

Sandy Lake - Sackville River Regional Park Coalition 115 Farmers Dairy Lane, Bedford, Nova Scotia www.sandylakecoalition.ca

Halifax Regional Plan Review 2020 Kate Green, Regional Policy Program Manager

April 24, 2020

Re: Submission to RP+10 Review from Sandy Lake-Sackville River Regional Park Coalition (SL-SRRP groups listed at bottom of page)

This is our initial submission to the Regional Plan review (RP+10) on behalf of The Sandy Lake-Sackville River-Regional Park Coalition. We expect to send further installments over the next several months, and we request that those additions plus this installment together become our complete submission.

Our comments and requests will include both the specific issues at Jack Lake/Sandy Lake Regional Park (We will refer to this as Sandy Lake – Sackville River Regional Park or SL-SRRP) and also more general requests and suggestions that we see as beneficial to HRM.

The submission has a background segment plus three request sections, each followed by supporting information and appendices in the usual place. We ask:

- 1. That the SL-SRRP be expanded by additional 1,800 acres (see Map 1). The SL-SRRP boundary be researched in the RP+10 process so that new boundaries based on science are established to encompass all remaining essential watershed to be protected and managed as a regional park for all time. That would mean finding "win-win" solutions that serve both the community and present landowners needs.
- 2. That the Halifax Green Network Plan (HGNP) be included in its entirety in the RP+10.
- 3. That the requests in sections A, B, and C be addressed within the RP+10 review and implemented.

The SL-SRRP wishes to thank the city for creating and passing the Halifax Green Network Plan (HGNP) and for amending the Regional Plan's conservation design development agreement policies to specifically reference the Important and Essential Corridors shown on Map 5, the Green Network Ecology Map, contained in the HGNP.

We also thank you very much for Director Denty's letter that states the city does not see a need for housing development at Sandy Lake for at least 15 years, for acquiring 160 acres next to Marsh Lake for the park

in 2015, for assurances that the city wants to expand this park, and for adding the Sandy Lake area to the draft 2020 Capital Projects Budget for land acquisition.

We look forward to working with the city on this latest upgrade to the Regional Plan to benefit all of HRM. Thank you for the opportunity to contribute.

Sincerely,

ORIGINAL SIGNED

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

David Patriquin, Co-chair of SL-SRRP Coalition and Steering Committee and rep. for NS Wild Flora Society, Halifax Field Naturalists, Woodens River Environmental Organization/The Bluff Trail 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 Walter Regan, SL-SRRP Coalition Steering Committee and rep. for the Sackville Rivers Association Harry Ward, SL-SRRP Coalition Steering Committee and rep. for Five Bridges Wilderness Heritage Trust

cc. Mayor Savage and Council Kathleen Fralic, Halifax Green Network Plan Leah Perrin, HRM Planning

Sandy Lake - Sackville River Regional Park Coalition Member Groups to date:

Sandy Lake Conservation Association Sackville Rivers Association Agropur Cooperative Dairy Bedford Plant Beechville Lakeside Timberlea Rails to Trails Canadian Parks and Wilderness Society - Nova Scotia Chapter Canoe/Kayak Nova Scotia Ecology Action Centre Five Bridges Wilderness Heritage Trust Friends of Blue Mountain Birch Cove Lakes Society Friends of McNabs Island Society Halifax North West Trails Association Kingswood Ratepayers Association Lucasville Community Association Lucasville Greenway Society McIntosh Run Watershed Association Mountain Bike Halifax Nova Scotia Bird Society Nova Scotia Salmon Association Nova Scotia Wild Flora Society St. Margaret's Bay Stewardship Association The Halifax Field Naturalists The Neighbourhood Association of Uplands Park The Turtle Patrol Trips By Transit WRWEO / The Bluff Wilderness Hiking Trail



Sandy Lake - Sackville River Regional Park Coalition www.sandylakecoalition.ca

Submission to the RP+10 Review

from

The Sandy Lake-Sackville River Regional Park Coalition

April 24, 2020

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Submission to the RP+10 Review from Sandy Lake-Sackville River Regional Park Coalition April 24, 2020

SANDY LAKE – SACKVILLE RIVER REGIONAL PARK (SL-SRRP) IN THE RP+10

Introduction

This is the initial submission to the Regional Plan review (RP+10) from The Sandy Lake-Sackville River-Regional Park Coalition (SL-SRRP Coalition).

We thank the city for this opportunity to bring our concerns, thoughts and suggestions to the process of revising the Regional Plan.

We also thank the city for all that is being done to protect and expand Sandy Lake-Sackville River-Regional Park. In particular, for creating and passing the Halifax Green Network Plan (HGNP), for Director Denty's letter that states the city does not see a need for housing development at Sandy Lake for at least 15 years, for acquiring 160 acres next to Marsh Lake for the park in 2015, for assurances that the city wants to expand the park, and for adding the Sandy Lake area to the draft 2020 Capital Projects Budget for land acquisition.

This submission has three request sections, A, B and C, each followed immediately by supporting information. The requests include issues specific to Sandy Lake – Sackville River Regional Park (SL-SRRP) and also topics we see as beneficial to HRM more generally.

We ask that the requests in each section be addressed within the RP+10.

While we are grateful that Regional Plans continue to say a regional park is intended for Jack Lake/Sandy Lake, a large part of the watershed area is now zoned for housing development. Much of this submission is focused on demonstrating why we believe this is a mistake.

Why do we need urban parks?

The push for urban parks began with the population explosion in the 1800's. Not unlike here, the original 1811 plan for Central Park in New York was simply to use the land to construct housing. Years of opposition to this approach (and again with a certain parallel here at SL-SRRP), the Central Park project was approved 46 years later in 1857.

An article by Iberdrola, an international sustainable energy company, <u>https://www.iberdrola.com/about-us/utility-of-the-future</u> entitled *The Importance of urban Parks*:

"The creation and adaptation of large green areas has become a constant on the agenda of cities of all sizes, particularly since the car was invented. This has to do with the term urban heat island, the name given to unintentional climate change to the air and the ground in cities - in comparison to non-developed areas - caused by factors such as road traffic, heating, the use of materials such as cement or asphalt, etc.

Urban parks - whether historic or newly designed - are one of the most sustainable ways of combating this island of heat and pollution: as well as producing oxygen, trees and vegetation helping control temperature and humidity. Other benefits are that they reduce radiation and noise from road traffic and machinery and create a sort of oasis for both plants and animals. They are also the perfect place to relax and play sports. "

Halifax is growing toward Bedford and Sackville at a relatively rapid rate. The Bedford of today is de facto the second largest city in Nova Scotia even though it is embedded in HRM. And thus, we have the need for regional plans - to attempt to predict that future and shape the urban design and infrastructure in such a way that optimizes the health and livability of our communities in a way that envisages that future and how to best meet the needs. Therefore, Sandy Lake – Sackville River and environs are not being planned for the community we have today, but the community of the future - a much denser population future and one in which housing development will likely exist on almost all available land for miles around.

The easy approach would be to follow the lead, let developers proceed as they see provides the surest and quickest way to achieving their best Return on Investment. The very difficult challenge is to create a match with that ROI objective and that of securing a win-win with an enviable quality of life. That is why this Regional Plan review is so important for the city, for all of us.

Further to this, decisions regarding other infrastructure such as water and wastewater and roads are no more important in their long-term implications for the health and livability of a community than the decisions regarding parks, wildlife connectors and open space.

Therefore, what follows provides some history on the establishment of SL-SRRP and why, in order to make it as sustainable an investment as possible, the imperative exists to protect for the future the lands and waters that effect its well-being.

About the Sandy Lake – Sackville River Regional Park Coalition: We are a coalition of 25 organizations and community groups with a membership of over six thousand and that reaches across the region. The SL-SRRP is a regional interest, not only local. Member groups are listed in the cover letter.

The SL-SRRP Coalition of groups supports the following mission statement:

"To preserve and protect 2,800 acres of wildlife and aquatic habitat surrounding the Sandy/Jack/Marsh Lakes and Sackville River area as Sandy Lake - Sackville River Regional Park for historical, cultural, conservation, educational, and recreational use." One thousand acres are now in public ownership as the Jack Lake Regional Park. The additional 1,800 acres the Coalition is working to protect are under immense development pressures and need to be protected to maintain the integrity of the Sandy Lake to Sackville River watercourse and as a critical wildlife corridor between the Chebucto Peninsula and central and eastern mainland.

With the help of planners and scientists **we have identified a new boundary** to protect the integrity of the ecological unit and also to allow good access to the park from all sides. The proposed Sandy Lake-Sackville River Regional Park is 2,800 acres of rich ecosystem that stretches between the Hammonds Plains Road and the Sackville River encompassing the lands and rivers of Sandy, Marsh and Jack Lakes and the Sackville River. The resulting proposed **SL-SRRP Boundary Map 1** is Appendix A.

The city already owns about 1,000 acres as park land, called Jack Lake Regional Park or Sandy Lake Regional park, depending on the city document being referenced, although the park has not yet been formally activated as a functioning park.

About 800 of the 1,800 acres belong to about 20 private landowners. The balance, approximately 1,000 of the 1,800 unprotected acres, are owned by developers. One that owns about half of that has applied for secondary planning in the RP +10 Review (Schedule D).

We 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 SL-SRRP.

Actions of past decision-makers have led so far to limited development in the Sandy Lake area watershed. Despite some setbacks, deliberate actions by community, municipalities, the province, and others have preserved for many decades the beautiful old growth forest and view planes, and thus set these lands and waters up to still be uniquely worth acquiring for park protection.

Important Background

The SL-SRRP 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 includes 3 lakes, each of them unique – Marsh Lake, on the Sandy Lake to Sackville River watercourse is shallow and marshy. Sandy Lake is a deep "blue lake" (rather than a "tea lake" like most in this part of NS) which stratifies seasonally providing summer habitat for salmonids, and Jack Lake, which drains into Papermill Lake and then into Bedford Basin has a boreal forest quality.

The Sandy lake watershed is the largest or second largest subwatershed of the Sackville River Watershed, depending on how the sub-subwatersheds are aggregated. (Sackville River Watershed Wetland Inventory, 2011.

https://novascotia.ca/tran/works/enviroservices/Stream_Restoration/Sackville%20River%20Watershed %20Wetland%20Inventory_2010_2011%20Appendix.pdf)

In April, 1971, the P.B. Dean report, *Natural Environment Survey: A Description of the Intrinsic Values in the Natural Environment Around Greater Halifax –Dartmouth*, was released <u>http://sandylake.org/1971-pb-dean-environment-report/</u>

The **1971 MAPC report** followed. <u>http://sandylake.org/1971-mapc-recreation-report-on-7-regional-parks/</u> The area was selected as a joint Provincial/municipal project as one of seven unique "jewels in the crown" of the Halifax region – priority areas to be protected for their ecological richness and for community education and recreation. (Appendix B)

The seven unique areas were: the Shubenacadie Canal, The Cole Harbour Salt Marshes, Admiral's Cove, Hemlock Ravine, McNab's Island, and Long Lake, and **Marsh and Sandy Lakes, Sackville Flood Plain** (its original name).

Dean's report, Natural Environment Survey, classified Sandy Lake and Marsh Lake as Category 1: "...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." The Sackville River as a Category 4 area "of high recreational or environmental value." p.6.

"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 the Canada Land Inventory Recreation Capability Survey and as such received the highest rating of any inland site around the metro area." P. 49. "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.

The subsequent 1979 MAPC planning document produced conceptual maps and implementation plans. (Appendix C) <u>http://sandylake.org/1979-halifax-dartmouth-regional-parks-report/</u>

The critical watershed in these concepts included land all around Sandy and Marsh Lakes as park and as important buffering areas.

Many university and professional studies were done over the years. (Appendix D)

We request that you read the full reports, but for example, the 2001/2002 DalTech and NSCAD Environmental Planning Departments created six reports on various environmental attributes of Sandy Lake related to potential development pressures. "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 (URLs in Appendix D)

Other study quotes are in Appendix E.

Is the ecological value of the SL-SRRP area still intact after all these years?

That can be answered through a number of means. From a map perspective, it is hard to tell from Halifax Green Network Plan's high-level maps. Provincial maps – notably the Provincial Landscape Viewer, give an indication of the ground cover in the SL-SRRP, but map-based analyses are always limited by the quality of the data. In some cases, Nova Scotia doesn't have very good environmental data at a provincial scale, and some layers of Nova Scotia's ecological maps are very poor. Of the few key layers that are limiting, one is the forest cover layer, or Forest Resource Inventory. Relying on such maps will not tell us precisely what is at SL-SRRP. In order to know if current information accurately shows what is still present at SL-SRRP we needed some ground-truthing of the area.

In the late spring of 2017, we contacted retired Dalhousie University Biologist Dr. David Patriquin to request a formal assessment of assets. He said he was overcommitted for at least the next two years. However, he offered to take a quick look that week end. That was June of 2017, and that visit caused him to return over 25 times by the fall on a volunteer basis, and to involve other experts, in lichens, fungi, old growth water sampling and more. His ongoing findings are available forest, at www.sandylakebedford.ca, also through his talk at: http://goo.gl/ipYCR2, and summarized in the attached documents. (Appendix F) Dr. Patriquin now co-chairs this coalition and is deeply committed to protecting what is here for wildlife and outdoor recreation.

Dr. Patriquin told us of canoeing across the lake the first day he visited, and stepping ashore into a cathedral-like, old, Hemlock stand. And in the shallows were Gaspereau. (pages 5&6 Appendix F)

Sandy Lake is an unusually deep, moderately well buffered lake in a region historically prone to aquatic acidification (from, for example, local ironstone deposits and rain-carrying pollutants from the industrial American northeast). This deep lake allows for vigorous populations of fish, waterfowl, frogs, insects and all the richness of shoreline and near forest life associated with a healthy northern temperate climax forest ecosystem.

Marsh Lake is a large marsh, identified as one of the top park priority assets along with Sandy Lake, the Sackville River, streams, old growth forests and drumlins.

Those drumlins have rich soil that supports a remarkable Acadian forest with significant old growth stands and striking Pit and Mound Topography with accompanying evidence of historical storms such as the Saxby Gale and Hurricane Juan. From mounds formed by the windfall of very large, old growth trees grow many examples of an association Dr. Patriquin describes as the "Acadian Love Affair" – physically intimate associations of hemlock and yellow birch. They are characteristic of old growth Acadian forest, which is very different from boreal forests. These mixed hardwoods and softwood species give NS the colours of fall that are missing in other kinds of forests. Some trees are over 200 years old. Less than 1% of NS Acadian forest is old growth, but SL-SRRP has outstanding patches of old growth dominated variously by hemlock/yellow birch, mixed hardwoods (sugar and red maples, yellow birch) and white pine/red spruce. An experienced landscape planner told us of finding west of Sandy Lake the most magnificent grove of white ash he has ever seen in NS.

Diverse wildlife still live in the waters and forest, including nesting osprey and loon families, barn swallows, wood turtles, deer, ermine, mink, beaver, and a full suite of Acadian forest flora. The Nova Scotia Department of Lands and Forestry considers the proposed SL-SRRP as "important mainland moose habitat" and endangered mainland moose continue to be sighted. There are snapping turtle and painted turtle nesting areas, and many varieties of fish, including both wild Atlantic Salmon and speckled sea trout in Sandy Lake. Of 22 lakes in the region that recently had thriving snapping turtle populations, Sandy Lake is one of only 3 lakes remaining. Snapping turtles are an indicator species, indicating lake health has not slipped too far to support them.

Old growth forests can house species that younger forests cannot. Some say they are not concerned about birds when trees are stripped for housing because birds just fly to another place. This is not so. Most birds are territorial. Many require old growth trees to survive. As one scientist said, we can't lever a Barred Owl into a hole in a 10-inch tree. Their old growth habitat is becoming harder to come by, but they are frequently spotted at SL-SRRP, along with many more. This forest supports a full suite of Old Forest Species; 22 of 23 vertebrates associated with structural features of old Acadian forests have been recently found.

We commissioned a bird survey and a closer examination of existing wildlife corridors. Clarence Stevens cites 20 vertebrate species as Species of Interest to Federal and Provincial conservation bodies; these

include 13 Species-at-Risk, that is 4 aquatic and 9 terrestrial species. See his full report in Appendix G: *Avian and Species at Risk Surveys of the proposed Sandy Lake-Sackville River Regional Park.*

Compiled flora and fauna counts from several sources provide both historical data and recent wildlife sightings by park users. (Appendix H)

The conclusion from the bird and corridor study, Avian and Species at Risk Surveys of the proposed Sandy Lake-Sackville River Regional Park:

"The area within the proposed Sandy Lake-Sackville River Regional Park warrants protection as it provides important habitat for 21 Species of Interest to Federal and Provincial conservation bodies including 13 wildlife species officially designated as Species at Risk.

...would protect two major wildlife corridors, including one identified in the Halifax Green Network Plan as vital to wildlife movement on and off the Chebucto Peninsula, which is a major conservation area.

... would protect the Sandy Lake Wildlife Corridor which is a major connector for wildlife to the Blue Mountain-Birch Cove Lake Wilderness Area. Protection of this corridor would enhance the survival of species found in both parks as well as protect the biodiversity of these two areas.

...would protect an important portion of the Sackville River which is one of the two major wildlife corridors that act as crucial travel routes for wildlife and has the additional advantage of helping to direct moving wildlife away from man-made structures such as roads.

... would protect at least a dozen smaller corridors containing important riparian and/or wetland habitats. Locations of these smaller corridors have been ground truthed and mapped out in this report thus providing important information for the more detailed decision-making process, necessary when plans are made beyond the higher, regional level planning.

... provides an important oasis and support for wildlife living in green spaces located in the more urban areas surrounding the proposed park, and that failure to establish the proposed park's boundaries would lead to a collapse in wildlife species in terms of both volume and variety.

In order to protect the health and diversity of the current Sandy Lake Park, its borders need to be expanded to reacquire lands that were once set aside for inclusion in the park

Acquisition of additional lands found inside the proposed park boundaries is needed in order to protect the water quality and watersheds in the current Sandy Lake Park. These additional lands would include important watershed lands.

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.

The proposed Sandy Lake-Sackville River Regional Park represents the last opportunity to acquire and protect wetlands and woodlands that directly connect the Sackville River watershed to Blue Mountain-Birch Cove Lake Wilderness Area." p. 13

From observations of historical and current water sampling, Dr. Patriquin concludes that "While the area remains varied and rich in ecological values, it is already suffering significant impacts from human activities. Sandy Lake, with its deep seasonally stratified waters, was oligotrophic in 1979 and historically, and is now mid-mesotrophic. (Appendix I)

Minimal effort could move it back to oligotrophic, but any significant housing development allowed in the remaining watershed would inevitably tip the area over the edge. We need to continue to walk it back to its former state, especially given climate warming, and to continue to support the rich biodiversity of this watershed system." (Appendix J)

Topography, Park Assets, Park Access, Park Planning, the New Map

We obtained the services of a professional planner to review and produce a park proposal. The planner's report provides a new request boundary for the park along with the rationale and access points. (Appendix K)

The Recommended Boundary of the Sandy Lake – Sackville River Regional Park includes "all still available and important land required to protect critical environmental components of the Park. The proposed boundary will also include land required to establish proper public access opportunities to the Park." (Slide 13 of Planner's Report, Appendix L)

Foxes and fish don't recognize property lines made by humans. It is the natural ecological boundary that will protect an area. The natural boundary of this system resembles more of the original concept of the Regional Park, which called for parkland around the lakes, not to one side. As the conceptual plans developed in the 1970s, the 1979 MAPC plan included even more area on all sides, from the Sackville River to the Hammonds Plains Road and from the Bedford Rifle Range west toward the Lucasville Road, including buffers and flood plains.

Because so much of the watershed has already been built upon, the remaining area is needed even more as buffering to protect the park's remaining primary assets, Sandy and Marsh Lakes, the streams and Sackville River, the drumlins, rich vegetation and wildlife.

The new reports also show the Johnson's Brook sub-subwatershed, which includes the area along Hammonds Plains Road, is very important to protection of Sandy Lake and the entire system through to the Sackville River to the Bedford Basin. Also, that protecting the remaining corridor at Webber's Lake is important to the corridor system.

- The floodplains of Bedford and Sackville are affected by what happens all around Sandy and Marsh Lakes. If the watershed around the lakes is further developed, this will cause the flood plains to be increased in size downstream, especially in Bedford. More hard surface means faster run-off.

On August 14, 2018, at the release of the 2017 Sackville River Floodplain Study Phase Two, Mr. W. Alexander replied to a question about why the expected housing development west of Sandy Lake was not included in the study. He answered that the city provided them with the scope of the study and, since Sandy Lake was not included in the scope, the city must therefore not be planning to develop at Sandy Lake for 100 years. Development at Sandy Lake would potentially increase the already troublesome flooding in Sackville and Bedford. The study is available at: https://www.halifax.ca/sites/default/files/documents/business/planning-development/FinalReport.SRFS_.Phase2_.12April2017.pdf

Cultural and Educational Aspects strengthen Environmental and Historical aspects

- Excerpts from R.D. Mahar's 1994 study summarize the early human history in the area. (Appendix M)

- There are Areas of Elevated Archaeological potential (Appendix N)
- A History of Sandy Lake, Bedford (Appendix O)

- As most likely know, there is an ongoing Nature Deficit among our children. With so many schools nearby, this park would be an ideal area for increased exposure to nature. "In the case of schools such a location would facilitate outdoor science and field trips." P.23 Dean Report.

Mahar's 1994 report and 2001/2002 studies by NSCAD/Daltech (URL in Appendix D), among others, also refer to these values being so close to communities.

We hope to see many Halifax schools taking part in educational programs at SL-SRRP. With a deep blue lake (most lakes in the area are "tea" lakes), a marsh lake and a boreal lake within walking distance of each other, students can access three distinct ecologies plus those of streams so easily. They learn about boreal forests, where pit and mound terrain comes from in old growth Acadian Forests, and then with a short hike learn about marshland ecology at beautiful Marsh Lake. A walk in these woods is awe-inspiring with a skilled naturalist to show what most of us don't see. This healthy area is rich with flora and fauna. Even this close to civilization, the deep woods are so quiet that even the shy ovenbirds can be spotted. Dr. Patriquin exclaimed that he hasn't seen so many frogs since he was a kid.

The Sandy Lake Academy has the good fortune of being on Sandy Lake. The Academy hosts events for students from all seven of their provincial schools because it is the one with ready access to nature. A major pillar of this private school organization is honouring the natural environment. The school and the SL-SRRP Coalition are working closely together to foster environmental education through nature walks

and also to protect their Acadian forested grounds, including the astounding old hemlock stand that makes up most of their peninsula.



Holding spotted salamander eggs, Earth Day Nature Walk at Sandy Lake 2017

- Mahar's reflections on human connection to environmental landscapes give insights. (Appendix P)

- The investment of communities or individuals is an often-overlooked value. Individuals and community groups across the region have cared about, and put large amounts of work, worry, time and funds to take care of special places. The Sandy Lake-Sackville River area is a major one.

Community Support

- Appendix Q is a list of groups that worked over the decades to protect the Sandy Lake area, each one has a story of what they did and why it was important.

- The Sackville Rivers Association has reclaimed the once severely damaged Sackville River and made it available to the people, repaired much of Peverill's Brook, and returned Atlantic Salmon to Sandy and Marsh Lakes. It also advocates for other areas. For example, the Lucasville Greenway, Sawmill River

Daylighting in Dartmouth, Lewis Lake Wilderness Area, protecting Owl's Head, and much more - from transportation to urban infill. It has become part of the fabric, the culture, of the local area and of the city.

Over the decades, there was always something challenging the welfare of Sandy Lake and area. But there were crucial points. From reading minutes and documents from 1982, it appears that a complex interaction between at least the Province, Municipality, local council and residents resulted in Bedford Council voting to rezone the area from Park to Secondary Development. When this rezoning away from Park Zone was happening, where were the voices that still knew of the area's ecological value? Or had the tides simply changed so those voices had less influence for a while?

One community member told us that in the mid 1970s his father sat him down to say, "Son I've been watching out for this lake for a long time, and now it is your turn." He went on to act time and time again for 35 years, alone and as part of several groups that came and went. He told us that he simply got worn out eventually. Not so much from the amount of work, although that was substantial, but from the discouragement that too many did not see what was at risk here and get down to the business of creating the Regional Park.

Much of this came to light when 300 acres of land beside the lake were clear cut by a developer in 2013 without forestry permits or development approval from HRM. At the time we were told it was 200 acres but actual acreage has come to light since. We learned the citizens we thought had been keeping an eye on things had quietly stepped away. Efforts began anew to achieve the original goal of protecting this beautiful area for the city's future.

It is the people who live nearest an area that usually see what is going on and act first to protect it. They are often enough accused of acting in a NIMBY fashion. If that were the case here, existing proposals to retain as park land just the acreage immediately east of Sandy Lake and to develop the rest would be the easy way out and might be acceptable. Acceptable but uninformed, because that would not protect the interdependent watershed, not protect the existing park's assets. It is also more than NIMBY because the SRA is involved to save this large subwatershed to the Sackville River. The residents and the Coalition groups from all over the municipality recognize what is actually at stake here.

This is a regional issue, not just a local one. The constituents of all city councillors stand to benefit from this regional park. While there are three city Councillors with territory within the essential watershed of SL-SRRP (Appendix R) and expanding the boundary is supported by local residents, as indicated in the petition presented to North West Regional Council on November 4, 2014, <u>http://sandylake.org/wp-content/uploads/2020/04/NWCC-response-and-SLCA-petition-2014.pdf</u>, Coalition member groups come from across the region and their members total well over 6000 citizens.

Our HRM Alliance lists the proposed SL-SRRP as one of three primary natural areas close to Halifax proper needing protective action now: Purcell's Cove Backlands (now Shaw Wilderness Park), Blue Mountain Birch Cove Lakes (both under way, much still to do) and Sandy Lake – Sackville River Regional

Park. (Appendix S) SL-SRRP is a critical component, providing connectivity for both the Purcell's Cove Backlands and Blue Mountain Birch Cove Lakes, as well as other conservation lands on the Chebucto Peninsula to the greater mainland.

The members of this SL-SRRP Coalition of 25 groups have been effectively raising awareness about the precarious situation at Sandy Lake and Sackville River. Our online and in-person campaign (https://www.sandylakecoalition.ca/) has emphasized that this area is of exceptional importance for nature conservation and recreational access. We have encouraged people to share their passion for the area with their city councillors. For example, our Valentines campaign delivered over 350 virtual and many hand-made valentines to select city councillors.

The Coalition has been working hard to find opportunities to expand and protect the park. For example, through our efforts and those of our local federal MPs, the federal Minister of the Environment has advised us that 600 acres of the neighbouring DND rifle range are being evaluated by the **Federal OCEM program** for possible designation as part of the country's 17% protected wilderness. OCEM refers to "other effective conservation area", according to criteria set by the United Nations Convention on Biological Diversity. This would not change the status and function of the DND property, but would ensure continued protection of the wilderness assets and would enhance the neighbouring park's well-being.

From our efforts, CMHC and the city are in discussions about bringing 50 acres surrounding Marsh Lake into park protection. We have also identified a private landowner who is willing to sell to the city for park expansion. We look to the city to follow up and bring these assets into the park.

Member groups contribute to stewardship of the park in this in-between period where citizens are using it while it is still not formally operated by the city as a park. Some examples:

- 1) We have a good working relationship with the city parks department.
 - (a) We keep them informed if we notice damaged gates and such, and we collect litter.
 - (b) We prevent harm together during hunting season. Because so much land within the park boundary is privately owned, hunters use the area too. Deep in the woods it is hard to tell where the park boundaries begin and private ones end so there is potential for an accident to happen. We work with the city parks to keep park users informed while the parks dept. takes steps annually to post "No Hunting" signs on park land. Hunters are not allowed to cross park land with weapons of any kind. This situation reduces park usage during hunting season.
 - (c) It is a city park and by-law P-600 protects it from damage from motorized vehicles in theory. However, much damage is being done to trails and the fragile waters' edge of lakes. City parks is working with us, Halifax Water, NS Power and police to reduce the access to park land by these vehicles.
- 2) With Dr. Patriquin's guidance SLCA is conducting a regular water testing program.

- 3) We provide an article to residents on *How to Protect Your Lake* (Appendix T) if they live on or near the water courses.
- 4) We assisted the dairy to find a skilled environmental design company to plan their parking lot upgrade to prevent the lake from run-off.
- 5) We partner with the Bedford Lions Club to plant trees and care for the beach park
- 6) We helped the Academy plan how to preserve the old growth forest on their property, and plan nature walks to enhance their program
- 7) We host public nature walks and other events
- 8) Not everything we try to do for the park goes well:
 - a) We informed the city when a crucial lakeside lot near the Lions Club beach came up for sale. Unfortunately, the city didn't tell us they were not going to purchase it; a member would have purchased it had we known. As a result, an old logging path within the park that hikers traditionally have used and that passes close to the lot is now passable to cars. We were told the city gave the new owner permission to remove a few branches to make it easier to access his lot. Unfortunately, no one oversaw the process. Instead, over 100 small trees were cut down, a wood chipper sprayed processed trees along the sides of the path, and the path was patched and widened. So now any car can drive in there, and of course they do. This opens the interior of the park to uncontrolled use and potential fire hazard.
 - b) We are disappointed that, so far, the city has not acted on a significant opportunity we created with a major developer who owns over 500 acres of the essential watershed west of Sandy Lake. The developer offered to trade in writing, to work with the community and the city to find a "win-win" trade. (Appendix U) This is one of the opportunities we ask the city to follow up and achieve for the sake of the park and citizens. The Shaw Wilderness Park is a good example of how working together can achieve this. We do want to see the developer's business do well, but SL-SRRP is no ordinary place. It had a higher purpose and can still.
- 9) We meet with any who might help councillors, the mayor, city staff, agencies, nature trusts, government departments, businesses, MPs and MLAs to find ways to help save the area.
- 10) We bring in scientists and other professionals to document what is here and help us protect it.

How did the area go from being a recognized ecological unit destined to become a regional park in the 1970s to now being divided into two halves, one side heading for housing development that will put the other side at risk?

We looked to find where things went wrong

Twists of fate have caused protection to fall short, but community efforts plus municipal actions and other twists of fate have allowed the lands and waters to remain in good condition. See the provided Time Line http://sandylake.org/time-line/. SL-SRRP moved from jurisdiction to jurisdiction. It was in the County, then in Bedford and then in HRM. Many documents were lost during amalgamation, and not every project survived the transitions.

The park ideals were well underway by 1974. Mrs. Pender (Pender's lumbermill) wanted to donate 500 acres west of Sandy Lake to the park, but that was vetoed by a political decision to allow a processing plant to build beside Sandy Lake instead, and dump effluent into the lake daily. But the lake was saved thanks to citizens, the municipality and the company itself. Treatment ponds were installed instead and the system was connected to the city system. Time and time again this lake has come under threat after threat, and people and the municipality put effort into protecting it. You read some examples in the History of Sandy Lake (Appendix O) or in the Time Line.

Although the Province had spearheaded the regional parks, the political winds shifted in the next decade, and all the parks were left to the local governments to finish. By then, documents called it the **Sackville River Regional Park**, and by 1986, **the Sandy Lake Regional Park**.

After the Province left the project, the County and then Bedford acquired more land for the park as it came up, including a Provincial/Municipal co-purchase of 236 acres in 1985, and a gift of 6 acres from the dairy in 1992. In 2006 the Jack Lake lands were added to the park, thanks to CMHC and the Province and, together with the Lions Club Beach on Sandy Lake (2002, part of the original 1970's plans), all were identified as lands for the **Jack Lake Regional Park** (the park's next name).

Regional Plans 1975 to 2015: A Sandy Lake Mistake

The objectives for Regional Parks, as outlined in our 2014 Regional Plan, are "to preserve significant natural or cultural resources, and to be large enough to support both ecosystem protection and human enjoyment at the same time." (page 57) Historical documents show the importance of including the Sandy Lake watershed within the park.

If anything, its importance has elevated with the closing-in of development on all sides of the watershed, and also with the need for recovery of growth in the 300 acres of forest that were cut down in 2013.

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

1975 Halifax-Dartmouth Regional Development Plan defines and separates regional parks and development areas and identifies seven unique areas to become regional parks: Hemlock Ravine,

Schubenacadie Canal system, McNab's island, Admirals Cove, Cole Harbour/Lawrencetown Beach, Long Lake/Chain Lake, and **the Marsh and Sandy Lakes, Sackville Flood Plain.**

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

2004 Town of Bedford Municipal Planning Strategy Environmental Policies:

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

"Policy E-20: It shall be the intention of Town Council upon the adoption of this plan to undertake an indepth environmental study of the Sandy Lake watershed which will include input from the N.S. Department of Environment as well as area residents, and shall examine present water quality, watershed land use practices increased rates of sedimentation, and the development of a recovery and protection program for Sandy Lake if warranted by the study."

2006 Regional Plan identifies six areas for **future growth** (**housing**) **in HRM**: Bedford South, Morris-Russell Lake, Bedford West, Port Wallis, **Sandy Lake** and Highway 102 west corridor adjacent to Blue Mountain - Birch Cove Lakes Park. (*One has to ask what changed to make this happen. Where were the voices of the community and scientists who previously identified this as ecologically important? A mistake was made here that we must correct.*

- 2006-2010 Kingswood North is built west of Sandy Lake. Developers are land-banking.
- 2009 Developers submit applications for developing Sandy Lake west.
- 2009 CBCL Cost of Servicing Study to proceed, and developer proposes oversized sewer pipe.)

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

2012 - A memorandum of Understanding was made between Armco and Halifax Water for Armco to contribute \$1mil of the \$3.1mil estimated cost of upsizing the wastewater pipes of Bedford West to accommodate possible future development at Sandy Lake. Item 5 of the MOU states, "Armco shall make the above-noted upfront payment recognizing and accepting that the decision to approve a secondary

planning strategy for all or a portion of the Sandy Lake lands is ultimately in the sole discretion of HRM Regional Council"

July 3, Council Report, Wastewater Oversizing for Future Development of Sandy Lake Lands. "*HRM is not a party to the proposed Armco-HWRD contract. As such, the terms and conditions do not commit a future council to any planning approvals in either Bedford West or the Sandy Lake lands.*" p.1

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

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

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

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

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

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

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

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

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

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

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

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

(Note: All of these points are directly relevant to SL-SRRP. See Request Section C in this document)

2015 Halifax Municipal Strategy for Bedford, the wording is exactly the same as in 2011, but the pages are 122-125. "...shall continue working towards the establishment of major parks at Admiral's Cove, Sandy Lake, and within the Waterfront Development Area (Policy P-6)" ...Policies P-8 and P-9 indicate Town Council's intentions to designate future parkland within the Jack Lake assembly..."

..." the future development of existing open space is now seen as a higher priority than the acquisition of additional open space. Exceptions to this would be land acquired in relation to subdivision development, land for neighbourhood parks, specialized land for linkages or unique sites, and **Sandy Lake**."

The Sandy Lake area is clearly still seen as important park land, but watershed that protects those park assets is now on a parallel path toward housing. Protecting the Sandy Lake watershed from development is critical to the entire park/watershed through to Sackville River and basin. We have a mistake to correct. (Appendix V)

Another mistake to fix

In 2015 the city produced the Off-site Parkland Dedication Request to acquire 160 valuable watershed acres west of Marsh Lake. That was not a mistake! That acquisition is very important to the park, and we are grateful the city was able to do it. (Appendix W)

Our concern is that we have learned that the map is now being used as the suggested boundary for the park. (Appendix X)

Note that the area to the west of the lakes is missing. Does this mean those lands are no longer important to the integrity of the system? No. We are told by people close to the drafting of that map that it was drawn only to do the 160-acre transaction. It was not intended to become the new boundary for the regional park. To draw the boundary around developer-owned lands to the west would have caused controversy and might have resulted in the loss of the 160 acres.

It was necessary for us to bring in professionals to take a closer look. It resulted in our new Boundary Map 1. All around those 160 acres are about 900 acres of rich park land that should be protected, but is currently at risk of being destroyed by development.

We are requesting that the city examine scientific and historic facts as we did, and determine the needed area for the park. To that end, we provide in this document studies and information to assist the process, the information that led us to the resulting Recommended Boundary Map 1.

Here is good news

We are also told by people close to the drafting of that Conceptual Map that the city's rationale for acquiring the 160 acres, which is contained in that 2015 report, can be applied directly to the importance of acquiring the rest of the lands west of the lakes now. Those lands are critical to the health of the watershed and were part of the 1971 and 1979 concepts, with land all around Sandy and Marsh Lakes being within the park or as important buffering areas.

From the August 2015 staff report, Off-site Parkland Dedication Request – Marsh Lake Lands, Bedford (Appendix W):

"Staff has been assembling lands at Marsh Lake since 1999, first following direction set out in the former Town of Bedford's MPS policy and then in the 2006 Regional Plan. If these lands were currently available for sale on the open market, staff would be recommending to Regional Council, independent of this request, that they be purchased using the funding from the Park Land Reserve account.

...Conclusion

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

...COMMUNITY ENGAGEMENT

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

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

- 1) provide a Regional Near Urban Wilderness Park adjacent to the Bedford /Sackville Area;
- 2) protect representational Acadian Inland forest habitats;
- 3) provide water quality protection of Sandy Lake, Jacks Lake and Marsh Lake;
- 4) provide access to and protect the ecology of the Sackville River; and

5) provide continuity of a wilderness corridor along the Sackville River stretching from the 102 highway at Bedford to the Pockwock Municipal Watershed.

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

- add 160 acres of desirable forested recreation lands to the Jacks Lake Regional Park land assembly. The lands help create a loop trail around Marsh Lake and have the potential to provide low impact access to undeveloped sections of the Sackville River with desirable aesthetic value;
- host a variety of successional Acadian forest types including complexes and ages which are near to being classed as rare old growth forest as well as former industrial forest;
- offer a buffer to Marsh Lake from future development, helping to protect water quality and habitat within the Sackville River watershed;
- *extend from Marsh Lake to the banks of the Sackville River and add another* $\frac{1}{2}$ *km of shoreline protection for the watercourse;*
- protect habitat presently functioning as an un-official wildlife corridor extending from the Bicentennial Highway at Bedford along the Sackville River to Hants County. This corridor's viability is presently ensured by public ownership of the lands associated with Jacks Lake Regional Park, the Dept, of National Defence Rifle Range, the former Sackville Landfill and the Pockwock/Tomahawk Watershed lands. The Halifax Green Network Plan, currently underway, will be recommending that this corridor be one of several key wilderness corridors penetrating into the urban area to be incorporated into land use and park planning.

ENVIRONMENTAL IMPLICATIONS

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

Land for the Park

While it is very important to acquire the undeveloped lands within the 2015 Conceptual Map boundary, as noted, those significant lands outside the boundary, including those owned by developers, can make or break the park.

The largest landowner is Clayton Developments, with ~550 acres immediately west of Sandy Lake, in the most critical part of the watershed (It includes the 300 purchased from the developer who clear-cut). The recent planner's and scientists' reports are showing this area, including the Johnson's Brook watershed which includes the area along Hammonds Plains Road, is very important to protection of Sandy Lake and the entire system through to the Sackville River to the Bedford Basin. The clear-cut is regenerating with

the full suite of Acadian forest and is beginning to support the lakes again. It must be supported and allowed to revitalize.

At least two other developers, one with 102 acres and another with \sim 390 acres, also own properties in that essential west watershed. Several other developers own a total of \sim 95 acres between them in other parts of the watershed. We request that the city acquire all of these lands. (Appendix Y)

- Acquiring the lands north of Sandy and Marsh lakes and in among existing park lands will help protect the existing park assets and create a unit that can be better managed as a park. It will help remove the potential harm from hunting or motorized vehicles and other unauthorized park uses. It is an outstanding old growth and drumlin area.
- Acquiring the Clayton lands (PID 41127945) west of Sandy Lake will:
 - protect the 3 tributaries to Sandy Lake which cross that land
 - leave over 600 acres of important drumlins undisturbed
 - help maintain the water quality of Sandy Lake and water bodies downstream
 - provide connectivity to the newly acquired 160 acres beside Marsh Lake
 - add to the Green Network goals, including but not limited to protecting wildlife corridors, especially those connecting the Chebucto Peninsula to the greater mainland
 - help provide access to the lakes and the regional park from all sides, including the many schools and the ~10,000 newer residents of Bedford West.
 - Enhance the Lions Club Beach, already within the park boundary, by maintaining
 water quality for swimming and protecting viewplanes. The clear-cut includes a
 drumlin (hill) that if built upon would ruin the forested viewplane from everywhere
 on the shore of the larger part of Sandy lake, and notably, is directly visible across
 the lake from the Lions Club Beach.
 - Correct a mistake made in 1974 and again in 1986: obtain those essential acres, the 500 acres Mrs. Pender once offered for free and that Clayton Developments purchased from Armco in 2015.



A section of the 2013 clear-cut as seen from Lions Club Beach (Sandy Lake Beach)

- Acquiring the 390 acres west/northwest of the newly acquired 160 acres beside Marsh Lake (Five PIDS), plus PID#s 00645143 (20.34 acres), and PID#s 00645135 and 00422857 (102 acres), will contribute to all of these things just listed in addition to fulfilling the values listed in the city's 2015 land acquisition document.
- Acquiring the Armco lands near Webber Lake will help preserve the narrow wildlife corridor there to the Chebucto Peninsula. (p. 11, Appendix F)
- Acquiring the Crombie 50 acres (PID #41404450) that were traded in 2013 to save Morris Pond would return valuable old forest to the park that should never have been traded out as park land for park land. It would not be happening now. It could help with park access as well.
- Acquiring the PID#40098097 (15 acres) beside the Academy on Hammonds Plains Road would provide a controlled access point to the lake and protect it from additional motorized craft or other threats to the wilderness lake. Ownership is the best way to control what happens to the lake, and ultimately the park assets, from that location.

All major tributaries to Sandy Lake cross the lands to the west. Sandy Lake and the whole system suffers right through to the Sackville River if the watershed is further degraded. The Sackville Rivers Association has worked for over 30 years to restore the quality of the Sackville River, once a great Atlantic Salmon river. Young salmon are finally being caught again in Sandy Lake.

Land Acquisition to Date

There is a strong history of park land acquisition by the municipality and city. Appendix Z is a summary and map of all city-owned park land up to 2019.

This is what we know:

In 1983, although the Province withdrew from the plan for the 7 regional parks, **the local areas decided to do it themselves.** Bedford's Mayor Cosman championed the park idea still, but Bedford Council rezoned the area for development for complex reasons touched on in the Time Line. To preserve the area in hopes that a park plan would evolve eventually, Sept 26, 1983, Council passed a zoning bylaw to restrict any new construction to a minimum 5-acre lot on a publicly serviced road that is publicly serviced as of October 9, 1991. This zoning protected the lake from in-fill development ever since, and is still in the 2016 Bedford Land-use By-laws. (Appendix AA) However, with the zoning change, developers began to buy up land.

Bedford continued to purchase land around Sandy Lake toward this future park purpose:

On **July 22, 1985**, a 50/50 purchase by the Province and Town acquired 236 acres for Sandy Lake Park and 61 for Admirals Cove Park for \$700,000 from McCulloch and Co. We are not sure which parcels.

In 1992, 6 acres were given to Bedford by Farmers Dairy specifically for public parkland, with a covenant requiring the land be used only for public parkland, no buildings, and no travel over the lands or parking, no motor vehicles of any kind.

In 1986 CMHC gave its Jack Lake lands to the province. The large public housing development they were planning for Jack Lake would not happen because of the need for 2 expensive highway interchanges and for extensive mitigations required to prevent environmental damage to Jack, Sandy and Marsh lakes. (Jack Lake Environmental Report, 1986, <u>http://sandylake.org/1986-jack-lake-environmental-evaluation-final-report-2/</u>.

Subsequently, the Province gave the ~1000 Jack Lake acres, minus 50 acres, to the municipality for the park.

Those 50 acres were later considered for a prison but eventually went to the park instead.

In 2006 a successful lobby by Sackville Rivers Association and others made the Jack Lake lands a Regional Park. It remains identified as park today, but is not being managed as an active park.

2013, the city traded Sobeys/Crombie 50 acres of the Jack Lake lands (across from the BMO) to protect Morris Pond. Thus, the city unfortunately traded out park land to protect other park land without the community knowing.

At the September 15, 2014 meeting of North West Community Council, a petition was received from the Sandy Lake Conservation Association requesting that the municipality expand the park lands surrounding Marsh Lake and Sandy Lake to create a regional park and wilderness area. Staff responded with an Information report to Community Council indicating that planning and land acquisitions for the Regional Park were continuing, and directing community efforts for the park into the Halifax Green Network Plan HGNP. <u>http://sandylake.org/wp-content/uploads/2020/04/NWCC-response-and-SLCA-petition-2014.pdf</u>

October of 2015, HRM purchased the 160 acres from Armco. Most developers' lands west of Sandy Lake were not included in the conceptual map. "In keeping with the Regional Plan, the Marsh Lake lands are highly desired for regional park purposes..." "...This land will serve as a positive move to protect and preserve high value ecological lands associated with the Sackville River Corridor."

Early in 2019, very good news came as an internal report is apparently authorizing future acquisitions for the park, and by December, 2019, Sandy Lake is a line item along with Blue Mountain Birch Cove Lakes in the city's Capital Projects Budget.

Meanwhile, within that full HGNP process, the SLCA submitted letters, emails, reports, including a detailed submission February 2016, to the O2 company undertaking the evaluation, and a 2017 submission to the city's GNP planning team. The submission is posted at <u>http://sandylake.org/wp-content/uploads/2020/04/2017-SLCA-SRA-Submission-to-Green-Network-Implementation-Phase-12-June-2017.pdf</u>

In March, 2016, an O2 public meeting unveiled the GNP study. A city parks staff person showed SLCA members on Map 23 that Sandy Lake has a high value as one of few natural links for connectivity of the Chebucto Peninsula to the rest of NS, in particular to the Pockwock region, and said that the barriers of Hammonds Plains Rd and Kearney Lake Rd "pose a problem, but staff is interested in exploring options".

2017, March 10, SLCA sent all of the collected historical reports, from the 1971 Dean Report-on, to the city's new park planning lead, as was requested in a meeting with SLCA where he expressed this park seems like "unfinished business".

We only recently learned that these strong acquisition moves are tempered by the fact that the city is using the 2015 Conceptual Map to guide acquisitions. All of the lands to the west of Sandy and Marsh Lakes are out of bounds. Even if we came to the city with an agreement in hand with any of the developers, city staff have no authorization to work on acquiring those critical ecological lands. This situation can be changed in the Regional Plan.

Learning that the 2015 map is limiting the possibility for protecting this ecological unit was the latest disappointing surprise added to the series of shocks we who know this area well have experienced. How could zoning for an area like this have changed in 1982 and then be listed for development next in 2006 without the community knowing? We believe the answer may be that all Regional Plans continued to list

Sandy Lake as a pending Regional Park. People exhausted from years of work to protect this area looked in the parks section and would see it is still on track.

We only discovered that the Regional Plans had competing sections when 300 acres of Acadian forest west of the lake were stripped of trees in 2013 by the developer who previously owned the Clayton lands. That was done without permits for housing or for forestry. That, and so many important events and facts we have learned by chance or by digging.

We trust that you understand why we are submitting this information, these requests and attachments; why we can't assume this information has already reached you. Much of what we request in this submission comes from a desire to prevent some similar things from happening to others. And we want to be sure this Sandy Lake – Sackville River Regional Park area is once again protected in the Regional Plan. Once again, but really protected this time.

It is in your hands as you adjust the Regional Plan to set all this all to rights, to examine and redraw the boundary to include the long-recognized ecologically necessary lands, to finally protect the park's assets. To set Sandy Lake - Sackville River Regional Park on the path to realizing its best potential role in this city.

REQUEST SECTIONS A, B and C follow. They contain more supporting information along with the itemized requests we believe will improve much for many, for the city and for SL-SRRP.

* * *



REQUEST SECTIONS A, B, and C

Initial Submission, Request Section from Sandy Lake-Sackville River Regional Park (SL-SRRP) Coalition to the Regional Plan Review (RP+10)

The request section is in three parts:

A. Items relevant to expansion, creation, and protection of SL-SRRP

B. More general items that may benefit SL-SRRP but will support other goals and areas of HRM

C. Items in the Halifax Green Network Plan that affect SL-SRRP

A. Requests that support expansion, creation, and protection of SL-SRRP

Further detail is provided on each item in the notes following the table.

The SL-SRRP Coalition requests that:

1A.	A policy be created in the RP+10 stating "The Sandy Lake - Sackville River Regional Park as defined in Map 1 (Appendix A) is recognized as a valuable ecological unit to preserve and is imperative to the enhancement of and continued quality-of-life in the fast-growing areas of Kingswood North, Bedford, Hammonds Plains, Sackville and the city as a whole."
2A.	The 2015 Sandy Lake Conceptual Boundary (Appendix X) currently being used by the city be expanded to include all lands needed to protect the park's assets, as outlined in the community's new Recommended Boundary for Proposed SL- SRRP Map 1 (Appendix A).
3A.	The 2009 CBCL Cost of Servicing Report be modified to remove both BMBCL and Sandy Lake-Sackville River areas.
4A.	All policy conflicts that are barriers to full protection of the lands and waters of the Sandy Lake-Sackville River watershed be removed during the RP+10 process, such as development policy conflicts, transportation policy conflicts, zoning conflicts
5A.	The existence of ready infrastructure, such as the oversized Bedford West sewer lines that were installed on speculation and the upgrade to the Exit 3b interchange, must not override natural environment policies that support the quality of the natural environment or the quality of life the park provides to the communities and the city as a whole.

6A.	The SL-SRRP Map 1 area be designated an environmentally
	sensitive area and be acquired and preserved as a regional park.
7A.	All undeveloped lands and other properties which potentially
	directly impact the water quality, and that become available
	over time, that are within new Recommended Boundary for
	Proposed SL-SRRP Map 1 be acquired by the city for the park.
8A.	Park access lands indicated in the new Recommended
	Boundary for Proposed SL-SRRP Map 1 be acquired.
9A.	Privately owned homes and businesses within the new
	Recommended Boundary for Proposed SL-SRRP Map 1 be
	included in a new Conceptual Boundary, receive special park
	zoning designation, and have special provisions to benefit both
	private owners' assets and the park assets.
10A.	Research be done on several topics relating to protection of
	water quality, species retention, park asset enhancement and
	protection at SL-SRRP such as how to mitigate the run off from current housing and industrial areas within the SL-SRRP
	watershed, including the additional 1800 acres, once acquired.
	This should include how to mitigate and treat the current
	stormwater run-off.
11A.	The Uplands Park Wastewater Treatment Plant owned by
	Halifax Water be decommissioned and the effluent be
	redirected off of the Sandy Lake watershed and into the city for
	appropriate treatment.
12A.	Special park-protective by-laws be implemented for three
	defined layers of the SL-SRRP watershed: 1. the main park

	assets, 2. the buffer, and 3. the rest of the sub-watershed which may or may not have housing or industrial uses already.
13A.	Existing regulations such as the "Five-Acre By-law" be reviewed and strengthened to protect the SL-SRRP watershed.
14A.	The natural corridors of all sizes (Appendix BB) within SL-SRRP be protected and enhanced.
15A.	All remaining wildlife corridors between SL-SRRP and BMBCL and the Chebucto Peninsula and into the Mainland, including stepping-stone corridors, be identified, protected, enhanced and acquired where necessary.
16A.	The city create wide active transportation corridors that double as Essential wildlife corridors between Sandy Lake and Blue Mountain Birch Cove Lakes.
17A.	No development would be permitted that would further degrade the existing SL-SRRP viewshed, and no height increases be allowed that would pierce an existing SL-SRRP viewshed.
18A.	SL-SRRP be added to the HGNP's Working Landscape Map according to the definition of Working Landscapes, and be protected as a valuable tourist and scenic resource site.
19A.	SL-SRRP, including the future 1800 acres, be planned and managed for public use, including year-round public access to the park.

Supporting Information: Requests for changes in the RP+10 relevant to expansion, creation, and protection of SL-SRRP

1A. The approach of preserving natural assets which make for an enhanced quality of life, which we in Nova Scotia are so fortunate to possess, is evident in the Regional Plan, both in the intent to create the Halifax Green Network Plan and as described under Regional Parks:

"The primary objective of a Regional Park is to preserve and protect significant natural or cultural resources. The essential feature of a Regional Park may include, but not be limited to, open space, wilderness, scenic beauty, flora, fauna, and recreational, archaeological, historical, cultural and/or geological resources." p.26, RP+5. We must examine and protect the remaining watershed of Sandy Lake and Marsh Lake through to the Sackville River to prevent harm, to enrich and strengthen the existing regional park assets.

All Municipal and Regional Plans for the area since 1975 to the RP+5 state intent to create a regional park at Sandy Lake, although the names changed for time to time, and to acquire land for that park. However, a mistake was made. For whatever reason, the ecological value of the lands west and northwest of Sandy and Marsh Lakes was lost sight of and housing development is now a serious risk to the watershed that protects the entire park. We have an opportunity to intercept harm now, in this RP+10. (Appendix V)

Why must the SL-SRRP be expanded by 1800 acres? For many reasons, historical, biological, ecological, recreational, educational, historical, and more we outline in this submission. Appendix CC provides an overview.

The balance of this document, including all items from all sections, and indeed the entire submission, all work together to fortify #1A. That is, we request a policy be created in the RP+10 stating that "The Sandy Lake - Sackville River Regional Park as defined in Map 1 (Appendix A) is recognized as a valuable ecological unit to preserve and is imperative to the enhancement of and continued quality-of-life in the fast-growing areas of Kingswood North, Bedford, Hammonds Plains, Sackville and the city as a whole."

2A.We are requesting the city research and redraw within the RP+10 process the boundary map for SL-SRRP that will protect the park's assets, using currently available scientific data, ecological information, and natural boundaries of the Sandy Lake - Sackville River watershed, in addition to baseline data gathered over 50 years, in order to determine the appropriate ecologically sensitive, science-based park boundary that will protect park assets. Include examination of the watershed to the west and north of Sandy and Marsh Lakes that lie between the Hammonds Plains Road, Kingswood North, and Sackville.

Conduct a special analysis based on science to determine the proper boundary to protect the park's assets. Use the Recommended Boundary for Proposed SL-SRRP, Map 1 (Appendix A) to guide

research to redraw/expand the 2015 conceptual map (Appendix X) to encompass the additional essential watershed lands of Sandy Lake – Sackville River Regional Park. Identify the park's assets (lakes, streams, Sackville River, old forests, species diversity, drumlins...) and what is needed to protect them.

The Sandy Lake-Sackville River Regional Park Coalition learned recently that the 2015 conceptual map is being used as the city's guide for acquiring property for Sandy Lake – Sackville River Regional Park. While we are very grateful that the city is acquiring land for the park, we are concerned because that map was drawn for a specific purpose, to acquire 160 acres, and does not reflect actual watershed lands that are needed in order to protect even the existing park assets.

We have been informed by those close to the drawing of the map that the line was drawn not to protect water assets, not based on research, but only to acquire the 160 acres. It was drawn for the transaction. To include more of the developer's lands at the time would have created controversy and likely would have caused the 160-acre acquisition to fail. If this map is being used as a defining boundary for park acquisition now, it is being used for a purpose for which it was not designed.

However, we were told that the rationale for acquiring the 160 acres that is contained in the 2015 document is the same rationale that the city can use to protect the rest of the watershed. (Appendix W)

Include in the study clarification of the validity of our assertion that the current use of the 2015 conceptual map as the boundary map for park land acquisition is in error, and that the protective boundary must me redrawn to also include essential watershed lands west of Sandy and Marsh Lakes, and up to Webber Lake.

The SL-SRRP Coalition engaged the skills of a professional planner to propose a boundary for the proposed park that could protect the valuable assets including the lakes, streams, Sackville River, the drumlins, old growth forests, rich vegetation and wildlife, including species at risk, that still exist at SL-SRRP. (Appendix K)

The watershed of Sandy Lake is of vital importance for the ecological integrity of Sandy Lake, and Sandy Lake is vital to protect the rest of the entire park system through to the Sackville River. The area is a rich and diverse ecological system. Three kinds of lakes (a deep blue lake, a boreal lake and a marsh lake) a major river sit side by side, each surrounded by vegetation as diverse as they are. It is an outstanding location for educational purposes.

Dr. David G. Patriquin has studied water data dating back several decades and has been testing the waters in and around Sandy Lake since 2017. The lake has marginal Oxygen in deeper waters now. It was Oligotrophic in the 1970s and is now mid-mesotrophic. It is already on the edge, and any

significant development in the remaining watershed will negatively impact the entire system. Dr. Patriquin says the goal should be to return the lake to its previous Oligotrophic condition to preserve and enhance what is there. He tells us the acres that were cut in 2013 are growing again with the full suite of Acadian forest, and they are already helping to protect the lake. They need to be allowed to grow. The protection of developers lands west of the lakes, and control of what can happen on that land, is critical to the entire system.

The ongoing surveys of Dr. Patriquin, since June 2017, have added his scientific observations as well as that of guest-scientists on amphibians, lichens, mushrooms, soil, old growth forests, and more.

(Appendices F and I) and Dr. Patriquin's Sandy Lake and environs website: <u>www.sandylakebedford.ca</u>

Dr. Patriquin's talk Sandy Lake and Environs: http://goo.gl/ipYCR2

We engaged a wildlife professional to do a 3-year Species at Risk study (Appendix G) and compiled species lists from several sources (Appendix H)

We provide a collection of studies from 1971 to the present (Appendix D)

And selected quotes from some of these studies that demonstrate the long-held scientific awareness that the entire area is of value. (Appendix E) Unique, according to the 1971 Dean Report. http://sandylake.org/1971-pb-dean-environment-report/

We request a special analysis to determine the proper boundary of the park to protect the park's assets, the lakes, rivers, streams, vegetation, drumlins, old growth stands, the rich flora and fauna including endangered species. Watershed issues, environmentally sensitive aspects, flooding prevention, tree retention, HGNP corridors and other issues are some of the factors that need inclusion in the study to determine the needed boundary.

- 3A.Modify the 2009 CBCL Cost of Servicing Report to remove both BMBCL and Sandy Lake-Sackville River areas. This would protect the environment, the lakes, and future development costs and maintenance.<u>https://www.halifax.ca/sites/default/files/documents/home-property/solarprojects/CBCL%20Cost%20of%20Servicing%20Study%202009.pdf</u>.
- 4A.Remove during the RP+10 review all conflicts that are barriers to full protection of the lands and waters of Sandy Lake-Sackville River watershed, such as development policy conflicts, transportation policy conflicts, zoning conflicts.... Make this a priority.
- 5A. The existence of ready infrastructure must not influence the placement of the expanded park boundary and also not be a factor in the decision as to whether to proceed with secondary planning anywhere in Map 1 (Appendix A). The Sandy Lake environs is a valuable ecological unit and is

also imperative to the continued quality-of-life in the fast-growing areas of Kingswood North, Bedford, Hammonds Plains, Sackville, and the city as a whole.

For example, the oversized Bedford West sewer lines that were installed on speculation must not override natural environment policies that support quality of life. We are very grateful that the agreement between Halifax Water and Armco clearly stated that the city was not part of that agreement, and therefore any city decisions related to where or when housing is allowed would be independent of that agreement. (Appendix DD) The agreement also stated the developer who requested and paid for part of that oversizing, or any who bought out the developer's interests, would receive no compensation should the city decide not to proceed with development at Sandy Lake. Thank you for the city's wisdom in making those provisions, because we have seen that the ecological values of Sandy Lake had been temporarily lost sight of. Now we have all become aware again and it is not too late to benefit, thanks to that foresight.

A second example, the 2009 CBCL Cost of Servicing Study is based on a proposal to create homes for 16,000 people west of Sandy and Marsh Lakes. That could mean 5,000 to 8,000 more cars on the Hammonds Plains Road, and would add significantly to an existing traffic problem.

Natural science must be the determining factor in the expansion of the park boundary. Fish and foxes do not recognize the property lines people make, but they and the ecological units they reside in are affected by those boundaries. Roads and buildings are interruptions of the natural order. There is already human interference in the watershed of Sandy Lake. We need to minimize this damage by at lease not adding more, and by enhancing water quality. Natural science must be the determining factor in the expansion of the park boundary and therefore of any decision as to whether to proceed with secondary planning anywhere in Map 1. Appendix EE)

6A. The SL-SRRP Map 1 area be designated an environmentally sensitive area and be acquired and preserved as a regional park.

Mahar's Towards the Identification of Environmentally Sensitive Areas for Environmental Management: A case Study in the Sackville River Watershed, Rhea D. Mahar (1994) rated Sandy Lake as second out of forty environmentally sensitive sites in the Sackville River Watershed, between Mount Uniacke and the Bedford Basin, and the Old Quarry Corridor section of the Sackville River Corridor was rated third.

"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

"The area meets all of the criteria in the ESA definition, including use for scientific studies, such as the study of the effects of liming lakes to reduce phosphorus from acid rain. The area is near several public and private schools of all grade levels, in Sackville, Bedford, on the Hammonds Plains Road, so the opportunity to use the area for environmental education is great." (Appendix FF Dr. David Patriquin's recent survey of the area causes him to say that the entire area, including the lands and waters west of Sandy and Marsh Lakes and north to Webber Lake, is ES and should be acquired and protected.

7A.Acquire all undeveloped land within the boundary, including privately owned properties as they become available, the dairy or homes or cottages on the lakes or rivers and developers' properties. The goal would be to protect the water quality of the park's water bodies for the long term, to protect all natural assets.

Over 1000 acres of the 1800 acres requested are owned by 8 local developers, with three of them owning the majority (close to 900 acres). The remaining requested acreage is owned by17 private citizens with 50 acres owned by CMHC.

In June of 2018 community representatives met with the largest landowner (Clayton) representatives. Clayton generously offered to trade for other lands if the city would make that happen. (Appendix U)

We request that staff look into this option to acquire the Clayton lands at Sandy Lake either by finding a viable, win-win trade for the lands or by any other means available to the city.

There are several other developers as mentioned above who own lands in critical parts of the watershed. (Appendix Y) We request that the city acquire their properties for the park using whatever means agreeable or possible. Even if Clayton is not interested in a purchase, perhaps other would be. We understand another Canada Nature Fund opportunity is expected to be available at some point.

8A.Acquire park access areas as a priority as indicated in the Recommended Boundary for Proposed SL-SRRP. (Appendix L)

One of the main barriers city planning staff identified previously was the lack of easy access points for the proposed SL-SRRP. Therefore, an important task for the SL-SRRP Coalition planner was to identify solutions for access to the park. Slide 26 in the planner's report identifies primary and secondary access points and properties that might be acquired to solidify them. The primary access points would meet the basic requirements for regional access including:

- direct access from at least a collector road,
- suitable topography for the required parking,
- access to public transit and active transportation,
- sufficient space for a future welcoming centre,
- its surroundings be esthetically supportive of the Regional Park.
- 9A.Include privately owned homes and businesses within the park boundary as indicated in Recommended Boundary for Proposed SL-SRRP Map 1. Give special park designation within the

RP for all properties within the newly expanded park boundary. The purpose would be to protect the park's assets with special requirements that educate and ensure that property owners with parcels that could impact the quality of the park's assets would do so. Property values of homes within the park would increase. Taxes could be capped for owners to make it more attractive. Guidance and regulations would be provided to property owners in a similar way as at Three Brooks subdivision.

See <u>https://sites.google.com/view/tbhoa/home-owner-association/protective-covenants</u> and other parks with private properties within the parks with the goal of protecting the park assets.

- 10A. Conduct research (e.g. university departments) on several topics such as how to mitigate the stormwater run-off from areas such as Kingswood North, Bluewater Road, the highways, and other developed areas within the SL-SRRP watershed, to enhance the lakes and rivers' water quality. Include other topics of park enhancement, such as augmenting species retention and enhancing educational experiences. Several university departments could contribute different components to these studies.
- 11A. We request that the Uplands Park Wastewater Treatment Plant owned by Halifax Water be decommissioned and the effluent be redirected off of the Sandy Lake watershed and into the city for appropriate treatment. Pages 46 and 47 of the AECOM Sandy Lake Watershed Study-Final Report, August 2014, supply a list of point sources of pollution and organics at Sandy Lake. Among others, the list includes the Uplands Park wastewater treatment plant. The treatment plant, built in 1969 serves 170 people and discharges nutrients/pollutants into Sandy Lake. The system "may overflow and bypass the treatment cycle during storms or malfunctions". "…Halifax Water does not measure the concentration of effluent released to the environment during an overflow event." P. 28, 46, 47.

Note that several lakeside residences use the lake water as drinking water.

Also note that the SLCA provided the city with a dissenting report to the AECOM report that provides professional recommendations for improved future watershed studies based on significant deficiencies in the Sandy Lake Watershed Study.

http://sandylake.org/wp-

content/uploads/2017/04/ResponseofSLCAtoAECOMreportOct2014FINALwithAttachments.pdf

- 12A. Study the risks to park assets and create special park-protective by-laws for three defined layers of park sub-watershed, such as specific regulations to ensure run-off is clean and or treated before it reaches the park. Include various forms of protection within these three layers of the sub-watershed:
 - a. The park's central assets,

- b. the buffer area which protects the central assets and which is ideally also within the park boundary, and
- c. the remainder of the watershed which may include residential and industrial and roadway areas that, because of their location within the watershed or sub-watershed, influence the water quality within the park and other park assets.
- 13A. Review existing regulations for their ability to continue to protect the park assets, and modify them if needed. For example, the "5-acre by-law" or something stronger may still be needed or strengthened to continue to protect SL. This By-law has done much to preserve SL-SRRP's unique ecosystem so that we can carry on now with the long-held goals for a viable regional park here. (Appendix AA)
- 14A. Protect and enhance the natural corridors at SL-SRRP as in Appendix BB as a minimum. The Sandy Lake watershed is identified as one of three large relatively undisturbed sub-watersheds of the Sackville River. The Sackville River, is one of only 5 major natural corridors (watersheds) in HRM as identified in the HGNP.

This area is also important to relieve the pinch point across the neck of the Chebucto Peninsula, as identified in the HGNP. Protecting and enhancing its Important and stepping stone wildlife corridors will help protect the viability of the Chebucto Peninsula, as stated in Dr Patriquin's work listed above, in the 3-year Species at Risk study (Appendix G), the NS Nature Trust corridor map and the Halifax Green Network Plan.

- 15A. Identify, protect, enhance and acquire where necessary all remaining wildlife corridors between SL-SRRP and BMBCL and the Chebucto Peninsula and into the mainland, including stepping-stone corridors. See Appendix BB for ground-truthing already conducted. These corridors form an important link and might be missed if we don't put emphasis on them in the RP+10.
- 16A. We ask that the city acquire the properties needed to create wide active transportation corridors that double as Essential wildlife corridors between Sandy Lake and Blue Mountain Birch Cove Lakes now, before applications for housing close off the pinch points to the Chebucto Peninsula. This measure would also be a way of moving out from under the legal restrictions imposed by the Halifax Charter's s.237 and toward s.239 which has a more workable 5-year window for transportation-related acquisitions. Over time it is reasonable to assume that wildlife corridors in an urban environment such as exists currently will become active transportation corridors as well. Such corridors would serve the connectivity needs and also recreational needs. Also look for opportunities for doing this into the mainland and in other areas.
- 17A. Existing viewsheds must be preserved. Other than newly constructed buildings at Bedford West that are already visible from some part of the proposed park, the viewsheds are still quite good throughout the park. The acres that were stripped of trees in 2013 are slowly re-growing and improving the view from Lions Beach.

We request that no development would be permitted that would further degrade the existing SL-SRRP viewshed, including no height increases that would pierce the existing SL-SRRP viewshed. Council endorsed a viewshed concept for the BMBCL Regional Park. A similar commitment at SL-SRRP is needed before any more degradation happens. As a guide, the BMBCL HRM deed observes:

"The purpose for Blue Mountain- Birch Cove Lakes Regional Park viewshed protection include protection of the wilderness experience, which is, in part, defined by wilderness views and vistas from the proposed Blue Mountain-Birch Cove Lakes Regional Park. These wilderness views establish the setting and essential character of the park.

Wilderness park viewsheds and vistas are valued assets of the landscape of the proposed Regional Park which require protection from diminution and loss can result in the visually undesirable impacts of development.

Development along the ridgeline and side slopes of hills at elevations near and proximal to the elevations at the interface of the Property and the proposed Regional Park present risk of undesirable visual impacts and changes to valuable views and vistas. Development controls presented herein are designed to limit such undesirable visual impacts and minimize the visual impact of permitted development to the extent reasonably achievable."

18A. Based on the HGNP definition of Working Landscapes, the SL-SRRP area is a valuable working landscape from the Tourism and scenic resource aspects. It is already a popular location for fishing, canoeing, nature walks, birdwatching and much more. It was featured by Halifax Tourism as one of the five best places to view fall colours in 2017. (see photo in Section C) The entire interdependent 1800 acres should be included as an important area on the HGNP's Working Landscapes map. Not protecting valuable watershed will degrade the current values. "Tourism and Scenic Resources A strong tourism industry within the Green Network requires attractive and accessible landscapes with diverse recreational experiences and an engaging cultural heritage. However, the beauty of these landscapes can be negatively impacted by poorly designed and screened residential, industrial or commercial developments that distract from scenic routes and vistas. Underdeveloped tourism infrastructure, such as lodging, restaurants and recreational experiences, can also hinder efforts to draw visitors to an otherwise highly marketable scenic landscape." P.45 HGNP

"...Enabling the development of resource-based and eco-tourism opportunities, including fishing, wildlife viewing, hunting, agriculture and forestry focused tours and experiences." P.46

19A. Plan and manage the Sandy Lake – Sackville River Regional Park, including the future 1800 acres, with public consultation, for public use including year-round public access to the park. Action item #44 of the HGNP supports this. Currently, a common complaint we receive from park users is that the main parking lot at Smith's Road is closed all winter and causes congestion on Smiths Road. The park is experiencing high usage and the lack of organization and planning is harming park assets now. The commitment from the city to make the SL-SRRP all that it should be is needed.

Trails and the fragile water's edges are being damaged by motorized sport vehicles, although this is improving with cooperative efforts of the Sandy Lake Conservation Association (SLCA) and city parks personnel and Halifax police. By-law P-600 attempts to prevent damage from motorized vehicles but enforcement is a challenge.

The park already has high usage. A fully planned and functioning park plan would help direct usage, protect park assets, and provide ways for the public to appreciate those assets.

B. Requests that are more general in that they may benefit SL-SRRP but will support other goals and areas of HRM

Further detail is provided on each item in the notes following the table.

SL-SRRP Coalition requests that:

1B.	The Halifax Green Network Plan (HGNP) be implemented in the Regional Plan in its entirety. Create policies to ensure that the environment prevails as the priority over other policies.
2B.	The recommendations in the Sandy Lake Conservation Association (SLCA) Response to the Sandy Lake Watershed Study – Final Report (AECOM 2014) be followed to improve the quality of all HRM watershed studies that are done prior to developments. (See URL below)
3B.	A Tree retention by-law that is effective in preventing unnecessary damage or destruction to trees on private or public property be created. It would protect single trees and prevent larger cuts such as were done at Sandy Lake, along the Purcell's Cove road, and in other areas.

4B.	A lake protection by-law or policy be created that will improve the existing water quality in all Halifax lakes and be effective in preventing unnecessary damage or destruction to the city's lakes such as by public use or housing. Use the Stantec Water Quality Monitoring Functional Plan (2009)
5B.	Within the new Regional Plan, a secondary planning zone be created for the Sackville River and adjacent corridor, similar to the Bedford Land Use By-Law. This secondary planning zone would run from the mouth of the Sackville River all the way to the East Hants County Line.
6B.	The "Five-Acre Bylaw" (Part II Residential Reserve Zone 2016 Bedford Land Use By-law, page 59) be expanded to all RR zones of HRM.
7B.	All rivers in HRM have their flood plains identified, mapped, and zoned.
8B.	A 100 m mandatory publicly owned vegetative buffer be mandated for all watercourses in HRM, especially SL-SRRP watercourses and lakes. Identify zoning as Environmental Protection Zone.
9B.	Fifty-metre publicly owned vegetated buffers from the high- water edge of wetlands be mandated.
10B.	The Water Quality Monitoring Functional Plan by Stantec (2009) be implemented in the RP+10 in its entirety.
11B.	Hydrographic stream gauges be installed to measure annual waterflow out of all rivers in HRM. This is especially important to acquire baseline water flow information prior to future development.

12B.	By-laws be developed to require that stormwater does not impact or change pre-development water quality standards of water courses. Receiving water quality must meet or exceed predevelopment water quality standards and does not exceed pre-existing water- quantity flow. The HRM Red Book and the Halifax Water White Book must include stormwater treatment.
13B.	All detention/retention ponds that are required be designed to hold back 2-100-year storm events and be engineered as functional wetlands.
14B.	Policy be created in the RP+10 to put the Stantec Water Quality Monitoring Functional Plan (2009) into the RP+10 to improve the degrading water quality in Sandy Lake and other lakes in HRM before wildlife species and other values are lost due to current threats to water quality. Sandy Lake's water quality is important to protection of the park's entire system.
15B.	HRM support the SL-SRRP request to the Province to amend s.237 of the HRM Charter to change the 1-year decision period for lands zoned park to 5 years aligned with s.239 respecting transportation reserves.
16B.	All wildlife corridors be identified, ground-truthed, protected, enhanced and acquired, including those within and between SL-SRRP and BMBCL and the Chebucto Peninsula and into the Mainland, including stepping-stone corridors.
17B.	The city create wide active transportation corridors (trails) that could double as Essential Wildlife Corridors between green areas and also across or under roadways, including but not limited to SL-SRRP and Blue Mountain Birch Cove Lakes.

18b.	Identify and protect old-growth trees in SR-SRRP and throughout the city.
19B.	Create policies to prevent park land from being traded, built upon or eroded by other interests. Park land must be valued as an asset to the city and its people, and be protected. Never do we hear anyone say they wish this park had been turned into housing, but we do hear people lament the loss of green space when it to goes to housing.

<u>Supporting Information: General requests for changes in the RP+10 that may benefit</u> <u>SL-SRRP but will support other goals and areas of HRM</u>

- 1B.Implement the Halifax Green Network Plan (HGNP) in the Regional Plan in its entirety. See Section C below for HGNP action items. Also create policies to ensure that the Green Network Plan goals and environmental policies prevail. This is because in practice, when decisions are being made case by case, there is a risk that decision-makers may be tempted to give other goals and policies a priority over Green Network Plan goals.
- 2B. Follow the recommendations in the Sandy Lake Conservation Association (SLCA) *Response to the Sandy Lake Watershed Study Final Report* (AECOM 2014) to improve the quality of the watershed studies that are done prior to developments throughout HRM. The SLCA response and the AECOM report were posted together on the city's website for some time, but we have not found it recently. The AECOM report is available through HRM or at: http://sandylake.org/wp-content/uploads/2017/11/SandyLakeFinalReport26Aug20141.pdf

The SLCA response report is at: <u>http://sandylake.org/wp-</u> content/uploads/2017/04/ResponseofSLCAtoAECOMreportOct2014FINALwithAttachments.pdf

3B. Create a tree retention by-law that is effective in preventing unnecessary damage or destruction to trees on private or public property be created. It would protect single trees and prevent larger cuts such as were done at Sandy Lake, along the Purcell's Cove road, and in other areas. (Appendix GG)

We are encouraged that the Annual Review of the HGNP mentions the intention to improve this issue. However, as the HGNP is written now, there is no concrete action or regulation being

proposed. We are aware of a successful and inexpensive self-regulating program in New Hampshire that is based on education and community advocacy and which could protect trees here. Toronto, Ottawa and Calgary have effective by-laws. See the comments on tree retention at the end of the SLCA response to the AECOM report <u>http://sandylake.org/water-quality/</u>

- 4B. Create policy in the RP+10 to put in place steps such as in the Stantec *Water Quality Monitoring Functional Plan* (2009) to improve the water quality in all Halifax lakes and be effective in preventing unnecessary damage or destruction to the city's lakes such as by public use or housing. A source for guidance regarding septic systems near lakes: <u>https://www.oowa.org/consumerinformation/resources-for-homeowners/</u>
- 5B. Within the new Regional Plan, a secondary planning zone be created for the Sackville River and adjacent corridor, similar to the Bedford Land Use By-Law. This secondary planning zone would run from the mouth of the Sackville River all the way to the East Hants County Line. The Sackville River is one of only five major natural corridors identified in the HGNP in all of HRM. It is the largest source of fresh water entering Halifax Harbour. It is a major recreation corridor as well as a major natural conservation corridor. (Appendix HH)

The Sackville River is under severe development pressures and already has close to 60,000 people living on the watershed. There are currently at least 7 housing developments planned or underway within the watershed. The impacts of all activities and the values of this major asset could be better coordinated within a separate land-use by-law.

This new secondary zoning plan would be similar to the Lake Simcoe Lake plan in Ontario.

- 6B. Expand Part II Residential Reserve (RR) Zone the 2016 Bedford Land Use By-law, page 59, also known as the "Five-Acre Bylaw", to all of HRM (Appendix AA) This by-law has done much to preserve SL-SRRP's unique ecosystem so that we can carry on now with the long-held goals for a viable regional park here. Other HRM areas could benefit from a similar by-law.
- 7B. We request that all rivers in HRM have their flood plains identified, mapped, and zoned.
- 8B.Create a 100 m mandatory publicly owned vegetative buffer around watercourses and lakes, and zone these areas as Environment Protection Zones. Note: Trails may be permitted in these buffers. SL-SRRP Coalition agrees with the following request of Friends of BMBCL and would support its being applied more broadly:

"Increasingly, there has been recognition that the current 20m setback required in both commercial and residential developments is insufficient to address impacts on lake water quality. We are recommending this be increased to a 100m buffer in recognition of the need to ensure the health and livability of our communities. [See Stevens Group residential proposal for the former Sisters of Charity lands buffer from Susie Lake].

The water quality of our lakes is a significant community asset - one that is far cheaper to maintain than to correct. It is recommended that a 100m mandatory buffer be required, to be zoned as an Environment Protection Zone. Consideration should be given to requiring that the Environment

Protection Zone extend beyond the 100m buffer where the topographical conditions are such that runoff would be likely to negatively impact the lake waters...

Wetlands are a critical filter naturally managing the water quality of our lakes. At p. 51 of Setbacks and Vegetated Buffers in Nova Scotia, by E. Rideout, 2012 it states:

"... riparian vegetation, particularly when there is a very wide vegetated buffer, can slow the flow of water over land, promotes infiltration and reduces peak flows which can cause flooding. Riparian vegetation filters pollutants (sediment, nutrients, bacteria, pharmaceuticals, salt, and toxins) from overland runoff and improves water quality, both in inland watercourses and marine waters. Riparian vegetation provides habitat for terrestrial and aquatic species. A setback will protect property from flooding and erosion by separating human activities from immediate impacts of these processes. Flooding and erosion will still occur, but will pose less of a threat to people and property.

The report goes on to state at p. 52:

Vegetated Buffers: It is very important to note that many benefits are derived from the vegetation adjacent to watercourses that cannot be provided by setbacks. In particular, the filtration function of riparian and coastal vegetation can enhance water quality whereas setbacks have a neutral or even negative impact on water quality. Stormwater mitigation and habitat and connectivity values are also provided by vegetation and not by setbacks.'

It is recommended that vegetated buffers of at least 50m from the Spring high water mark of a stream/brook/tributary during high water conditions be mandated in the Regional Plan and also mandated in the associated zoning provisions. This is consistent with the 50m buffer recommended by the Bedford Watershed Advisory Board, but rejected by Council on June 25, 2013, in respect of Black Duck Brook on the eastern boundary of BMBCL Regional Park adjacent to the Bedford West Brookline S/D. The Friends of BMBCL suggest it is timely to reconsider the 100m lake buffer given the increasing recognition of the importance to our health and well being that our lake water quality be maintained." (BMBCL Regional Plan Submission March 11, 2020.)

9B.Mandate fifty-metre publicly-owned vegetated buffers from the high-water edge of wetlands.

As noted in 8B, wetlands are a critical filter naturally managing the water quality of our lakes. At p. 51 of Setbacks and Vegetated Buffers in Nova Scotia, by E. Rideout, 2012 it states:

"... riparian vegetation, particularly when there is a very wide vegetated buffer, can slow the flow of water over land, promotes infiltration and reduces peak flows which can cause flooding. Riparian vegetation filters pollutants (sediment, nutrients, bacteria, pharmaceuticals, salt, and toxins) from overland runoff and improves water quality, both in inland watercourses and marine waters. Riparian vegetation provides habitat for terrestrial and aquatic species. A setback will protect property from flooding and erosion by separating human activities from immediate impacts of these processes. Flooding and erosion will still occur, but will pose less of a threat to people and property."

- 10B. Implement the Water Quality Monitoring Functional Plan by Stantec (2009) into the RP+10 in its entirety.
- 11B. Hydrographic stream gauges are needed to measure annual water flow out of rivers in HRM. This information is required to help with water quality monitoring, and also to have baseline information prior to development.
- 12B. By-laws be developed to require that stormwater does not impact or change predevelopment water quality standards of water courses. Receiving water quality must meet or exceed predevelopment water quality standards and does not exceed pre-existing water- quantity flow. The HRM Red Book and the Halifax Water White Book must include stormwater treatment.
- 13B. All detention/retention ponds that are required be designed to hold back 2-100-year storm events and be engineered as functional wetlands.
- 14B. Create policy in the RP+10 to put the Stantec Water Quality Monitoring Functional Plan (2009) into the RP+10 to improve the degrading water quality in Sandy Lake and other lakes in HRM before wildlife species and other values are lost due to current threats to water quality. Sandy Lake's water quality is important to protection of the park's entire system.

Sandy Lake's water quality is important to protection of the park's entire system. The lake was oligotrophic historically. Testing over the decades shows a decline to the present, where it is now in the low mesotrophic category. Since the 2013 clear-cut of 300 acres beside the lake, residents and visiting scientists have noticed changes in the lake. Thick organic matter, wood chips from the clear-cut, has collected where Karen's Brook, a tributary across from Peverill's Brook, enters Sandy Lake. In the past 3 summers thick growth of reeds lining the edge of most of the lake has been growing. Such reed growths indicate deteriorating water quality and reduce the swimming and other shoreline recreational potential. The swimming beach has had to be closed several times in recent years due to algae blooms, previously an uncommon event here. Effort is needed to walk back the damage to the lake, to return it to oligotrophic again.

Other pollution sources listed in the AECOM study are septic systems within 300 m of the lake, (\sim 20 residences within 300 m of Sandy Lake and \sim 200 residences within 300 m of watercourses), motor boats, fertilizers, and the off-leash dog park at Sandy Lake beach is discussed as a source of pet feces.

The report prepared by Stantec *Water Quality Monitoring Functional Plan* (2009) provides recommendations for improving water quality in existing lakeside communities. (Appendix II, e-k)

The SLCA also produced an article for public use and circulation among the public. (Appendix T)

The Stantec report also identifies Sandy Lake as a Tier 1 waterbody or "High Vulnerability" needing a robust water quality monitoring plan that will identify how water quality may be impacted by development in the Sandy Lake watershed. P. 43, AECOM report.

- 15B. The SL-SRRP requested, along with several other HRM park organizations that the Province amend s.237 of the HRM Charter to change the 1-year decision period for lands zoned park to 5 years to align with the s.239 time frame respecting transportation reserves. To require budgeting and Regional Plan processes to happen plus a purchase negotiated all in one year after rezoning is not a realistic time frame. SL-SRRP requests that HRM supports this and works with the Province to achieve it in order to benefit many future potential park land acquisitions.
- 16B. Identify, ground-truth, protect, enhance and acquire wildlife corridors throughout HRM and into the mainland. Coordinate with other counties and the Province to plan ahead to avoid blockages. These corridors might be destroyed if we don't put emphasis on them in the RP+10. (Appendix BB)
- 17B. We ask that the city acquire the properties needed to create wide active transportation corridors (trails) that double as Essential Wildlife Corridors between green areas anywhere in HRM that would benefit from this, including but not limited to SL-SRRP and Blue Mountain Birch Cove Lakes. This could be combined with construction of corridors over or under roadways for both humans and wildlife connectivity. This measure would also be a way of moving out from under the legal restrictions imposed by the Halifax Charter's s.237 and toward s.239 and its more workable 5-year window in transportation-related acquisitions. Over time it is reasonable to assume that wildlife corridors in an urban environment such as exists currently will become active transportation corridors as well.
- 18B. Identify and protect old-growth trees in SL-SRRP and throughout the city. Less than 1% of Acadian forest in Nova Scotia is old growth.

This is the response of Sandy Lake Conservation Association (SLCA) to *Old Growth Forest Constraint Mapping:* A mandate of the AECOM Sandy Lake Watershed Study is to address policy E-17. Item E-17-k states "identify areas that are suitable and not suitable for development". (p. 51, Appendix II)

"Upon reviewing the final copy of the AECOM study, it was alarming to learn that small lot residential development was recommended on the southern peninsula of Sandy Lake; the same southern peninsula that is stated in the study as having a mature hemlock forest. Given that the Department of Natural Resources (DNR) acknowledges that old growth forest in Nova Scotia is rare, and is actively attempting to protect it, recommending this area as suitable for development is extremely misguided.

To provide validity on said point, arrangements were made to have a DNR employee collect data using a sampling protocol designed specifically to quantify old forest in Nova Scotia. Three sample plots were collected on October 3, 2014.

The data was reviewed by the DNR manager of research and planning. He stated these are two high quality old growth stands from the "SH2 Hemlock-White pine/Sarsaparilla" vegetation type. Hemlock is the longest-lived species in the province, and the longevity of hemlock and pine in this community supports development of old growth forests that can persist for long periods through gap replacement processes that maintain uneven aged conditions. The old forest score of 87 out of a possible 100, and age >175 years would make these one of the higher scoring old growth stands in the Province. If it occurred on Crown Land it would fall under DNR's old forest policy, and would likely be reserved.

HRM should not accept the final draft as submitted by AECOM without accurately addressing item E-17-k in the context of old growth forest. Old growth forest should not be suitable for development. Dr. Patriquin recommends mapstand H4470637 387 and H4470636 182 be deemed a Type 1 constraint similar to AECOM's old growth constraint designation for the Birch Cove Lake watershed study. A more thorough review of other forested land in the Sandy Lake watershed using a geographical information system and DNR's Old Forest Policy 2012 to identify additional old growth forest area is required."

19B. Create policies to prevent park land from being traded, built upon, or eroded by other interests. Park land must be valued as an asset to the city and its people, and be protected.

Too often when a school or transit hub or other infrastructure is needed, or in the case of SL-SRRP a 50-acre piece of fine park land was traded to a developer to save a pond in another area, the land is scooped out of the park as an "easy solution". Park land needs to be seen as an asset, valuable in itself as park land.

Never do we hear anyone say they wish a park had been turned into housing, but we do hear people lament the loss of green space when it goes to roads or buildings.

C. Halifax Green Network Plan items that support protection of SL-SRRP

Further detail is provided on each item in the notes following the table.

SL-SRRP Coalition requests that:

1C.	The city take action to protect the proposed SL-SRRP as an expanded regional park, as delineated in Map 1 (Appendix A) by any means available, including using the Halifax Green Network Plan (HGNP).
2C.	The value conflict of lands in the SL-SRRP area be resolved. Map 9 (page 51) shows its conflicting values, particularly to the west of Sandy Lake. The area is zoned for housing yet has "core areas and corridors".
3C.	The city refine and incorporate Map 5 into the RP+10. (4.1.3.1 Action 1, p.38), and incorporate the entire HGNP into the RP+10.
4C.	The Regional Plan be amended to ensure that the Green Network map (Map 5 on page35), is used when reviewing changes to the Urban Service Area boundary, Urban Settlement Designation, Urban Reserve Designation, and when preparing Secondary Planning Strategies.
5C.	The MPS be amended to identify and protect environmental sensitive areas at SL-SRRP and consolidate environmental protection zones to protect the drumlins, old growth forest, wetlands, slopes, feeder brooks, the ecology which hosts the rich and rare flora and fauna and other environmentally sensitive features of the SL-SRRP. (4.1.3.2 Action 3, 4 & 5, p. 39)
6C.	The city request the Province amend the Halifax Charter to give the city the ability to acquire environmentally sensitive areas

	(riparian, wetlands, drumlins, stands of trees, steep slopes etc.) as an environmental reserve in addition to parkland dedication provisions. (4.1.3.7 Action 18)
7C.	The Regional Plan be amended to remove Urban Settlement designation from corridors. (4.3.3.3, Page 51 map)
	Include core areas and important corridors west of Sandy Lake and Jack Lake cross Hammonds Plains Road and reach toward Blue Mountain Birch Cove Lakes (BMBCL) as clear links. Some are stepping stone links for wildlife between BMBCL/Chebucto Peninsula through Lower Sackville and Dartmouth and east toward Preston/mainland east.
8C.	The essential and important corridors shown on the Green Network Ecology (map 5) be preserved. (4.3.3.5 Action 37)
9C.	Existing and new stepping stone corridors through Bedford West and other areas be enhanced and acquired to create corridors from Chebucto Peninsula through Sandy Lake to Sackville River and the Mainland.
10C.	All wildlife corridors be identified, ground-truthed, protected, enhanced and acquired, including those within and between SL-SRRP and BMBCL and the Chebucto Peninsula and into the Mainland, including stepping-stone corridors.
11C.	Wide active transportation corridors (trails) be created that could double as Essential Wildlife Corridors between green areas and also across or under roadways, including but not limited to SL-SRRP and Blue Mountain Birch Cove Lakes.
12C.	The Regional Plan and Municipal Planning Strategies be amended to prioritize the preservation and creation of natural

	connections to the Chebucto Peninsula (Map 9) from the Mainland when reviewing development proposals and updating planning policies and zoning in the area. (Action 32)
13C.	The HGNP guidelines be used to maintain and enhance all of the wildlife corridors in SL-SRRP, including those west of Sandy and Marsh Lakes which we understand currently lie outside the city's conceptual map (Map 5 on p.35) through Municipal Planning Strategies and Land Use Bylaws.
	"maintain what remains, seek opportunities to restore disturbed areas and mitigate the impacts of nearby human activity." P.38 "maintain the largest possible remnant patches and encourage best management practices in the intervening areas to provide opportunities for wildlife movement between patches." p.39 (4.1.3.1 Action 2)
14C.	The urban forest be maintained and enhanced by adoption of a private trees by-law to prevent unnecessary tree damage or removal of trees on public or private property. (Action 9, p. 39 and see section B above.)
15C.	Open spaces, including SL-SRRP, be prioritized and preserved as a low-cost sustainable approach to mitigating climate change. (4.1.3.6)
16C.	Riparian areas and shoreline vegetation be prioritized, preserved and restored as an effective method for mitigating flood impacts. (Action 14 and See Section B above)
17C.	The city work with the Province to create and enhance wildlife road crossings. (4.3.3.6)

18C.	Through the HGNP, with the development of new parkland
	targets and standards, the city amend the Regional Plan and
	Regional Subdivision By-law to direct the acquisition,
	development and management of Municipal Parkland (Action
	53)
19C.	The city assess through the RP+10 review the establishment of
	future Regional Parks, as identified in the Regional Plan, and
	their boundaries, through the Land Capability Analysis tool and
	other criteria (listed) In the case of SL-SRRP, follow actions 64
	and 65 to expand the conceptual boundary to appropriately
	include important watershed lands within the park boundary
20C.	The city use the Land Capability Analysis Tool and any other
	means available to acquire the watershed of SL-SRRP.
21C.	Year-round recreational infrastructure including winter
	activities be incorporated when planning parks. (Action 44)
22C.	A public engagement program for planning and stewardship of
	public parks be created. (Action 43)
23C.	Policies to prevent park land from being traded, built upon or
	eroded by other interests be created. Park land must be valued
	as an asset to the city and its people, and be protected. Never
	do we hear anyone say they wish this park had been turned
	into housing, but we do hear people lament the loss of green
	space when it to goes to housing.
24C.	The entire 1800 acres of the SL-SRRP be added to the HGNP's
	Working Landscape Map according to the definition of Working

Landscapes, and be protected as a valuable tourist and scenic resource site.

Supporting Information: Sandy Lake - Sackville River Regional Park's place in the Halifax Green Network Plan

The Halifax Green Network Plan (HGNP) passed Regional Council on Tuesday August 14, 2018.

https://www.halifax.ca/sites/default/files/documents/city-hall/standing-committees/180621cped151.pdf

SL-SRRP comments regarding Sandy Lake Sackville River Regional Park (SL-SRRP) are in italics.

What happens to the lands and waters at Sandy Lake will have significant impact on HRM from an ecological perspective, including on flooding of the Sackville River downstream in Bedford.

Each time we study the HGNP documents we find more information that fortifies the ties between the HGNP and the Sandy Lake-Sackville River area. Some that we have identified are:

Pages 3, 4, and 5 give an overview of the essentials. To those who know SL-SRRP well, these introductory pages reflect the values at Sandy Lake and area.

Page 20 Ecological Open Space Values: *SL-SRRP contains at least 18 of the 23 items listed:* Important Biodiversity Areas, Large Natural Patches of 1000-5000ha (*1133ha at SL-SRRP*), Mature Forests (>100 years old), Rare Forest patches (*Ash, Hemlock*) Protected Water Supply Area, Shallow Water Tables, (<2m to surface), Watershed with Low Human Footprint, Riparian Areas, Wetlands, Endangered Moose Habitat, Important Bird and Biodiversity Areas, Observed Species of Concern, Provincially Significant Habitats, Salmon Habitat (100m buffer), Connectivity Pinch Points, Essential Connectivity Regions.

Page 24 Socio-Cultural Landscape Open Space Values: *SL-SRRP contains the following:* Areas of Archaeological Significance, Historical Indigenous Use, Near-Urban Natural Areas, Inland Water Routes, Lakes, Waterscapes, Essential Urban Green Space, Regional Park, Wilderness Area, Urban Forest Patches, Trails, Public Beach, Military Use Area adjacent.

Page 30 Guiding Principles: All of the Guiding Principles apply to the Sandy Lake area, but a few stand out: "sustain and restore ecological functions." "Ground decisions in science, including conservation biology, landscape ecology and the social sciences." "Protect important ecological, cultural, recreational and working landscapes." "Ensure the long-term stewardship of open spaces as a vital community and regional asset." "Collaborate with citizens' organizations, private investors and landholders for more coordinated management and investment in public and private land." And "...provide opportunities for all

residents to enjoy nature, cultural heritage and outdoors within easy access of their homes and workspace." *Interconnected, Grounded in Science, and Sustainable.*

Page 34 Ecology section 4.1.1 Goal: Support a healthy and sustainable natural ecosystem. 4.1.2 Key Considerations: Parks and Protected Areas, Regulated Areas (*Riparian and Wetland areas, significant amounts of Old Growth Acadian Forest*), Areas of High Environmental Value-Overlap (*Defined as areas whose loss would have a detrimental impact on ecological integrity*), Core Areas (*Large, well-connected patches of natural habitat…*) Important Corridors (*feeding nearby Essential corridors at pinch points*).

Map 5 (on page 35.) and the new **Map 6** (on page 36) the Ecology Maps identify the Sandy Lake area as an "Area of high environmental overlap." (defined page 34 as "High-valued areas whose loss would have a detrimental impact on ecological integrity.")

Map 9 (page 51) shows its conflicting values particularly to the west of Sandy Lake, and identifies west of Sandy Lake as having "core areas and corridors". That is, while it is important ecologically as a large sub-watershed in the Sackville River system (one of only five major watershed and natural corridors in the HGNP) and has important wildlife corridors that link to the Chebucto Peninsula, it is also zoned for housing development - An important conflict to resolve. Unfortunately, the maps stop before showing north to the Sackville River.

4.1.3.1 Action 1, p.38: recommends the city refine and incorporate Map 5 into the Regional Plan.

4.1.3.1 Action 2, page 38: Use these guidelines when planning, maintaining and restoring "essential and important corridors (Map 5 on p.35) through Municipal Planning Strategies and Land Use Bylaws: Essential corridors should ideally be 1km wide" "Where a 1km width is not possible for essential corridors, maintain what remains, seek opportunities to restore disturbed areas and mitigate the impacts of nearby human activity." P.38 ... Important corridors at least 100m.

"Where intact, important corridors are unavailable and/or not possible to restore, maintain the largest possible remnant patches and encourage best management practices in the intervening areas to provide opportunities for wildlife movement between patches." p.39

Note: Sandy Lake area has at least 3 marked important corridors and several minor corridors which feed those. (Appendix BB). They are shown linking east to west to the essential corridor to the Chebucto Peninsula, south across the Hammonds Plains Road just west of Sandy Lake, and east in the Sobeys property. Due to housing additions since HGNP creation, the remaining stepping stone corridors below Hammonds Plains Rd. are even more important to maintain and enhance.

4.1.3.2 Action 3, 4 & 5 (p. 39): amend MPS to identify and protect environmental sensitive areas and protect them during master planning exercises (ie: secondary planning) and consolidate environmental protection zones to significantly sized vulnerable landforms.

The drumlins, old growth forest, wetlands, slopes, feeder brooks, the ecology which hosts the rich and rare flora and fauna at SL-SRRP and other environmentally sensitive features of the SL-SRRP need protection within the park boundary.

Rhea Dawn Mahar's 1994 thesis identified Sandy Lake as the 2nd most valuable environmental sensitive (ES) site, and the Sackville quarry as the 3rd most valuable ES site out of 40 sites evaluated in the study of entire Sackville River watershed from Mt. Uniacke to the Bedford Basin. https://smu.ca/academics/departments/rhea-d-mahar.html

Dr. David Patriquin's recent survey of the area caused him to write that the entire area, including the lands and waters west of Sandy and Marsh Lakes and north to Webber Lake, is ES and should be acquired and protected. <u>www.sandylakebedford.ca</u>. (Appendices D, E, F, G, H, I, W)

The SL-SRRP area was recognized for decades as highly valuable ecologically, even unique (Dean Report), but somehow, possibly during the chaos of amalgamation, was lost sight of. It is important to put it back on track. We request the drumlins, old growth forest, wetlands, slopes, feeder brooks, the ecology which hosts the rich and rare flora and fauna at SL-SRRP and other environmentally sensitive features of the SL-SRRP be protected environmentally sensitive and drawn to be within the park boundary.

4.1.3.3 Action 6: Protect riparian corridors and wetlands from degradation, pollution and other threats. The HGNP requests an increase buffers to 30m for watercourses wider than 50cm, and an increase of drinking water buffers to 100 metres. Consolidate environmental protection zones to sensitive riparian areas and wetlands, floodplains, large wetland complexes. Increase buffers and runoff requirements in industrial areas. *However, SL_SRRP Coalition requests A 100 m mandatory publicly owned vegetative buffer be mandated around SL-SRRP watercourses and lakes, and zoned as an Environment Protection Zone. Note: Trails to be permitted in any buffer. Fifty-metre publicly owned vegetated buffers from the high-water edge of wetlands be mandated.*

4.1.3.4 Maintain and Enhance the Urban Forest

Action 9: Consider adoption of a private trees by-law to manage removal of trees on private property in serviced areas. Action 9 also recommends: Focus on large properties and minimizing impact on smaller properties, prioritizing the protection of trees and vegetation within the watercourse buffer; Create an Education campaign re tree stewardship on private property. Note: the 300 acres beside Sandy Lake that were stripped would still have been exempt. Therefore, this item is a step in the right direction, but needs to be strengthened to prevent similar damage elsewhere. Adopt a private trees by-law to prevent unnecessary tree damage or removal of trees on private property. See section B and Appendix GG. Create an Education campaign re tree stewardship on private property.

4.1.3.5 Water quality: Action 11, 12, 13: Strong new storm water management is needed

4.1.3.6 Prioritize the preservation of open spaces as a low-cost sustainable approach to mitigating climate change.

Action 14: "...prioritize the preservation and restoration of riparian areas and shoreline vegetation as an effective method for mitigating flood impacts." At the 2019 public meeting releasing the flood plain report, Dr David Patriquin asked why the proposed development west of Sandy and Marsh Lakes was not included in the study of potential impacts on the Bedford flood plains. The answer was that the city must not plan to develop at Sandy Lake for at least 100 years. Further development in the SL-SRRP would increase risk of flooding downstream in Bedford/Sackville.

4.1.3.7 Action 18: Request the Province to amend the Halifax Charter to give the city the ability to acquire environmentally sensitive areas (*riparian*, *wetlands*, *drumlins*, *stands of trees*, *steep slopes etc.*) as an environmental reserve in addition to parkland dedication provisions. *This would benefit all areas including the SL-SR area. We strongly support this for the good of all.*

For the SL-SRRP area we request that the SL-SRRP Map 1 area be designated in its entirety as an environmentally sensitive area and be acquired and preserved as an expanded Sandy Lake - Sackville Regional Park. See 4.1.3.2 and Section A above.

4.2 Working Landscapes. Based on the definition of Working Landscapes, the SL-SRRP area is a valuable working landscape from the Tourism and scenic resource aspects. It is already a popular location for fishing, canoeing, nature walks, birdwatching and much more. It was featured by Halifax Tourism as one of the five best places to view fall colours in 2017. (see photo below) The entire interdependent 1800 acres should be included as an important area on the HGNP's Working Landscapes map. Not protecting valuable watershed will degrade the current values.

"Tourism and Scenic Resources A strong tourism industry within the Green Network requires attractive and accessible landscapes with diverse recreational experiences and an engaging cultural heritage. However, the beauty of these landscapes can be negatively impacted by poorly designed and screened residential, industrial or commercial developments that distract from scenic routes and vistas. Underdeveloped tourism infrastructure, such as lodging, restaurants and recreational experiences, can also hinder efforts to draw visitors to an otherwise highly marketable scenic landscape." P.45

"...Enabling the development of resource-based and eco-tourism opportunities, including fishing, wildlife viewing, hunting, agriculture and forestry focused tours and experiences." P.46

4.3 Community Shaping. 4.3.2 p.49: Chebucto Peninsula: Concerted efforts needed to avoid impacts to connectivity, or else its "wildlife and ecological health will be severely compromised". *SL-SRRP corridors relieve a significant pinch point to the Chebucto Peninsula. Its corridors must be protected and enhanced along with stepping stone corridors and other connectivity, including wildlife road crossings to augment the remaining corridors through SL-SRRP into the mainland and to Chebucto Peninsula.*

4.3.3.3 Amend the Regional Plan to remove Urban Settlement designation from corridors. Page 51 map. Note core areas and important corridors west of Sandy Lake and Jack Lake that cross Hammonds Plains Road. Note they reach toward Blue Mountain Birch Cove Lakes (BMBCL) as clear links. Some are stepping stone links for wildlife between BMBCL/Chebucto Peninsula through Lower Sackville and Dartmouth and east toward Preston/mainland east.

Action 29 (page 50): Amend Regional Plan to use Map 5 when reviewing changes to Urban settlement & Urban reserve, Designation & preparing Secondary Planning Strategies

Action 32: Amend the Regional Plan and Municipal Planning Strategies to prioritize the preservation and creation of natural connections to the Chebucto Peninsula (Map 9) from the Mainland when reviewing development proposals and updating planning policies and zoning in the area. *This is important to SL-SR because it has corridors that link to Chebucto Peninsula through an area outside our proposed park and that is under development pressures. Some are stepping stones now. All need protection. We request that the RP deliberately preserve these corridors and those of SL-SRRP.*

4.3.3.5 Action 37: "Preserve the essential and important corridors shown on the Green Network Ecology (map 5)"

1. essential watershed lands west of Sandy and Marsh Lakes, also up to Webber Lake

and down to the Hammonds Plains Road tie together the remaining wildlife corridors and stepping stone corridors as identified in the HGNP. With the disappearance of some wildlife corridors since the HGNP was drafted, the remaining important corridors and the remaining stepping stone corridors are even more important to be preserved.

2. The area between Sandy Lake and Blue Mountain Birch Cove Lakes needs concerted effort to maintain and enhance the connectivity to the Chebucto Peninsula. (Sections 15A, 16A, 16B, 17B, and Appendix BB)

4.3.3.6 Work with the Province to create and enhance wildlife crossings.

4.4 Outdoor Recreation (p.54) "The objectives for Regional Parks, as outlined in our Regional Plan, are to preserve significant natural or cultural resources, and to be large enough to support both ecosystem protection and human enjoyment at the same time." (p.57) *Current and historical studies indicate that the watershed west of Sandy and Marsh Lakes must be preserved if the park's existing park assets are to survive and flourish.*

Action 43: formalize a public engagement program for planning and stewardship of public parks.

Action 44: Incorporate year-round recreational infrastructure including winter activities when planning parks.

Map 10 (p. 55) : Sandy/Jack lake lands owned by city are marked as HRM Regional Park and are listed as "Areas of Consideration" along with BMBCL, Sackville lakes Prov. Park, Feely Lake, Porter's Lake Crowbar Lake, Purcell's Cove Backlands, Cole Harbour Open Space Plan Study Area, 100 Wild islands, Wright's Lake area.

Map 10 along with the Map 5 Ecology values and Map 6 combine to make it possible for the HGNP's newly established Land Capability Analysis Tool to assess and allow for the acquisition of watershed lands of SL-SRRP, particularly those essential watershed lands currently needing inclusion in the park boundary.

Action 53 – 55: Potential new parkland will be evaluated and acquired through the Land Capability Analysis Tool. Use the Land Capability Analysis Tool and any other means available to acquire the watershed of SL-SRRP. "With the development of new parkland targets and standards, amend the Regional Plan and Regional Subdivision By-law to direct the acquisition, development and management of Municipal Parkland" The watershed west of Sandy and Marsh Lakes must be preserved if the park's existing assets and those of the Sackville River are to survive and flourish.

Action 64 and 65: In the case of SL-SRRP, follow actions 64 and 65 to expand the conceptual boundary to appropriately include important watershed lands within the park boundary:

"During the next Regional Plan review assess the establishment of future Regional Parks, as identified in the Regional Plan, and their boundaries, through the Land Capability Analysis tool and other criteria that includes:

a. The location of any conceptual park boundary

b. Relationship to adjacent lands and community

c. The landform, ecological attributes, and cultural features of the lands including connectivity to other lands

d. The presence or potential for recreational features such as existing trails and their usage

e. Existing and possible access to the lands and the ability to accommodate primary or secondary trailheads

f. The planning, zoning, and development potential of the lands,

g. The interest of competing development plans and the impact that municipal parkland acquisition would have on them,

h. Acquisition models such as outright purchase or other alternatives

1. Financial and other budget factors..." (p.60)



Halifax Tourism, Sandy Lake, 5 Best places for fall colours, October 2017, by Nick @Sasktraveler

SUMMARY AND CONCLUSIONS

The Sandy Lake – Sackville River Regional Park Coalition requests that the city acquire 1800 acres to protect the long-known valuable ecological unit, the SL-SRRP.

Halifax County, Bedford, and now the city, have all acquired land for the Sandy Lake – Sackville River Regional Park (SL-SRRP), totalling about 1000 acres of the requested 2800-acre SL-SR proposed park. We are grateful for the city's recent actions to acquire more.

The park is at risk from events that span 5 decades. See the provided Time Line. <u>http://sandylake.org/time-line/</u> With each administrative move, from Halifax County to Bedford, and then the 1996 amalgamation, things happened or failed to happen.

The 1971 MAPC report raised the expectation that the Sandy Lake area was to be made a regional park. All subsequent regional plans reaffirm that. For example, in the 2015 Halifax Municipal Strategy for Bedford:

"...shall continue working towards the establishment of major parks at Admiral's Cove, Sandy Lake, and within the Waterfront Development Area (Policy P-6)"

Policies P-8 and P-9 indicate Town Council's intentions to designate future parkland within the Jack Lake assembly stating:

" the future development of existing open space is now seen as a higher priority than the acquisition of additional open space. Exceptions to this would be land acquired in relation to subdivision development, land for neighbourhood parks, specialized land for linkages or unique sites, and Sandy Lake." P. 122-125

After 300 acres of Acadian forest west of Sandy Lake were stripped of trees in 2013 by a frustrated developer, the community was surprised to learn that in 1982 a large area had been rezoned from its former Park designation. In the 2006 RP process, the area was listed, along with two others, to possibly become available for development next. Nevertheless, the Sandy Lake area continued to be identified as park in regional plans.

It is evident that **this is the last opportunity to create a** <u>sustainable</u> regional park at Sandy Lake. The developers are at the gate. In the last several years developers have been reconfiguring their land holdings in the Sandy Lake area at substantial cost to optimize their holdings for development purposes. This includes a \$1Million developer contribution to an oversized wastewater line in anticipation of development. Now, developers own about 1000 of the requested acres, and one of these developers, Clayton (Sandy Lake Holdings) has requested Secondary Planning within the RP+10 process. This same developer also offered to trade their lands if the community can convince the city to do that. We do want to see developers continue to prosper. If we focus on a win-win we will achieve success.

SL-SRRP is a regional asset, not simply a local asset. In 1971 the Sandy Lake/Marsh Lake/ Sackville River area was selected by the Province to be one of seven "jewels in the crown" of Metro to be protected as regional parks for their ecological richness and for community education and recreation. Overall, the area has been recognized for 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 includes 3 lakes, each of them unique – Marsh Lake, on the Sandy Lake to Sackville River watercourse, is shallow and marshy and is identified as one of the top park priority assets along with Sandy Lake, the Sackville River, streams, old growth forests and drumlins. Jack Lake, which drains into Papermill Lake and then into Bedford Basin has a boreal forest quality. Sandy Lake is a deep "blue lake" (rather than a "tea lake" like most in this part of NS) which stratifies seasonally providing summer habitat for salmonids. This unusually deep lake allows for vigorous populations of fish, waterfowl, frogs, insects and all the richness of shoreline and near forest life associated with a healthy northern temperate climax forest ecosystem. The drumlins have rich soil that supports a remarkable Acadian forest with significant old growth stands, striking Pit and Mound Topography and accompanying varied and rich wildlife.

Mahar's paper on *Environmentally Sensitive Areas in the Sackville River Watershed from Mt. Uniacke to the Bedford Basin* identified the Sandy Lake area as #2 out of 40. The area meets all of the criteria in the ESA definition, including use for scientific studies and for educational purposes. https://smu.ca/academics/departments/rhea-d-mahar.html

Our HRM Alliance lists the proposed SL-SRRP as one of 3 prime natural areas close to Halifax proper needing protective action now: Purcell's Cove Backlands, BMBCL and Sandy Lake - Sackville River Regional Park.

The Halifax Green Network Plan identifies this area as (1) having important wildlife corridors and stepping stones to alleviate the pinch point at the neck of the Chebucto Peninsula, and (2) being essential to the Sackville River System, which is a major watershed and natural corridor in the GNP and (3) being a valuable working landscape from the Tourism and scenic resource aspects. Yet (4) The Green Network Plan also identifies this as an area with overlapping values – over 1000 acres of this rich ecological treasure are zoned for housing - a conflict of purposes that need to be solved.

Regional Plans from the '70s to the present all listed this as an area to become a Regional Park. What has been lost sight of is the importance of preserving the interdependent ecological unit recognized in multiple studies. The existing park assets will fail if we fail to protect essential watershed. The negative impact on water quality of the simple act of tree removal made this demonstrable when Armco cut 300 acres in 2013.

Based on the advice of local scientists and professional planners, we have identified 1800 additional acres needing protection. This includes the Johnson's Brook watershed, along Hammonds Plains Road, which feeds Sandy Lake and the entire system. The new Recommended Boundary of the Sandy Lake – Sackville River Regional Park includes *"all still available and important land required to protect critical*

environmental components of the Park. The proposed boundary will also include land required to establish proper public access opportunities to the Park." (Appendix K)

The city is using the 2015 map from the *Off-site Parkland Dedication Request – Marsh Lake Lands, Bedford* report (Appendices W and X) as the proposed park boundary. **Critical Sandy Lake watershed was omitted from that conceptual map**, as it was drawn only for the purpose of acquiring the 160 acres from Armco in 2015. It is important that this map not be used for a purpose for which it was not designed. However, the same rationale the city applied for acquiring the 160 acres is equally applicable to the rest of the watershed.

The proposed SL-SRRP map includes additional lands outside of the Conceptual Map's borders in order to:

- (1) be consistent with historical concepts of a Sandy Lake Regional Park and with priorities identified in the HGNP, most notably connectivity between the Chebucto Peninsula and the greater mainland;
- (2) protect the Sandy Lake to Sackville River watercourse for migratory fish, reptiles, amphibians, waterfowl, otters..., water quality/aquatic recreation and to reduce downstream flooding. (The Sandy Lake watershed's significance was NOT modelled in the 2017 Sackville River Floodplain Study Phase Two, on the assumption that there would be no development there for 100 years. This critical area for flood control in Bedford area has not been properly examined.); and
- (3) increase the area of mature and old growth forest habitat and provide a forested wildlife corridor connecting lands of the Chebucto Peninsula with the central and eastern mainland.

Benefits to preserving the entire area within the new Boundary Map 1:

- Landscape Connectivity: The whole sweep of forest provides an essential wildlife corridor at the neck of the Chebucto Peninsula, north to the Sackville River and the mainland an important link identified by the Halifax Green Network Plan (GNP).
- Trails: The area proposed for Sandy Lake Sackville River Regional Park is already used unofficially by citizens of HRM for multi-recreational purposes through a network of existing trails. Currently, a wide variety of outdoor activities are conducted on these lands, including fishing, mountain biking, birdwatching, swimming, paddling, dog-walking, cross-country skiing and snowshoeing, to name a few.
- The Sandy Lake watershed is a large sub-watershed of the Sackville River and hosts populations of seagoing American eel, Atlantic Salmon, Gaspereau and speckled trout. The integrity of this system is critical to the Sackville Rivers Association's efforts to revive salmon in the Sackville River system, a major watershed and natural corridor identified in the GNP.
- To prevent increased risks of flooding in the Sackville River flood plain.
- The wetlands bordering Sandy Lake and Marsh Lake and along much of Peverill's Brook leading to the Sackville River host a complex, healthy ecosystem that includes large populations of amphibians and reptiles.
- The diverse wildlife population includes over 100 species from the mighty osprey to the tiny rubythroated hummingbird. Loons, otters, frogs and snapping turtles inhabit the lakes, and the

woodlands are home to bobcats, barred owls, many warblers, wood turtles, deer, ermine, fox and mink.

- Sandy and Marsh lakes are bordered by rich drumlins that support magnificent mixed, multi-aged Acadian forest with significant old-growth stands, some trees over 200 years old, and striking "pit and mound" topography.
- Historical evidence and studies
- The new map provides solutions for park access points
- Sandy Lake is a popular location for research for schools, universities and community. Aquatic studies point to deterioration in oxygenation and increased salt loading of Sandy Lake since the 1970s, related to urbanization and some clearcutting. Significant further settlement within the Sandy Lake watershed would make the lake inhospitable to the migratory fish, reduce wildlife diversity, as well as increase flooding downstream.
- Lions Club Beach, already within the park boundary, will be enhanced by the expansion of the park boundary to encompass the lands west of Sandy and Marsh Lakes. Both water quality and view plains will be enhanced.

The 2013 clear-cut west of Sandy Lake is already re-growing with the full suite of Acadian forest. Young yet, but already serving its role again to protect the water quality of Sandy Lake and the system and to return habitat for the area's creatures.

From an ecological standpoint, any significant new housing development allowed in the remaining watershed would inevitably tip the area over the edge ecologically.

In addition to significant municipal expense, effort and acquisitions, and the community efforts over decades, there have been federal contributions (1000 acres CMHC Jack Lake Lands), provincial contributions (selection of the site for regional park, 50 prison acres, purchase/gift of 236 acres), gifts from individuals and groups (Lions Club Beach), and businesses (Farmers Dairy donated 6 acres). Those lands must remain protected, but most of the still-unprotected 1800 acres of the critical Sandy Lake to Sackville River corridor are essential to the welfare of the entire system. They are critical to the existing park that has been slowly put together over five decades by all.

We must not let all of that effort and expense of the community, the municipality, the Province, go to waste just because circumstance caused some to lose sight of the vision and change a major part of the watershed to allow housing development. It was a mistake. Pure and simple. It is not too late to correct that mistake, but time is running out. We need concerted action from the city to ensure that this entire jewel will be preserved for generations to come.

From the Talks with Scientists and Planners page (Appendix EE):

"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."

Those irreplaceable watershed acres of the Sandy Lake watershed might result in homes for as many as 16,000 people, and thousands more cars on the crowded Hammonds Plains Road. Or, they can make a natural oasis and recreational hub for the growing population of Bedford, Sackville, Hammonds Plains, HRM, and the Province.

Were mistakes made at Sandy Lake that brought us here? Base the new boundary on science, watershed protection, not on property lines, and take action to correct past mistakes. The Regional Plan review and the Green Network Plan are in a position to protect these lands and waters, as intended for so long for the residents of Halifax, Bedford, Hammonds Plains, Sackville... for the good of all.

We are grateful to the developers who offered to trade, to landowners who are willing to sell for the park, to the city, politicians and citizens, to all who are helping. It is not too late to find solutions to set things back on the best path, to look forward, toward protecting each other's investments. The way all have worked together at Purcell's Cove in creating the Shaw Wilderness Park is a great example of what can be done when it is important to change direction.

This is city-building with vision. The kind of visioning that protected Point Pleasant Park, Gatineau Park, Stanley Park and others, and has indeed almost protected this park a few times.

Never do we hear anyone say they wish a park had been turned into housing, but we do hear people lament the loss of green space when it goes to roads or buildings.

Within the RP+10 process please evaluate the assets of the park and what is needed not only to preserve but enhance those natural assets. Seek trades or do whatever is necessary to protect this entire area about which the Nature Conservancy of Canada's former N.S. Program Director said, "The highest and best use of this property is park land."

With development coming ever nearer and at an accelerated pace, this may be our last opportunity to preserve this outstanding ecosystem and recreational area for all time.

We ask that:

- 1. The SL-SRRP be expanded by additional 1,800 acres (see Map 1 Appendix A). The SL-SRRP boundary be researched in the RP+10 process so that new boundaries based on science are established to encompass all remaining essential watershed to be protected and managed as a regional park for all time. That would mean finding "win-win" solutions that serve both the community and present landowners needs; and
- 2. The Halifax Green Network Plan (HGNP) be included in its entirety in the RP+10.

3. The city address and implement each of the requests in this document's Request Sections A, B, and C.

Thank you for this opportunity to provide input on some of our particular concerns from the Sandy Lake-Sackville River area. We plan to send additions to this submission in the coming months.

We send good wishes to all involved for an excellent outcome to benefit everyone.

Most Sincerely,

Sandy Lake-Sackville River Regional Park Coalition (SL-SRRPC)

