

Honourable Timothy Halman  
Minister of Environment and Climate Change  
Nova Scotia Department of Environment and Climate Change  
PO Box 442  
Halifax, NS  
B3J 2P8



April 27, 2022

**Re: Collaborative Protected Areas Strategy to Protect 20% of Lands and Waters by 2030**

Dear Minister Halman,

The Blomidon Naturalists Society welcomes the Government of Nova Scotia's commitment "to conserve at least 20% of the total land and water mass of the Province by 2030 as protected areas and other effective area-based conservation measures, including Indigenous Protected and Conserved Areas, in a manner consistent with national reporting criteria" as per Bill-57, *Environmental Goals and Climate Change Reduction Act*. In this time of climate crisis and biodiversity decline, the strong and dedicated protection of our natural ecosystems is imperative. But, how do we reach this 20% target? We know the government is preparing a *collaborative* strategy by the end of 2023, which we applaud, and as such seek to provide some of our thoughts and broad recommendations on this matter.

A long-standing naturalist group based in the eastern Annapolis Valley, the Blomidon Naturalists Society (BNS) represents over 100 memberships of individuals and families. Our mission is to develop understanding and appreciation of nature, and as such we are committed to environmental conservation and advocacy. Naturalists are keen observers, stewards, and activists. Through dedicated observation of the natural world, we have a deep understanding of the utmost importance of the protecting lands and waters in this province, and would like to provide our broad recommendations.

Our main recommendations for a protected areas strategy area are as followed, and will be delineated in more detail below:

- A halt to clearcutting on public lands;
- A focus on protecting public land;
- The prioritization of large core areas and the maintenance of corridors between areas;
- A focus on ecological priorities: freshwater, species at risk, old-growth forest;
- An increased budget for buying private land;
- A concerted approach to engage and work with private land-owners;
- Democratic collaboration, not just consultation, with Indigenous nations, community groups, academics and ecologists, non-governmental organizations, and all other engaged Nova Scotians; and
- A strategy that centres and values life.

We propose the following priorities for a protected areas strategy, generally. We also seek to provide specific recommendations for our local area of Kings County, which we will explain at the end of this letter.

## **Moratorium on Clearcutting Public Lands**

First and foremost, the government must implement a ban on clearcutting public lands until the Lahey Report (An Independent Review of Forestry Practices in Nova Scotia) has been implemented in full, and while the strategy for protected lands is being developed. Otherwise, what valuable forests and other habitat might we lose between now and 2023, when both the Lahey Report and the collaborative strategy for protected areas are supposed to be implemented? It does not make sense to cut now and protect later – let us not wait until 2023 to start doing what is necessary.

With the delays to the implementation of the Lahey report, harvesting operations are continuing, changing habitats that otherwise could have been protected under an ecological forestry framework, to less valuable and ecologically-rich areas. Placing a moratorium on the cutting of public lands is needed to ensure we do not lose more invaluable nature while decisions for land protection are made. We join and reiterate the calls from many other groups across the province in demanding a stop to clear-cutting on public lands.

## **Prioritize Public Lands**

The government should prioritize protecting public lands. Public lands are often larger parcels of land, which are important for capturing biodiversity and preventing habitat fragmentation. Moreover, public lands are intended for the benefit of all and should be directed by the interests of the public. Protecting lands and preserving their biodiversity is in the best interest of all life in this province, including the lives of Nova Scotians, as we grapple with the compounding consequences of the biodiversity and climate crises.

There is intrinsic value to protecting nature, and respecting all other forms of life with whom we share this world. However, we must also recognize our humbling interdependence with the natural world and hence the necessity of protecting the natural environment. Protected lands with mature forests sequester much more carbon than a young forest growing back after a clearcut. Carbon sequestration is necessary in this time of climate catastrophe. Moreover, these public forests support biodiversity and ecosystem services that maintain our societies, and provide spaces for the recreation and enjoyment of nature that are vital to our physical and mental wellness. Public lands should serve the public, and protected landscapes are a key way of doing this.

## **Focus on Large Core Areas & Corridors**

We recommend that a focus for protected areas be on large areas, so as to prevent the fragmentation of habitat and the isolation of populations of species. Moreover, there must be an emphasis on corridors between protected areas when possible. The protection of isolated areas is ineffective, and increases the risk of species extirpation. A focus must be on joining new and existing protected areas, and on protecting large areas with corridors allowing the travel and flow of species in between protection regions. Nothing exists, or can exist, in isolation.

Species at risk, such as the Mainland Moose, rely on this connection between habitat. Further, old forests often provide habitat for rare and endangered lichens, like the boreal felt lichen, to provide another example. Typically, these lichen species have poor dispersal abilities, so if they are isolated or fragmented to the edge of an area, they cannot colonize new patches. Thus, large patches with corridors and connections are necessary for their existence. Indeed, neighbouring clear-cutting and habitat

change can change microclimates and affect species, like lichens, so protecting large areas is very important for these species, as it is for many others.

### **Ecological Priorities**

We recommend that the province consider ecological priorities when mapping out protected areas, notably freshwater and wetland areas, species at risk habitat, and old-growth forest, and species.

There is much to be said about the societal and ecological importance of our waterways and wetland areas. Many of our watersheds are threatened by development or industry, yet support diverse habitat and at-risk species. Wetlands, in particular, are extremely biodiverse ecosystems that perform so many functions and services, from improving water quality to buffering the impact of floods to protecting coastal areas from erosion. As this province grapples with mitigating, and adapting to, the impacts of climate change, protecting wetlands should be a high priority.

Moreover, we ask that old-growth forests are protected through this protected areas strategy. Old-growth forests are home to unique species diversity, and are also valuable carbon sinks. Protecting these stands is in our work against biodiversity loss and the climate crisis. While the recent old-growth policy (2021) aims to protect some old-growth stands, there is the need for legislated protection. Legally protecting old-growth stands will help mitigate against these areas having protection removed, given the accountability built into the legal system. A major weakness of the old-growth forest policy was the ease of which protections could be removed and renege upon, and thus we ask that the government prioritize old-growth forest and stands of intact Wabanaki (Acadian) forest in considering areas to be protected. This may involve buying private land and working with private land-owners on ecological protection methods. As well, a plan to protect forests should consider the advances of invasive species and pests, and how their effects can be mitigated and protected against.

Species at risk must also be prioritized, such as Mainland Moose, the American Marten, and the Boreal Felt Lichen, just to name a few.

### **Increase the Budget for Buying Private Land**

Given that the majority of Nova Scotia is privately owned, the government needs to prioritize the protection of private land, including by increasing the budget to buy back large parcels of land for protection.

### **A Concerted Approach to Engage and Work with Private Land-Owners**

The government should have a concerted approach to work with land-owners in order to effectively protect 20% of the lands and waters in this province. We recommend that this involve public discussions, consultations, and engagement events to explore and promote ways to protect private lands, such as conservation easements and nature trusts.

### **Intentional and Constructive Collaboration**

Moreover, we need collaboration, not just consultation, with Indigenous nations, community groups, academics and ecologists, non-governmental organizations, and all other engaged Nova Scotians. The protection of our lands and waters implicates and affects all those in this province. How will this *collaborative* process, as cited in Bill-57, take place?

There is the need to build back trust in the protected areas system in Nova Scotia, especially following the secret delisting of Owls Head Provincial Park and the ensuing grassroots effort to protect it from development. Intentional, widespread, and open collaboration with Nova Scotians is needed to restore faith in the government's protection of lands and waters.

Nova Scotians are still writing letters, demonstrating, camping out to protect forests, speaking to the Legislature, and tirelessly trying to win bolder commitments on environmental protections and climate action from our provincial government. We deserve to know that our words and actions are being heard and listened to. Intentional, democratic collaboration is needed to ensure and restore trust in our political system, so that such engagements are not merely lip-service, and to ensure a liveable future.

### **A Strategy that Centres and Values Life**

Overall, the strategy for protected areas must centre the value of life. In a time of twinned biodiversity and climate crises, we must recognize that protecting and regenerating our biodiverse ecosystems and ecologically rich lands and waters is essential for survival. We depend on biodiversity, and a strategy that values life is necessary. The current ways of operating, with clear-cutting and habitat loss for example, are untenable. Thus, we welcome the desire to protect more areas across this province, and ask that this process not be done in isolation. We need a new way of operating as a province that truly understands the critical importance of biodiversity.

### **Specific Recommendations for Kings County**

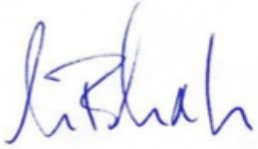
Furthermore, the Blomidon Naturalists Society would like to support the recommendations made by Kings County resident and biologist Alain Belliveau, who has previously submitted a report to the Minister of the Environment. Currently only 4.5% of Kings County is protected. Alain proposes an approach that focuses on large parcels of land and ensuring habitat corridors when possible. This includes connecting to the existing Cloud Lake Wilderness Area by protecting areas around the Shell Camp Lakes and the Gully Lakes. Alain's proposal also considers many key details, such as waterways, bogs and other wetlands, and species at risk like black ash. While the fragmentation of the Annapolis Valley floor by development and farming poses a challenge, there are many opportunities for the government to work with private land-owners and to protect public lands with ecological significance, as Alain illustrates through his maps, to effectively protect 20% of Kings County and align with provincial targets.

We have appended Alain's document to this letter.

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In conclusion, we have lost a lot of biodiversity and natural areas in this province. It is time to protect what is left and engage Nova Scotians in this effort. Things could certainly get worse, so action now to protect lands and waters in the province (with consideration of the correlated and intersecting challenges of climate change, biodiversity loss, species at risk, and more) is needed. The Blomidon Naturalists Society hopes that these key elements are considered by the government in the collaborative protected areas strategy.

Sincerely,



Soren Bondrup-Nielsen  
President, Blomidon Naturalists Society  
Professor Emeritus, Biology, Acadia University

Caroline Beddoe  
Program Coordinator, Blomidon Naturalists Society

On behalf of the Blomidon Naturalists Society.

Letter from Alain Belliveau

January 24, 2022

Dear Minister Halman,

Congratulations on recently introducing the Environmental Goals and Climate Change Reduction Act and enacting the legal goal of protecting 20% of Nova Scotia by developing a collaborative protected areas strategy to be released by December 31, 2023. This collaborative approach is key and I'd like to participate in this process by providing information for Kings County in this email. Currently, only 4.5% of the county is protected and this may be the lowest amount in Nova Scotia (see **Map 1**). I hope that this information, based on my experience and expertise in biodiversity conservation throughout Nova Scotia, can help Nova Scotia Environment (NSE) staff. Please forward this email and attached maps to the NSE Protected Areas Branch for further review and consideration.

Protecting 20% of Kings County is most feasible using public lands and parts of private lands that can be purchased by government or protected in other ways, as shown in **Map 2**. This mapped area is based on presence of intact forest according to both NSE and DNRR data, presence of large wetlands, lakes and rivers, and the presence of Species at Risk and other species of conservation concern.

Two parcels of public lands are highlighted in **Map 3** and are absolutely needed for protecting enough area in Kings County. The Shell Camp Lake and Gully Lakes core areas are critical to wildlife movement and connectivity with other protected areas in the province. With due diligence in mind, these public land core areas should be evaluated by NSE and offered to the public for consultation, especially before any further forest harvesting operations take place. As such, please place a moratorium on forest cutting on these public lands until public consultation has taken place.

Even with public lands protected, the area of Kings County still does not reach 20% of protection and private lands need to be considered. Portions of land from several large private land holders are included in Maps 2 and 3 to achieve 20%. This can be done by buying back land or placing conservation easements on private land. Please increase the provincial budget for buying back lands in order to achieve 20% protection in Kings County.

To summarize:

- 1. Please forward this email/maps to the NSE Protected Areas Branch for further review/consideration.**
- 2. Please place a moratorium on cutting on public lands in areas mapped.**
- 3. Please increase the provincial budget for buying back private lands.**

This is my best attempt at helping the government of Nova Scotia achieve 20% protection by 2030, and I'm happy to provide more information for any of the mapped areas with regards to their value to biodiversity conservation.

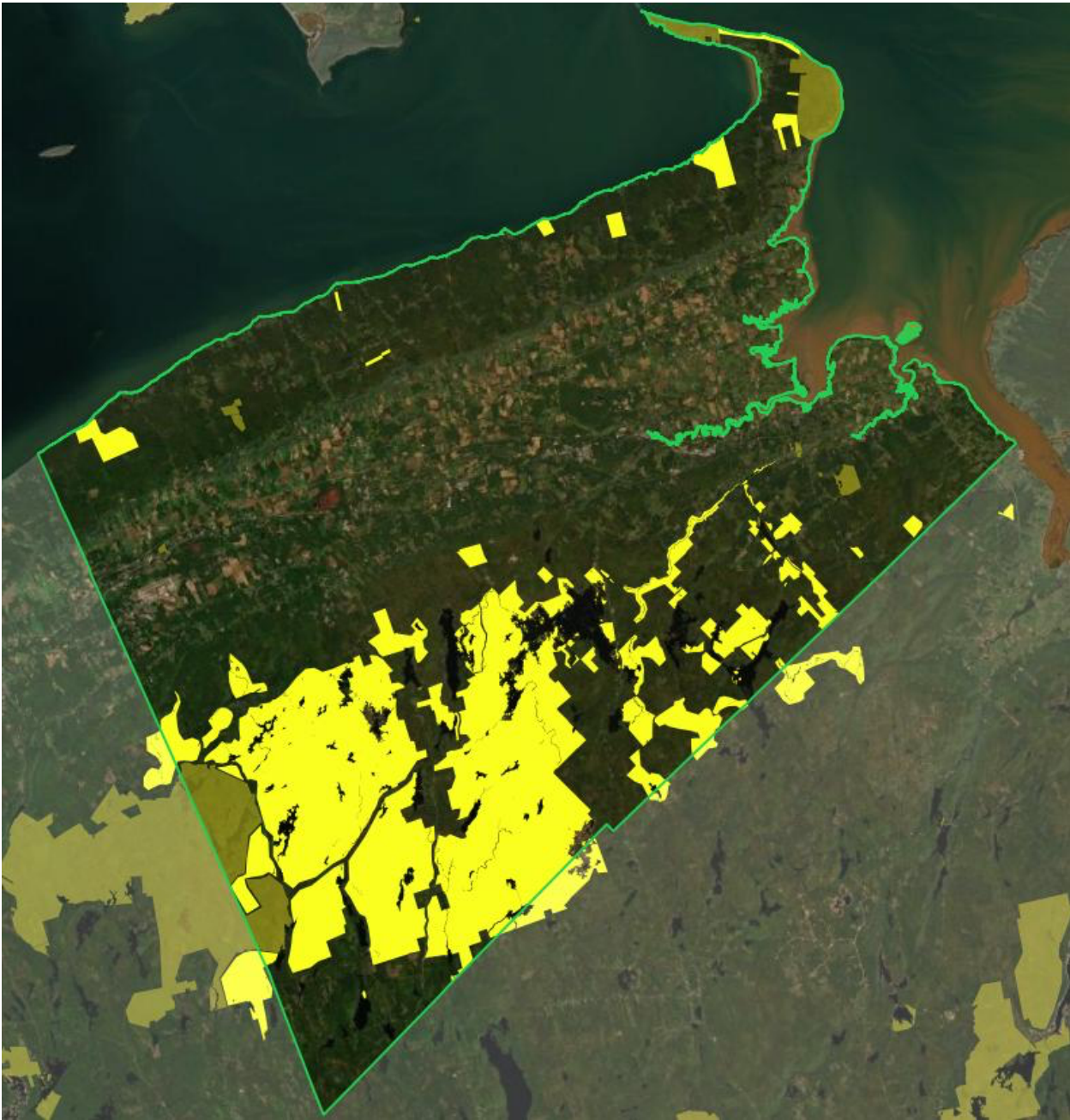
Best Wishes,

Alain Belliveau  
Kings County Resident

**Map 1** – Only 4.5% of Kings County is currently protected (faded yellow colour in maps below). This may be the lowest amount for any county in Nova Scotia.



**Map 2** – Areas proposed for protection to achieve 20% goal in Kings County.





**Map 3** – Areas for achieving 20% goal with public lands in yellow and large private lands in orange.

