# Top issues with the background studies completed for the Sandy Lake Special Planning Area

Sandy Lake – Sackville River Regional Park Coalition
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Background studies were completed for the <u>Sandy Lake Special Planning Area</u> by a consulting company, based on a <u>Request for Proposals</u>. These studies examined environmental features of the area and explored ways in which traffic, water serving, and stormwater management could function if the estimated 7,000 to 9,000 housing unit development proposed for the area were to go ahead. The studies do provide some insights relevant to evaluating the potential for development in the area, however, the studies are incomplete and lacking in the following ways:

# 1. No evaluation of flooding risk for lower Sackville River based on potential development at Sandy Lake.

It is vital that a study be completed that examines the potential flooding risk on the lower Sackville River that is based on the proposed development scenarios within the Sandy Lake Special Planning Area. The Sackville River floods. In 2023 a flood on the Sackville River caused substantial damage, impacting homes, businesses, infrastructure, and more in the floodplain of the Sackville River, specifically in Bedford and Lower Sackville. Rivers like the Sackville River flood more extensively when forested land in the watershed is converted to hard surfaces, such as the roads and houses in housing developments. The Sandy Lake subwatershed is the largest subwatershed in the Sackville River watershed. How water moves through the Sandy Lake subwatershed could have a profound effect on flooding downstream. It is imperative that the potential increased flood risk to the lower Sackville River be known before development decisions are made.

# 2. Lack of analysis of potential impacts on Sandy Lake <u>Regional Park</u> despite this requirement in the background studies.

Sandy Lake Regional Park (owned by HRM) could be impacted by development in the Sandy Lake's headwaters. If water quality of the lake continues to deteriorate, which can be accelerated by housing development next to the lake, then the HRM beach at Sandy Lake Regional Park may be closed to swimming more often to due to blue-green algae blooms. Wildlife and plants in the park, that contribute to its ecological functions and recreational quality, could be driven away by the destruction of their habitat in the proposed development

area. Recreational characteristics that are currently assets of the park, including the quiet that can be experienced in the park's forest, may be diminished by adjacent development. All of these things and more are relevant to HRM assessing the potential impacts of development on their park assets, and this examination was directed in the scope of the study (Request for Proposals), yet they were not studied.

3. No serious consideration or use of HRM Council's motion regarding the Sandy Lake Environmental Features Assessment (a.k.a. the McCallum report) despite requirement to do so.

The Request for Proposals for the background studies specified that the consulting company must "review and use the findings of the <u>Sandy Lake Environmental Features Assessment</u> in background studies." This was not done. The Sandy Lake Environmental Features Assessment provided data specific to Sandy Lake's situation that could inform the background studies, including mapping areas with sensitive environmental features. And it recommended at least a 50m buffer next to wetlands and a 100m buffer next to watercourses in this special case. These recommendations were endorsed in a <u>motion by HRM Council in 2022</u>, yet this assessment and Council motion were ignored in the background studies.

4. Lack of inclusion of several, relevant reports and datasets in the background studies, despite the requirement to do so in the RFP.

Multiple studies by consulting companies, academics, and community researchers were ignored in the background studies even though these sources of information were sent to the consulting company and HRM. Missing studies included long-term lake water quality testing results for Sandy Lake, and a report on Species at Risk and wildlife corridors at Sandy Lake – all were topics covered in the background studies.

For example, the watershed and stormwater management background studies draw conclusions about impacts to Sandy Lake while ignoring relevant data.

A deep-dive analysis of the watershed and stormwater management background studies by retired biologist Dr. David Patriquin demonstrates that there are 3 major flaws with this work:

i. The background studies did not include longer-term water quality data for Sandy Lake, gathered by local researchers and through citizen-based science. The background studies limited themselves to recent lake water quality sampling conducted by the consultant only. This intentional ignoring of longer-term lake water quality data led the background studies to miss seeing the existing decline in water quality, which would be worsened by development next to the lake.

- ii. Ignoring the longer-term lake water quality data for Sandy Lake has additional ramifications, including that longer-term data shows very low deep water oxygen levels, and internal phosphorus loading, both of which could be exacerbated by development next to the lake.
- iii. Current development scenarios show building in the most sensitive area of the subwatershed (west side of Sandy Lake where the lake's tributaries are located). A more accurate understanding of Sandy Lake's current water quality and potential impacts of development could have led to recommendations not to develop in the headwaters of Sandy Lake, which is where development is currently proposed.

For a further explanation of the extreme flaws in the Sandy Lake water quality section of the background studies see Dr. Patriquin's "Community Studies for Sandy Lake (Bedford, NS) Special Planning Area "ignore" critical data on water quality 25Jul2025"

#### 5. Not all wetlands in the study area were visited and studied.

There are 24 wetlands in the Sandy Lake Special Planning Area. The Request for Proposals for the background studies required delineation, assessment, and inventorying of *all wetlands* in the Study Area, but the consulting company reported only conducting these field assessments on 13 of the 24 wetlands. Each wetland needs to be evaluated to understand how it contributes to holding back floodwaters, improving water quality, and hosting biodiversity. The work on wetlands is incomplete and should be completed in order to get a true picture of the watercourses and wetlands, and the potential impacts on them of development.

### 6. Wildlife corridors mapping is incomplete, incorrect, and did not inform concurrent background studies

The Sandy Lake – Sackville Rivers area contains wildlife corridors that are vital for wildlife movement in the region between the Mainland Nova Scotia and the Chebucto Peninsula. Three different wildlife corridor research reports have provided evidence as to where wildlife corridors need to be preserved in the Sandy Lake Special Planning area. The background studies use some of this research to propose valid wildlife corridors in the area, yet two problems remain. The minimum wildlife corridor width of 100m wide is incorrectly mapped and recommended as 100m on top of a watercourse, which then creates only a 50m width terrestrial corridor on each side of a watercourse (not adequate for animals and plants that do not cross over water and that require 100m). The mapping and rationale for wildlife corridors is then ignored in all the other background studies on traffic and infrastructure. In those reports, mapping and recommendations proceed with no wildlife corridors involved.

### 7. Traffic study finds that even in a "no development" scenario, traffic on Hammonds Plains Road becomes untenable.

The traffic modeling examined 2 development scenarios and their impacts on local and regional traffic. Even in the scenario where no development proceeds at Sandy Lake, the traffic models showed "significant increase in existing congestion by the 2031" on Hammonds Plains Road and Larry Uteck Boulevard. Congestion will be worse at a larger scale too – traffic modeling showed road capacity "on Highway 102 into Halifax will exceed 100 percent by 2031, characterized by severe congestion even before the Sandy Lake development is introduced." With the proposed development built out, the traffic modeling projects 20,000 car and transit trips per day in and out of the Sandy Lake Special Planning Area!

### 8. The provincially-proposed "Sandy Lake connector" road/highway has not been studied.

During the fall 2024 election campaign, the Province announced a "Sandy Lake connector" would be built as a road or highway connecting Hammonds Plains Road more directly to Highway 101. Little information was provided but the Province stated that the new road would supposedly reduce traffic congestion on Hammonds Plains Road and would "create potential housing opportunities." No analysis has been done to substantiate these claims, and a Sandy Lake connector was not used in the background studies' traffic analysis. The crude map by the Province shows the connector passing right through a key wildlife corridor in the Sandy Lake area, and crossing multiple headwater streams that feed into Sandy Lake.