylaw which has preserved the Sandy Lake area and its valuable ecosystems for many years. For a building to be approved, the lot size must be 5-acre minimum and the property has to have been on a serviced road on or before October 9, 1991. If the entire area is rezoned back to its earlier park designation as we request, and the area is therefore protected under the park umbrella, this “five-acre by-law” may become unnecessary. Until the area is fully protected, we request that it remain in place.

2.5.2 Growth Targets

We support **RP-13** to focus growth 90% into the “urban area”, avoiding urban sprawl. It is important not to include Sandy Lake as urban. It is near the service boundary but its natural home lies with its strong ecological assets. Yes, place growth in the urban area and in communities such as Musquodoboit and Main St. Dartmouth which want to be more urban.

Develop on brownfields and redevelopment areas, not in greenfields such as Sandy Lake-Sackville River.

It is concerning that we were told earlier in the process that potential greenfield development will be explored in the RP review Phase 5. Please look closely at studies around the economic side of greenfield vs brownfield development as well as redevelopment and urban infill.

See the **Brownfields report HRM, 2002:**

<https://www.dropbox.com/sh/236g71ydn1acfv7/AACVt8HPMDMy81UY2x9wbFzYa?dl=0>

Especially in a valuable ecological location such as Sandy Lake-Sackville River, building housing makes no sense. Appendices 2 through 6 hold information on values of natural areas of Sandy Lake’s ilk. And also, as seen just above,

<https://www.novascotia.ca/parksandprotectedareas/docs/archibald-lake-proposal.pdf>

and CBC: <https://tinyurl.com/2wx624wb> .

2.5.3 Service Areas

Policy **RP-14** defines “Urban Area” as that which “is serviced with municipal water, wastewater and stormwater services and conventional transit services”. However, Map 3, contains areas which are not yet serviced, such as at Sandy Lake. Sandy Lake is better utilized as public park than as housing. Please change the map to remove the misleading portion at Sandy Lake, and go on to preserve the full park.

Do not develop in greenfields such as Sandy Lake just because they lie beside more developed areas or because they are owned by developers. See the background section of the SL-SRRP RP Submissions <https://www.sandylakecoalition.ca/rpsubmission> for how the important Sandy Lake Park land was rezoned to become residential. Our communities need a rich ecological unit at Sandy Lake-Sackville River, as was intended in 1971 when Federal biologists selected the ecological unit to be preserved for all time. Developing parts of the area instead will impact negatively the health of the remaining park and reduce the ecological services values as described previously in this document.

We support policy RP-21 The Open Space and Natural Resource Designation to identify the green network as it relates to both public and private land. Use the HGPN as an overlay zone when making development decisions.

Chapter 3: Building Healthy and Complete Communities:

3.4.5 Future Serviced Communities

Remove “Sandy Lake” from Table 3.3. Despite who owns the land now and that the province wants housing at all costs, citizens and the city must do whatever is necessary to raise awareness among decision-makers to find a win-win so that together we save Sandy Lake-Sackville River.

Multiple studies since the 1970s, including the 2022 McCallum Report, have underlined Sandy Lake’s outstanding ecological values.

HC-7 iii) add (i.e. Lucasville Road, Lucasville Greenway and Sackville River Conservation Corridors) and connect the trails to the expanded Sandy Lake Park. In particular, protect now the narrow pinch point of wildlife corridor that runs by what was Heffler’s Lumber in Sackville. The walking trails could link through there as well.

In the RP, the trail system is called a “backbone” in the plan, however, a trails map(s) is missing.

Chapter 4: Parks: 4.2

Section CI-1 and CI-2 Sub-sections a-h

We support policies CI-1 and CI-2 and the creation of a **Regional Parks Priority Plan** - a high-level strategic park plan that also looks at the level of service for different types of parks and their distance to communities.

Nature Parks: 4.2.1

We thank you for the recognition of Nature Parks in **Table CI-1**, in support of Sandy Lake, Blue Mountain-Birch Cove Lakes, and the Purcells Cove Backlands.

Quote: *“The Municipality currently has direct involvement in land ownership and park management for three areas that are being developed as Nature Parks. The primary goal of park planning for these publicly held lands is to retain them in a natural state, offering passive access to nature. An overview of these areas is provided in Table CI-1 below. Lands that the municipality currently owns, or provincially or federally owned lands will be subject to future park planning processes. As development proceeds in close proximity to park areas, attention should be placed on ensuring land use is of a suitable use and scale.”* This sentence is of particular interest to us as it could assist the efforts to expand the viability of the Sandy Lake Park.

However, we have some concerns over some text in **Table CI-1: Description of Nature Parks:**

“Sandy Lake -The Sandy Lake Regional Park consists of municipally owned land around Sandy Lake, Marsh Lake and Jack Lake containing a beach, formal trails, and undeveloped wilderness lands. Located near Hammonds Plains Road, it extends up to the Sackville River and encompasses the Sandy Lake watershed, including the watercourse from Sandy Lake, Marsh Lake, and into the Sackville River. The Park also includes Jack Lake, which is part of the Papermill Lake Watershed. The Municipality has an active program to include additional lands to support the further development of this nature park.”

From reading this one might conclude that the Sandy Lake watershed is encompassed in the park. That is, already protected within its boundary. This is not the case. Significant portions of the Sandy Lake watershed still need protection within the park in order for park assets to remain intact and functioning, and some of these significant portions are slated for development in the province’s SPA Sandy Lake. **That said, we strongly support the description here that does include Sandy Lake’s watershed in the park.** We look to the Regional Plan to achieve a win-win for all.

We do not support Sandy Lake and Blue Mountain-Birch Cove Lakes (Highway 102 West Corridor) as **Future Serviced Communities**. We understand these areas are undergoing extensive pre-development and land suitability studies. However, we believe that these areas are more valuable to HRM and the Province as parkland. We believe that developing these areas will result in a net loss of community and environmental benefits.

We support the addition of at least 1,800 acres to the existing Sandy Lake Regional Park. The McCallum Report, and others listed in these documents, show the importance of the additional acres and waterways to the survival of the existing park’s assets. See in our earlier RP submissions <https://www.sandylakecoalition.ca/rpsubmission> that reveals that using the 2015 conceptual map to guide acquisition was not the intended use of that map and will not protect the valuable assets of the park. See our April 24, 2020 submission, page 17, entitled “Another Mistake to Fix”.

We support the full protection of the BMBCL, Shaw Wilderness, and McIntosh Run. These parks complement each other ecologically and otherwise, along with their sister park Sandy Lake-Sackville River.

We support Sections **CI-3** to **CI-4**.

However, we support Mr. Regan’s comments that we do not fully understand the position of Section **CI-5**.

Policy **CI-5** is to study lands in close proximity to nature park areas and ensure land use is of a suitable use and scale to support the creation and ongoing use of the nature park. How will the Municipality ensure that land use is of a suitable use and scale to support the creation and

ongoing use of the nature park? Is the wording “to support the creation” relevant here if the park is already in existence? “to support expansion” seems better.

Please include direction to study these lands for park expansion, and create a park acquisition strategy to support conservation and connection of large wild areas and the corridors that connect them, such as at and between Sandy Lake, BMBCL and PCB/Shaw Wilderness. It is the corridor through Sandy Lake that will preserve biodiversity in the other 2 sister parks.

Level of Service Standards

Section **CI-9** Change the wording and intent: Where a proposed development is considered by development agreement, the Municipality shall ~~consider~~ undertake the acquisition of riparian buffers, wetlands and islands as public open space to protect public interest, facilitate public access, create wildlife corridors and preserve water quality. Make them a priority, as explained in other parts of this document.

4.9 Regional Energy and Telecommunications Infrastructure:

HRM should encourage NS Power to use manual techniques to remove vegetation where necessary and to leave largely intact buffers with respect to watercourses under high voltage transmission lines.

HRM should encourage NS Power to use bridges or bottomless culverts for watercourse crossings.

Both of these would help Sandy Lake Park now, as there are multiple power lines, a NS Power substation, and a road within the park boundary.

Chapter 5: 5.0 Fostering Diverse and Affordable Housing:

On redevelopment of sites, (especially urban sites), create green space and parks and include adjoining sites if possible. This should also apply to Provincial schools, community centers and housing developments.

Adaptive Reuse: 5.2.3

Section H-10: a) iv, include green areas, parks and other amenities for public use and enjoyment.

v, sites are not to be 100% developed.

10-b) iv, v include green areas, parks and other amenities for public use and enjoyment.

Sites are not to be 100% developed.

Section H-11

We agree with Mr. Regan, to add a sub-section,

f) sufficient green space and/or naturalized areas and to include green areas, parks and other amenities for play areas and enjoyment.

g) sites are not to be 100% developed.

5.3.2: Incentive or Bonus Density:

Density Bonusing must include storm water retention, tree planting, green spaces. Money in-lieu must not be used as a way to allow more density and site use while not allowing/ building/ funding of green spaces and parks.

We support initiatives to discourage urban sprawl and encourage ground water recharge and minimize hard surfaces.

We support the establishment of retention ponds and naturalized areas including day-lighting and rewilding within any high-density developments.

On infilling of sites/ areas, green space should not be destroyed or developed.

Chapter 6: Protecting the Environment and Acting on Climate:

As indicated, we support Mr. Regan's and OHA submissions regarding Chapter 6:

We are at a point where **EC-1 The Actions of the Halifax Green Network Plan** must lead business planning, programming and regulatory activities of the Municipality, not just be considered in.

EC-1-7 Protection of wetlands, corridors and other natural elements is essential for the city, the community, and the planet. Think globally and work locally. It all will add up.

Section 6.3.1.2 Preserving Natural Corridors

Section **EC-12** We strongly disagree with this by-law. It removes the true purpose of an Essential Corridor. It also conflicts with the intent of EC-11- i)

Section **EC-13 a)** add, “and shall also identify Important Corridors”.

Section **EC-13 c)** We agree with this provision (see **EC-11 c** of SRA comments)

However, the definitions of Essential and Important corridors being used in this RP document are not consistent with the definitions in the HGNP. This will be confusing to many readers. Please return to the HGNP definitions or supply different names.

add d) consider opportunities for wildlife crossings over and under transportation infrastructure or other major barriers.

add e) the Municipality shall identify Essential and Important Corridors especially in rural areas prior to loss and development pressures.

add f) both Essential and Important Corridor widths should be as stated in the Halifax Green Network Plan as a minimum.

add g) both Essential and Important Corridors should be as stated in the Halifax Green Network Plan, and should be extended beyond the floodplain buffer as a minimum and be beyond the watercourse setback.

add h) both Essential and Important Corridors that follow watercourses shall be a minimum width of 100 metres.

6.3.3 Naturalization and Municipal Natural Assets Management

We are strongly in favour of this section.

add b) Floodplain Mapping, Zoning and Stream Gauging to be part of the naturalization and asset management within this section.

add c) Protection of large undeveloped blocks of land including Sandy Lake Lands and Feely Lake.

6.3.4 Urban Forests

There is strong evidence that the Urban Forest department is understaffed and under-funded. We recommend that several positions be created in the Planning Department of HRM to develop and manage the Urban Forests Plan.

Add a section to deal with the coming concern that Hemlock Woolly Adelgid is now in HRM and will need funding and dedicated staff to prevent loss of significant hemlock forests including Hemlock Ravine and Sandy Lake and others.

A new Master Urban Forest Plan must be undertaken.

Section-EC-17, We are strongly in favour of this section.

Section EC-17 Add a) a by-law to be created to insure protection and replacement of trees on private property.

6.4 Protecting Our Water

We are in favour of this section. Except that, while we agree with the intent of this section, in many areas there are no community – level groups to assume a stewardship role. In these cases, HRM must create and manage Watershed Management Plans.

As SRA states: Many watersheds cross Municipal boundaries, HRM Staff should take the lead and be involved in inter-municipal watershed planning. It is extremely difficult for community – level groups to deal with the different levels of government with respect to environmental issues. HRM shall provide leadership, liaison and staff to facilitate coordination of inter-governmental cooperation.

We fully support using the Watershed as a basis and defined unit of measurement for Watershed Planning.

To expand on the stewardship concept:

The Sandy Lake Conservation Association community group and NS Power enjoy a mutually productive working relationship in our ‘Sandy Lake Security Committee’, along with Halifax Police, RCMP, Halifax Water, Halifax City Parks, SRA, DND, and others. Together we have been successfully working for 3 years to reduce illegal activities in all of our properties, such as hunting, ATV use, illegal fires, illegal camping and structures, trespassing and vandalism. Provincial parties such as DTAT, DNRR and DECC are also assisting these efforts. We encourage the city to encourage and assist other city parks to create similar partnerships, and joint stewardship projects for the benefit of all.

The Woodens River Watershed Environmental Organization (WRWEO), A Sandy Lake – Sackville River Coalition member group, created a stewardship proposal. It is another model that could enhance our parks. (See Appendix 8) Both models can be useful guides for a city-organized stewardship program. We encourage the city to explore the benefits of fostering such a program through this Regional Plan review.

Section EC-18

We support all of Mr. Regan's comments in this section. In particular, points on stormwater, corridors, floodplain mapping, and other climate Change mitigation.:

add c) Acquisition of large natural assets and conservation areas such as 1800 acres at Sandy Lake, and protect Feely Lake.

Mr. Regan: "All riparian buffers must be in public ownership. Riparian Buffers kept in a natural state will protect water quality for adjoining wetlands and forests, riparian buffers should be established for daylighted streams and brooks. (i.e. 1,800 acres at Sandy Lake, Feely Lake). This Policy increases in importance where wildlife corridors adjoin Riparian buffers."

6.4.3 Watershed Studies

We strongly support all of Mr. Regan's comments in this section.

Also, make use of the criticisms and comments from the professionals about the 2014 AECOM study of Sandy Lake. At Sandy Lake \$200K gained very little real information other than to support development goals.

2014 Sandy Lake AECOM report: <http://sandylake.org/sandy-lake-watershed-study-final-report-aecom-2014/>

2015 Response: <http://sandylake.org/response-of-dr-hansen-and-sandy-lake-conservation-association-slca-to-sandy-lake-watershed-study-final-report/>

Sandy Lake limnological profiles reveal freshening and oxygenation of the water column after extreme rain events; and a worrisome "Metalimnion Oxygen Minimum"

2Sep2023: <http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-ns-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>

6.4.4 Rural Community Watershed Management

We support Mr. Regan's comments.

6.4.5 Lake Monitoring --add "and Rivers" to Title

We join Mr. Regan in strongly supporting lake and river water quality monitoring.

EC-22 remove “to provide guidance” and add “and restorative or mitigative efforts such as sediment removal from watercourses and liming.

Mitigative measures must be done to return watercourses back to a natural state. Testing shall lead to restorative actions.

EC-23 remove “may” and replace with “shall”.

6.4.6 Riparian Areas and Wetlands

6.4.6.1 Riparian Areas

EC-24 the 30-meter-wide buffer shall be acquired in public ownership. Large rivers and important wetlands shall have a minimum buffer of 100 meters. Remove “as well as” and replace with “and”. Remove “contiguous with watercourses”.

HRM should acquire existing riparian buffers along watercourses.

Wherever possible these features (especially storm water infrastructure) shall be constructed to maintain the integrity of the riparian buffer.

EC-27 Change “shall” to “may”.

Mr. Regan: “Vegetation within the area of the reduced riparian buffer shall be re-constituted to a natural state where possible by landscaping and plantings.

Given the ever-increasing awareness and concern with regard to water quality, HRM shall develop an outreach or education plan to educate the public on the vital importance for protection of wetlands and riparian buffers.

(Mr. Regan) feels very strongly that under the Regional Plan very little attention is given to identifying and policing existing riparian buffers and setbacks with respect to tree and vegetation removal. By-law enforcement must not only be complaint driven. During the construction process it must be the responsibly of the Building Inspector or Development Engineer to monitor the site for proper sediment control and the protection of trees and other vegetation within the riparian buffer.

Post development, trees and other vegetation are often removed from the riparian buffer. Every 3 to 5 years (or on sale of property), all riparian buffers should be inspected for integrity. Where vegetation has been removed in contravention of the by-law, it should be reconstituted at the land owner’s expense. Where structures are found that are not permitted under the provisions of the by-law, these structures are to be removed or relocated at owner expense.

EC-28 Change “shall” to “may”.

EC-29 Change “shall” to “may”.

EC-30 (Mr. Regan) fully supports this section. Add HRM shall have a Tree Retention By-law for the entire municipality, to include riparian buffers.”

We strongly support this. See our RP submissions for the devastation caused to Sandy Lake, ongoing, from the Armco clear cut of 2013. Individual trees in HRM as well as large portions must be protected from cutting that is currently allowed by this current lack of protection.

EC-31 We support this section, but change “may” to “shall”.

6.4.6.2 Wetlands

We support Mr. Regan’s comments as stated and highlight in **EC-33** change “may” to “shall”.

EC-34 The 30 metres setback (100 meter for larger rivers and wetlands and special wetlands such as at Sandy Lake) should be turned over to the Municipality as a public owned buffer.

EC-35 add (c), all wetlands and vernal pools shall be identified and protected with a minimum 30-meter buffer.

We strongly support policy **EC-41** to utilize green infrastructure and nature-based solutions to mitigate climate change. please also include trees retention, promotion of native NS plants, and protection/restoration of wetlands.

At Sandy Lake, it is imperative to have the Sackville River Floodplain study expanded to include the Sandy Lake watershed because what happens at Sandy Lake will affect water levels in Bedford and Sackville. This study must be done before any decision to build or not build at Sandy Lake is made.

The Sandy Lake watershed is already functioning to do these things to a high degree. To remove those contributions makes no sense.

6.5 Acting on Climate Change

We are all fortunate that despite 50 years passing since the Sandy Lake-Sackville River ecosystem was first identified by federal biologists, the area is still functioning to mitigate both Climate Change and Biodiversity Loss, as well as high-level educational, health and recreation for citizens, and will continue to do so if we choose together to do whatever is necessary to preserve the unit. We must find the win-win-win.

6.5.3 Stormwater and Flooding

We support Mr. Regan’s comments and recommendations, including “**EC-42** remove “consider”, change “adopting” to “adopt”. After “matters may” change may “to “shall”, and remove “the cost and effectiveness of”.”

“Add f) sub-sections – a to d shall apply to existing developments and re-developments with emphasis on:

- no direct discharge into watercourse
- no permanent disturbance of naturalized buffers
- increase use of permeable surfaces to reduce storm water run-off and increase groundwater recharge
- the object should be not to exceed maximum inputs and rate of discharge that receiving watercourses can assimilate without adversely effecting water quality and quantity and to avoid stream bank erosion and damage to wetlands

EC-43 change “may” to “shall”, add “by end of pipe treatments” after “facilities and watercourses”.

Including education of citizens and storm gauging.

EC-44 Change “may” to “shall”

- a) All bridges and open bottom culverts shall be designed for the anticipated 100-year storm
- b) Fish habitat improvement and protection shall be considered.
- c) Daylighting will also help mitigate the effect of climate change.

EC-45 change “may” to “shall”

- a) (Mr. Regan) supports this sub-section
- b) (Mr. Regan) fully supports this sub-section
 - i) All bridges and open bottom culverts shall be designed for the anticipated 100-year storm
 - ii) Fish habitat improvement and protection shall be considered
- c) (Mr. Regan) supports this sub-section
- d) (Mr. Regan) supports this sub-section

See Appendix 9 for lessons learned regarding flooding in the Sackville River Floodplain and the unquestionable need for a Sandy Lake subwatershed floodplain study to be added to the Sackville River Floodplain Report of 2017 before any decision is taken to proceed or not with development.

EC-46 (Mr. Regan) supports this sub-section.

EC-47 (Mr. Regan) supports this sub-section.”

Do the recommended changes of “may” to “shall”.

EC-76 add

- a) there shall be a policy to mitigate habitat loss during road construction and installation of transmission lines
- b) riparian buffers and wetlands shall be respected

Chapter 7: 7.1 Objectives

We support this section. Exercise caution in how large and where traffic circles are placed. They do not foster community living or community building unless they are designed with this in mind.

q) construct the Lucasville Greenway and connect it to the expanded Sandy Lake-Sackville River Regional Park trails.

r) create a standing committee for recreation and AT Trails for construction and maintenance (HRTA)

Keep in mind that Sandy Lake Park is a city park and motorized vehicles are not allowed. By-law P-600 is vital to keep intact for protection of city parks.

7.5 Complete Communities and Streets

7.5.1 Complete Streets

We support Mr. Regan’s comments on this section.

“7.7 Active Transportation

Add to 7.7 after first paragraph:

(Mr. Regan) believes that AT should be fully funded on an on-going basis. HRM should adopt “Third Mode Funding Concept “as used in New York.

M-25 Add a) combine the management of recreation trails (Parks and Recreation) with the AT Network.

- a) Create an advisory group for trails (similar to Halifax Regional Trail Association- with Staff, members from the various trail groups and Councillors).

- b) Funding for Recreation Trails and AT Trails be significantly increased and with a large increase in HRM Trails Staff.

M-26 add f) Recreation Trails

M-27 (Mr. Regan) fully supports this sub-section.

M-28 (Mr. Regan) fully supports this sub-section.

- a) All new developments shall contribute to the Capital Cost Contribution to help fund and build AT trails, (similar to **M-30**)”

(Mr. Regan) does not support the use of motorized vehicles for regular use on multi-use trails. Use of ORV’s however, is supported for service and maintenance of said trails.

Chapter 8: 8.4 Industrial Employment Lands

EP-11 revise “map 6”to include the Sackville River – Sandy Lake Corridor

Ep-17 add i) protecting wetlands, wildlife corridors, old growth/ mature tree stands, floodplains, watercourse and unique eco-systems

8.4.5 Halifax Harbour

Add that Lawlors Island, Georges Island, Devils Island, McNabs Island, Admirals Cove, Wrights Cove, Bedford Basin islands (and other lands around the harbour existing in an undisturbed state since 1749) should be protected to recognize their natural and historical significance. Efforts should be made to preserve and protect the natural inter-tidal zone whenever and wherever possible.

8.4.5.2 Water Lots

EP-22 (Mr. Regan) agrees with this sub-section.

Add a) water lots should be acquired whenever possible in public ownership.

EP-23 (Mr. Regan) agrees with this section.

8.5 Rural Employment Lands

(Mr. Regan) supports this section (GNP Working landscape Open Space Plan Values Map)

8.7 Tourism

With in-stream conservation and habitat restoration annually amounting to about 10 million a year and Recreational Fishing worth approximately \$70 million annually in NS and about \$21.5 million a year in HRM (with about \$1.5 million a year from tourism). Recreational Fishing is very important to HRM and should be recognized and supported.

EP-28 (Mr. Regan) supports, plus add e) by considering nature parks, Conversation Areas, park expansion (e.g. Sandy Lake Park, Blue Mountain-Birch Cove), birding, canoe and kayak and other nature-based activities.

A liming program could be developed for low ph impacted watercourses. Increase the number of Conservation parks (e.g. Sandy Lake, Freely Lakes, Anderson Lake and Beaver Bank Lake).

I-7 a) (Mr. Regan) agrees with sub-section

b) Add (e.g. Sandy Lake, Blue Mountain Birch Cove, and Feely Lake)

10.3.2 Priority Plans

Please see again our concerns in Appendix 1: Item 4, Priorities Plans

We support Mr. Regan's comments in this section.

10.3.4 Special Planning Areas (page 168)

SL-SRRP Coalition asserts that this Housing Task Force issue should not be included in the draft HRM Regional Plan at all.

1. Most important is the concern that **rushing any of the SPAs ahead by allowing early destruction of the natural landscape before all the studies are in and deliberated thoroughly is putting the cart before the horse.** The optics of that are highly concerning to say the least. If the authors of this section, and Council, the Province, or anyone, thinks that what is right for an area will of course take precedence in the decision-making process despite the existence of this new version of fast-tracking as written here, they have not been paying attention to the long history as well as the short history. Permission in certain circumstances to move ahead can easily be used as a new kind of green light toward housing development when **what we really need is to shift the priorities so that development, ecological, cultural, and other factors are valued equally.** The development priority already has enough opportunities and excuses to be made easier to proceed. Why would make it worse?

2. From a timing perspective, it seems that what the Task Force is doing is in many ways irrelevant to the RP plan. The RP is long term and the Task Force was set up for a fixed time period (2 years?). We have been told its mandate should have run out before the long-term vision of the RP is put into place.

Note: this next paragraph was written before the October 12th 2023 Bill 329 was proposed: **Concern: Is this section an indicator that the Province has taken over housing for the long term (has not told citizens this yet)?**

3. Also, including this section in the city's RP **appears to indicate HRM's support and acceptance of the Special Planning Areas (SPA) selected by the province**, and therefore gives unstated support to the Task Force's goals and methods. However, the mayor, CEO, and many councilors have indicated displeasure with the processes and specifics of the Province's and Task Force activities. Does Council know what passing a RP draft with this section in it says to citizens?

The SL-SRRP Coalition strongly requests that this entire section be removed for each of these reasons, plus we join Mr. Regan's and Our HRM Alliance's position:

“(Mr. Regan) does not support this section **10.3.4 Special Planning Areas**. The intention removes public input and circumvents the HRM planning process. Sandy Lake and Drain Lake have been designated as Special Planning Areas. Environmental protection of the Sackville River and tributaries is of paramount importance to our Association.

(Mr. Regan) is strongly in favor of 1-20 a), b) and c). In his experience, the problem has been that these plans, in most cases are not implemented in their entirety throughout the course of the project and are not inspected to ensure functionality.

In the rush to expedite development the shortcuts such as early tree removal, blasting, earth works and other activities that HRM normally follows as part of an orderly development process will lead to sedimentation and water quality issues in the receiving watercourses.

Special Planning Areas should not be excluded from the normal HRM Planning Development process.”

Chapter 10: 10.3.5.1 Suburban Area Sites

We support this section as described in Mr. Regan's submission:

“I-43 a) where it is necessary to protect environmental features that exceed 10% park dedication the Municipality may establish a larger percentage for park dedication. (Conversation zoning will be in addition and not to be included in the 10%)

I-44 add c) where 5% park dedication does not include significant ecological or environmental features the percentage for park dedication will be increased.

I-45 add g) importance as conservation areas, environmental areas, Special and Important Wildlife Corridors and natural features.

Add h) the lack of green space in our downtown (s) areas HRM shall work to increase the number and areas of Green space in those areas.”

10.5 Water and Wastewater Services

We support Mr. Regan’s comments including changing “may” to “shall”, and pumping of septic systems.

Support documents are contained in the Dropbox:

<https://www.dropbox.com/sh/w7qf00zpuppp5t2/AAA8udBcNXhfw-uSpKBQU4F8a?dl=0>

Thank you for the opportunity to contribute to this Regional Plan draft.

Sincerely,

ORIGINAL SIGNED

Karen Robinson, Co-chair of SL-SRRP Coalition Steering Committee and rep. for Sandy Lake Conservation Association

Walter Regan, SL-SRRP Coalition Steering Committee and rep. for the Sackville Rivers Association

Mary Ellen Donovan, SL-SRRP Coalition Steering Committee and rep. for Friends of Blue Mountain Birch Cove Lakes Society

Karen McKendry, SL-SRRP Coalition Steering Committee and rep. for the Ecology Action Centre

Ray Plourde, SL-SRRP Coalition Steering Committee and rep. for the Ecology Action Centre

Harry Ward, SL-SRRP Coalition Steering Committee and rep. for Five Bridges Wilderness Heritage Trust

Sandy Lake - Sackville River Regional Park Coalition Member Groups:

Sandy Lake Conservation Association
Sackville Rivers Association
Agropur Cooperative Dairy Bedford Plant
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
Council of Canadians - Halifax Chapter
Cole Harbour Parks and Trails Association
CP Allen High School's Cheetahs for Change
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 Hares Trail Running Group
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
WRWEO / The Bluff Wilderness Hiking Trail

APPENDIX 1

Examples re: SL-SRRP Coalition’s concern that essential information has been missed by key staff working on Sandy Lake Special Planning Area. Our concern is also for the bigger picture – to prevent such situations in general.

Specific examples below: 1) the need for Sandy Lake to be added to the 2017 Sackville River Floodplain Study, 2) the ill-advised use of the 2014 AECOM predictions, 3) Council’s intentions regarding their motion on the McCallum Report buffer recommendations and 4) Council’s intentions in the Oct 11, 2022 amendment to the Regional Plan re: natural area issues.

1. Floodplains:

In our meeting with Stantec Environmental and HRM development staff online, June 22, 2023 re: the Sandy Lake SPA we expressed that building further in the Sandy Lake watershed will have significant impact downstream. Plus, full buildout will impact feeder streams & the lake. This is serious.

Staff mistakenly believed that the Sackville River 2017 floodplain study already factored in what would happen if SL were developed.

We pointed out that the consultant did not look at runoff from SL. There would likely be major effects downstream and on SL too.

We described the public release of the study where the consultants were asked why Sandy Lake is not included in the model. The reply was that they were not asked by HRM to include it. Why? “HRM must have assumed there would be no significant development there for 100 years.”

We were told they will look into it, and there may be interest in HRM in updating that FP study separately from this one. We requested the study area instead be added to the present floodplain study and be done by the same consulting firm in order to save time and expense, and before any decision is made on whether to build or not to build the SPA. The consequences of building in the Sandy Lake watershed without the corresponding floodplain study could be marked. (Note this was prior to the floods of 2023). We have had no response since as to the status.

2. Use of AECOM 2014 report in Sandy Lake SPA:

From June 22, 2023 online meeting with Stantec environment team and HRM staff re: Sandy Lake SPA:

Staff indicated they plan to rely on the 2014 AECOM watershed study which provided projections & considerations. We expressed concern and asked that AECOM 2014 be critically used because it is flawed, and that Stantec/HRM get a review. The AECOM projections and considerations were very arbitrary and the projections have proved false in real terms.

See <http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-ns-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>

And

<http://sandylake.org/response-of-dr-hansen-and-sandy-lake-conservation-association-slca-to-sandy-lake-watershed-study-final-report/>

The HRM staff voiced appreciate for the information which they did not have yet. There has been no follow up with us.

3. Buffers:

From June 22, 2023 online meeting with Stantec environment team and HRM staff re: Sandy Lake SPA:

Stantec expressed that they were currently early in the assessment phase, and will fill in gaps from previous studies including finalizing wildlife corridors.

They were unsure if buffers would fall under HRMs responsibility and any associated bylaws regarding green spaces & natural areas.

We expressed that this area needs special protection. Buffers need to follow the McCallum recommendations and should be in public ownership.

The McCallum study did recent work on conservation values at SL, including buffers. We underlined the Importance of the use of a 50-metre buffer around wetlands & 100 water courses, as recommended. Council made a motion that is the minimum they are expecting. Our understanding from Council's motion is that this area would go above & beyond the minimal setbacks in HRM (currently 20m RP calling for 30). Expectation is different at SL because of the sensitivity of the wetlands & watercourses.

We will be looking for you to work from those McCallum guidelines. Many guidelines for buffers are typically based on things like sedimentation & erosion run-off. They are not defined on the basis of wildlife needs. They are very narrow in scope of what they are actually supposed to be

doing. People in the field automatically use those typical buffers with no accommodation to real wildlife needs or edge effects. They need to be much wider buffers to support wildlife.

We were asked to forward all of these resources to the HRM/Stantec team, which we did, including:

Dr. Beazley's submission provided to Stantec at a previous meeting is posted online at http://sandylake.org/wp-content/uploads/2023/10/Beazley_SandyLake_SAR_Wildlife_Corridors.pdf

Dr. Patriquin's submission to Stantec is entitled, 'PatriquinSandyLakeWQforStantec22Jun2023b', and is and posted at: <http://sandylake.org/wp-content/uploads/2023/10/PatriquinSandyLakeWQforStantec22Jun2023b.pdf>

Council's motion regarding the McCallum Report's buffer, corridor and old growth forest protection in the case of the Sandy Lake area is provided here. Link to Council minutes:

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

TEXT:

July 12 2022, Page 11-12:

15.1.10 Case 23952: Sandy Lake Ecological Features Assessment The following was before Council:

- Staff recommendation report dated July 4, 2022

MOVED by Councillor Blackburn, seconded by Deputy Mayor Lovelace

THAT the motion be amended to include the words "at least" to the beginning of sections 2(a) and 2(b).

MOTION TO AMEND PUT AND PASSED. (12 in favour, 3 against)

In favour: Deputy Mayor Lovelace, Councillors Deagle Gammon, Purdy, Austin, Mancini, Smith, Morse, Cuttell, Stoddard, Blackburn, Russell, Outhit

Against: Mayor Savage, Councillors Mason, Cleary

Not present: Councillors Hendsbee, Kent

The motion as amended now read:

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:

- a. **at least** the suggested widths for important corridors,
- b. **at least** 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.

MOTION AS AMENDED PUT AND PASSED UNANIMOUSLY.

Not present: Councillors Hendsbee, Kent

In a subsequent meeting with HRM staff on Nov 1 2022 to discuss the Sandy Lake Ecological Features Assessment and how it will be used, we learned that staff in the meeting believed that Council's motion was 'to be considered', and is not direction.

However, in follow-up meetings with councillors we were assured that their intent was that the motion be followed.

We were left with the question as to who will be making that happen.

4. Council Amendments to Regional Plan Oct 11, 2022 to ensure Integrated Mobility Plan, Halifax Green Network Plan, HalifACT, and Halifax's Inclusive Economic Strategy 2022-2027 are included in development decisions:

The minutes of the Council meeting where the amendments were passed, October 11, 2023:

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/221011rc-mins.pdf>

Here is the wording of the 2 policies that were passed on that day that relate to wildlife corridors, wetlands, water courses and forests:

9.6.A PRIORITIES PLANS

Since the adoption of this Plan in 2014, Regional Council has approved several priority plans including the Integrated Mobility Plan, Halifax Green Network Plan, HalifACT, and Halifax's Inclusive Economic Strategy 2022-2027. The second review of this Plan began in 2020 and is expected to be readopted by Regional Council in 2023. The review will revise the policies of this Plan to ensure they are consistent with the priorities plans as approved. In the interim, this Plan supports the priorities plans which are actively used by staff to guide ongoing work.

G-14A In considering development agreements or amendments to development agreements, or any proposed amendments to the Regional Plan, secondary planning strategies, or land use by-laws, in addition to the policies of this Plan, HRM shall consider the objectives, policies and actions of the priorities plans approved by Regional Council since 2014, including:

- (a) The Integrated Mobility Plan;
- (b) Halifax Green Network Plan;
- (c) HalifACT;
- (d) Halifax's Inclusive Economic Strategy 2022-2027; and
- (e) any other priority plan approved by Regional Council while this policy is in effect.

G-9A Given the strategic importance of regional objectives in mitigating climate change and protecting the future health of the municipality, new secondary planning strategies or

amendments to existing secondary planning strategies, shall organize land use or management of land in a manner, including the scale, location, density and form of development, so that:

(a) the protection of environmental or cultural features of significance on the lands is considered, including wildlife corridors, the urban forest, wet areas, wetlands and watercourses;...

During the RP pop-up sessions of Sept-October 2023 to seek input and answer questions about the draft RP **a planner's response to a question as to why Council's motions of October 11th 2022 amendments to the Regional Plan that include wildlife corridor preservation do not seem to be showing up in the Subareas 12 & 1 plan.**

The planner read the 2 amendments 9.6.A and G-9A and said it is clear that G-9A does not extend to Subareas 12 & 1 because it is in the development agreement phase, and the term "development agreements" does not appear in the text. We expressed that it would seem clear from Council's amendments that they intended this be included because the corridor through Subareas 12 & 1 is a pinch point of the last remaining corridor in the area because the RP's map 6 shows this as fact. The planner agreed it should be fixed, and would bring it to the city's attention.

Following is our **September 13, 2023 email for related items for inclusion in the Regional Plan:**

"The minutes of the Council meeting where the amendments were passed October 11, 2022:
<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/221011rc-mins.pdf>

Our comments:

1. G-9A needs to be fixed. We need an amendment to the amendment.
The G-9A section clearly does not apply to development agreements such as what is happening at Subareas 12 & 1, because that word "development agreement" is not included in the text. That needs to be fixed and applied immediately to Subareas 12&1 as well as throughout the RP. Otherwise, what is all the HGNP and other work for? We need to be brave at this point. It is a David & Goliath situation with the province & the developers both wanting one thing only, but if there were ever a time to make sure the right thing happens it is here for corridors, at Subareas 12&1, and the RP has to be amended to make sure it happens now.
2. 9.6.A Priorities Plans section does not appear to be being well implemented in the current Subareas 12 & 1 plans. Most importantly, that area has a wildlife corridor which has now become an "Essential Corridor" since the HGNP was written. It was then one of 2 Important corridors through to the Chebucto Peninsula & BMBCL. Now, the other previously "Important Corridor" was closed off to the east of Sandy Lake by Clayton's development there. Where is Subarea 12&1's wildlife corridor? 30 Metre buffers are important but they are not equivalent to a full corridor. In this case the consequences of not providing the full corridor (and not expecting Clayton to participate in that – leaving it to the remaining private landowners who plan to develop in the area in the future is unfair) will be far-reaching and permanent. This is the proving ground that sets the tone for the preservation of corridors.

The time is now to show the HGNP is being used in development decisions. With the twin crises of Climate Change and Biodiversity Loss, both of which threatened life on this planet, we need to make sure the language in the RP ensures our ability to do the right thing for our planet now. Every small decision counts.

Subareas 12 & 1 are the proving ground. If they are allowed to slip past achieving true wildlife corridor protection, wetland and floodplain protection, then what is to stop the next domino from falling the same way? The province and the developers are putting so much pressure on creating housing at all costs, and we can see the planners are feeling caught by that. If ever there were a time to bravely face and enforce the facts of Climate Change and Biodiversity Loss it is now.”

*Thank you very much for the opportunities that the city provides to citizens to give input and have questions answered. We believe firmly that the city’s willingness to involve citizens and citizen experts in processes will and does make our city a better place for all. It is through these sessions that we sometimes find issues that could be changed to make things better.

From these examples, how is it Council’s motions and amendments are sometimes being so misunderstood in critical cases? Is it an example of “following the letter of the law and missing the intent of the law”? But then, how is it the Floodplain Study omission of Sandy Lake was missed? As well as two dissenting papers with proof that the AECOM 2014 predictions were very wrong?

Mis-steps like these can have huge impacts. What can be done to prevent them? Currently, it seems the community groups are forced to be the regulators, watching every detail and then struggling to get things fixed.

Further Examples contained in the document below, called ‘Why does something different come out the other end?’, have been noticed by us and may be important factors. We expect you have some reasons, and we ask that you take steps to prevent these critical errors.

A Scientist Asks, “Why does something different come out the other end?”

October 7, 2023

We appreciate the items in the draft Regional Plan that are attempting to move forward important ecological issues. How can we all make sure that action follows across the municipality, and more quickly than to date?

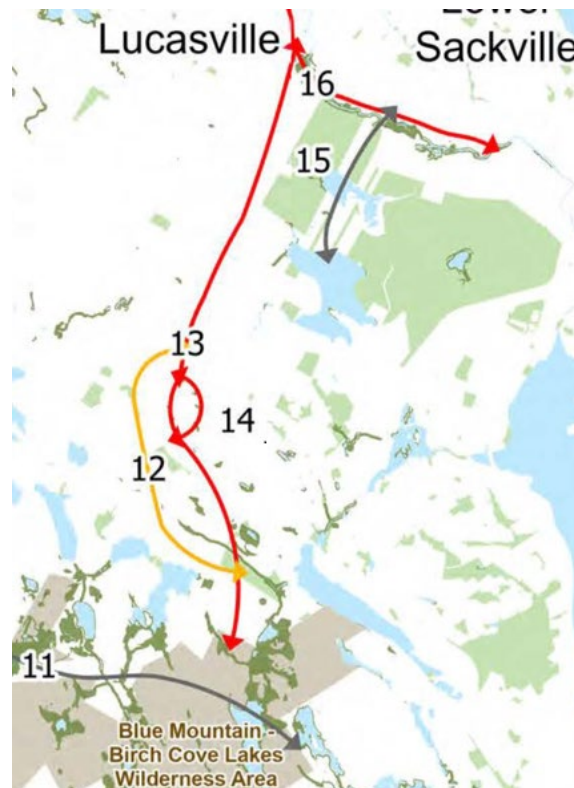
One thing in particular struck our team in one of our meetings with the Stantec team that is doing environmental studies on Sandy Lake area. One of the Doctors of Science with us asked a clear question about how it is that in so many instances the environmental studies get done and evidence of environmental value is clear and yet, in the end, development happens anyway. She asked what in the process causes that to happen when the evidence to the contrary appears so compelling.

We have been writing down examples, or some of the factors, as we observe them. We are sure there are others, but even addressing these would make a huge difference.

A big one came the week of October 1, 2023, see below, but a few other important observations will follow.

In the August 16, 2023 public meeting on the proposed development agreement for Bedford West's Subareas 12 & 1 some of us noticed no evidence of a plan to preserve the critical wildlife corridor there.

As background, see the following map and text from the draft Regional Plan:



Sandy Lake and Subarea 12 Essential Wildlife Corridor zoomed from Map 6 RP draft, June 2023

This text is from the draft RP and refers to the above map:

“6.3.1.2 PRESERVING NATURAL CORRIDORS Within the open space network, larger patches of wilderness are connected through undeveloped natural corridors which provide opportunities for wildlife to move, seek shelter, food, water, space and mates; all important components for maintaining healthy, diverse wildlife populations. However, human activity such as new development, natural resource extraction, highway and road construction, and removal of vegetation are increasingly threatening these critical connections. Without intervention, there is a risk of losing and disconnecting these corridors permanently. Therefore, it is critical to identify and implement a clear approach to protect natural corridors as the region grows. The HGNP was the initial step to begin conceptualizing the relationship between corridors and areas of high environmental value which were then further refined. The HGNP highlighted the connection between mainland Halifax and the Chebucto Peninsula as particularly under threat. By overlaying the HGNP essential corridors with land use and planning data, a high-level understanding of the interplay between wilderness and land use can be seen. Through this analysis, a pattern emerges, and highlights connections at the highest order as shown on Map 6 to identify varying levels of risk and the need for different levels of intervention. Three distinct corridor types are as described below:

1. Corridors At Risk (Essential Corridor Area 1) - Essential corridors present in areas that are not yet developed but are in pressure points and are at high risk of being lost. This is especially true to allow the movement of wildlife between the Chebucto Peninsula and Mainland Halifax. These types of corridors require immediate intervention.”



Subarea 12 section of corridor Clayton is not being required to contribute - further pinching the pinch point

This map shows that the developer has a corridor area it could be contributing, or be required to contribute. It may look smallish but is significant to the corridor width.

Corridor width is an important factor in wildlife using the corridor with facility, or at all. The Now-Essential-Corridor through this area is critical to preserve and even enhance. There had been a corresponding Important Corridor east of this one, but Clayton, the developer of that part of Bedford West, chose not to preserve it, as was explained to us by city staff. Stroller-parks were installed instead, effectively limiting any real wildlife movement, and causing this companion corridor through Subarea 12 to become an Essential Corridor.

From the map you can see most of the corridor is in the yet-to-be applied for Subarea 12 lands to the west, but the pinch point is made worse if Clayton doesn't contribute now.

Our team had discussed this and decided it is not fair to other landowners who do not have Clayton's deeper pockets to be left holding the bag. It makes sense if the developer responsible for the situation now, where we have one corridor left where there were so recently two, be included now in the saving of this remaining corridor. But also, we need a clear demonstration that the corridors are being taken seriously. However, it doesn't feel that way if at first chance a significant piece is compromised away. "Death by a thousand cuts".

At the August 16th public meeting the planners seemed surprised that we were not content that the proposed map protects 30-metre buffers along waterways. We pointed out that this is valuable too, but the buffers can't replace the terrestrial corridor.

Subsequently, two Coalition representatives met with a head HRM planner and planners on the Subarea 12&1 team and learned a few things:

1. Planners again seemed to believe we would be content with the bigger buffers of 30 metres. Our biologist team insisted that while the increased buffers are important, they do not substitute for a terrestrial corridor.
2. The planners don't feel they have the tools to implement the corridors.
3. Planners did go to the Regional Plan staff to ask for guidance on the corridor in 12&1 but the RP staff put it back on them to create a plan.
4. The Regional Plan is a high-level document with lots of language supporting corridors, but it does not provide the "how".
5. Planners said they get no training in "how"

Therefore, the biologist team provided guidance and ideas on the spot. Reportedly, the planners were excited to learn these things and asked for a letter right away since the development agreement is expected to be finalized soon. The letter containing ideas was delivered within days.

Then this week (October 4, 2023) came the staff reply that “HRM planners feel the bulk of the corridor is outside the Clayton development (lands beside Clayton) and will reconsider your comments in future”.

It appears that the corridors will be put off for a future discussion and decision. Who will be around to follow up on corridors when other landowners in Subareas 12&1 apply to develop? Some may not apply for years we were told. We already know that at least 2 who have applied are hitting barriers.

After years of work on this, our take from staff is that this corridor work is great in theory but not practical to actually do.

Really, that is not an adequate response from the city after years of studies and reports costing large amounts of money and time. There is always wiggle room to avoid action. Clayton is off the hook and the city is off the hook. A reason is chosen to avoid starting the corridor work now. The system is failing again.

What are some of the other factors/barriers?

- We see a great deal of finger-pointing. It is up to “others”.
- At the best of times, silos in the planning department mean information and important aspects simply don’t get moved into other parts of the process, or if they are moved, their importance may not be understood and seen as a priority.
- We request that wording in the Regional Plan be changed to make an equal playing field for nature protection, community issues, and such, along with development. We request that “may” or “shall be considered” be replaced with “shall” in order to prioritize nature protection and community issues rather than just development. See section C of our current letter/submission which refers to our comments on the draft RP for many examples of the need for this wording change.
- HRM is consulting the public on the draft plan and policies, but does not consult on the by-laws. Given all of these points outlined here, how can we know that this won’t result in more differences between intent and by-law outcomes?
- A meeting with the parks department uncovered another layer. Parks takes direction from the Regional Plan but action tends to be gradual, over time. They already have enough things they are working on and do not have the time, staff or budget to take on more. Regional Plan exercises are not so welcome because they cause more work. This puts action on natural decisions in jeopardy once again. We were told that changes are not automatic even when the Regional Plan says they are to be made real.
- The city doesn’t have a role in species at risk (SAR) protection

- The Sandy Lake-Sackville River Coalition and other groups have been requesting for several years that the city and the province change to 5 years the HRM Charter s.237(2) which currently provides that when privately owned land is zoned for future public use, it must be acquired within one year, or the designated alternative zoning will apply. This time frame for zoning land for future parkland and expecting one year to be sufficient to undertake the acquisition is not realistic, especially given the timing of budgets and the overall Regional Plan processes required.

For comparison's sake, s.239(2) of the Charter allows for a 5-year time frame for lands set aside as transportation reserve before the alternative zoning takes over. Park lands are harder to keep in their natural state and so protecting park land is even more of a challenge. This park zoning process could use a 5-year window as well. City staff have told us this would help them, but so far, we are getting no action from those who could make the change.

Yet, suddenly, on October 12th 2023 the Province presented Bill329 that is to change the Halifax Charter, and yet important charter changes such as this one are not in it.

Instead, the bill is designed to remove even more of the city's role in housing development and to give one person, Minister Lohr, the final say in everything related. This is an egregious overstep of immense proportions from all we have read in the bill. Citizens voted for municipal councillors to represent them and to carry out municipal responsibilities such as guiding and regulating housing. The city has 90 planning staff who work to get it right. It is an ever-evolving system that the city is genuinely working to improve. Nothing is perfect, mostly because factors keep changing in real life, but we look to the Province to work collaboratively to assist the city, rather than tossing the baby out with the bathwater.

It seems evident that the province has been given incorrect information and is trying to heavy-handedly solve a problem they don't know enough about. Even well-meaning developers are in business, and even the best ones can only take altruism so far. The province needs to recognize soon that their methods are making things worse, not better.

- That the province has taken over is now added a huge excuse to that finger-pointing and to communication challenges. Planners voice there is huge pressure from the province and developers to develop. Who is their boss? The province is in charge.
- Councillors have responsibility to keep speaking up for their constituents and the city's goals and practices, but how can they when the province is telling them very little or nothing about plans for the councillors' areas? There is fear of what the province might do if there is too much push-back.

- The province has really one priority and very little real knowledge of the subtleties of the development process.
- About Sandy Lake specifically, the Provincial Housing Task Force minutes, and from what we learn in meetings, was getting frequent up-dates from city staff (and Stantec) on the progress of development studies at Sandy Lake, at least until the Task Force stopped meeting in July 2023. Yet, councillors tell us they could get no corresponding updates from staff or Stantec due to a provincial non-disclosure order that prevents communication with the city about what is presented to the Task Force. This is a huge mistake on so many levels. Secrecy causes reasonable people to suspect wrong-doing. Why would the province invite that? The city is the body that knows the needs of the city and its people and how development needs to be shaped. The city should be involved in all of this. These city staff have been placed in yet another silo at a time when we need to break down silos.
- The province's "develop at all costs" approach is a damaging priority, the mistakes from which we will be forced to live with for a very long time.

We are sure that you have other examples. We include this account of recent events as an important part of our feedback to the draft Regional Plan. Why do all of this work, years of studies and reports, including Council's motions and amendments, if timely implementation is unlikely? Fixing this process must be a priority for making use of the Priority Plans.

- **We start with a strong recommendation that all city planners receive training in biology, ecology and the "how and why".**

Please consider these comments and requests in the way they are intended – with good will to make the process work better for all. Each of the items needs solving, and the Regional Plan can direct such changes and lead the implementation.

- Sandy Lake-Sackville River Regional Park Coalition

APPENDIX 2

A Collection of Studies done in the Sandy Lake, Bedford, Area 1971-2023

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.

1986, Sandy Lake Park Master Plan

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., Nova Scotia 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, AECOM Sandy Lake Watershed Report

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.

2017 & 2018 breeding seasons, *Species of interest to Federal and Provincial conservation bodies observed on surveys conducted on the lake areas of the proposed Sandy Lake-Sackville River Regional Park lands*, by Clarence Stevens. www.sandylake.org

2017 - ongoing, *Compiled Species List for Sandy Lake and Environs*, <http://sandylake.org/research/>

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

2018, August 14, *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.

2018, 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 - ongoing, Water quality testing, deep lake readings and surface waters, including tributaries.

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*.

<http://sandylake.org/sandy-lake-sackville-river-regional-park-2020-planning-study-2/>

2020, March, *Avian and Species at Risk Surveys of the proposed Sandy Lake-Sackville River Regional Park*, Natural Wonders Consulting Firm: <http://sandylake.org/avian-and-species-at-risk/>

2020-2021, Ducks Unlimited Canada WESP Reports: <https://sandylake.org/ducks-unlimited-wetland-assessment-report/> Marsh Lake was designated a 2021 Treasured Wetland by Ducks Unlimited Canada and the NS Departments of Environment and Climate Change and Natural Resources and Renewables:

<https://storymaps.arcgis.com/stories/4274e1c1ec584850b613e5c856b0eef0>

2021, Wildlife Corridor Landscape Design Charrette, Chebucto-Timberlea-Sandy Lake area of Halifax, Nova Scotia Crown Share and Legacy Trust. <http://sandylake.org/wp-content/uploads/2021/04/WildlifeCorridorCharretteReport.pdf>

Incorporating Corridor Charette in HGNP April 5 2022:

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220405rc1531.pdf>

2021, A Tale of Two Lakes: Lake Mixing, by Mimi O'Handley, Wetlands and Water Officer at the Ecology Action Centre: https://11722e7d-8c8c-4838-969e-bee1181ed9f8.filesusr.com/ugd/66e517_ba066d91cdbe47f887d1b3028ed57e6e.pdf?index=true

2022 Bluegreen algae incident and test:

<http://versicolor.ca/sandylakebedford/2022/06/28/blue-green-algae-warning-for-sandy-lake-bedford-28jun2022/> (*Sandy Lake now has on record 2 instances of algae blooms in recent*

years. Fortunately, neither was of a toxic BG variety, but we must walk back the damage being done to the lake so this trend will not continue.)

2022, July, Sandy Lake Ecological Features Assessment, McCallum:
<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf>

2022, July, Council's amendment motion to the MacCallum report, re: buffers and corridors (p.11-12):
<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc-mins.pdf>

2023, March "Deep water oxygen levels in Sandy Lake fall to precariously low levels" D. Patriquin: <http://versicolor.ca/sandylakebedford/2023/03/21/deep-water-oxygen-levels-in-sandy-lake-bedford-ns-fall-to-precariouly-low-levels-19mar2023-19mar2023/>
Also updated: <http://versicolor.ca/sandylakebedford/waters/lakes/sl-report-more-details/critique-of-predictions-lack-of-follow-up/>

2023, Sandy Lake (Bedford, NS) limnological profiles reveal freshening and oxygenation of the water column after extreme rain events; and a worrisome "Metalimnion Oxygen Minimum"
2Sep2023: <http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-ns-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>

(2016 - ongoing, *Forests and Surface Waters of Sandy Lake & Environs (Bedford, Nova Scotia): Studies and surveys of the Sandy Lake - Sackville River Regional Park 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." <http://www.versicolor.ca/sandylakebedford>)

APPENDIX 3

Links to important documents re: Sandy Lake – Sackville River area

September 30, 2023

Dropbox containing documents: <https://www.dropbox.com/sh/w7qf00zpuppp5t2/AAA8udBcNXhfw-uSpKBQU4F8a?dl=0>

Two videos:

Ducks Unlimited Marsh Lake video 2022:

<https://www.facebook.com/AisforAdventure/videos/150950111235044/>

Sandy Lake drone video: <https://www.youtube.com/watch?v=ZJwTLIYIbZg>

SL-SRRPCoalition two RP+10 Submissions: <https://www.sandylakecoalition.ca/rpsubmission>

Sept 2023: **Sandy Lake (Bedford, NS) limnological profiles reveal freshening and oxygenation of the water column after extreme rain events; and a worrisome “Metalimnion Oxygen Minimum”:**

<http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-ns-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>

June 2023 **“Deep water oxygen levels in Sandy Lake fall to precariously low levels”:**

<http://versicolor.ca/sandylakebedford/2023/03/21/deep-water-oxygen-levels-in-sandy-lake-bedford-ns-fall-to-precariouly-low-levels-19mar2023-19mar2023/>

also:

<http://versicolor.ca/sandylakebedford/waters/lakes/sl-report-more-details/critique-of-predictions-lack-of-follow-up/>

Versicolor, **Sandy Lake re:2023 flood and Subarea 12 & 1**

[Regarding Case 23307 – Bedford West subareas 12 & 1 Special Planning Area 25Jul2023 | Forests and surface waters of Sandy Lake & Environs \(Bedford, Nova Scotia\)](#)

Marshes, corridor to BMBCL, and significant habitat in Bedford West Subarea 12, south of Hammonds

Plains Road: <http://versicolor.ca/sandylakebedford/lakes/ec-ph/more-monitoring/south-of-hprd/>

Summary of A Report on the State of Sandy Lake February 23, 2021:

<http://versicolor.ca/sandylakebedford/waters/lakes/sl-report-summary/>

A Report On the State of Sandy Lake, the Historical Trends and its Future Trajectory, posted at:

<http://versicolor.ca/sandylakebedford/waters/lakes/>

Versicolor **Sandy Lake: Blue-green Algae scares at Sandy Lake:**

<http://versicolor.ca/sandylakebedford/2023/03/21/deep-water-oxygen-levels-in-sandy-lake-bedford-ns-fall-to-precariouly-low-levels-19mar2023-19mar2023/#followup>

(Sandy Lake now has on record 1 instance of an algae blooms in recent years. Fortunately, it was not of a toxic variety, but we must walk back the damage being done to the lake so this trend will not continue.)

Dr. David Patriquin's Sandy Lake and environs website: <http://www.versicolor.ca/sandylakebedford>

Putting Economic value on wild land:

<https://www.novascotia.ca/parksandprotectedareas/docs/archibald-lake-proposal.pdf>

and CBC: <https://tinyurl.com/2wx624wb>

Sandy Lake Ecological Features Assessment, (McCallum Report), 2022:

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

Council's amendment motion to the MacCallum report, July 12, 2022

re: buffers, forests, and corridors (p.11-12):

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

Nova Scotia Crown Share and Legacy Trust Wildlife Corridor Charette Report: <http://sandylake.org/wp-content/uploads/2021/04/WildlifeCorridorCharretteReport.pdf>

Council incorporates the Corridor Charette in the Halifax Green Network Plan, April 5 2022

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220405rc1531.pdf>

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

(Our physical submission has a short paper on how Sandy Lake-Sackville River fits within the HGNP)

Council amends the Regional Municipal Planning Strategy Conservation Design Developments section to include Map 5, Green Network Ecology Map, contained in the Halifax Green Network Plan:

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/190813rc1512.pdf>

Council Amends Regional Plan Oct 11 2022 to ensure Integrated Mobility Plan, Halifax Green Network Plan, HalifACT, and Halifax's Inclusive Economic Strategy 2022-2027 are included in development decisions

The minutes of the Council meeting where the amendments were passed, October 11, 2023:

<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/221011rc-mins.pdf> See

9.6.A PRIORITIES PLANS, G-14A, and G-9A

Sandy Lake Park Planning Study: <http://sandylake.org/sandy-lake-sackville-river-regional-park-2020-planning-study-2/> *(This was made by a professional city parks planner to help guide the process of expanding Sandy Lake's protective boundary.)*

Natural Wonders Avian Species report: <http://sandylake.org/avian-and-species-at-risk/>

(The number of Species at Risk has increased since this report. Now there are 16 confirmed and at least 24 Species of Interest. See the summary document included with this package. Note that this report found evidence of Mainland Moose in the area, and DNRR considers it Mainland Moose habitat.)

Summary of Natural Wonders Avian Species corridors section:

<http://versicolor.ca/sandylakebedford/species-lists/avian-sar-report/wildlife-corridors/>

Ducks Unlimited Canada WESP Reports: <https://sandylake.org/ducks-unlimited-wetland-assessment-report/>

Marsh Lake, 2021 Treasured Wetland, designated by Ducks Unlimited Canada and the NS Departments of Environment and Climate Change and Natural Resources and Renewables:

<https://storymaps.arcgis.com/stories/4274e1c1ec584850b613e5c856b0eef0>

Ducks Unlimited article on healthy/sick lakes: <https://www.ducks.ca/healthy-lakes/>

Sackville River Floodplains study phase 2:

https://www.halifax.ca/sites/default/files/documents/business/planning-development/FinalReport.SRFS_Phase2_12April2017.pdf

We are requesting that a floodplain study be added that examines the Sandy Lake subwatershed of the Sackville River be done prior to any decision about whether to develop or not at Sandy Lake.

Flood Risk Assessment Study:

<https://www.halifax.ca/sites/default/files/documents/city-hall/boards-committees-commissions/180613rwab1011.pdf>

(Our group is concerned about the wetland that floods at the base of Bluewater Road, where it intersects with Hammonds Plains Road. We are actively seeking information. So far, two things are of concern. One is that some at City Hall are encouraging the development at Sandy Lake in order to have the developer pay for half the cost of upgrading the section of Hammonds Plains Road between Larry Uteck and Gary Martin Drive, which contains the wetland in question. If so, this amounts to trading the welfare of a valuable park for 50% of a road upgrade, and this is not acceptable to us. Two is that the Bluewater Road wetland may not be seen as a wetland. It seems to be “a flooding problem” to be solved, possibly by raising the road by 4 feet and adding culverts. We are looking for confirmation that it is being seen as, and protected as, a wetland important to the Sandy Lake watershed.)

Photos/video of some marshes etc of Sandy Lake area: <http://versicolor.ca/sandylakebedford/photo-albums/> and <http://versicolor.ca/sandylakebedford/videos/>

EAC Interactive layer map: <https://ecologyaction.ca/map-hrm-special-planning-areas>

Notice how you can turn on and off layers that show predicted wildlife corridors in HRM.

The LiDAR Topographic and Topo-Bathymetric Data is available on the HRM Open Data Portal at:

<https://www.halifax.ca/home/open-data/open-data-files#LiDAR>

Jack Lake Environmental report 1986: <https://sandylake.org/1986-jack-lake-environmental-evaluation-final-report-2/>

A Tale of Two Lakes: Lake Mixing, by Mimi O'Handley, Wetlands and Water Officer at the Ecology Action Centre, compares Sandy Lake and Oathill Lake, 2021: <https://tinyurl.com/5x2xzbpt>

The city had these two reports below posted together for several years. We are not sure where they are currently on their website:

2014 AECOM report: <http://sandylake.org/sandy-lake-watershed-study-final-report-aecom-2014/>

SL-SRRPC Response: <http://sandylake.org/response-of-dr-hansen-and-sandy-lake-conservation-association-slca-to-sandy-lake-watershed-study-final-report/>

It is important that decisions about Sandy Lake Special Planning Area do not use this AECOM report. Also see:

<http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-ns-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>

Why Regional Plans are important plus SL-SRRP links:

<http://versicolor.ca/sandylakebedford/2020/05/01/the-case-for-sandy-lake-sackville-river-regional-park-goes-to-halifax-rp10/>

iNaturalist projects for the area (species observations):

<https://inaturalist.ca/projects/flora-and-fauna-of-sandy-lake-bedford-ns-environs>

<https://inaturalist.ca/projects/twns-bioblitz-2021-marsh-lake>

eBird Hotspot for Sandy Lake Park: <https://ebird.org/hotspot/L7735676>

ESSC presentation June 3, 2021, Karen McKendry re EAC report on Themes & Directions from a parks & biodiversity perspective. comments start at 1:48:35: <https://www.youtube.com/watch?v=X1lQpTdger4>

Why Protect 1800 acres more at Sandy Lake:

#1 Why Protect 1800 acres at SL-SRRP: <http://sandylake.org/why-protect-1800-acres-at-sl-srrp/>

#2 Combined - WHY 1800 plus In a Nutshell Why: <http://sandylake.org/in-a-nutshell-why-we-need-to-protect-lands-on-sandy-lake/>

#3 Why Dr. Dean said Sandy Lake-Sackville River important to preserve, 1971: <http://sandylake.org/why-dr-dean-said-sandy-lake-sackville-river-is-important-to-preserve-1971/>

#4 Excerpts from 2015 160-acre acquisition report: 2015 acquisition of 150 acres west of Sandy/Marsh Lakes: <http://legacycontent.halifax.ca/council/agendasc/documents/151006ca81i.pdf>

p 3 "Suitability for parkland" lists the values for protecting the 150 acres. *The document's authors informed the Coalition that these same values also apply to why the rest of the lands west of Sandy and Marsh Lakes should also be protected as park.*

Budget speech, April 4 2023, Environment Minister Halman addresses the environment portion of the budget: https://www.youtube.com/watch?v=11rByb6t_U

Of note: in this speech the Minister repeatedly frames getting into nature as important for people's health, including mental health. "A healthy environment equals healthy people." The province is going to protect more land and water.

(Go to 2:34:57 to hear a shout out to coalition co-chair Walter Regan.)

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HRM video of Mayor Savage: <https://www.halifax.ca/about-halifax/energy-environment/halifac-2050-acting-climate-together/featured-projects> around minute 2:15 Mr. Mayor said in reference to addressing climate change: 'We are accepting our responsibility. There is always a reason not to do the right thing. But we have to do the right thing. I am proud of the fact that Halifax is.'

SL-SRRPC Letter to MLAs about Special Planning Area, Sandy Lake, March 15 2023:

<http://sandylake.org/wp-content/uploads/2023/02/Sandy-Lake-Special-Planning-Area-letter-to-MLAs-15Feb2023.pdf> *(This letter went to all MLAs in Nova Scotia to make them aware of the situation at Sandy Lake and that they may be needed to help preserve the area. It is also a good reference document about the area.)*

Brownfields report HRM, 2002:

<https://www.dropbox.com/sh/236g71ydn1acfv7/AACvt8HPMDMy81UY2x9wbFzYa?dl=0>

(This is an older document. We trust the city and province have current maps of brownfields that could be developed instead of developing at Sandy Lake, which is a valuable greenfield.)

The natural services supplied by new trees are far outweighed by that of mature trees. *The economic benefits to protecting nature far outweigh the benefits of exploiting it.* <https://phys.org/news/2021-03-economic-benefits-nature-outweigh-exploiting.html>

Protection of freshwater: <https://www.anthropocenemagazine.org/2020/11/focus-on-freshwater-conservation-and-land-gets-swept-along-for-the-ride/?fbclid=IwAR3udGi4xe1KH15e2ytMZqPVgtOpwwJ-UyG2S8sW08lQsk0EfV-U4uOonbM>

At least two local schools, Sandy Lake Academy and CP Allen High School, have lessons, walks, and activities in and around this park. The Cheetahs for Change (one of our Coalition groups) is learning from the Turtle Patrol (another of our Coalition groups) about turtles, which are still very present in this park. Two other coalition groups, the Sackville Rivers Association and EAC are planning walks and water testing classes with the students. These students are the scientists of the future and need this rich natural area to be kept intact and functioning for them and future generations.

APPENDIX 4

Quotes from Studies and Reports: The Sandy Lake area is identified as a unique natural area worth protecting

September 2023

- **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 probably the 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.”*
- **2018 - 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.”*
<http://www.versicolor.ca/sandylakebedford>
- **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
- **Sandy Lake Ecological Features Assessment, McCallum, 2022:**
<https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf>

“The Study Area boundaries were provided by the Proponent and include 1,700 hectares of municipal and private land in Bedford, NS. The Study Area is bordered by Highway 101 to the north, Highway 102 to the east, Hammonds Plains Road to the south, and Gatehouse Run/ Viscount Run to the west (Figure 1). The Halifax Green Network Plan (HGNP) identifies important habitat and primary corridors within this area that connect green spaces on the Chebucto Peninsula to those of mainland Nova Scotia.” P. 4

“Important Corridors Layer
The Important corridors layer from the Halifax Green Network Plan overlaid with and adjusted to include other corridors that are mentioned in the available documents (Natural Wonders 2020, NSCSLLT 2021), Natural Wonder). This map shows both aquatic and terrestrial connectivity on the landscape. Between Sandy Lake and the regen sites west of the lake is a very important corridor, connecting to a major North-South corridor through the park (Natural Wonders 2020). This corridor has an average width of 100 m, which is considered to be the minimum corridor width required by many species (Natural Wonders 2020, NSCSLLT 2021). The Sackville River has also been identified as an important aquatic corridor (Natural Wonders 2020, NSCSLLT 2021).” P.24
- **Sandy Lake (Bedford, NS) limnological profiles reveal freshening and oxygenation of the water column after extreme rain events; and a worrisome “Metalimnion Oxygen Minimum”**
2Sep2023: <http://versicolor.ca/sandylakebedford/2023/09/02/sandy-lake-bedford-n-s-limnological-profiles-reveal-freshening-and-oxygenation-of-the-water-column-after-extreme-rain-events-and-a-worrisome-metalimnion-oxygen-minimum-2sep2023/>
“AECOM (2014) ... recommended “a robust water quality monitoring plan...for the Sandy Lake watershed to provide a further assessment of current conditions and to evaluate the impacts of development on the water quality.” (Italics inserted) *Such monitoring was not subsequently implemented by HRM, which nonetheless continued to plan for a major development;* more recently the provincial Task Force on Housing in HRM has named the land West of Sandy Lake a “[Special Planning Area](#)” to be fast tracked for development. In other words, such planning is proceeding on the unproven and very uncertain assumption that new development could proceed without serious impacts of the recreational and ecological well-being of Sandy Lake.”

APPENDIX 5

Note: the McCallum boundary study added a rare lichen, The Blue Felt Lichen, to the rare and endangered species list at Sandy Lake, bringing the known total to 16, grand total 24 depending on the list used. <https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220712rc15110.pdf>

Summary of Natural Wonders Avian Species Report

<http://versicolor.ca/sandylakebedford/species-lists/avian-sar-report/>

In March 2020, the Natural Wonders Consulting Firm (NWCF) reported on Avian & Species at Risk Surveys of the proposed Sandy Lake – Sackville River Regional Park.

There were an astounding 11 habitats identified within the proposed park.

Data drawn from the Report:

- 117 species of birds visit or reside year-around or seasonally within the SR-SRRP
- 99 bird species nest within the SR-SRRP
- **15 are avian species of “Species of Concern”**
- Of those 15, **7 are classified as “Species-At-Risk”** and are protected under the Nova Scotia Endangered Species Act

The NWCF Report also documents **6 non-avian Species-At-Risk** in the SL-SRRP, these being the

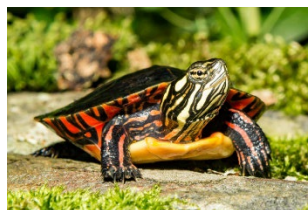
- Monarch Butterfly
- Little Brown Myotis (Bat)
- Moose (Mainland Population)
- Common Snapping Turtle
- Eastern Painted Turtle
- Wood Turtle

Two Species present but not cited as they are aquatic and outside of the NWCF study scope are

- Atlantic Salmon
- American Eel

In summary, the proposed park has **11 habitats**, at least **15 avian and non-avian Species-At-Risk** on **Federal and Provincial lists (total: 15 + 6 + 2 = 23, plus Blue Felt Lichen = 24)** along with an amazing number of old growth forest stands, part of the less than 1% still remaining in the province.

Dr. Patriquin asks, “Is there any other equivalent area in HRM?”



APPENDIX 6

Conversations With Retired City Planners about Sandy Lake-Sackville River – 2019 to 2023....retirement brings an ability to speak freely.

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. *(2023 note: this was the McCallum Report of 2022)*

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.

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.**

In conducting the special analysis to determine the proper boundary of the park, understand 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.

We'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 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.

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 component.

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.

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. What is left, sometimes just stepping stone corridors, is 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. Protect 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 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.

More development upstream equals more flooding downstream. Already properties are of lower value in the Bedford floodplain and little Sackville River. The 2017 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 300-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.

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

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.

The 2015 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 they know it or not, this is why. It was not to please residents' views. It was for the ecological system.**

People kill lakes. The City has a responsibility not only to protect, but to enhance, all elements of the quality of the park. Then the city can then say to the public 'Yes we did everything possible to protect Sandy Lake Park, the Sandy Lake system including Sackville River and all the critical components of the park'.

For the last 50 years Sandy Lake watershed was recognised by planners for significant environmental value, especially to Bedford/Sackville communities, but beyond as well. This should be reflected in the current planning process. The boundary of the park should be determined by the watershed, not by the roads.

We have a crisis if we don't protect Sandy Lake's water quality and Marsh Lake's Water quality. Protecting the water quality has to be paramount. Because all of the habitats and natural features that we know are here rely very much on good water quality in those bodies, and all the way to the Sackville River.

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 will help the municipality deliver something it can't deliver otherwise.**

APPENDIX 7

Brief Backstory, Sandy Lake-Sackville River Regional Park

The Sandy Lake-Sackville River area has been recognized for nearly five decades, provincially, municipally and locally, and in multiple reports and studies, to be a special landscape worth protecting, complementing not replicating other major natural assets of Halifax.

The area between Hammonds Plains Road and the Sackville River, which includes the tributaries into the system, Sandy Lake, Marsh Lake, and a substantial portion of the Sackville River was chosen by Federal biologists in 1971 as a unique and valuable ecosystem to preserve for all time. That has not changed. If anything, the area is even more valuable today, given the twin crises of Climate Change and Biodiversity Loss that need all hands on deck.

Despite some setbacks, including a rezoning of a huge area of the former park land to future development that was done in 1982 without the advice of biologists, deliberate actions by community, municipalities, the province, and others have preserved for many decades the valuable old growth forest, habitats, wildlife corridors, and integrated ecosystem, and thus set these lands and waters up to still be uniquely worth reacquiring for park protection.

About 1,000 acres are currently zoned Regional Park. Informed citizens request that the city acquire the requested 1,800 acres, including developer's lands, in order to protect the long-known-about valuable ecological unit that is the main topic of this submission, the Sandy Lake-Sackville River Regional Park (SL-SRRP).

Traditional ways of looking at undeveloped land assume that it is not “doing anything useful” until it is developed. New research, especially in the face of Climate Change is determining ecosystem values of wild land. See

<https://www.novascotia.ca/parksandprotectedareas/docs/archibald-lake-proposal.pdf> and CBC: <https://tinyurl.com/2wx624wb> “...a 2013 assessment by Global Forest Watch Canada that said Nova Scotia's protected areas have an average annual value of \$5,827 per hectare for ecosystem services of the system (annually). A subsequent report from 2017 by TD Bank Group and Nature Conservancy of Canada pegged the value of ecosystem services of the Long Tusk Lake lands at a minimum of \$26,250 per hectare annually.”

We must all work together to ensure that this valuable environmental area at Sandy Lake-Sackville River doesn't instead find itself used to address a different crisis that is less relevant to this area, that is, the housing crisis. There are better places to put the needed housing.

In 2021 – 2023 the province took over both of the special planning areas in the Sandy Lake subwatershed, the Sandy Lake SPA and Subareas 12&1 SPA. We all must bravely and deliberately work to educate the Province about values they apparently are not yet seeing.

APPENDIX 8

COMMUNITY BASED WILDERNESS STEWARDSHIP

Approved December 2nd, 2020

Version updated January 26, 2021

*This document is a proposal to HRM to create an Office of Community Stewardship (CBWS) to support the Halifax Green Network Plan (HGPN). The proposal has the objective of fostering ecologically sensitive recreational use of the public open spaces that are integral to the HRM Regional Plan now under review in 2020-2022. The **Executive Summary** is at the end (p. 7).*

Protected Wilderness Areas, Nature Reserves, Parks, and Open Space in HRM

Thanks to the Province and thousands of dedicated citizens, HRM as of 2015 enjoys 14 wilderness areas protected under the 1998 Wilderness Areas Protection Act. They comprise approximately 15% of open space in HRM. If we add the 12 nature reserves, 36 provincial parks, and 6 major municipal parks, and other open space, approximately 84% of HRM was open space as 2015.¹ These natural assets have immense positive implications for the vitality of our flora and fauna, the general health of our ecosystems, the physical and mental health of our citizens, the ability of HRM to attract more tourists and investment in our green economy, and the capacity of the Province to meet its goals in mitigating the impact of climate change.

The Paradox of Success in Achieving Wilderness Protection

Wrapped up in this good news, but no longer hidden from us, are bad news and a paradox that cries out for resolution. To make a complex message plain and simple, consider a clear example of how good news has paradoxically become bad news. In 1995 citizens concerned to protect from development the unspoiled barrens and moose habitat on the west side of the Chebucto Peninsula created the Woodens River Watershed Environmental Organization (WRWEO) to act as a steward of the important watershed at its core. Because there were no roads or even marked trails in the extensive wilderness in and around the watershed, the public was mostly unaware of this natural treasure just a few minutes bus ride to the west of Halifax.

To encourage public support for the legal protection of this wilderness, WRWEO constructed **The Bluff Wilderness Hiking Trail** to acquaint the public with the astonishingly beautiful ecologically sensitive barrens around the trail. The trail was completed in 2005 under a letter of authority from the Nova Scotia Department of Lands and Forestry. The hiking trail achieved its purpose, drawing the enthusiastic support of more than 30 community groups and businesses. In October 25, 2011, the Province declared the wilderness around the trail to be protected. It comprises almost 10,000 hectares of lands, lakes, and

¹ For a summary of these facts and a map that was current in 2014/15, see: <http://wildlandns.ca/docs/sharing/PPA.html>.

streams and is home to rare species such as the mountain sandwort and to broom crowberry that is uncommon outside this region. However, as a direct result of its popularity—the trail had been declared by a well-known outdoor magazine to be one of the eight best urban escapes in Canada—the trail began to deteriorate through overuse and misuse.² The paradox is that The Bluff Trail—a key means to achieving protection of a healthy, health-creating wilderness—had become a key means to the gradual destruction of what it was designed to protect.³

Long-Term Community-Based Resolution

A natural response to this dilemma is to imagine that it is possible to close the trail to the public for a period of recovery, but this idea is not promising for several good reasons. First, closing the trail denies to the public the vital health benefits of being able to have easy access to the wilderness and makes Halifax a much less attractive place of destination and residence. Similar problems arise for other natural open spaces close to the urban core. Are they to be closed to the public too? Furthermore, it is not really possible to close these natural spaces, since the Province lacks the resources to enforce the lockout, and if it did the social consequences could be extremely negative. Lastly and most important, closing the trail would postpone the continuation of the problem rather than resolving it. Strictly enforcing the rules would not result in changes in the mindset that generates the bad behavior. The behavior would return as soon as the trail was reopened or the threat of being caught diminished. Neither lockdown nor strict enforcement nor both together is a sustainable solution.

Fortunately, there is a clear and tested way forward to resolving the paradox. The answer is to formulate principles and practices for stewardship of natural areas in HRM and to engage the public in their use. The community would learn through engagement with trail stewards how to have minimal impact on the trail tread and surrounding wildlife. This learning would come through a stewardship program of the kind described in the document cited in footnote 3. In this community-based program a Stewardship coordinator trains volunteers how to exert minimal impact, such as practicing Leave-No-Trace (LNT) camping, which can include using a fire bowl to make a small fire for cooking instead of an open fire, avoiding trail braiding, refraining from cutting trees and leaving trash, and avoiding disturbance of wildlife habitat (by, for example, having dogs on leash). These volunteers or “trail stewards” are trained how to remediate damage to the trail and how to engage other trail users in a friendly and cooperative manner to convey positive habits and attitudes, thereby creating incrementally through many such encounters new trail stewards who will educate others in turn even without

² Evidence of issues in 2016 can be seen at: <http://versicolor.ca/docs/BluffTrailHike2016.pdf>

³ For an exposition of the problem and solution see BTSP funding request to NSE:

https://drive.google.com/file/d/0B4hch_IZZfoQUElqUnhsUTJPRmZxZ2xUQk9wdmI0bkNrUTBI/view?usp=sharing

intending to do so. The community of trail users has in effect created a larger community of wilderness stewards from the ground up. The stewardship training would be community driven, community organized, and done voluntarily by those who hike, canoe, camp, bird watch, fish and hunt, and immerse themselves in the beauty and natural energy around them.

Is this a pipe dream? Are there any stats to support the effectiveness of this kind of program? The answer is positive and detailed in the Lancaster report of the last WRWEO AGM on July 7, 2020.⁴ The report compares trends for numerous variables during the past three years. Trends are positive from 2017-2020, involving the work of over 100 stewards trained to look after the trail, engage the users of the trails, and report problems as well as positive outcomes. This strategy is endorsed by Nova Scotia Department of Environment (NSE) and appears to be a positive, long-term, sustainable solution.⁵

The Community Stewardship program, undertaken by WRWEO in collaboration with the St. Margaret's Bay Stewardship Association (SMBSA), not only appears to be successful as a means of preserving sustainable public access to ecologically sensitive lands of the Five Bridge Lakes Wilderness Area (FBLWA), but also appears to be a likely means to address the problems of a similar kind that arise in adjacent wilderness areas surrounding Halifax whether they are protected or are simply open areas of natural beauty. The protected areas are Blue Mountain Birch Cove Lakes Wilderness Area (BMBCLWA), the Waverley-Salmon River Long Lake Wilderness Area (WSRLLWA), and the Terence Bay Wilderness Area (TBWA). Other key areas are the wilderness lands supported by the Backlands Coalition, the Sandy Lake wilderness lands adjacent to WSRLLWA, the Ingram River wilderness area that citizens have proposed for protection, and the islands managed by SMBSA.

How Do We Define Community Stewardship? What Is Its Goal?

Drawing on Merriam Webster Dictionary, stewardship may be defined as the careful and responsible management of something entrusted to one's care. If we now apply this definition to the case at hand, we can say that the Office of Community Stewardship will seek to ensure the careful and responsible management of green spaces and wilderness areas in HRM. How will this goal be achieved? The means to achieve this goal would include: development of plans, guidelines, and strategies to reach this goal; recruitment and training of Volunteer Stewards; a presence, as constant as possible, of these trained stewards in the areas subject to the most use, including green spaces and wilderness areas in HRM that have trails; and a coordinated effort by these stewards to engage, inform, and support the hikers, campers, and others who use these lands so that they can join in our effort to become better stewards of nature.

⁴ [Bluff Trail Stewardship Program, Year In Review Report, 2019](#)

⁵ Fire pit rings remain a serious concern: 53 were remediated in 2017, 12 in 2018, and 20 in 2019. The practice of camping with open fires is deeply engrained in our culture and only sustained stewardship over the long term will eliminate it.

Through their engagement with these persons, Volunteer Stewards would endeavour to decrease the impact of human harms on the green spaces and wilderness areas in HRM; improve Leave-No-Trace (LNT) practices among all users; enhance sustainability of the green spaces and wilderness areas in HRM and the wildlife that live in them; and ensure the implementation of the best possible stewardship practices in these spaces.

Is Community Stewardship Right for All Managed Natural Areas?

Since the approach is community based, it is not the place of WRWEO to speak for communities that are supporting other nearby wilderness areas. They must speak for themselves. Moreover, there are many more resources and experiences that can be drawn upon. We note for example that the Sackville River Association has gained related experience and a high degree of success in its efforts over many years to engage the public in restoration of the Sackville River system.

We suggest that there is already significant empirical evidence that this approach is workable provided that it remains a ground-up, community-centered effort that is endorsed by the community. As such, the cost of the approach will be affordable since the effort comes primarily from volunteers who are committed to preserving through ecological stewardship natural wildlife areas and the wildlife corridors that link them, whatever their current status and use.

Stewardship and Trail Maintenance

The Province and Municipality are already engaged in community stewardship through supporting the Halifax Regional Trails Association (HRTA). HRTA is an organization that has representatives from over 25 community trails groups that have created and maintained trails within HRM. Obviously, building and maintaining trails in environmentally sustainable ways, as is one of HRTA's key objectives stated in their website, entails stewardship of the land.

The present community stewardship proposal, however, envisions a much broader conception of stewardship of land. The public use of wild areas includes more than hiking on trails. Many people hike and camp off trails and their negative impact on the land can be significant, for example, if lack of good practices causes a forest fire. It is critical that community stewardship extends well beyond trail maintenance and includes the inculcation of ecologically respectful treatment of nature on and off trails. An Office of Community Stewardship would need to coordinate with and be able to support the objectives of HRTA but at the same time would have a broader mandate that would cover all wilderness areas, nature reserves, parks, and open spaces that can be negatively impacted by human use.

Monetary Support

That said, in contemplating the creation of the OCS, there are two kinds of monetary support that are important. A knowledgeable, experienced Stewardship Coordinator who is especially competent in communication and leadership should be retained by salary (we suggest that a salary of at least \$50,000 would be appropriate if he or she is covering more than one area managed by a community group).

There needs also to be at least two assistants to work with the Stewardship Coordinator (2 x \$25,000) and money to pay students during the summer to help in the stewardship training. As detailed in the report in footnote 4, The Canada Summer Jobs Program yielded \$18,572 in 2019 for work in BTSP. If a similar amount were raised for wilderness areas stewardship programs, the total would be almost \$120,000.

This money would be budgeted independently of money now provided for HRTA groups. One would not detract from the other. The sources of funding for OCS and HRTA groups would be separate, though the stewardship work would be complementary.

The breakdown of sources of OCS funding might be divided as follows: Federal green initiative funding: \$30,000; Provincial funding: Environment, Tourism, Health and Wellness, each \$10,000 = total \$30,000; HRM: Parks and Recreation \$60,000 with half from Active Transportation; Volunteer Contributions In Kind: 6 groups (in a pilot project) at \$20,000 each. Government (Federal, Provincial, and Municipal) total contribution: \$120,000. Volunteer total contribution: \$120,000.

The details need to be worked out but *costs are minimal in consideration of what is at stake*. Many millions of dollars are generated each year through commercial ecosystem services, the attraction not only of tourists but of innovative, young immigrants that are looking for a global, progressive city, as evidenced in the report by Gardner Pinfold, commissioned by the Province.⁶ These attractions are under threat and likely severely diminished if proper stewardship is not enacted. It is absolutely vital that funds be provided for an Office of Community Stewardship that are both sufficient and reliable throughout the term of the pilot project.

We would suggest that no more than four to seven natural areas around Halifax be included in a pilot program for three years. If the results are as positive as reported in the review for FBLWA for 2017-19 (see footnote 4), the Community Stewardship (CS) program could be extended to all natural areas in

6

https://novascotia.ca/nse/protectedareas/docs/NS_Protected_Areas_Commercial_Benefits_Final_Report.pdf (note continued on next page)

Commercial Benefits of Nova Scotia's Protected Areas

- Exploring opportunities to develop non-motorized moose hunt in other protected areas in the province.
- Promoting health-related benefits of protected area use.

novascotia.ca

HRM that are in need of the program and OCS would become integral part of the HRM Regional Plan. Whether it is extended, however, should depend on both government and volunteers finding the CS program jointly acceptable and either government or volunteers represented by Our HRM Alliance could veto continuation of the program beyond the pilot stage.

Indigenous Leadership

The WRWEO dedication sign at the beginning of the first loop of The Bluff Trail acknowledges our indebtedness to and reverence for the First People who lived here longer than we have and preserved this land before us. Several years ago we renamed Indian Hill Loop to Mi'kmaw Hill Loop and assigned Mi'kmaw names to the LNT camping sites. It is appropriate in this time of reconciliation to go much further. We propose that the Office of Community Stewardship be provided resources to engage the leadership and guidance of the Mi'kmaw community to help the local trail groups and other stewards find the best way to move forward in Community Stewardship drawing on Mi'kmaw traditions, experience, and knowledge.⁷

The invitation to a conversation about stewardship, however, should be framed so that it is not, and does not come across as, a request that the Mi'kmaw people help descendants of settlers manage the land that those settlers took away from them. The request should be put in such a way that it is open-ended and would allow the Mi'kmaw community to define the terms of engagement, whether as co-stewards, or sources of expertise about principles of stewardship, or on some other model, as they see fit. (Thanks to Lynette Reid and Ariella Pahlke for this last point.)

Connectivity, HGNP, and Community Stewardship

A critical element in stewardship of the wilderness has been omitted in the above discussion, though it lies at the heart of wilderness protection and the success of the Halifax Green Network Plan. The missing element is connectivity linking together the protected wilderness areas. There is ample scientific evidence to support the conclusion that without wilderness corridors linking wilderness areas biodiversity in these areas will inevitably decline and will negatively affect the resilience of plant and animal life in the area including iconic species such as the mainland moose whose numbers in the area have drastically reduced, causing them to be declared an endangered species in 2003 when the first two loops of the trail opened.⁸

⁷ For support from the World Wildlife Fund-Canada newsletter see: **Indigenous-led conservation is the path forward** at WWF-Canada wwf.canada@wwf.ca

⁸ See, for example, the HGNP and information archived on the WRWEO website:

<https://web.archive.org/web/20131127150100/http://wrweo.ca/ChebWilderness/index.html> Also see:

Guidance on the maintenance of landscape connectivity features of major importance for wild flora and fauna – – Guidance on the implementation of Article 3 of the Birds Directive (79/409/EEC) and Article 10 of the Habitats Directive (92/43/EEC).

Though there can be and are corridors of connectivity within wilderness areas, what is important to notice in this instance is the need for communities *from adjacent wilderness areas* to combine their roles as stewards of the land to find corridors and learn together how to protect the corridors that allow wildlife both plant and animal to move between (and ultimately among) various wilderness areas and open spaces. One can safely say that without connectivity even the “protected areas,” though legally designated as protected, are not in truth protected. Community Stewardship as advocated here must therefore include stewardship of connectivity between natural areas of all kinds. Moreover, this concept and aspiration should be written into our mutual understanding of the HGNP as Council completes its ten-year review of the Regional Plan.

Executive Summary of Community Stewardship Proposal

A central paradox besets the efforts of local communities to promote preservation of the many wilderness areas surrounding Halifax. We promote the legal protection needed to block development in these ecologically vital areas and we build trails for recreational access to the natural areas on which our health depends. We thereby make the inherent value of these areas known and accessible. But the means to this important end can result in the gradual deterioration of the very areas that we are trying to preserve. We negatively affect the natural value of these areas, thereby defeating the point of their preservation. The answer to this problem is Community Stewardship of the kind proven to be successful over the past three years on The Bluff Wilderness Hiking Trail. This submission recommends as a pilot project the establishment of an Office of Community Stewardship (OSC) that would coordinate and enhance the voluntary participation of four to seven community groups already providing stewardship to natural areas to determine whether this project should be extended further. Besides criteria applied to measure the success of the stewardship program on The Bluff Wilderness Hiking Trail, we could include criteria to measure success in increasing connectivity between natural areas as a guide to determine success of a more inclusive stewardship program. The proposal is to build, stage by stage, the Community Stewardship of wildernesses and other open spaces into the Greenbelt portion of the Regional Plan for HRM and thereby help to preserve the ecological and monetary value of the natural resources in HRM.

Respectfully submitted with approval of the WRWEO board by these members:

Paul Berry, Board Chair and Treasurer; David Patriquin, ecologist;

Mike Lancaster, stewardship coordinator; Richmond Campbell, founding member.

Marianne Kettunen et al., 2007. Institute for European Environmental Policy (IEEP), Brussels, 114 pp. & Annexes.

https://ec.europa.eu/environment/nature/ecosystems/docs/adaptation_fragmentation_guidelines.pdf

This proposal has been endorsed and supported by Our HRM Alliance including the following members.

[Ecology Action Centre](#)

[Hike Nova Scotia](#)

[Canadian Association for Retired Persons Nova Scotia](#)

[Sandy Lake Conservation Association](#)

[Friends of Blue Mountain Birch Cove Lakes](#)

[Backlands Coalition](#)

[Trips By Transit](#)

[Downtown Halifax Business Commission](#)

[The Village on Main \(Main Street Dartmouth Business Improvement District\)](#)

[North End Business Association](#)

[McIntosh Run Watershed Association](#)

[Purcell's Cove Area Residents Action Committee](#)

[Beechville, Lakeside, Timberlea \(BLT\) Rails to Trails Association](#)

[Cole Harbour Parks and Trails Association](#)

[Friends of Hemlock Ravine](#)

[Halifax Regional Trails Association](#)

[Preston and Area Trails Association](#)

[Penhorn Lake Area Trails Association](#)

[Canadian Parks and Wilderness Society, Nova Scotia Chapter](#)

[Canoe Kayak Nova Scotia](#)

[Eastern Shore Forest Watch Association](#)

[Five Bridges Wilderness Heritage Trust](#)

[Ducks Unlimited Canada – Nova Scotia](#)

[Sackville Rivers Association](#)

[Sackville Lakes Park and Trails Association](#)

[Save Bedford's Waterfront Society](#)

[Citizens' Climate Lobby – Halifax](#)

[Canada Green Building Council – Atlantic Chapter](#)

[Dalhousie Office of Sustainability](#)

[Ferguson's Cove Neighbourhood Association](#)

[Friends of McNabs Island Society](#)

[Halifax Field Naturalists](#)

[Halifax Urban Greenway Association](#)

[Lake Echo Watershed Association](#)

[Shore Active Transportation Association](#)

[Shubenacadie Watershed Environmental Protection Society](#)

[St. Margaret's Bay Stewardship Association](#)

[Williams Lake Conservation Company](#)

[Woodens River Watershed Environmental Organization](#)

[Cole Harbour Rural Heritage Society](#)

[Dalhousie School for Resource and Environmental Studies](#)

[FUSION Halifax](#)

[Genuine Progress Index \(GPI\) Atlantic](#)

[Halifax Cycling Coalition](#)

[Heart and Stroke Foundation of Nova Scotia](#)

[It's More Than Buses](#)

[Lucasville Community Association](#)

[Musquodoboit Harbour and Area Community Association](#)

[North End Community Health Centre](#)

Purcell's Cove Neighbourhood Committee
[Rural Coastal Communities Network](#)
[Walk n' Roll Halifax](#)
[Wyse Society for Sensible Urban Development, The](#)
[YWCA Halifax](#)
[Akoma Holdings Inc.](#)
[Downtown Dartmouth Business Commission](#)
[Quinpool Road Mainstreet District Association](#)
[Sackville Business Association](#)
[Spring Garden Area Business Association](#)
[St. Margaret's Bay Chamber of Commerce](#)
Community Society to End Poverty
Halifax North West Trails Association

APPENDIX 9

Reasons a Sandy Lake Subwatershed floodplain study is needed:

June 19 2023 - Updated July 2023

1. The McCallum motion that staff passed July 12, 2022 had a bit on the floodplain (see in red below)

The motion as amended on July 12, 2022 now read:

“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:*

- a. at least the suggested widths for important corridors,*
- b. at least 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.*

MOTION AS AMENDED PUT AND PASSED UNANIMOUSLY”

2. The Sackville River Floodplain Study Phase 2 of 2017 was released in a public meeting in 2018:

https://www.halifax.ca/sites/default/files/documents/business/planning-development/FinalReport.SRFS_Phase2_12April2017.pdf

A scientist in the audience asked why the Sandy Lake watershed was not included in the study. The consultant, A. Wilson, replied that the city gave them the scope of the study, and if Sandy Lake was not included it must mean that the city does not intend to build there for at least 100 years.

3. As Councillor Outhit points out, Sunnyside is in the floodplain. It will be affected by flooding caused by development (runoff etc.) in the Sandy Lake subwatershed. A thorough floodplain study of what will happen in Bedford/Sackville if housing is added to the Sandy Lake watershed is essential before any decision to build or not is made at Sandy Lake.



Union Street Bedford 1956

4. **The need for the additional Sandy Lake subwatershed portion of the Sackville River study is of considerable concern given the awareness now of havoc caused by 2023 flood events and that the province's current plan that appears to be "build at all costs".**
5. **For continuity, it recommended this study be an adjunct to the Sackville River Floodplain Study Phase 2 of 2017.**

Now we have the experience of the 2023 100-year storm and new pictures of Union Street and the Sackville River Floodplains. Climate Change is promising more frequent and larger storms. **This floodplain study must be done before any decision is taken on whether or not to build at Sandy Lake.**