



August 22, 2008

Nova Scotia Environment
Protected Areas Branch
Box 442
5151 Terminal Road
Halifax, Nova Scotia B3J 2P8

Re: Blue Mountain – Birch Cove Lakes Candidate Wilderness Area

I am pleased to submit comments with regard to the Blue Mountain – Birch Cove Lakes Candidate Wilderness Area on behalf of the Mining Association of Nova Scotia (MANS). We are a provincial organization representing over 100 members – companies and individuals - in all areas of mining - exploration, discovery, development, production and reclamation as well as consultants and suppliers to the industry.

In terms of economics, our industry is directly and indirectly responsible for some 6300 jobs – mostly in rural Nova Scotia – and about \$490M of our provincial Gross Domestic Product (GDP). What is of particular interest to many is that our average weekly wage (over \$1000 per week) is number one among the resource sectors. The industry's total payroll is \$96M per year and we pay about \$1.9M in municipal taxes per year.

At this time, I would like to reiterate that MANS is committed to working with government and other stakeholders to ensure that we meet the provincial goal of ensuring that 12% of the total land mass of the province is legally protected. We look forward to continued dialogue as we all move toward this target.

In terms of Blue Mountain – Birch Cove Lakes, we note that the Minerals Branch of the Nova Scotia Department of Natural Resources (NSDNR) has compiled a geology and mineral resources evaluation. It is critical to note that this evaluation was not done through direct observation of the candidate area, something that MANS maintain should be undertaken through the consultative process for all candidate wilderness areas. We realize that a boot and hammer analysis is labour intensive but feel that it is critical to ensuring that all economic factors are taken into consideration before designating any area as protected. We also look forward to continued discussion on how best to move forward with this concept.

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The proposed candidate wilderness area in Blue Mountain-Birch Cove Lakes does have good potential for a number of minerals as outlined in the Minerals Branch report. Of particular note is the dimension stone and aggregate potential. Part of the proposed candidate wilderness area could be a viable quarry operation and its location within city limits is an ideal co-use for sustainable economic development of this resource given carefully defined development permitting to protect other wilderness aspects of the area. Government should give careful consideration to this economic potential before removing this resource as a possible economic development – particularly in light of recent discussions on fuel surcharges for shipping and trucking and more importantly, reduction of greenhouse gas emissions.

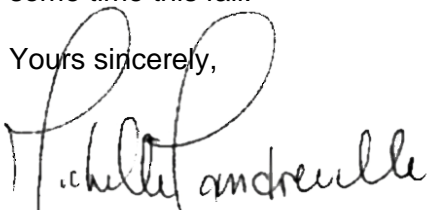
As well, we remind regulators that the issue of uranium exploration continues to be one of concern for MANS as we continue to protect land in Nova Scotia. As with our previous submission, we ask that once the moratorium on uranium exploration is lifted, there be some mechanism to evaluate this area for uranium. This of course, would be done in a most respectful manner to the other uses of the protected area. Again, we are asking for this consideration so that all Nova Scotians can benefit from all of the natural resources of our province.

Finally, we note that there are no active claims in the candidate area.

In conclusion, MANS supports the designation of Blue Mountain-Birch Cove Lakes as a wilderness area but we request that in the future, a boot and hammer evaluation be undertaken as part of the consultative process. We ask for this so that government can be fully informed in their decision making particularly as it relates to sacrificing future economic development that would benefit all Nova Scotians.

I trust that these comments will prove helpful as we move forward with the designation of this candidate wilderness area. We, an organization, look forward to the announcement some time this fall.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Michelle Landreville". The signature is fluid and cursive, with a large initial "M" and "L".

Michelle Landreville
Executive Director