

Ocean State Aquaculture Association

Rhode Island's Aquaculture Trade Association
P.O. Box 2031, Kingston, RI 02881

TO: CRMC Council Members

Date: 9/1/23

RE: application of Edward Troiano - CRMC File Number 2017-05-006

I am writing to provide comment on the application of the application of Edward Troiano - CRMC File Number 2017-05-006 to operate a small half-acre lease to grow oysters. It is my understanding that the primary objections have come from the wild harvest shellfishermen who maintain that the site might be viable for clam harvesting.

I am writing to remind the Council about the conditions that were agreed upon decades ago after the current aquaculture lease laws were passed.

RIGL 20-10-5

(c) The director shall review the application to determine whether the aquaculture activities proposed in the application are:

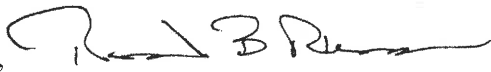
(2) Not likely to have an adverse effect on the continued vitality of indigenous fisheries of the state.

(d) The MFC shall review the application to determine whether the aquaculture activities proposed in the application are consistent with competing uses engaged in the exploitation of the marine fisheries.

After the passage of these laws the Ocean State Aquaculture Association worked with the Aquaculture Working Group (which included representatives from CRMC, DEM, URI, and the RI Shellfisherman's Association) to develop a workable definition describing the population density of clams that would be considered commercially harvestable and worthy of protection from development for aquaculture. At the time the state quahog surveys reported a mean density for the State of approximately three clams per square meter. The Working Group reached a consensus that it was not economically viable for a commercial harvester to work in areas that had a density less than the state average as the value of the catch would not justify the effort. Most diggers seek sites with much higher densities to work. After some negotiation it was agreed that 3/m² would be the density below which aquaculture leasing could be considered, while sites with densities over the state average would be considered potentially valuable for the commercial fishery.

My understanding is that Dave Beutel's density survey from 2017 found 0.27 quahogs/ m² and that the average density over the 21 years of sampling by DEM near the proposed site is approximately 0.47clams/ m². It is evident that this is not a site with commercially important densities of hard clams worthy of precluding aquaculture.

Sincerely,



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