

Lisa Turner

From: Ben Goetsch
Sent: Monday, September 21, 2026 2:02 PM
To: Carol Nulman; Geoffrey Lewis
Cc: Lisa Turner
Subject: Re: Cedar island oyster company

Thank you for your comment. I am confirming receipt and letting you know that it will be added to the record.

Benjamin Goetsch
Coastal Resources Management Council
Aquaculture Coordinator
Oliver Stedman Government Center
4808 Tower Hill Road
Wakefield, RI 02879
Office: 401-783-3370

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From: Carol Nulman <nulmanc@aol.com>
Sent: Monday, September 21, 2026 1:58 PM
To: Ben Goetsch <bgoetsch@crmc.ri.gov>; Geoffrey Lewis <geof.lewis@outlook.com>
Subject: Cedar island oyster company

Rhode Island Coastal Resources Management Council

Re: Cedar Island Oyster Company
CRMC File Nos. 2001-02-025 and 2004-05-024
Point Judith Pond

To the Members of the Council:

I am writing to request that the Council require a more complete environmental and carrying-capacity analysis before approving the proposed modifications to the Cedar Island Oyster Company aquaculture operations in Point Judith Pond.

I am opposed to further development due to reaching its agreed upon limit of 5% capacity of oyster farms

Carol Nulman

Managing Director, Principal

ROBERTSON STEPHENS®

50 South County Commons Way E6, South Kingstown RI, 02879

Office and cell: (401) 372-0361

carol.nulman@rscapital.com | www.rscapital.com | [Important Disclosures](#)

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Brittany Spurlock

From: bradley.james.waugh@gmail.com
Sent: Wednesday, September 16, 2026 7:13 AM
To: Ben Goetsch; Cstaff
Cc: 'Nadia Waugh'
Subject: Proposed Oyster Farm Expansion & Eel Grass

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Britt

Rhode Island Coastal Resources Management Council
Stedman Government Center
4808 Tower Hill Road
Wakefield, Rhode Island 02879

Re: Cedar Island Oyster Company
CRMC File Nos. [2001-02-025](#) and [2004-05-024](#)
Formal Environmental Objection and Request for Additional Review of Eelgrass, Submerged Aquatic Vegetation, Fish Habitat and Wildlife Habitat

Dear Chair and Members of the Council:

I respectfully submit this formal objection to approval of the proposed Cedar Island Oyster Company aquaculture modifications unless and until the Coastal Resources Management Council develops an adequate, current and site-specific record addressing potential impacts to eelgrass, submerged aquatic vegetation ("SAV"), fish habitat and associated wildlife resources. As a former commissioner of the Narragansett Bay Commission, where I sat during the CSO (containment sewage overflow) project, I am uniquely aware of both the positives and negatives associated with the subject of nutrients in the water, and how they can impact the overall biomass. I am also a long time resident of Great Island, where I have had a house at 17 Edith Road for over twenty years.

Importance of Eelgrass to Point Judith Pond

Eelgrass, *Zostera marina*, is not simply aquatic vegetation. It is recognized by CRMC and federal resource agencies as a highly valuable coastal habitat.

CRMC itself has described eelgrass as performing numerous ecological functions, including supporting the marine food web and providing habitat for fish and invertebrates. CRMC specifically identifies tautog, bay scallops, quahogs, blue crabs and lobsters among the species associated with Rhode Island eelgrass beds and notes that some waterfowl feed upon eelgrass. CRMC has further recognized that eelgrass stabilizes marine sediments and reduces shoreline erosion.

NOAA similarly recognizes submerged aquatic vegetation as providing spawning, nursery, refuge and feeding habitat for fish and shellfish and states that eelgrass supports the life cycle of numerous species.

The Rhode Island Coastal and Estuarine Habitat Restoration Strategy identifies seagrass beds as a priority habitat and explains that eelgrass produces organic material supporting the marine food web, cycles nutrients, stabilizes sediments and provides important fish and wildlife habitat.

Loss of eelgrass therefore represents considerably more than the loss of a plant. Degradation of an eelgrass bed can affect juvenile fish production, shellfish habitat, invertebrates, waterfowl, water quality, sediment stability and the broader food web.

For that reason, prevention of damage is particularly important. Replacing an established natural eelgrass meadow after it has been lost is not equivalent to protecting the original habitat.

CRMC Regulations Specifically Protect Eelgrass

The applicable CRMC aquaculture regulation is explicit.

650-RICR-20-00-1 provides:

“Proposed aquaculture leases may not be sited where eelgrass (*Zostera marina*) or widgeon grass (*Ruppia maritima*) exists.”

CRMC’s SAV regulations separately recognize the particular problem presented by aquaculture gear. Section 1.3.1(R) of the Rhode Island Coastal Resources Management Program states that aquaculture operations utilizing floating racks and bottom culture techniques can shade SAV.

The same CRMC provision identifies light intensity reaching the leaves as the most critical factor in maintaining healthy SAV habitat.

CRMC’s current aquaculture application guidance goes even further, providing that aquaculture gear shall not be permitted over or within 25 feet of protected submerged aquatic vegetation.

These protections are directly relevant here because the Cedar Island applications propose a substantial increase in floating gear.

According to the September 8, 2026 CRMC agenda, File No. [2001-02-025](#) proposes six horizontal floating lines containing 400 low-profile FlipFarm baskets per line, while File No. [2004-05-024](#) proposes seven horizontal floating lines containing 500 baskets per line.

Together, those proposals contemplate approximately 5,900 floating baskets.

This is a significant physical intensification of aquaculture activity regardless of whether the legal boundaries of the existing leases are being enlarged.

Scientific Evidence Establishes That Oyster Aquaculture Can Damage Seagrass Through Shading

There is substantial peer-reviewed scientific evidence supporting CRMC’s own recognition that aquaculture gear can adversely affect submerged vegetation through reduction in underwater light.

A 2014 field experiment involving eelgrass, *Zostera marina*, and suspended oyster aquaculture found that reduced underwater light comparable to that experienced beneath suspended oyster operations produced significant reductions in:

- eelgrass shoot density;
- above-ground biomass;
- below-ground biomass;

- canopy height;
- leaf area; and
- photosynthetic capacity.

Significant effects were observed in as little as 67 days under the experimental shading conditions.

Importantly, the researchers found that many eelgrass characteristics remained significantly reduced even 253 days after the shading treatment was removed. This indicates that assumptions of rapid recovery following removal of aquaculture-related shading may not be justified.

See: Skinner et al., “Experimental determination of the effects of light limitation from suspended bag oyster (*Crassostrea virginica*) aquaculture on the structure and photosynthesis of eelgrass (*Zostera marina*),” *Journal of Experimental Marine Biology and Ecology*, Vol. 459 (2014), pp. 169-180.

A separate 2022 field experiment examining different oyster cultivation methods found that oyster trays reduced available light by approximately 90.8 percent and longline baskets reduced light by approximately 52.8 percent. Both configurations were associated with approximately four-fold declines in seagrass shoot density.

That study also found that floating bags under the particular conditions tested did not produce measurable decreases in seagrass density. This distinction is important because it demonstrates that aquaculture impacts are highly dependent upon the configuration, density, water depth, spacing and type of gear employed.

The authors specifically cautioned that additional research was needed concerning floating bags deployed in shallower water and at greater densities.

See: “Floating bags have the potential to minimise oyster farming impacts on *Posidonia australis* seagrass meadows,” *Aquaculture*, Vol. 560 (2022), Article 738594.

The appropriate scientific conclusion is therefore not that all oyster aquaculture necessarily damages eelgrass, nor that floating gear necessarily has no impact.

The scientifically supportable conclusion is that the effect depends upon gear design, density, spacing, water depth, light availability and site-specific conditions.

Those are precisely the factors that should be examined before authorizing approximately 5,900 floating baskets in Point Judith Pond.

CRMC’s Own Materials Recognize the Habitat Risk

CRMC guidance concerning aquaculture and Essential Fish Habitat states that SAV such as eelgrass is important nursery habitat within shallow estuaries.

CRMC further recognizes that eelgrass provides refuge for juvenile fish, reduces turbidity by trapping particles, stabilizes bottom sediments, and contributes to nutrient cycling.

Most importantly for these applications, CRMC’s own aquaculture planning materials recommend that:

“Aquaculture facilities should be limited or restricted in areas where they would be replacing or deterring natural eelgrass beds from growing.”

This principle is directly relevant to the Cedar Island modifications.

The inquiry cannot be limited to whether mature eelgrass happened to be observed directly beneath the proposed gear on a prior occasion.

CRMC should also determine whether the location represents suitable eelgrass habitat and whether dense floating gear could deter the natural expansion, recolonization or establishment of eelgrass that otherwise could occur.

The Existing Administrative Record Appears Insufficient

The Cedar Island staff reports indicate that eelgrass and widgeon grass do not currently exist at the sites based upon “staff observations and state data,” and reference previous routine eelgrass surveys.

However, the publicly available staff materials do not appear to identify:

- the date of the most recent site-specific underwater SAV survey;
- the individuals who performed that survey;
- the precise geographic area surveyed;
- the survey methodology;
- whether transects were conducted;
- whether divers or underwater cameras were used;
- whether adjacent eelgrass was mapped;
- whether bottom habitat capable of supporting eelgrass was identified;
- the water depth at the proposed gear locations;
- underwater light availability;
- the dimensions and surface footprint of the proposed baskets;
- the percentage of the water surface that would be covered or intermittently shaded;
- the amount of bottom receiving reduced light;
- the seasonal duration of that shading;
- the cumulative effect of thousands of baskets;

or

- whether the proposed equipment could inhibit future eelgrass recruitment or expansion.

This is a significant evidentiary gap.

CRMC’s own SAV survey standards contemplate documenting transects, sampling stations, water depth, survey date and time, fixed-point locations and the extent of SAV coverage.

A generalized statement that eelgrass was not previously observed is not equivalent to a current, site-specific evaluation of the environmental consequences of substantially increasing floating aquaculture gear.

Lease Acreage Is Not the Same as Environmental Impact

The fact that Cedar Island is not requesting additional legal lease acreage does not eliminate the need to evaluate the environmental consequences of the modification.

The proposed increase in gear changes the physical use and intensity of the area.

A two-acre area containing limited bottom culture does not necessarily have the same environmental effect as that same area containing hundreds or thousands of floating baskets.

The relevant environmental question should therefore be the intensity and effect of the proposed activity, not merely whether the survey coordinates defining the lease boundary have changed.

That issue is especially important because Point Judith Pond is already subject to CRMC's regulatory limitation on the percentage of coastal-pond open water that may be occupied by commercial aquaculture.

The Council should not evaluate intensification within existing leases solely as a matter of acreage if the modification substantially increases the amount of gear, surface occupation, shading, biomass and operational activity.

Requested Information and Additional Review

Before taking final action on CRMC File Nos. [2001-02-025](#) and [2004-05-024](#), I respectfully request that the Council require the following information to be placed in the administrative record:

1. A current, site-specific survey of eelgrass, widgeon grass and other submerged aquatic vegetation within and surrounding both proposed gear areas.
2. Identification of the date, methodology, personnel, environmental conditions and geographic extent of every SAV survey relied upon by CRMC.
3. All eelgrass and SAV GIS layers, maps, aerial imagery, field notes, photographs, underwater video, inspection reports and survey data for these locations and adjacent waters from 2021 through 2026.
4. Mapping of all SAV located within at least the applicable CRMC buffer distance from the proposed gear.
5. Identification of potentially suitable eelgrass habitat within and immediately adjacent to the proposed areas, even if eelgrass is not presently established there.
6. The dimensions of every proposed FlipFarm basket and line and the maximum number permitted to be deployed simultaneously.
7. Calculation of the total surface area occupied by the proposed gear.
8. Calculation or modeling of the percentage reduction in light reaching the bottom beneath and adjacent to the proposed gear.
9. Evaluation of shading at different sun angles, tides, seasons and basket-loading densities.
10. Evaluation of whether the proposed gear could inhibit natural eelgrass recruitment, expansion or recolonization.
11. Evaluation of biodeposition from the proposed oyster biomass, including feces and pseudofeces and any potential changes in sediment oxygen or organic loading.
12. Evaluation of vessel, harvesting, maintenance, anchoring and gear-handling impacts upon shallow habitat.
13. Evaluation of cumulative impacts when the proposed modifications are considered together with existing commercial aquaculture throughout Point Judith Pond.

14. Identification of any consultation undertaken with RIDEM, NOAA Fisheries, URI researchers or other qualified habitat specialists.
15. Establishment of a post-installation SAV monitoring program with objective environmental thresholds that would require corrective action.
16. Identification of CRMC's enforcement authority and procedure for reducing, relocating or removing aquaculture gear if eelgrass subsequently appears or if monitoring establishes an adverse impact.

Conclusion

There is no need to establish that oyster farming is inherently harmful in order to require careful review of these applications.

Oyster aquaculture can provide environmental benefits, including filtration of the water column.

But those benefits do not eliminate the separate physical effect of thousands of pieces of floating gear reducing light reaching the bottom.

Indeed, CRMC's own regulations recognize both propositions: shellfish aquaculture can improve water quality, while floating aquaculture gear can shade SAV.

The issue is therefore one of scale, location, configuration and carrying capacity.

Approximately 5,900 proposed floating baskets concentrated within relatively small areas of Point Judith Pond constitute a sufficient change in intensity to warrant a current, site-specific scientific evaluation before authorization.

CRMC has determined that eelgrass is sufficiently valuable to prohibit aquaculture siting where it exists and to prohibit aquaculture gear over or within the prescribed distance of protected SAV.

The same resource should not be placed at risk because the agency relied principally upon historical mapping or generalized observations rather than determining the present conditions at the exact locations where thousands of floating baskets are proposed.

Accordingly, I respectfully request that CRMC defer approval of these modifications until the administrative record demonstrates, through current and site-specific evidence, that the proposed activity will not adversely affect existing eelgrass, adjacent eelgrass, suitable eelgrass habitat, the natural expansion or recolonization of eelgrass, Essential Fish Habitat, fish and shellfish resources, or other wildlife dependent upon Point Judith Pond.

I further request that this letter, CRMC's response, all underlying SAV information, and any subsequent scientific analysis be incorporated into the official administrative record for CRMC File Nos. [2001-02-025](#) and [2004-05-024](#).

Respectfully submitted,

Bradley Waugh
401-965-7171

From: bradley.james.waugh@gmail.com
Sent: Tuesday, September 8, 2026 5:03 PM
To: Ben Goetsch; Cstaff
Cc: 'Nadia Waugh'
Subject: Proposed Oyster Farm Expansion

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Oliver

To Whom It May Concern:

I own two houses on Great Island at 13 & 17 Edith Road, and I have been coming to the Point Judith Salt Pond since 1977. I adamantly came out against the Vanhemetrijck lease a couple of years ago, and we were told that CRMC would no longer approve new leases or the expansion of existing ones, yet we recently heard that Cedar Island Oyster Company is looking to expand and change the 2.3-acre lease (2001-02-025) and the 15-acre lease (2004-05-024) that they currently have. This will seriously impede navigation and the recreational impacts to water skiing & tubing are insurmountable!

The Point Judith Pond has already reached CRMC's 5% aquaculture limit and this addition will exceed the that 5% limit.

Brad & Nadia Waugh

September 7, 2026

Rhode Island Coastal Resources Management Council
Full Council
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879

Re: Cedar Island Oyster Company — CRMC Files 2001-02-025 and 2004-05-024

Dear Members of the Coastal Resources Management Council:

We are writing as the owners/residents of 73A Fire Lane 3 in South Kingstown, directly on Point Judith Pond, to respectfully oppose the proposed modifications to the Cedar Island Oyster Company aquaculture operations. We ask the Council to deny these modifications, or at minimum continue the matter until the Council has a clear, accurate visual assessment of what the proposed floating gear will look like from surrounding waterfront properties.

Our concern is not opposition to the oyster industry. We recognize the importance of shellfish aquaculture and support responsible working-waterfront uses. Our concern is from our high vantage point on the Bluffs, the scale and visual character of the proposed change to Point Judith Pond and the cumulative effect of placing thousands of additional floating objects in an otherwise open and scenic pond will severely impact our view and property value.

The CRMC agenda identifies two separate modifications. File 2001-02-025 would add six horizontal floating lines containing 400 low-profile baskets each — approximately 2,400 floating baskets — within a 2.3-acre existing lease. File 2004-05-024 would add seven lines containing 500 baskets each — approximately 3,500 baskets — within a three-acre portion of an existing 15-acre lease. Together, that represents approximately 5,900 floating baskets.

From our home, we have a broad, elevated and unobstructed view across Point Judith Pond. The pond is not simply a working waterway to us; it is the defining scenic feature of our property and the surrounding community. The introduction of thousands of floating baskets arranged in multiple long lines would materially change the appearance and character of the water that we see every day.

We are particularly concerned that the visual impact has not been demonstrated adequately. The applicant describes the gear as low profile and says the linear arrangement will mitigate scenic impacts. However, low profile does not mean invisible, particularly from an elevated waterfront residence. The scale matters: thousands of individual surface-level objects arranged in long lines can create a distinctly different visual landscape even if each individual basket is small.

We also believe the Council should consider cumulative impact rather than looking only at the fact that the underlying lease acreage is not increasing. A modification can substantially change what is physically visible and how the water is used without adding lease acreage. The question should therefore be what Point Judith Pond will actually look and feel like after these modifications, not simply whether the legal footprint of the existing lease changes.

The application materials themselves recognize scenic impact as an issue. In addition, another objector has specifically requested clearer maps and an accurate visual representation of the proposed result, noting that the scale of the thousands of surface-level baskets is difficult to

understand from the submitted drawings. We agree. Before approving a change of this scale, the Council should require a realistic visual simulation from nearby waterfront viewpoints, including 73A Fire Lane 3.

We are also concerned about recreational use. Point Judith Pond is used by our family of five for boating, kayaking, paddle boarding, water skiing, fishing and most important is swimming. Even if passage remains technically possible between floating lines, adding multiple long lines of gear changes the experience of navigating the pond. The Council should evaluate reasonable access and recreational use in the context of the cumulative amount of aquaculture gear, not simply whether a boat can physically pass through a gap.

For these reasons, we respectfully request that the Council deny the proposed modifications. If the Council is not prepared to deny them, we ask that the matters be continued and that the applicant be required to provide: (1) accurate, easily understandable site maps; (2) a scaled visual simulation showing the proposed gear from surrounding waterfront properties; (3) an analysis of cumulative visual and recreational impacts from both proposed modifications together; and (4) a clear demonstration that traditional boating, fishing, swimming and other recreational uses will remain reasonably accommodated.

We respectfully ask the Council to protect the scenic character and shared recreational value of Point Judith Pond while allowing responsible aquaculture to continue. It's important to look at surveyed setbacks, habitat information and a cost supported equipment -removal bond. I believe these proposed modifications, at their proposed scale, warrant a more complete peak season navigation evaluation before approval. If in fact, this is considered for approval, it should include fewer lines, wider navigation corridors, adequate marking and lighting, seasonal safeguards and enforced monitoring conditions.

Thank you for considering our concerns and for allowing us to be heard on this important matter.

Respectfully,

Kristen Martone
Owners/Residents
73A Fire Lane 3
South Kingstown, RI 02879

Lisa Turner

From: Geoffrey Lewis <geof.lewis@outlook.com>
Sent: Monday, September 28, 2026 9:24 AM
To: Lisa Turner
Cc: Stephen Chenard
Subject: FW: Object to Approval of Applications 2001-02-025, 2004-05-024 for Modification of Oyster Farms in the Salt Pond

Lisa,
Here is an additional email that did not make it to the "Letters of Objection"
Geof Lewis

From: stephen chenard <stevechenard21@gmail.com>
Sent: Monday, September 7, 2026 1:49 PM
To: cstaff1@crmc.ri.gov; bgoetsch@crmc.ri.gov
Cc: Geoffrey Lewis <geof.lewis@outlook.com>
Subject: Object to Approval of Applications 2001-02-025, 2004-05-024 for Modification of Oyster Farms in the Salt Pond

I am a highly concerned resident and owner of property at 100 Marine Drive on Great Island in Narragansett, RI. The Salt Pond is already severely congested with both manmade and natural waterway constriction. Adding thousands of floating baskets for the commercial gain of a few individuals is counter to the enjoyment of the masses of Rhode Islanders who use the open resources of the Point Judith Salt Pond. Approval of these applications will impede navigation, recreation, and fisheries in Point Judith Pond. Families and recreational user safety and enjoyment should be given first priority in consideration of the uses of the pond.

Before granting your approval I and my neighbors ask that you perform due diligence with a thorough and detailed review of all aspects of the impact including impact of additional congestion to sailing vessels, poor visibility, already limited turning space and emergency access. Both applications should be considered in their totality for impact as a cumulative effect. Please consider a delay in decision making until peak-season navigation and recreational use studies; surveys of setback impacts, and habitat concerns can be adequately and independently confirmed.

The reality of floats in wave and tidal highs and lows should be documented independently and studied fully. The rights of homeowners should also be considered as these installations encroach on riparian rights. As these installations wear out and lose their integrity, marine life and safe boating will also be impacted. Are you looking at the long-term impact of these decisions?

Sincerely
Stephen Chenard
508 320 2064

Lisa Turner

From: Geoffrey Lewis <geof.lewis@outlook.com>
Sent: Monday, September 28, 2026 9:11 AM
To: Lisa Turner
Subject: FW: Cedar Island Oyster Company

From: Geoffrey Lewis
Sent: Monday, September 14, 2026 11:42 AM
To: 'bgoetsch@crmc.ri.gov' <bgoetsch@crmc.ri.gov>; Cstaff <cstaff1@crmc.ri.gov>
Cc: jjjbaldwin@aol.com; Brad Waugh (bradley.james.waugh@gmail.com) <bradley.james.waugh@gmail.com>; timr@iwestco.com; Glennmorin@ymail.com; 'pmilton14@cox.net' <pmilton14@cox.net>; 'stephen chenard' <stevechenard21@gmail.com>; 'Martonefamilyri@yahoo.com' <Martonefamilyri@yahoo.com>; 'sclacar.sc4@gmail.com' <sclacar.sc4@gmail.com>; 'jschupack@gpymca.org' <jschupack@gpymca.org>; 'joakim.karlsen@uri.edu' <joakim.karlsen@uri.edu>; 'amenzie@narragansett.ri.gov' <amenzie@narragansett.ri.gov>; 'jdurkin@narragansett.ri.gov' <jdurkin@narragansett.ri.gov>; 'jcolonies@narragansett.ri.gov' <jcolonies@narragansett.ri.gov>; 'rtorrealday@narragansett.ri.gov' <rtorrealday@narragansett.ri.gov>; 'sen-valverde@rilegislature.gov' <sen-valverde@rilegislature.gov>; 'rep-mcentee@rilegislature.gov' <rep-mcentee@rilegislature.gov>; 'towncouncil@southkingstownri.gov' <towncouncil@southkingstownri.gov>; 'desk@wpri.com' <desk@wpri.com>; 'news@wjar.com' <news@wjar.com>; 'wrichmond@usatodayco.com' <wrichmond@usatodayco.com>; 'saltpondscoalition@gmail.com' <saltpondscoalition@gmail.com>; 'harbormaster@narragansett.ri.gov' <harbormaster@narragansett.ri.gov>; 'lturner@crmc.ri.gov' <lturner@crmc.ri.gov>; cnulman@hightoweradvisors.com <cnulman@aol.com>
Subject: Cedar Island Oyster Company

Rhode Island Coastal Resources Management Council

Re: Cedar Island Oyster Company
CRMC File Nos. 2001-02-025 and 2004-05-024
Point Judith Pond

To the Members of the Council:

I am writing to request that the Council require a more complete environmental and carrying-capacity analysis before approving the proposed modifications to the Cedar Island Oyster Company aquaculture operations in Point Judith Pond.

These applications should not be viewed simply as changes in aquaculture gear. Together, the proposed modifications would introduce approximately 5,900 floating oyster baskets within existing leased acreage—approximately 2,400 baskets associated with File No. 2001-02-025 and approximately 3,500 baskets associated with File No. 2004-05-024.

The significance of this increase is especially important because Point Judith Pond has already reached CRMC's established 5% aquaculture acreage limit.

CRMC has previously described its aquaculture limits as scientifically defensible limits developed through an ecosystem-based approach and informed by ecological carrying-capacity considerations. If the purpose of the 5% limitation is to protect the ecological carrying capacity of the Pond, then it is not sufficient to evaluate these applications solely on the basis that no additional leased acreage is being requested.

The relevant environmental question is not simply how many acres are leased. It is how much aquaculture activity and oyster biomass the ecosystem is being required to support within those acres.

The addition of thousands of floating grow-out baskets may significantly increase the number and biomass of oysters actively feeding in the upper water column. That raises environmental questions that are distinct from the physical impact of the baskets themselves.

Before approving these applications, CRMC should require a site-specific and cumulative analysis addressing, at minimum:

1. The total number and estimated biomass of oysters that would be present under the modified operations, compared with current production.
2. The filtration demand created by the additional oyster biomass.
3. Whether phytoplankton production and tidal exchange are sufficient to support the proposed increase without food depletion or reduced productivity elsewhere in the Pond.
4. Water residence time, flushing rates and circulation characteristics in the portion of Point Judith Pond affected by these operations.
5. The potential increase in fecal and pseudofecal biodeposition beneath the floating gear.
6. Potential changes in sediment organic loading, sediment oxygen demand and benthic conditions.
7. Potential effects on dissolved oxygen, particularly during warm-weather and low-flow conditions.
8. Potential impacts on nitrogen cycling and other water-quality processes.
9. The cumulative effect of these proposed modifications when considered together with Cedar Island Oyster Company's existing bottom culture and all other existing aquaculture operations in Point Judith Pond.
10. Whether intensification of oyster production within already-leased acreage is consistent with the ecological assumptions underlying CRMC's 5% aquaculture limitation.

The existing agency review appears to focus primarily on whether the proposed gear modification itself would have significant fisheries or habitat impacts. That is an important consideration, but it is not the same as evaluating ecological carrying capacity.

A floating basket may have minimal direct physical impact while the oysters contained within thousands of baskets collectively exert a substantial biological effect through filtration, food consumption and biodeposition.

This distinction is particularly important where the receiving water body has already reached CRMC's established aquaculture acreage ceiling.

There is also a cumulative-impact issue. These two applications were submitted at approximately the same time and affect the same operator and the same water body. Evaluating each modification independently risks understating their combined effect. The relevant environmental baseline should include both proposed modifications, existing Cedar Island Oyster Company production and other existing commercial aquaculture within Point Judith Pond.

The Council should therefore determine the environmental effects of the proposed approximately 5,900 additional floating baskets collectively rather than treating each application as an isolated gear modification.

I am not suggesting that oyster aquaculture is inherently environmentally harmful. Oyster aquaculture can provide significant environmental benefits. However, even beneficial activities can exceed the ecological carrying capacity of a confined or partially confined water body when production becomes sufficiently intensive.

That is precisely why carrying-capacity limits exist.

The central question before the Council should therefore be:

If Point Judith Pond has already reached CRMC's scientifically established aquaculture acreage limit, what scientific analysis demonstrates that a substantial intensification of oyster production within that existing footprint remains within the Pond's ecological carrying capacity?

Unless that question has been answered through a quantitative, site-specific and cumulative analysis, I respectfully submit that the environmental review is incomplete.

I therefore request that CRMC either:

- require a formal carrying-capacity and cumulative-impact analysis before approving these modifications; or
- obtain written findings from the appropriate environmental and fisheries agencies specifically addressing the increased oyster biomass and production intensity associated with the combined approximately 5,900 floating baskets.

This is not simply a question of additional acreage. It is a question of additional biological loading within a water body that CRMC has already determined has reached its aquaculture acreage threshold.

Respectfully submitted,

Geoffrey Lewis
114 Marine Drive
Narragansett, RI 02882
Geof.lewis@outlook.com
(917) 613-6900

Lisa Turner

From: Geoffrey Lewis <geof.lewis@outlook.com>
Sent: Monday, September 28, 2026 9:24 AM
To: Lisa Turner
Subject: FW: Please review attached concerns for Approval before September 8th CRMC Meeting at One Capitol Hill @ 6pm.
Attachments: map of Pt Jude.jpg

Lisa,
This was an additional email I sent in objection to the Cedar Island application.
Please add to the Letters of Objection
Thank you,
Geof Lewis

From: Geoffrey Lewis
Sent: Tuesday, September 8, 2026 12:40 PM
To: bgoetsch@crmc.ri.gov; cstaff1@crmc.ri.gov
Cc: Geoffrey Lewis <geof.lewis@outlook.com>
Subject: Please review attached concerns for Approval before September 8th CRMC Meeting at One Capitol Hill @ 6pm.

Rhode Island Coastal Resources Management Council
Full Council
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879

Re: Cedar Island Oyster Company — CRMC Files 2001-02-025 2004-05-024

Dear Members of the Coastal Resources Management Council:

I am a resident and owner of 114 Marine Drive, Narragansett, RI and I just became aware of the public notice of Cedar Island Oyster Co..

I am writing to oppose the application of Cedar Island Oyster Company — CRMC Files 2001-02-025 and 2004-05-024.

I am privileged to view the recreational and commercial activities, water use, and activities effected daily in file 025 2004-05-024.

1. No where in the request does it identify by a study the recreational use the same area.
2. No where does it identify the the amount of boat traffic in about the area
3. No one has ordered a study of who will be affected by adding floating cages.

Just because the cages are outside of a marked coast guard navigation area, does not mean the proposed area is not widely used.

The proposed area is 6 feet deep at MHW and 11 feet deep at MLW and currently being used by many boaters. This access will be seriously comprised under the plan.

What benefit does allowing the applicant to farm in this area create, or is it simply to enrich the lives of the farm owners?

1. How many additional jobs will it create?
2. What additional taxes will be paid?
3. What public landing will the farmers be using? What wear on the facility will that cause?
4. What accommodations have been guaranteed if there were damages by the farm?

Long term impact?

1. Will every farmer currently farming on the seabed now be allowed a lease on top? Did the CRMC state that the Vanhemelrijck license would be the last on Point Judith Pond.
2. The farmer has provided no substantiation of bird mitigation, only their opinion. A professional report should be required.
3. Many times the farmer has quoted that their system is “better”. Should you assume that “better” is acceptable? Where is the opinion of experts?
4. The farmer states that his gear is less visual overall. Does that make it right? Has anyone done a survey of residents

Location?

1. The Company states that it is creating optimal conditions, but have not provided an alternatives. It is an unjustified, unsubstantiated statement

Questions to Category B Tidal Aquaculture Form:

1. A) What evidence to the statement “we are being drastically outcompeted” has been provided? Is the enrichment of two people a reason to deny many people access and use of important pond space?
B) Please explain how moving from bottom gear to floating gear you will reduce the visual impact.
6. A) What study has been provided to support the statement “the requested alteration will not unreasonably interfere....
B) What study has been done to support the statement “in which general passage is usually avoided” or “sees the least amount of activity”.
10. What study has been done to support the statement “generally discourages boating activity”

Geoffrey Lewis
114 Marine Drive
Narragansett, RI 02882

Lisa Turner

From: Geoffrey Lewis <geof.lewis@outlook.com>
Sent: Monday, September 28, 2026 9:36 AM
To: Lisa Turner
Cc: Peter Milton
Subject: FW: File 2004-05-024 Oyster farm

Lisa,
Here is one addition email that was sent in objection to the Cedar Island application but not posted to the Letters of Objection.
Thank you,
Geof Lewis
(917) 613-6900

From: Peter Milton <pmilton14@cox.net>
Sent: Monday, September 7, 2026 9:26 PM
To: crmc1@crmc.ri.gov
Cc: Geof.lewis@outlook.com
Subject: File 2004-05-024 Oyster farm

To whom it may concern;

My name is Peter Milton, I am a resident of great Island. My property overlooks the section of Point Judith Pond, where the proposed oyster farm is to be located. I would like to voice my opposition to this proposal as it would impede recreational use of the pond and present a navigational hazard to boaters traversing the area . These oyster leases are slowly reducing the available public areas, not to mention the visual beauty of the pond.

Winters also present additional concerns. Over the past few years the pond has frozen over with a thick layer of ice. The oyster gear gets trapped in the ice with tidal currents dislodging it from their original locations , In many cases the markers, floats and netting float away or pile up on the local waterfront I do not see any benefit to the public only a hindrance.

Please do not approve this application

Respectfully

Peter K Milton
124 Marine Drive
Narragansett

[Sent from Yahoo Mail for iPhone](#)