

Cstaff1

From: council@crmc.ri.gov
Sent: Friday, November 3, 2023 12:29 PM
To: 'cstaff1'
Subject: FW: Public Comment for 2020-04-037
Attachments: CRMC HEARING LETTER.pdf

From: Jay Edwards <sighthound_lover01@yahoo.com>
Sent: Friday, November 3, 2023 11:09 AM
To: council@crmc.ri.gov
Cc: jwillis@crmc.ri.gov; terry.gray@dem.ri.gov
Subject: Public Comment for 2020-04-037

Dear Mr. Cola;

Attached are my comments in objection to the John Bowen & Patrick Bowen application 2020-04-037 scheduled to be heard at your November 14, 2023 meeting which I would like to add to public comment. I would have attended in person but have a conflicting Tiverton Town Council meeting on that date. While I cannot speak for other Town Council members, I think I can assure you that we are all of the same mind in objecting to this proposal.

Thank you for your consideration,

Jay P. Edwards
143 Merritt Ave.
Tiverton, RI 02878

Letter in opposition to Bowen brothers application File #2020-04-037

Dear Mr. Willis and CRMC members,

My name is Jay Edwards, no relation to Representative "Jay" Edwards, and I have been a resident of Tiverton for 41 years. I am currently an elected member of the Tiverton Town Council, which body has previously sent you a letter expressing its adamant opposition to this lease application, and the reasons for that opposition.

I also am opposed to this application as a private citizen. I do not live on the shores of the Sakonnet River, nor do I live in the Seapowet area. I do not live in a million dollar house with a water view and a dock and I don't own a boat. I am not a wealthy waterfront land owner nor am I a well-heeled summer vacationer. This proposed lease area is not directly in my back yard. But I AM a full time resident of Tiverton who appreciates the natural beauty of its coastal areas and who is fully aware of the varied uses that occur there each and every day. And, as a resident, I DO regard the Seapowet area and Sakonnet River as my own back yard. In addition, as an elected official, it is my duty and privilege to represent my constituents and give their concerns due regard and support.

The idea of a oyster farm is sound and commendable, but the location of the Bowen's proposed lease is not. It will most definitely interfere with the many activities that have been practiced in this area over decades, and by many generations of Rhode Islanders, and others, who continue to use it to this day. Swimming, boating, kayaking, wind surfing, fishing, clamming and simply walking the shore and enjoying the magnificent views. All of these activities will be diminished or eliminated within this proposed lease area, and for some distance around it. Activities related to harvesting and servicing will be very disruptive, as well as damaging, to the surrounding ecosystems. Powered equipment will be routinely brought into the area to service the lease with its attendant noise and pollution. The visual impact alone should be readily apparent to all. By way of contrast, the purely recreational activities that are currently in practice here are low impact and transient. They have little or no lasting impact on the area. While it is true that the Bowen's have purchased a very small parcel of land inshore of their proposed lease which makes them "riparian" land owners, it is also true that the land is zoned as residential and no commercial activities will be allowed there. This would include landing the harvest, transferring it to trucks and storage of equipment for servicing the lease. A ¼ acre parcel is not classified as a farm under the right to farm act.

Oyster farming is a very specific niche business serving a high end market. A oyster farm hires very few people at minimum wage and is seasonal at best. It requires constant attention. The only true beneficiaries are the owners. While the Rhode Island Right to Farm Act and RICR mention aquaculture, I do not see aquaculture, and oyster farming in particular, as a right to which all other public uses and access are subservient. It has been said that oyster farms are essential in reducing food insecurity in our state. I submit that those who cannot afford basic food items most certainly cannot afford to buy oysters. The idea that an oyster farm will relieve food insecurity is an illusion. But people can wade out to an area currently open to the public to harvest shellfish, or to fish, at no cost. A oyster farm will prevent or at least impede this. The public should not be required to adapt and modify their activities to appease two oyster farmers.

An approval of this lease will essentially take a well used public area, access to which is guaranteed to all, away from thousands of local residents and non-residents and hand it over to two businessmen for their own personal use and profit. It will than be lost to the public forever. This is tantamount to a taking of public land through eminent domain by a state agency for the benefit of a private enterprise. I cannot urge strongly enough that this council deny this application and take a position that favors a continuation of unimpeded public access and use.

Thank you for your attention.

Jay P. Edwards

Cstaff1

From: Eli Wilson <eliwilson9@gmail.com>
Sent: Tuesday, August 22, 2023 10:06 AM
To: cstaff1@crmc.ri.gov
Subject: [File #2020-04-037] Auxiliary Statement
Attachments: Statement of Support for Bowen Aquaculture Permit.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I am attaching an auxiliary statement as part of the file for aquaculture permit no. 2020-04-037.

Let me know if there is any more information you need. Thanks,

-Elisha Wilson

Statement of Support for Bowen Aquaculture Permit

To whom it may concern,

My name is Eli Wilson, and I am a PhD candidate in Industrial Ecology at the Norwegian University of Science and Technology, where my research focuses on quantifying the environmental impacts of agricultural activities through the holistic lens of Life Cycle Impact Assessment. I grew up in Little Compton, as a close friend of the Bowen family. I was excited and invigorated when Pat told me of his plans to start up an aquaculture farm in the Sakonnet River. Not only was I happy for their personal prosperity, but I was also quite aware of the positive ripple effects that shellfish aquaculture can have on nearby coastal ecosystems. So much of my work is oriented around the tension between human needs and ecological health. It's a Sisyphean task to try to satisfy the needs of each of these groups. But what has so excited me about the recent resurgence of shellfish aquaculture (especially in Rhode Island) is its unique ability to bring about *both* human prosperity and increased biodiversity.

One need not look further than our neighboring Massachusetts for evidence: here, we have seen the remarkable ability of shellfish aquaculture to provide robust, natural water filtration systems for rivers and estuaries where eutrophication and pollution (largely from upstream agriculture) represent a major environmental threat (1). A single oyster can filter up to 50 gallons of water per day (2). Oysters are also valuable for their ability to construct 3-dimensional reef habitats for other species to thrive in as well (3). These 'reefs' function as breeding grounds for a wide range of marine species which, otherwise, are woefully exposed to the threats of predation and undernutrition. In other words, shellfish habitats have been remarkably effective in reversing much of the damage caused to our local coastline in the 20th century as a result of dredging, overfishing, and pollution.

Clearly, the environmental benefits of shellfish aquaculture are well-documented and difficult to refute. But the benefits of oyster farms for human society are quite impressive as well. In the ecological sciences, there is a new and exciting concept called ecosystem services: the benefits that ecosystems provide to human society, which is only just beginning to be quantified in dollar amounts. A wide range of these services exist depending on the specific ecosystem, but some estimates put the global ecosystem services provided by shellfish aquaculture at \$30.39 billion: a conservative estimate (4). My personal back-of-napkin calculations using this study's methodology yields a conservative estimate of \$3 million in ecosystem services provided by shellfish farms in Rhode Island alone. And this doesn't even include the direct economic benefits in terms of job growth, food security, and GDP, which comes out around \$2.5 million in revenue each year (5). Thus, for each dollar of revenue oyster farms provide to our residents, they provide more than a dollar in *free* ecosystem services. It cannot be understated how valuable of a tool shellfish aquaculture is in the modern world; by simply existing, it improves our local waterways, transforming them into teeming marine ecosystems, protecting us from storms and erosion all the while. Cultivating them yields millions of dollars for our residents and our economy. The fact that they are beginning to experience explosive growth in our state is a boon to every single one of us. Every new oyster farm means a larger bounty of coastal resources for all of us to enjoy.

I realize that, in this case, the issue of aquaculture growth is not simply an economic or ecological one. But let us not let the ever-present voices of NIMBYism lead us off the path of prosperity for all Rhode Islanders. Healthy ecosystems provide health benefits that all of us enjoy, but very-slightly-modified aesthetics or slightly modified jet ski recreational areas are issues that only face a privileged few. Recreation has an important role to play in healthy lifestyle for all of us, but it should not take precedence over both ecological and economic benefits. Pushing local aquaculture activity into deeper

waters will only push these economic benefits out of reach, for both local farmers and for the rest of us residents as well. Given the miracle-working potential of oyster farms, it is foolish—heartbreaking even—to see the economic, ecological, and health benefits squandered in favor of wealthy special interests and NIMBYism. The literature is clear. The economics are clear. Even the fish side with the Bowens. We live in the Ocean State. Let's not lose sight of what is important.

Best regards,

Elisha Wilson

References:

1. <http://www.ceimaine.org/wp-content/uploads/2018/04/MA-South-Coast-Aquaculture-Analysis.2018.pdf>
2. <https://www.nature.org/en-us/about-us/where-we-work/united-states/massachusetts/stories-in-massachusetts/aquaculture-oyster-restoration/>
3. <https://onlinelibrary.wiley.com/doi/full/10.1111/raq.12584#pane-pcw-figures>
4. <https://onlinelibrary.wiley.com/doi/full/10.1111/raq.12301>
5. <https://www.shellfishri.com/the-plan/resources/aquaculture/>