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By Nova Scotia Aquaculture Review Board at 4:09 pm, Feb 14, 2023

From: [Roger](#)
To: [Aquaculture Review Board](#)
Subject: ARB Hearing commencing April 24, 2023
Date: February 14, 2023 8:42:01 AM
Attachments: [Attachment information](#)
[Roger 6 ARB.doc](#)

NSARB-2022-WRT-009
NSARB-2022-ORL-001

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Attention: Clerk of the Nova Scotia Aquaculture Review Board

Good Morning:

Re: AQ#1042, AQ#1043, AQ#1044

Please find attached my comments to ARB on the the lease applications mentioned above.

In addition, I am requesting to make a sworn oral statement or affirmation at the hearing commencing April 24, 2023.

Thank You,

Dr Roger Porter

████████████████████
Antigonish, NS
██████████

NSARB-2022-WRT-017

NSARB-2022-ORL-002

From: [Susan Shaw](#)
To: [Aquaculture Review Board](#)
Subject: TPO Aquaculture Proposals - Letter of Support
Date: February 24, 2023 3:06:30 PM
Attachments: [TPO Aquaculture Proposals - Letter of Support.pdf](#)

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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Hello Mr. Bruce - attached please find a letter of support for the Town Point Oysters proposals AQ #1442, AQ #1443 and AQ#1444.

If possible, I would like to present this letter as a sworn oral statement at the ARB hearing, scheduled for April 24-28, 2023.

In my letter, have included the factor to be addressed (a - optimum use of marine resources), as well as my civic address.

Could you please advise me if it is possible for me to present this letter orally at the hearing, as well as if you require further information from me.

I am looking forward to your response.

Sincerely
Susan Shaw

Sent from my iPad

From: [Aquaculture Review Board](#)
To: [REDACTED]@eastlink.ca
Cc: [REDACTED]
Subject: RE: Request to make a sworn oral statement at Public Hearing re application for Licences AQ#1042, 1043, 1044
Date: March 15, 2023 3:32:00 PM

NSARB-2022-ORL-003

Acknowledging receipt of your request to present an Oral Statement.

Thank you,

Stacy Bruce (he/him), EP
Clerk, Nova Scotia Aquaculture Review Board

1800 Argyle Street, 6th Floor
World Trade and Convention Centre
Halifax, NS
B3J 2R5

Phone mailbox: 902-722-1426
E-mail: aquaculture.board@novascotia.ca
<https://arb.novascotia.ca>

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From: [REDACTED]@eastlink.ca>
Sent: Tuesday, March 14, 2023 8:36 PM
To: Aquaculture Review Board <Aquaculture.Board@novascotia.ca>
Cc: [REDACTED]@eastlink.ca
Subject: Request to make a sworn oral statement at Public Hearing re application for Licences AQ#1042, 1043, 1044

RECEIVED March 14, 2023

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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(Emailing on behalf of Ronald M Fraser, cc'd)

March 13, 2023

The Clerk of the Board

Nova Scotia Aquaculture Review Board

PO Box 2223

Halifax NS

B3J 3C4

I am requesting your consent to make a sworn oral statement on the application by Town Point Consulting for three Marine Aquaculture Licences – AQ#1042, AQ#1043, AQ#1044 in Antigonish Harbour, Antigonish County. Per the Notice of Public Hearing, I understand the Hearing is due to commence Monday, April 24th, 2023 at 9:00am at St. Francis Xavier University, in Antigonish.

My full name is Ronald Malcolm Fraser, and my civic address is [REDACTED], Harbour Centre, NS.

Any correspondence should be sent to [REDACTED] Antigonish NS, [REDACTED] Or [REDACTED] [@eastlink.ca](mailto:[REDACTED]@eastlink.ca)

My preference is to comment on Factors D and E specifically, and to comment briefly on Factor C.

I am looking forward to this opportunity, and kindly request confirmation that I will be provided opportunity to speak. Thank you.

Yours,

Ronald M Fraser

NSARB-2022-ORL-004

TOWN POINT OYSTERS – PUBLIC HEARING

Re Sworn Oral Statement

Opening Remarks

Good (afternoon) and thank you for this opportunity to speak on this matter.

My name is Sean Day. I've lived in Antigonish for 30 years and for 22 of those, I lived and started my family on the harbour in a home I built.

For most of my time here, I worked in municipal government – mainly as the director of Community Planning and Development.

I now work as a private consultant with a focus on development that reduces our environmental footprint while improving community wellbeing.

As a believer in the benefit of spending time in natural settings – and as a lover of our coastal life, I have served for 10 years now as the president of the Antigonish Boat Club – an organization that strives to foster inclusive, low-impact, small craft boating on the harbour.

Having chosen to live and raise my family here, I want Antigonish to have a rich, vibrant and sustainable future. But our world is changing quickly now and we must evolve with it. This, inevitably, involves community change and I believe we must lean into this together in a respectful, open manner and one which is based on sound information. For these reasons, I applied to sit on the Community Liasson Committee.

During my time with the CLC, as we worked to provide answers to community questions, and to challenge the proponent to mitigate concerns, it has become clear to me that oyster aquaculture comes with a few challenges and many benefits. It has also become evident that Town Point Oysters (TPO) – through 5 years of research and field testing, community consultation and creative-solution finding, has risen to these challenges. This gives me confidence.

Board Factors

At this point, I'd like to talk about some of the concerns that have been raised regarding this proposal. These are in no particular order but do speak to the factors the board must consider.

NAVIGATION

In early stages, it was claimed that navigation east of Town point would be impacted significantly by this development. I am aware that TPO sought out feedback from area residents and addressed this concern both by reducing the area of lease substantially, and also by repositioning it. This opened up the navigable channel to about 250m wide. I think that will prove to be ample – even if tacking through in a sailboat.

Those paddling in the area will be able to pass though the farms should that prove of interest.

STORMS AND GEAR

Another concern raised by the community, and one that I share, is what may happen to gear during the increasingly violent storms we're seeing. One of the design considerations of the new cages was to be more storm resistant. During hurricane Fiona (a pretty good test) there were BOBR cages on three nearby farms and none were lost. This would seem to support TPO's claims of greater storm resilience of BOBR gear. That said, every storm is different and so pre and post storm protocols have been developed - sinking the BOBRs being one of the most effective ones.

OTHER MARINE INDUSTRIES [#community](#), [#economy](#)

In regard to other commercial users, it has been suggested that those who keep lobster boats in the harbour are concerned about the operation. Given that the proposed lease areas do not impact navigation to the harbour mouth, it is not clear to me as to why.

It was also mentioned that those who harvest non-farmed oysters have concerns. I think it is important to note that the proposed farms are located close to the two openings to the harbour and as such will see twice daily flushes. This, along with the abundant nutrient loading from the harbour watershed should ensure that both wild and farmed oysters will thrive.

VISUAL CONCERNS

Antigonish Harbour is a beautiful place and some opponents have claimed their view of the harbour will be impaired by the proposed farm leases. While it is true that some households and seasonal residents will have a view over one farm or the other, it must be noted that, by design, the BOBRs are intended to be visually unobtrusive.

Further, I expect that many, including perhaps some of those within view of a farm, will find the husbandry activities to be of interest.

Harbour Health

Perhaps, the greatest concern raised is the potential for impact on harbour health. To be clear, humans have been impacting Antigonish harbour since we first turned a plough or cut down a tree along its banks. Certainly, all who live on the harbour – or within its watershed, are impacting it.

As we all know, without treatment, harvesters cannot sell oysters from Antigonish harbour due to the potential of waterborne pathogens resulting from human practices. This is not the sign of a pristine environment.

Poor stormwater, erosion and riparian management practices relating to transportation and our resource economy impart huge sediment loads on the harbour. But oysters are filter feeders and by ingesting algae and other organic matter in the water they help to reduce excess nutrient loading and improve overall water clarity. This can have a positive impact on eel grass and other marine species in the area.

Economic Spinoff

Some suggest that this development will negatively impact tourism as it relates to the harbour. I don't buy that. AirBnBs are surprisingly sparse in the area and from 28 years of time on these waters, I can tell you that boating is minimal. As such, it's not clear to me what this impact would be. If anything, visitation could increase due to interest in these new systems along with tourism opportunities such as in Knysna, SA, where they hold a hugely successful, week-long Oyster festival each year.

Wrapping Up

Rarely in life do we get to make decisions based on 100% certainty. This case is no different. We decide based on the best available information and adapt as needed. TPO has already shown itself to be very capable in this regard.

Antigonish Harbour is a special place – for us. But so are all the other harbours around the province that can support oyster aquaculture – within those communities. Adding this oyster farm will allow our harbour to be both special and more productive - these characteristics are not mutually exclusive.

At great investment of time and money, TPO is seeking to found a new, sustainable industry in our community so unless there is something unusual about this harbour that would clearly be threatened by this initiative, I believe that these applications should be approved.

I would like to close by thanking all of those who have invested their time and energy to consider and weigh in on this proposal and its potential impact, negative and positive, on our harbour and our community.

Sean Day

██████████,
Antigonish, NS

██████████

██████████
██████████@gmail.com

NSARB-2022-WRT-054

NSARB-2022-ORL-005

Hana Nelson

[REDACTED]
Merigomish, NS, [REDACTED]

Nova Scotia Aquaculture Review Board
P.O. Box 2223 Halifax, Nova Scotia B3J 3C4
Attention: Mr. Stacy Bruce, ARB Clerk
aquaculture.board@novascotia.ca
Reference: Town Point Consulting, AQ#1442, AQ#1443 and AQ#1444

March 9th 2023

Dear Aquaculture Review Board,

I am writing to you as a supporter of the Town Point Oysters Application for leases AQ#1442, AQ#1443 and AQ#1444 to farm oysters in Antigonish Harbour. My area of expertise lies in sustainable seafood marketing and distribution, as the former owner of Afishonado Fishmongers Inc and as someone who has been actively involved in sustainable seafood and food system studies for over a decade. I have an undergraduate degree in Biology from Dalhousie and a Master's in Agroecology from the Norwegian University of Life Sciences and ISARA-Lyon France. My comments will relate to the following points: a) the optimum use of marine resources, and b) the contribution of the proposed operation to community and provincial economic development. I would like to present this letter as a sworn oral statement during the hearing.

I started Afishonado in 2014 from my observance that Nova Scotia lacked a brand that was focussed on high quality seafood from exclusively farmed and fished, eco-certified, recommended fisheries. We used the Ocean Wise recommended program as our principal guide for sustainable seafood procurement. Ocean Wise recommended fisheries represent those that are the best choice for the health of the ocean.

Farmed oysters are one of the best seafood sources from our ocean from a taste, carbon footprint, and nutritional perspective. In the context of carbon emissions, the consumption of low carbon footprint shellfish from the ocean is one of the best protein sources we can consume, outcompeting land-based animal proteins. Oysters are an unfed crop, consuming nutrients from the marine environment. They require no inputs. This concept of 'Blue Foods'ⁱ from Gephart et al., 2021 are those aquatic foods that have a lower carbon footprint than land based farmed animals. Oysters, as a blue food have some of the lowest environmental stressors such as "greenhouse gases, nitrogen, phosphorus, freshwater and land stressors for species groups.....unfed aquaculture results in negligible values for most considered stressors. Furthermore, blue foods provide the highest nutrient richness across multiple micronutrients. Farmed blue food is among the fastest growing food sectors and the global community now faces a unique window of opportunity to steer expansion towards sustainability."ⁱⁱ

In the seafood retail market space as more information is disseminated on the importance of blue foods it helps to increase consumption, and we already see this happening. Popularity of oysters on the half shell and in other uses has continued to rise. We see a steady demand, and even soaring demand in 2022 from our principal export market (the US). Eastern Canadian oysters are sought after both for their clean, crisp taste, but also for their shelf life in comparison to oysters cultivated in the Southern US. A

very attractive advantage for oyster bars and retailers that fetch a premium price as a result of these differences.

A presentation by John Sackton founder of www.seafoodnews.com at the 2022 Nova Scotia Ministers conference on Fisheries and Aquaculture showed data from the first half of 2022 for oyster sales and Maritime oyster pricing and volumes, which confirmed that Maritime oysters are seeing soaring demand. Most of this benefit has gone to New Brunswick and Prince Edward Island producers as Nova Scotia has not been able to increase its number of new entrants due to the restrictive regulatory process.

As ocean temperatures rise and the pressure sustained by our wild capture fisheries cause both fluctuations and decreasing stock abundance, we will continue to look to farmed seafood as an alternative. Fishing enterprises are critical to Nova Scotia's rural economies. The urgency is pressing to bring more blue food farming methods into the fold to sustain our rural economies. A statistic I find troubling is Nova Scotia's over-reliance on the wild capture fisheries. In 2021 Nova Scotia's seafood exports were \$2.48 billionⁱⁱⁱ. In 2021 Nova Scotia's aquaculture output value fell by 8.0% to \$83.0 million (the only province that reported a decline)^{iv}. Of the total aquaculture value, only \$6.12 million was attributed to shellfish in 2021^v. Those values translate to 3.46% of Nova Scotia's total seafood sales coming from all aquaculture sources in 2021 and 0.26% from shellfish. We are well off the global trend of over 50% of seafood coming from farmed sources. The threat to Nova Scotia's rural communities is looming if we do not take up the call to farm seafood with urgency.

One of the reasons I have been personally attracted to shellfish production and sales, is for its contribution to greater societal sustainability, as an environmentally friendly protein source, a healthy food choice, and as a livelihood for rural communities. I see all these as wins and I think the addition of Town Point Oysters as another oyster farm in our province will bring positive value to the community and provincial economy.

Sincerely,

Hana Nelson



[@gmail.com](mailto:hananelson@gmail.com)

ⁱ Gephart, J.A., P.J.G. Henriksson, R.W.R. Parker, A. Shepon, K.D. Gorospe, K. Bergman, G. Eshel, C.D. Golden, B.S. Halpern, S. Hornborg, M. Jonell, M. Metian, K. Mifflin, R. Newton, P. Tyedmers, W. Zhang, F. Ziegler, M. Troell (2021) Environmental performance of blue foods. *Nature*. 597:360-365

ⁱⁱ Gephart, J. A. et al. Scenarios for global aquaculture and its role in human nutrition. *Rev. Fish. Sci. Aquac.* 29, 122–138 (2021).

ⁱⁱⁱ <https://www.dfo-mpo.gc.ca/ea-ae/economic-analysis/Canada-Fish-Seafood-trade-commerce-poisson-fruits-de-mer-eng.html>

^{iv} https://novascotia.ca/finance/statistics/archive_news.asp?id=18369&dg=&df=&dto=0&dti=3#:~:text=AQUACULTURE%2C%202021&text=Nova%20Scotia%20was%20the%20only,aquaculture%20industry%20increased%20by%205.9%25.

^v <https://novascotia.ca/fish/documents/aqua-stats/2021-production.pdf>

NSARB-2022-WRT-066

NSRB-2022-ORL-006

Aquaculture Association of Nova Scotia
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seafarmers.ca

Mr. Stacey Bruce, ARB Clerk
Nova Scotia Aquaculture Review Board
P.O. Box 2223 Halifax, NS B3J 3C4

March 30, 2023

Dear Mr. Bruce:

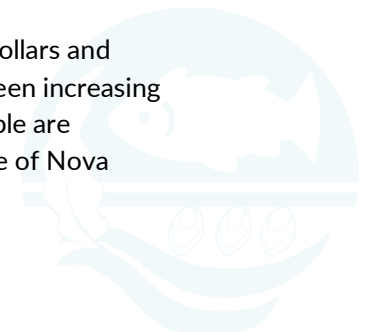
The Aquaculture Association of Nova Scotia (AANS) is pleased to provide a letter of support for the application by Town Point Consulting Inc. (Town Point Oysters) for three new marine lease/licenses AQ#1442, AQ#1443, AQ#1444 in Antigonish Harbour.

My name is Michelle Samson and I am the current President of the Board of Directors of the AANS. I am also the Director of Aquaculture at Premium Seafoods Limited where I oversee the cultivation and sales of scallops and oysters from our company lease in Arichat, Richmond County, Cape Breton.

The AANS was founded in 1977 and currently engages more than 100 sea farmers and stakeholder members throughout Nova Scotia, representing more than 95% of all active farm operations in the province. We are governed by a 13-member Board of Directors and two independent Science Advisors. The mission of the AANS is to support the production of quality seafood in the cool clear waters of Nova Scotia, creating wealth based on a renewable resource. The AANS supports our finfish, shellfish, and sea plant members in developing viable businesses by representing their interests with government, pursuing access to funding, providing appropriate services, and promoting sea farmers as producers of diverse, low impact and high-quality seafood products.

Given the increasing global demand for farmed seafood, there is tremendous opportunity to responsibly expand the diverse aquaculture industry in Nova Scotia. The farmed seafood sector offers the prospect of year-round, skilled, and high paying jobs in rural and coastal communities. These jobs are not just for those with aquaculture-specific training, but also include skilled trades such as plumbers, electricians, truck drivers, and general labourers. Aquaculture has the potential to reduce unemployment in these communities by offering year-round, full time, enriching careers, especially to members of under-represented minority groups such as First Nations, African-Nova Scotians, new Canadians, and women.

Aquaculture production in Nova Scotia in 2021 was valued at nearly \$83 million dollars and production volume was nearly 11.1 million kgs. Both value and production have been increasing slowly over the past two decades, despite regulatory slowdowns. Nearly 900 people are employed in part- and full-time jobs at the 232 sea farm leases across the province of Nova Scotia.



Regulatory Guidelines

As sea farming operations continue to grow across all regions of Nova Scotia, it is important to note that they are doing so under strict regulatory guidelines. The introduction of the 2015 provincial aquaculture development regulatory framework (following up on the recommendations of the 2014 Doelle-Lahey Panel) has provided not only a transparent platform for Nova Scotians on development initiatives in the aquaculture sector in our province but has also established a robust set of regulations that all aquaculture operators must follow. Sea farm operational regulations are strictly followed by operators and are monitored and enforced by the Nova Scotia Department of Environment and Climate Change. Therefore, for sea farmers to produce and operate, they must do so under a provincially approved Farm Management Plan, and farms must adhere to the provincial Environmental Monitoring Program that ensures environmental stewardship on all marine farms is at the highest standard.

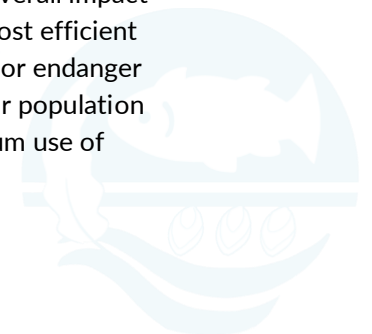
All marine farms are required to have an approval under the Navigation Protection Plan (issued by Transport Canada) and must properly mark all aquaculture leases per the site marking requirements mandated by Transport Canada. All marine farms in Nova Scotia are also required to have an approved surety bond in place (in accordance with the 2015 regulatory framework requirements) to ensure that Nova Scotia waters are protected against abandoned marine debris due to closures, transfers, and forfeitures of Nova Scotia aquaculture leases.

Community engagement outreach by Sea Farmers ensure that local communities and their residents are informed about practices and changes with regards to the operations on aquaculture leases. Final approval of all marine aquaculture lease and license applications are ceded to the independent Aquaculture Review Board. These include new lease applications, lease expansion applications, and amendments to add finfish production to shellfish leases.

Opportunity for aquaculture

Nova Scotia's North Shore, including Antigonish Harbour, holds great potential for a substantial, sustainable, and profitable shellfish and marine plant industry. Shellfish farming is characterized as low impact, high value aquaculture, and defined by Doelle and Lahey as having a low level of adverse environmental and social impacts while producing positive economic and social value. Shellfish aquaculture can provide sustainable seafood and improve the surrounding environment by providing valuable ecosystem services. According to the FAO's 2022 State of World Fisheries and Aquaculture, sustainable aquaculture development is critical to supply the growing global demand for aquatic foods, especially as fishery resources continue to decline. Shellfish aquaculture is strongly-aligned with five of the 17 United Nations Sustainable Development Goals for peace and prosperity for people and the planet, now and into the future: zero hunger, good health, economic growth, climate action, and life below water.

Town Point Oysters' proposal to raise oysters responsibly can help minimize the overall impact on the ocean while still feeding our growing population. Shellfish are one of the most efficient sources of protein and oyster aquaculture does not damage coastal environments or endanger wild fish stocks. This moves us closer to a sustainable balance between feeding our population and caring for the environment. Town Point's operation plan demonstrates optimum use of marine resources, as required by the Review Board (factor a).



In Canada, shellfish aquaculture was a \$122 million industry in 2021. But despite global growth and local opportunities, the value of shellfish aquaculture in Nova Scotia is continually and consistently dwarfed by the value of the industry in New Brunswick and Prince Edward Island, which are four and 12 times, respectively, the size of the industry here. Furthermore, while the Nova Scotia aquaculture industry as a whole has been slowly growing in value and production, the majority of this growth has been in the finfish sector, while the value of the shellfish sector relative to total industry value has declined.

The Northumberland Strait shoreline offers excellent conditions for low impact, high value aquaculture: shallow, protected bays with moderate tidal range and optimal temperature and salinity. Many shellfish producers have been operating in the region for years and have been well-accepted by their neighbours and other coastal stakeholders, who benefit from direct and indirect economic benefits, local food production, and untapped tourism potential.

Innovative Approach

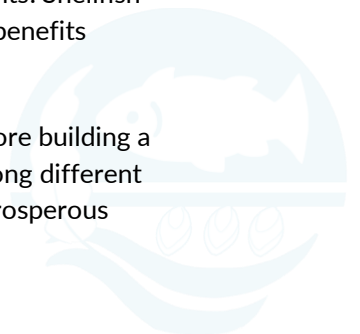
Town Point Oysters has been working through the lease and license application process for three new suspended culture oyster leases in Antigonish Harbour since 2019. Their application process has been executed in a coordinated, thoughtful, and science-based manner as they have proceeded through all the appropriate licensing and permitting steps. They have been met with opposition to their proposed operations but have handled objections with an openness to compromise, flexibility, and a willingness to work with community stakeholders to achieve a shared vision for Antigonish Harbour. One that achieves a balance of varied perspectives.

In partnership with a nearby oyster farmer, Town Point Oysters has taken technological innovation for oyster farming into their own hands with the development of a new growth unit called the BOBR: Benefit Of Being Round. Floating only a few inches above the water's surface, this type of cage has a reduced visual profile, blending in with the water surface rather than standing out. The BOBR units also take protection of eelgrass into account, as their design allows for more sunlight to penetrate through the water column into the surrounding environment, and the sinking method keeps cages off of the bottom during the winter. Town Point Oysters, along with their partner ShanDaph Oysters, received AANS's 2023 "Innovator of the Year Award" for their work on BOBR. The award is in recognition of the significant contribution the BOBR has made to the advancement of aquaculture in Nova Scotia.

Economic Opportunity

The AANS anticipates multiple ways that Town Point Oysters will contribute to the local economy. As has been demonstrated in Prince Edward Island, shellfish aquaculture can form a significant part of a region's tourism brand. As Town Point matures into a well-established producer of fresh seafood, it will play an important role in drawing visitors to Antigonish to enjoy the experience of tasting fresh from the sea oysters at the farm or in local restaurants. Shellfish farming communities in PEI and New Brunswick also enjoy the spillover economic benefits resulting from the support services required to operate the shellfish farm.

The Ivany Report was commissioned in 2014 by the provincial government to explore building a new economy for Nova Scotia. It recommended cooperation and collaboration among different regions, communities, and economic sectors in Nova Scotia to support building a prosperous



economy where future generations can live and thrive. Also known as the “One Nova Scotia Report”, it highlighted opportunities for entrepreneurship and increased global trade in ocean-related sectors to support and achieve meaningful economic and demographic improvements. According to the latest data, our Province is not progressing on track with three of the 18 goals stated in the One Nova Scotia Report. These goals include increasing new business startups, increasing the value of our exports, and increasing the number of firms participating in export trade. While the value of fisheries and agricultural exports are growing as planned, we know that shellfish aquaculture is contributing less and less to the total value of fisheries each year. Considering the uncertainty of the global wild capture fishery, the opportunity for aquaculture is immense, and Nova Scotia is poised to contribute. The business that Town Point Oysters is proposing to operate is well-aligned with many of the Ivany Report’s goals for sustainable and diverse growth of the economy. AANS is confident that Town Point Oysters will make a meaningful and positive impact on economic development in Antigonish and in Nova Scotia, as required by the Review Board (factor b).

The AANS fully supports Town Point Oysters’ application for leases in Antigonish Harbour and we look forward to supporting them as their business grows and thrives.

Thank you,



Michelle Samson
President of the Board of Directors
Aquaculture Association of Nova Scotia



NSARB-2022-WRT-149

NSARB-2022-ORL-007

Antigonish, Nova Scotia

May 24, 2023

Nova Scotia Aquaculture Review Board
P.O. Box 2223
Halifax, Nova Scotia
B3J 3C4

Attention: Mr. Stacy Bruce, ARB Clerk
Email: aquaculture.board@novascotia.ca

Reference: Town Point Consulting Inc., AQ#1442, AQ#1443 and AQ#1444

I have grown up and worked in Antigonish for sixty years. I have used Antigonish Harbour for recreation for more than forty years. My family owned a cottage at Seabright for forty years. My family swam regularly at the Seabright location. We also owned a sailboat which was docked in the harbour for forty years.

I want to express my support for the proposed oyster farm. I will address my comments in accordance with four of the eight factors.

- a) the optimum use of marine resources,
In my experience there is room for this level of commercial activity in the harbour. I have used the harbour near these areas for swimming and sailing.
- b) the contribution of the proposed operation to community and provincial economic development,
In my opinion, this commercial activity will support the local economy. It fits with the important fishing industry in Antigonish. All commercial activities can have negative impacts on the community. For example, lobster traps can completely surround a shorefront property my family has owned. Fertilizer, with a pungent odor, is used on farm fields that are 10 metres from my residence. These are reasonable impacts especially because there is a long history of fishing and farming in this region.
- e) the other users of the public waters surrounding the proposed aquaculture operation


This is a reasonable activity and location for boating and swimming.

f) the public right of navigation

I have navigated a sailboat in this area for forty years. The harbour is forgiving of boats that run aground due the soft nature of the bottom. I have personally got out of a sailboat and pushed it off. With proper navigational aids this development should not be a problem for navigation. The oyster traps will appear as floating docks, therefore, they will be obvious to boaters and others. Also the layout of the oyster farm provides for generous corridors for boats to enter and depart the harbour

I would urge approval of the application. I also request to make a sworn oral statement at the hearing.

Sincerely;



Leon D. MacLellan, MEng, PEng, LEED AP