



Honourable Tory Rushton  
Minister of Natural Resources and Renewables  
P.O. Box 698  
Halifax, NS  
B3J 2T9

**Re: REJECT forestry harvests at Minamkeak Lake (LU068578 A, LU099961 B, and LU099960 C)**

April 22, 2022

Dear Honourable Tory Rushton;

We, the undersigned, are writing to express our serious concerns regarding the proposed forest harvests located adjacent to Minamkeak Lake (LU068578 A, LU099961B, and LU099960 C).

These public lands are ecologically significant and contain critical habitat for species-at-risk that should not be disturbed by industrial forestry operations.

Our concerns are several-fold:

### **1) Impacts on Species at Risk**

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The Atlantic Whitefish is critically endangered, and its range is limited to only three lakes in the world, Hebb, Milipsigate, and Minamkeak, which are designated as critical habitat for the species. The Atlantic Whitefish is endemic to Nova Scotia and has been declining due to a combination of

anthropogenic effects. Moreover, Minamkeak is the only one of these three lakes which is free of the highly invasive chain pickerel, a major threat to Atlantic Whitefish survival.

Atlantic Whitefish are protected federally under the *Species at Risk Act (SARA)* and provincially under the *Endangered Species Act*. The local community has worked extremely hard to ensure that this species does not go extinct. This includes efforts from the federal Atlantic Whitefish Conservation and Recovery Team, Coastal Action, Dalhousie University, and the Bridgewater Public Service Commission who have been working within the watershed and directly with the species for many years, and more recently, on a streamside rearing facility for larval Atlantic Whitefish.

The Action Plan for the Atlantic Whitefish specifically recommends that public lands adjacent to the Petite Lakes, including Minamkeak Lake, be protected by Nova Scotia Environment as a legally established Wilderness Area (Recovery Measure #11 of Action Plan, p. 9). Both the Recovery and Action Plans anticipate negative impacts from forestry on adjacent lands and recommend a protected area designation as a proactive conservation measure.

Areas of public land surrounding Minamkeak Lake also meet the definition of critical habitat for the Eastern Ribbonsnake. The proposed harvest plans risk disturbing this threatened species by altering water levels and water flows; decreasing water quality; degrading, fragmenting, and reducing habitat; and potentially disrupting overwintering sites.

Conserving, protecting, and managing habitats for both the Atlantic Whitefish and Eastern Ribbonsnake are key priorities in the respective Recovery Plans for these species. In addition, *SARA* prohibits the destruction of critical habitat for endangered or threatened species listed in Schedule 1. Preventing industrial disturbances associated with forestry is necessary to minimize the threat to both at-risk species.

The proposed forest harvests (LU068578 A, LU099961B, and LU099960 C) run counter to the actions recommended in approved Action and Recovery Plans for the Atlantic Whitefish and Eastern Ribbonsnake and should not be allowed to proceed.

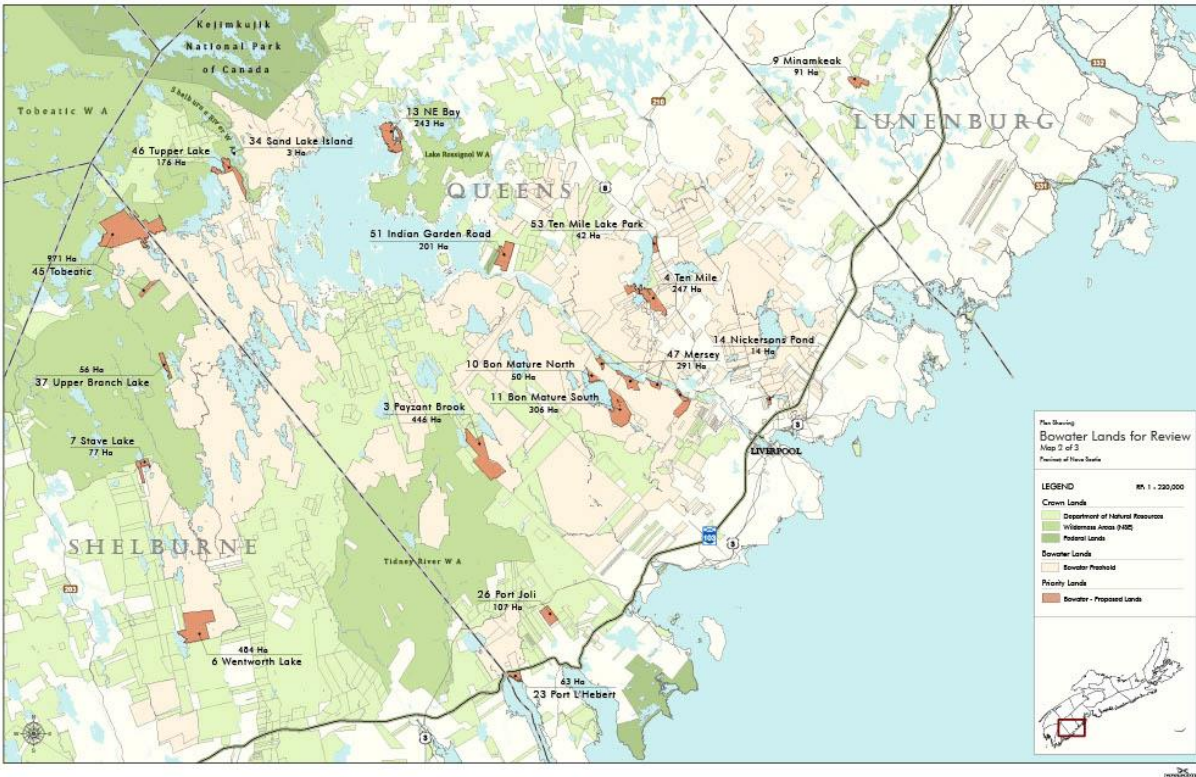
## **2) Public lands were acquired for conservation, not forestry**

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A portion of the public lands threatened by forest harvesting at Minamkeak Lake were specifically purchased by the Nova Scotia government for conservation (PID 60484045, PID 60311065). In 2012, the provincial government acquired a 91-hectare property from Bowater Mersey and committed, at that time, to directing this parcel towards legal protection:

*“The province has reached an agreement with Bowater Mersey to purchase 25,000 acres of land that will help Nova Scotia meet its goal to protect 12 per cent of its land mass, provide more recreational opportunities and save thousands of jobs along the South Shore and in southwestern Nova Scotia. (...) Most of the land, located in Annapolis, Hants, Lunenburg, Queens, and Shelburne Counties, was identified by the Colin Stewart Forest Forum as having*

high conservation values and will be included in the protected land process.” ([News release](#), January 2012).



*Map of Bowater Mersey lands reviewed for acquisition by Nova Scotia government, including a 91-hectare property at Minamkeak Lake.*

Despite this commitment, however, legal protection was never put in place on this property, leaving it vulnerable to industrial forestry operations and the proposed harvests that are being considered right now.

The Nova Scotia government subsequently purchased ALL of the private land holdings of the former Bowater mill, most of which have been directed toward forestry use and other industrial practices. It makes no sense to force industrial activities onto the much smaller public lands that were purchased specifically for conservation. The proposed harvests (LU068578 A, LU099961B, and LU099960 C) should be rejected on this basis alone. A promise is a promise. There are plenty of other locations where wood supply could be obtained rather than on public lands adjacent to Minamkeak Lake, that provide crucial ecological services to a critically endangered species.

### **3) Harvests are within the Bridgewater Watershed Protected Water Area**

The Bridgewater Watershed Protected Water Area encompasses Minamkeak Lake, as well as Hebb and Milipsigate Lakes in the Petite Rivière watershed. This designation is intended to protect the drinking water supply for the residents of Bridgewater, regulate incompatible activities, and is subject to protection under the *Environment Act*.

Given these concerns, Coastal Action, Canadian Parks and Wilderness Society – Nova Scotia Chapter, Bridgewater Watershed Protection Alliance, Healthy Forest Coalition, Public Service Commission of Bridgewater, Dr. Shannon Sterling, and Paul Bentzen of Dalhousie University, respectfully request that you outright reject the proposed harvests near Minamkeak Lake (LU068578 A, LU099961 B, and LU099960 C). We also encourage the Nova Scotia government to apply additional conservation measures to these public lands in the form of legal protection, so that they are never again threatened by industrial forestry activities. In that regard, these public lands should contribute toward your government's stated goal of achieving 20% land protection, recently included in the *Environmental Goals and Climate Change Reduction Act*.

We look forward to hearing back from you addressing our concerns.

Respectfully submitted,

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