Navigation Protection Program
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To Whom it may concern,

**RE: Andrew Metlege application NPP File Number 2021-203669**

**Characteristics of the Northwest Arm, Halifax Harbour, NS**

The Northwest Arm is both extremely narrow and extremely busy with watercraft.  It is approximately five kilometres in length and averages 500 metres in width, although its width narrows in areas to approximately 150 metres.

The Northwest Arm, as a sheltered body of water within metro Halifax, is heavily used by both commercial vessels (lobster fishers and tourism operators) and pleasure craft from over sixty feet to kayaks, paddleboards and canoes.  Larger boats and sea-dos dominate the main channel and smaller craft skirt the edges to avoid motorized boats, although often boats of all sizes are forced to pass close to each other due to the narrow nature of the Arm.

There are four yacht/boating clubs on the Arm, all of which operate sailing classes and are home to numerous private sail and power boats.  Canoe and kayaks are rented to visitors and locals.  Several boat launches are used to access the Arm with all manner of watercraft.  People swim at several locations in the Arm.  In short, the Arm is heavily used and often congested due to its narrow width and popularity with both commercial and non-commercial users.

**Navigation clearance**

The proposed infilling of the water lot at 1454 Birchdale Avenue would reduce the width of the Northwest Arm by approximately 15%.  This infilling will make navigation more difficult in the Northwest Arm, especially for sailboats and smaller craft that rely on the edges of the Northwest Arm for safe passage out of the path of larger motorized vessels.

**Safely make way**

The Northwest Arm is excessively congested already, with both commercial and non-commercial vessels, sailboats and motor craft, and sizes of vessels ranging from sixty feet or more to ‘sea-dos’, small kayaks, canoes and other personal watercraft.

There are numerous sailing classes that take place in the vicinity of the proposed infilling site, and these classes are already ‘squeezed’ to the size of the channel by the presence of larger motor boats that tend to take over the main channel area.

Kayakers and other human-powered craft are at risk of being stuck by motorized vessels, both large and small, especially on foggy days and during low-light times.  Although there is a six-knot speed limit within the Arm, it is rarely complied with and never enforced to my knowledge.  Even if the six-knot speed limit were enforced, the reduction in width of the Arm caused by the infilling still puts small craft

at heightened risk of collision with larger craft given that they travel at least twice the speed of most human-powered craft. In reality, I observe motorboats and seadoos traveling in excess of 50 miles an hour, some ten-times the speed of the kayaks, canoes and most sailboats on the Arm.

Forcing smaller and slower craft further into the main channel occupied by faster and larger boats will no doubt lead to collisions in the Arm, with serious risk of injury and death.

**Obstructions in way**

The proposed infilling will obstruct passage near the Waegwoltic Club and its mooring field. At present, boaters can pass on the inland side of the mooring field if necessary to avoid conflict with larger vessels in the main portion of the channel. The proposed infilling, however, will obstruct this 'inner' passage, forcing smaller boats to compete with larger vessels in the channel-side of the mooring field. Although the Arm is approximately one-thousand feet wide at the point of the proposed infilling, the already-existing mooring field immediately offshore of the proposed infilling means that the effective obstruction to navigation will be approximately fifty per cent of the channel for some boats.

**Cumulative navigation impact**

The proposed infilling at issue is only one in the latest of infilling projects that further narrow the already narrow Northwest Arm. Importantly, there are numerous other water lots on the Northwest Arm, which if infilled, would reduce the total water surface area of the Arm by a third, and narrow its width by half.

**Additional Comments**

I am concerned that the walls of the proposed infill may fail and fall outwards into neighbouring lands, including the federal lands on the channel side.

Furthermore, the proposal incorrectly implies that the water lot to be infilled is exposed at low tide. This is not the case. Almost the entire lot remains submerged at low tide.

Finally, the purpose of the proposed infilled is stated to be erosion protection and reclamation of land lost to erosion. However, there is no evidence of erosion along this shore within recent decades. Aerial images over the past 80 years demonstrate that the shoreline has not changed. On the contrary, the infilling of this water lot will most likely cause erosion by deflecting and concentrating wave energy on nearby shorelines.

**Conclusion**

I request that all infilling applications for the Northwest Arm be suspended pending the outcome of a cumulative impacts assessment of infilling on the Northwest Arm.

I also request this suspension of infilling applications until the Department of Transport has meaningfully consulted with both the Province of Nova Scotia and the Halifax Regional Municipality on the issue of infilling water lots.