

St. Margaret's Bay Stewardship Association

HEART OF THE BAY



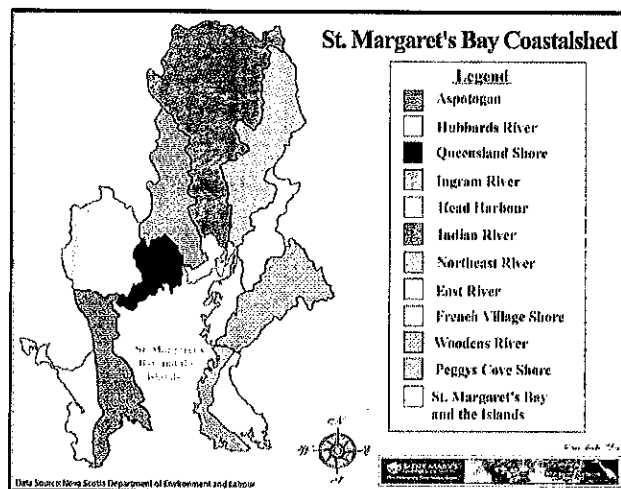
November 18, 2014

The Honourable Stephen McNeil, Premier
P.O. Box 726
Halifax, Nova Scotia
B3J 2T3

RE: RESOURCE MANAGEMENT IN NOVA SCOTIA

Dear Premier McNeil,

For over ten years the St. Margaret's Bay Stewardship Association, whose area of interest is the St. Margaret's Bay "coastalshed" (see below), has worked hard for the protection and enhancement of the Bay's and the province's environment and way of life. Through the volunteer efforts of our membership, which includes a deep bench of professionals, community leaders, and hundreds of dedicated residents, we have contributed with positive effect to numerous initiatives including, to name but a few, municipal planning, the province's coastal strategy, tax reform, protected areas, preservation of heritage resources and sacred Mi'kmaq sites, public education, and sustainable resource management, not only within our focus area, but for the entire province.



The SMBSA's focus area is far bigger than just the lands immediately surrounding the Bay, but rather the entire "coastalshed" extending up to the headwaters of its six major rivers.

.../2.

Two provincial initiatives to which we dedicated considerable volunteer resources were the province's Natural Resources Strategy and, as the leaders and organizers of the *Buy Back the Mersey* movement, the Western Crown Lands Planning Process. We saw these two efforts from the Department of Natural Resources (DNR) as full of potential. We rolled up our sleeves and enthusiastically pitched in. At last, we thought, the way this province manages its resources will change, and indeed, we were extremely encouraged when the Strategy was published and we read:

"This marks a fundamental change—a transition from the limited partnerships that government and industry relied on in the past, to a broadly inclusive and collaborative way of working."

- *The Path we Share*

The Strategy said specifically that the DNR would work with community groups, environmental groups, and municipalities "to ensure that the goals and actions in this strategy are fulfilled and measured." Premier McNeil, this is not taking place. Despite efforts by the SMBSA and its supporters, despite meetings with your Ministers, with staff, meetings with the public and open discussion in the press and over the airwaves, "a broadly inclusive and collaborative way of working" continues to elude us. DNR's current "consultations" on Crown Land allocations is a case in point.

On October 23rd Minister Churchill announced the launch of the "public engagement" part of a new allocation process and the posting online of maps showing where and how harvesting will take place. The public was given 20 days to respond. By his declared "rules," the department will grade our input 1 to 3, and reserve the right to over-rule anything we say. No appeal process is described.

The following chart accompanies their online map of our area:

LOT	IDENTIFICATION	INPUT DEADLINE
219	E5e06803	November 7, 2011
220	E5106803	November 7, 2011
221	E5e06804	November 7, 2011
222	E5106802	November 7, 2011
223	E5106803	November 7, 2011
224	E5110161	November 7, 2011
225	E5111639	November 7, 2011
226	E5111639	November 7, 2011
227	E5105e04	November 6, 2011
228	E5105e06	November 6, 2011
229	E5106801	November 6, 2011
230	E5106809	November 6, 2011
231	E515	November 6, 2011
232	E5309136	November 6, 2011
233	E5309132	November 6, 2011
234	E5106802	November 6, 2011

Key areas of interest, Lots 227-234, which include locations in the Ingram River watershed, the Bay's major nutrient pump, are given only 8 working days for comment, short even of the already abbreviated 20 day input deadline. Is this "broadly inclusive and collaborative?" However, in our opinion there are much larger issues with this abruptly and unilaterally designed "public engagement" process and its piecemeal roll-out.

- 1.) No detail is provided, no Pre-treatment Assessments, which are by DNR's description supposed to include public engagement. On the maps, there are just two alternatives presented: clear cut or partial cut – take it or leave it.
- 2.) Other than reference to the extremely general and non-specific Western Crown Land Conceptual Plan, there is no reference whatsoever to a larger scheme, how these proposed harvest areas might fit into a more comprehensive land use plan. The implication is that the only real use contemplated is forestry – nothing else. Is this how we are to manage our resources for future generations?
- 3.) There has been no public engagement whatsoever with us, our community, nor with the municipality, which has clearly stated its interest in these areas. All we have is a rush to judgment, a shotgun wedding between our public resource and industrial interests pre-selected by a non-transparent process.

Our position is this: **There should be no allocations until a proper public engagement process is in place.**

And we are eager to help design this process. As clearly stated in a meeting we organized last March 25th, nearly eight months ago, with your Ministers of Natural Resources, Environment, and the Mayor of Halifax, plus a dozen senior staff from all departments and the city, the SMBSA and its sister organizations are keen to help design and actuate an effective and transparent collaborative process as described in the Natural Resources Strategy.

In lieu of any real response from DNR in this regard, October 20th we convened a rally in Hubley, the very birthplace two years ago of the province-wide *Buy Back the Mersey* movement. 250 people came including DNR observers. Over a hundred participants signed up to lend a hand. The meeting was recorded on video and will be distributed widely in a variety of formats. Follow-up meetings have begun. A position document (please see attached) has been drafted. Correspondence and constructive dialogue flows freely between participants. We are reaching out in organized fashion to the media. A coalition is taking shape dedicated to the realization of the so far empty words of our Natural Resource Strategy.

The people appear ready to push for a more rational, inclusive solution than that currently on offer. One would hope that a new and better way to manage our resources will emerge. Accepted standards in other provincial jurisdictions, notably British Columbia and Ontario, have legislation (i.e. *the Ontario Crown Forest Sustainability Act, 1994*) and clear and transparent procedures in place that govern decisions and approval for harvesting on Crown Lands that include input from both community and industry stakeholders. We propose that similar legislation is in order for Nova Scotia.

We look forward working with you and your government to address these issues.

Sincerely,



Cathy Crouse, President

Cc: Honourable Zach Churchill, Minister of Natural Resources
Honourable Randy Delorey, Minister of Environment

MANAGING THE WESTERN CROWN LANDS FOR THE LONG-TERM

Many of the helpful observations and suggestions brought forward at the St. Margaret's Bay Stewardship Association's open house on October 20th focused on one or both of 2 main requirements: (1) tangible and transparent forest use plans; and (2) meaningful public involvement in the development and management of these plans. The meeting then considered 5 proposed 'solutions' – identifying what has to change to get back to the commitment to put the continuing health of the forest first, and to pursue forest plans and use allocations on a collaborative basis.

These proposed solutions, or 'principles in action', have been re-cast following the open house to try to capture key points raised in the discussion. The five recommendations are designed to provide practical ways the government can better align the policies and practices of DNR Forestry with the forest management principles and approaches set out in EGSPA and the Natural Resources Strategy.

FOREST STEWARDSHIP PRINCIPLES IN ACTION

- 1.) Plans:** *Proper assessment of individual licencing applications requires the development and publication of forest area management plans throughout the Western Crown Lands.* The short 'conceptual plan' for the Western Lands is a photo-essay, not a tangible framework within which to make major decisions and long-term commitments. Providing e-accessible maps of proposed licence areas will be a positive step, but of little use in isolation.
- 2.) Collaboration:** *Inclusive co-management processes must be developed and in place before any more significant decisions are made regarding Western Crown land use and rights.* Recognizing the many challenges of achieving consensus on forest stewardship and development, the Natural Resources Strategy report stressed the need for collaboration in both the design and the delivery of forest management plans. It is encouraging that DNR is now seeking input concerning techniques and mechanisms of collaboration.
- 3.) Municipalities:** *Municipalities and First Nations should also be represented in collaborative arrangements and processes in their jurisdictions.* Forest-based activity have important impacts on, and implications for, affected municipal and First Nations governments.
- 4.) Transparency:** *Applicants for harvesting licences should be required to address broad-ranging criteria in their submissions.* Transparency helps bring the trust that collaboration requires. The licencing process provides an opportunity not only to be transparent, but consistent with the community forest application process as well. In the CF review process, applicants were required to indicate what benefits, in return for wood harvesting, their operation would bring to the people and eco-systems in the region. Transparency also means an end to secret deals with individual mills or operators outside plans and processes.
- 5.) Responsibilities:** *The Environment Department should become the lead agency for those regulatory provisions which relate primarily to the health of the forest eco-system.* In rapid succession, three provincial governments have committed to promoting the long-term health of Nova Scotia's forests. No one department can be expected to reflect the full range of development interests and stewardship objectives related to this commitment. In a lead regulatory role, Environment would be expanding on its current base of responsibilities regarding forest habitat and watercourses.