

June 23, 2016

To: Municipal Clerk
P.O. Box 1749
Halifax, N.S. B3J 3A5

Re: Blue Mountain – Birch Cove Lakes Regional Park

Dear Mayor Savage and Members of Regional Council,

As a resident of Halifax for nearly 50 years I am familiar with the Blue Mountain – Birch Cove Lakes area. I have been there countless times from my 30s to my 70s, hiking, swimming, canoeing, skiing, and camping (Leave No Trace) in this pristine wilderness. I was thrilled but not surprised when the Municipality announced its plan to make the area a regional park. I recall ten years ago camping at Fox Lake when my companion told me the news. The plan made complete sense to me, since I knew the area so well. I remember feeling very proud to be a Canadian living in such a forward-looking urban community.

Later a large portion of the area became protected under the 1998 Wilderness Area Protection Act. Not all of it could be protected before the city acquired the private land holdings on the Halifax side of the watershed area, but the city intended to acquire these lands so the park plan could be fulfilled and I trusted the city to follow through. I am familiar with the Wilderness Protected Areas Act since I devoted 16 years as co-founder of the Woodens River Watershed Environmental Organization promoting with other volunteer community groups the legal protection of the Five Bridge Lakes Wilderness Area. Nova Scotia proclaimed this area legally protected in October 2011.

You may imagine my disappointment in learning this week that Justice Robertson, who has acted for two years as facilitator to reach an agreement between the city and the landowners, came out against city staff in favour of giving the developers and landowners almost everything they have proposed. What they propose would create an urban sprawl extending into the proposed regional parkland that would

- (1) permanently damage the ecological value of the legally protected wilderness land within the watershed and original park boundaries; and
- (2) render impossible implementation of the original vision of a regional wilderness park situated within Halifax that would be, as a city park that is adjacent to the urban core, unprecedented in size, beauty, and ecological integrity anywhere in Canada.

Let me elaborate on these two points and bring out their economic significance.

First, how exactly would the ecological value of the protected lands be damaged permanently? All watersheds have high ground at their boundary that sheds water (just as the word 'watershed' implies) from that boundary down toward the flow of water at its lower central part. In this instance the lands that are legally protected by the 1998 Wilderness Areas Protection Act are within the watershed and downward from where the development is planned. **Hence these legally protected lands will not be protected from ecological damage if the plan goes ahead.** You cannot expect to massively develop human habitation on high ground within the watershed and not expect there to be permanent damage to the ecology of the land and water at lower levels within the watershed. That's how drainage in a watershed works.

I note that there is in the penultimate paragraph on p. 14 of the facilitator's report an implied legal threat where it reads: "...failure by HRM [to do certain things] is actionable." With all due respect, one must wonder: if HRM fails to protect from damage the legally protected wilderness land would that failure also be actionable?

For more than a decade I was a member of the Five Island Lake Citizens' Liaison Committee that worked with HRM in the remediation of the North Bay of Five Island Lake in Hubley where there had been a serious PCB spill where PCBs were carried downhill from the site of the spill to the Lake. I cannot recall offhand the total cost of this remediation project but it ran into many millions of dollars. All that could be remediated was an area that comprised 5% of the lake where the contamination was worse. Imagine the cost of trying to remediate the inevitable pollution created by the massive development above the large now pristine protected wilderness area at Blue Mountain - Birch Cove Lakes. The remediation cost would be astronomical. The landowners and developers may not choose to contemplate that large cost, but Regional Council representing the HRM taxpayers surely will. The Wilderness Areas Protection Act has legal teeth. **A bad ecological decision in approving massive development can expect to have real, long term, serious, negative economic consequences for taxpayers.**

Let me turn to point (2) above. Would the destruction of the vision of a regional park of unprecedented size and beauty adjacent and accessible to the urban core have economic consequences? Most certainly it would, although it takes vision in turn to see it clearly. I believe that Regional Council has that vision.

For Nova Scotia to become prosperous and vital in the new age of green economy, we need to attract smart, creative, visionary people who are doing well in cities like Toronto and New York but who want a different life style but also want a place to live and work that reflects their forwarding looking values. **They are attracted to cities with a well-integrated "green belt" and green network.** By the same token they are repelled by urban sprawl and more so if they see a city that cannot manage to follow through with their regional plan but instead keeps backsliding for the sake of pleasing various folks who show no commitment to public good and earlier took a known risk in buying land for personal gain. I know many other people of means and vision and passion who love the life that is possible in Halifax and are tempted

to move here. My sense is that we have an opportunity to be a major attraction for young people who are already successful and want to move here to live in a truly forward-looking city. Backsliding on the regional plan by intensifying urban sprawl is the very last thing we should do if we seek to encourage investment and growth in our city that will create long-term employment and a growing, vibrant, youthful community.

The professionals in city staff know what is at stake. Justice Robertson disagrees (p.5) with the list of negatives on p. 17 of her report that give the reasons why not to approve the proposed development. Though she disagrees, I recommend that you heed these professionals who have studied the proposal and say of the development plan: (a) that it “fails to achieve the park objective of providing access”; (b) that it “fails to achieve buildability...without undue destruction of natural assets and undue costs”; (c) that it “fails to achieve the regional park objective of buffer wilderness protected areas”; (d) that it “fails to achieve the regional park objective of providing connectivity of natural areas”; and (e) that it “fails to achieve the regional park objective of positive views from key locations”.

You have more than adequate grounds to reject this proposed development plan and to act with courage and honor for the sake of our collective public good.

Sincerely yours,

Richmond Campbell
Halifax, Nova Scotia