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Re: Shelburne Barrens Ecological Reserve

March 15, 2000

Dear Honourable Ernest Fage

I am deeply concerned by your Department's decision to alter the boundaries of the Shelburne Barrens candidate ecological reserve to facilitate kaolinite exploration. Such a decision is contradictory to the notion of ecological integrity and the broader concept of sustainable development.

Only 8% of Nova Scotia is legally protected. Surely, we should be able to exclude development from such a small fraction of the province, particularly such ecologically significant areas as the Shelburne Barrens.

The Shelburne Barrens is no ordinary place. It is ranked, by the Nova Scotia Museum of Natural History, as the location in the province with the second highest priority for protection. When I learned of this, I was not surprised. The area is a natural jewel containing many rare plants and rare ecosystems. I have compiled a list of outstanding ecological features contained within the Shelburne Barrens that may be of interest to you (Table 1).

Outstanding natural features

- Rich concentration and variety of old-growth forest stands
 - Endemic Nova Scotian plant: *Euthamia galetorum*
 - Four additional documented rare coastal plain plants: *Aster undulatas*, *Myriophyllum farwellii*, *Spiranthes casei*, and *Spiranthes ochroleuca*
 - Diverse heterogeneous landscape mosaic comprised of Acadian forest, fire barrens, lakes, peatlands, and riparian wetlands
 - Rich aquatic and lacustrine diversity, including the presence of a spring-fed lake
 - Component of the largest remaining wilderness area in Nova Scotia
 - Significant habitat for far-ranging mammalian species, including the resident moose (*Alces alces*) and black bear (*Ursus americanus*) populations
 - Rare spaces, including forested floodplains and beach lakeshores
 - Largest intact fire barren in Nova Scotia
 - Provincially significant glacial features, including eskers and outwash plains
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Table 1: Documented outstanding natural features of the Shelburne Barrens IBP site.

I am disappointed the decision to alter the boundaries of the protected area was done without public consultation. Even individuals with knowledge of the ecology and geology of the Barren, such as myself and my colleagues Martin Willison and Leah Hageen, were unable to contribute meaningfully to the decision-making process. As a result, important information was overlooked by your department and the decision to adjust the boundaries of the Shelburne Barrens was done without sufficient knowledge of the dangers of kaolinite mining.

Furthermore, the rationale for the altering of the boundaries of the Shelburne Barrens is flawed. In a 1999 letter addressed to myself, I was informed the boundaries of the reserve were redrawn because similar landscape ecosystems were already well protected within the adjacent Tobeatic Wilderness Area. Such a justification is too narrow in its scope. The Shelburne Barrens was not nominated in 1974 as an International Biological Programme (IBP) site on the basis of representivity. It was selected for protection as an ecological hotspot.

A hotspot approach to reserve selection is crucial for the prevention of anthropogenically-induced extinction events. A recent publication by Myers (2000), in the journal *Nature*, shows one third of the world's biodiversity is contained within less than 1.4% of the earth's surface. The benefits of protecting such places are obvious. Therefore, justifying the adjustment of the boundaries of the Shelburne Barrens on the basis of representation unfairly skewed the decision-making process in favour of mineral exploration to the point of being embarrassingly near-sighted and simplistic.

I would like the following specific questions addressed with a written response:

Why was the public not consulted when the boundaries of the 25 year old Shelburne Barrens candidate ecological reserve were depleted?

Given that the Shelburne Barrens is an ecological hotspot, why does your department believe a landscape representation analysis justifies the altering of its protected area boundaries?

Why has the components of the Shelburne Barrens not affected by mineral exploration not been formally designated as a Special Place?

Sincerely,

Chris Miller