



February 12, 2025

The following submission in response to the Coastal Stabilization, Hartlen Point, Canadian Forces Base (CFB) Halifax is on behalf of the Ecology Action Centre (EAC).

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We take leadership on critical environmental issues from biodiversity protection to climate change to environmental justice. Grounded in over five decades of deep environmental change work and fueled by love and grief, EAC takes a 50-year perspective on what is needed to build towards a time of thriving and flourishing. We work to equip human and ecological communities for resilience and build a world where ecosystems and communities are restored not just sustained.

### 30 Day Comment Period

The Ecology Action Centre believes that the 30-day comment period is not enough time to provide a full response. Many of those who are interested in reviewing the documents and submitting comments do so on a volunteer basis and must dedicate a significant amount of time outside of their work and home life to write their comments. Please extend future public comment periods to at least 60 days so that organizations, groups and members of the public have a sufficient opportunity to review the relevant documents and form comments in response.

### Information Gaps

The information provided by IAAC and on the *Trident* website is not sufficient enough for the public, including the Ecology Action Centre, to be able to meaningfully provide informed comments. Complex terminology, and not elaborated on, thus resulting in a lack of clarity. For example, the term "static elevated dike" is highly specialized and does not provide enough context for the average reader, making it inaccessible to the public.

Moreover, the lack of detail surrounding the proposed shoreline stabilization is another significant gap. The information on the *Trident* website offers only surface-level descriptions, leaving out essential specifics about how the shoreline will be stabilized, what materials will be used, the environmental impacts, or how the project aligns with broader conservation or sustainability goals. This omission of key information hinders the public's ability to assess the potential effects of the project.

## Shoreline Stabilization

As noted above, the information provided about this proposed shoreline stabilization is inadequate to comment on in an informed manner. However, the Ecology Action Centre strongly encourages DND to explore and implement nature-based solutions, including living shorelines, as the primary method of shoreline stabilization. As noted by the Stewardship Centre for British Columbia, a non-profit that is a key leader in shoreline climate change adaptation, nature-based shoreline designs have economic, social and environmental benefits. This includes: restoring physical processes promoting the natural movement of water and sediment that maintain healthy shorelines; promoting local biodiversity and healthy ecosystems; and, reducing pollutants, stormwater and other sediments from entering waterways. Alternatively, hard armoring (e.g., seawalls) can lead to intensified beach erosion (including along neighbouring properties), destroys important habitat, alters wave patterns, impacts coastal access, and is often more expensive than nature-based shorelines.

As the design for this project progresses, local experts that specialize in soft shoreline approaches should be consulted on how to best incorporate nature-based shorelines as a form of shoreline stabilization at this location.

## Coastal Access

The long-term prospect of public access to Hartlen Point coastline is of serious concern to the Ecology Action Centre. With only 13% of Nova Scotia's coastline publicly owned (and even less publicly accessible), the loss of any coastal space to public use is significant, particularly this close to a major urban space.

While we recognize that some short-term limitation of access for safety reasons during construction is not wholly unreasonable, the language on the *Trident* website seems at times contradictory. For example, while it states that public access is a high priority, it also suggests that public access to the shoreline is subject to change on further notice. Does this refer to the construction phase of the project only, or longer-term impacts to public access?

The proposed shoreline stabilisation using hard coastal engineering is not consistent with conditions that allow quality access to the coastal space at Hartlen Point. Hard engineering structures often make traversing the shoreline difficult if not risk impeding meaningful access entirely. The nature-based solutions (see above) would be more consistent with public use of the shoreline at Hartlen Point.

Again, as outlined above, the lack of detailed information on the *Trident* website limits the ability of the EAC and other commenters from whom you are seeking input to adequately assess the risk the proposed shoreline stabilization will have on coastal access at Hartlen Point.