



From:

BC Marine Trails
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June 19, 2019

Regarding: Texada Island east, Northeast Bay Aquaculture Application, revised application

Crown Lands File No 1414717
Internal Interest Identifier 962841
Disposition Transaction SID 933326
Feature Code FL98000100

To Whom It May Concern,

The BC Marine Trails [BCMT] is a volunteer organization of nearly all BC coastal paddling clubs with a main goal of reducing public campsite loss and public access loss on the coastlines of BC.

BC Marine Trails is strongly opposed to an aquaculture endeavour in this provincially classified recreational location. Because of its UREP status and its wonderful wilderness aspect, this location has been designated by us as a Primary Marine Trail Site and has been utilized as such by the public for years in the past. However, the effect of an aquaculture operation being situated here would degrade all aspects of its attractive features.

We continue to have a wide range of concerns with the revised proposal that will be addressed in the following notes, organized from general to particular and finally ending on the over-riding and most important concern of conflicting use:

- 1) The first general concern is incompatibility of use. Intertidal beaches are treated preciously by districts and municipalities (i.e. the general public) along the whole Sunshine Coast and adjacent Gulf Islands. The high private coastline ownership means that access to intertidal beaches is of great importance to allow recreational enjoyment by neighbourhood resident, passing boater, voyaging kayaker and tourist.



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A public beach with an upland wilderness aspect is high value real estate where the general public and residents are real stakeholders. The revised proposal specifically devalues the oceanscape, the beach, as well as the upland as not only is much of the property and physical environs literally denied to the other users, but current activities as well will actually be denied by the presence and operation of this commercial operation.

- 2) The second major concern we have is that we, and others, believe the public presentation of this revision was misleading at best. To the best of our recollection the following ‘features’ or the revised proposal were delivered during that presentation:
 - a. There will be no buoys on the surface of the water—it’s a new way of doing aquaculture called ‘Submersible Longlines’. Essentially there will be nothing on the surface and all support is by invisible buoys suspended 5 to 15 metres below the surface of the water!
 - b. Indeed, because the surface is free, all vessels and motor boats will be free to pass over it without restriction—to access the beach or pass along the coast. To further support this specific point they also stated they will establish a kayak ecotourism business on this site and that the revised proposal would accommodate canoes, kayaks, surfboards and SUPs passing over the system as well as the other vessels mentioned.
 - c. Only a small portion of the beach will be utilized for clams and there will be no impact on the public’s ability to harvest their own shellfish, indeed the public will be encouraged, supported, and educated in the beach and aquaculture harvesting of shellfish.
 - d. Because the operation is completely hidden, there will be no impediment to the use of the beach—with the implication that all beach activities like canoeing, kayaking, SUP-ing and therefore obviously swimming or in-water activities would be able to take place.

Now, apart from issues to be covered later, how could one in detail not support such an original, amazing, and non-interventionist proposal?

However the revised proposal is without any of the presented issues above being noted at all and now with no public discourse to actually present what the features or lack of features really are: how are we and the public to have an active discourse about what is really going on here? Some of the questions that require answers are as follows referencing the same order as the previously listed ‘features’:

- a. When will the buoys be removed? This is a key issue. This presented ‘feature’ of no buoys was a key to minimizing public concern with the proposal at North East Bay. Was it misinformation? The revised proposal of 228 buoys with signs and radar reflectors is a far different intervention than a clear unobstructed oceanscape surface. Which is which?



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- b. Why is it not noted that there can be free movement over the proposal? Can two-stroke outboards and other types of motor boats pass over without restriction? We are concerned that the proposal as presented to us is not real. What is real now with the revision?
 - c. Why is it not noted that the public can still freely harvest shellfish in the bay? We understand there typically are distance restrictions between public and commercial use. What is the case now? Are there no restrictions for all aquaculture or for just this one? Or are there still restrictions?
 - d. Presumably canoers and kayaks can now pass over the aquaculture here as with motor boats—but kayakers and SUPs play in the water as well as on the water. Can this happen? That is, will swimming be allowed over this facility or are we misunderstanding again?

Of course, we are skeptical of our understanding of the above, but how can we or any of the public really know now? And how can we objectively comment on the actual proposal when we now don't really know what it really entails? What is going on? Is there really any way now for the public to really find out what an application is really about and truly comment before they get 'approved' when there is such a conflict between public presentation and proposal application? Was the applicant in discussion with the approval authority during the revision process and do his public statements reflect the actual discussed status on those concerns . . . or were we mis-hearing?

- 3) The next few points will be about Submersible Longlines a fairly new aquaculture method not known to the west coast of BC. There does seem to be one located on the west coast of South America and one on the west coast of the United States, but those applications are differing from what is proposed here. From what we can gather, it is recommended that first time users be experienced, sophisticated, use sophisticated equipment, and have consultant help. From what was presented in the public meeting and on the hand sketches, the proponent does not seem to meet those recommendations, no consultants were mentioned and indications from the information on the drawings imply their absence.

However, because of this totally new approach, it might be appropriate for the jurisdictional authorities to have some procedures in place first to govern this totally different approach to aquaculture.

- 4) The 'Submersible Longline' approach has been described as a dynamic system that came about take advantage of 3 issues:
 - a. Deep water placement—this is to maximize flushing, have the cleanest water and be distant from any physical obstructions.

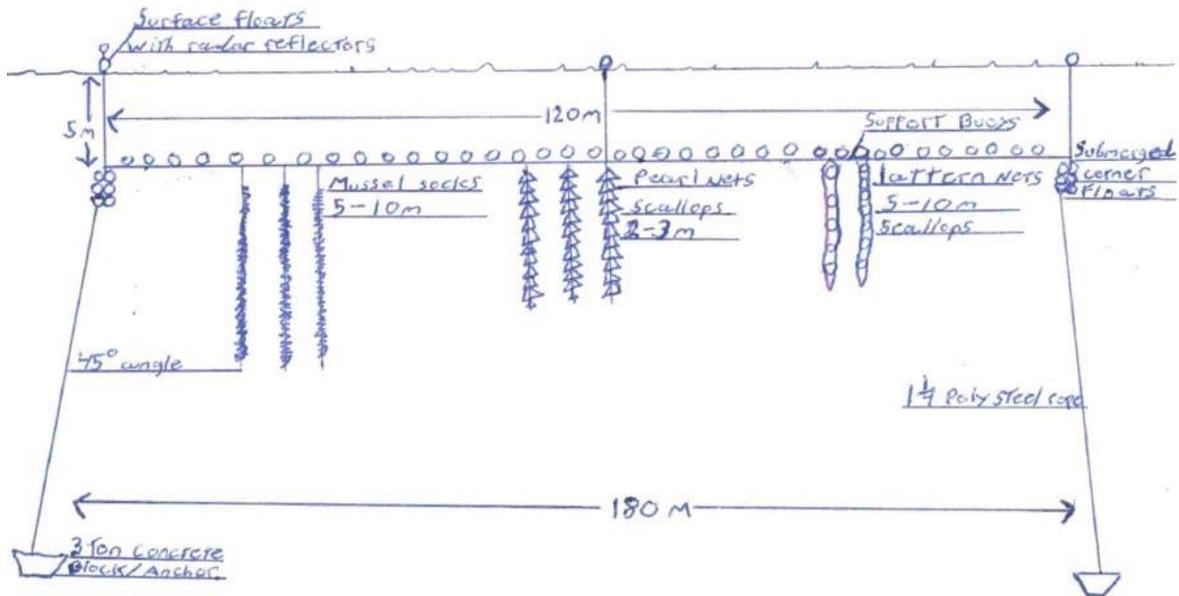
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- b. Separation from User Conflicts—this is to place the operations far from multi user conflicts so the aquaculture can exist on its own merits.
 - c. 'Set and Forget' operations—this is to minimize labour and maximize production.

However there's a problem with this application and the basic tenets of the Submersible Longline approach to aquaculture itself [addressed in the same order as the prior list]:

- a. This revision is not placed in a deep water environment that does not have obstructions—indeed this dynamic [i.e. it moves when there is wind and waves] system is hemmed in on three sides by the beach, by the south end of the bay and the little island to the north. Because no consultants will be used to develop this sophisticated proposal, there is relevant concern that the situation is not fully designed or developed before implementation.
 - b. The presence of massive user conflict is clear. Why place a new and untried proposal in a location with a proponent that has a high likelihood of major implementation issues?
 - c. Because the revised proposal is situated in a highly exposed [to public overlook, to wind/wave, to obstructions] area, constant overview and therefore labour and expense will be necessary to monitor the operation – the very opposite of what this approach can deliver in its ideal application.
- 5) The particulars of the revision on North East Bay are also of grave concern:
- All the adjacent waters are to be tenured. This includes waters that were previously utilized by small craft, shoreline navigation, beaching and shallow water anchoring.
- The application shows no indication of zoning for these current uses and instead is applying for everything. There is a tiny slip of unassigned water, but this is in the perimeter work zone that seems to be left out of the overall plan and not tenured. However, on the water there will still be a myriad of buoys and signs and radar reflectors. The effect remains the same as the original proposal but with a host of bigger buoys substituting for the proliferation of smaller. The whole visual landscape and waterscape from the edge of the upland UREP outward will be a visual monstrosity. This revised proposal has no sense of proportion for the location and the public appreciation of their facility.
- 6) As well, the proposal as presented lacks coherence. Please have a trusted independent engineer review the logic of the following few paragraphs.

The Submerged Longline revised proposal is shown in the following cross section submitted by the proponent:

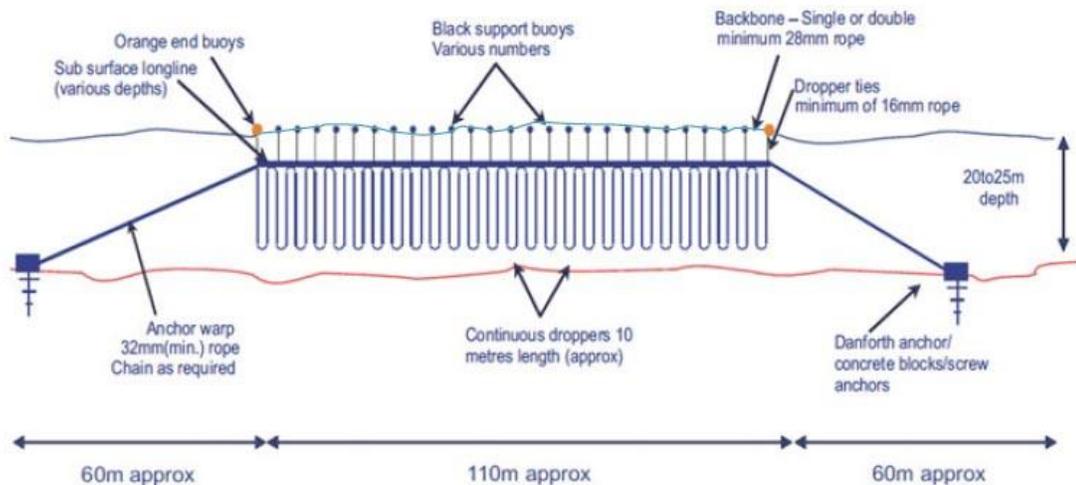




Each longline consists of a submerged 120 metre line with continuously growing aquaculture hanging from it and continuous support floatation distributed along it. This is the first order attempt at neutral buoyancy similar to all Submersible Longlines but from there the anchoring and surface floatation separation floats of the revised proposal differ significantly from typical Submersed systems. The over-riding issue is that maintaining neutral buoyancy some distance below the water's surface is a complex balancing issue that is never perfect.

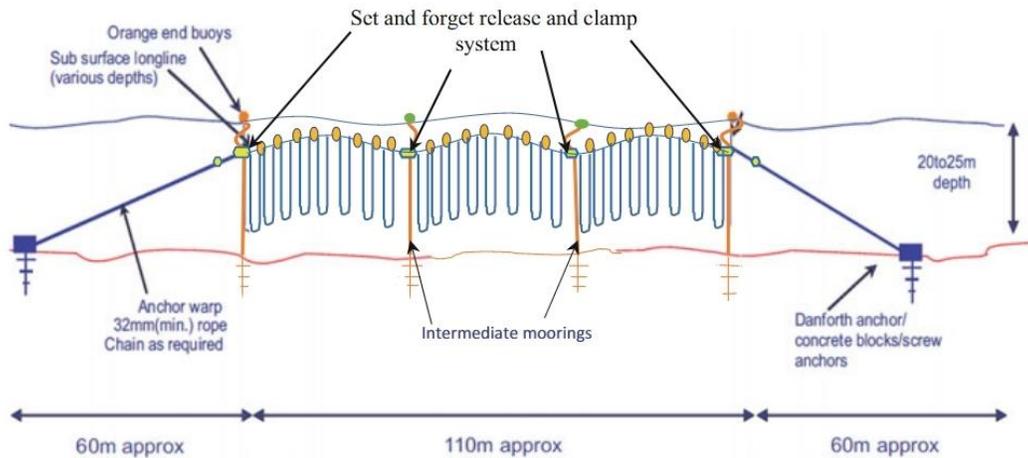
Compare the revised proposal drawing with the two typically described methods of Submersible Longline aquaculture:

a. Continuous Surface Support



This system is unlike the revision, but there are some aspects to note. Contrary to an always changing and impossible neutrally buoyant approach, the only way to keep the extent of the longline parallel to the water surface [in ideal situations] is by a continuous line of highly buoyant floats. This of course works ideally but there are a proliferation of buoys and the system gets highly dynamic [moves sideways and up and down] because of the lower number of restraints. Note also that the extent of the 110-metre Longlines in this and the next example is much less than the revision's much longer 180 metres.

b. Intermittent Surface Support:



In this system, note almost twice the occurrence of surface buoys as well that each of them is restrained by bottom anchoring. Especially note the indication that this type of aquaculture is not neutrally buoyant but will arch up to the surface when unloaded and when ready for harvest will drape down. Note that when there are surface waves that reach even a fraction of the 5 metre depth of the aquaculture operation, surfacing will occur. This does not take into account storm events. Furthermore, there is an ominous subsurface presence of large submersed buoys with continuous substantial upward floatation forces. Have any of these been accounted for in public safety? Are there minimum requirements for this situation? We are not away that any have been stated or required.

Just think of the implications for kayaks, SUPs, swimmers and their safety in this situation. These craft and their owners are in the water as well as on it—especially SUPs. Just think of the propeller entanglement concerns of transiting motor vessels in storm conditions.

The proposal as revised has half the buoyancy, half the restraint, and none of the engineering. It doesn't make sense and it sure doesn't make sense in this public location that is now getting more and more publicity and notice and use. A proposed neutrally buoyant system with continuously changing mass and widely based restraint is a recipe





for public disaster and incidentally poor publicity for a valid approach in much differing and appropriate siting situations.

7) Marine Trails and tourism concerns:

Previous responses submitted by the BC Marine Trails outline many of our basic precepts and concerns of losing this site's existing undeveloped features.

The viability of a Marine Trail campsite, or any campsite for that matter, is directly affected by the usability of its water access, its ready intertidal access at all tide levels for leaving and arriving happen at all tide levels and over time as well, the attractiveness of its land setting, the attractiveness of its beach setting, the amount of space for tenting and other activities, whether fresh water is available, the attractiveness of the ocean setting, the peacefulness of its nature, and reasonable paddling distance to the next sites in all other directions.

These sites are difficult to find and hold—and having one like this so well placed and with so many features as mentioned above – is worth strongly stating our views against its potential loss of viability. Plainly speaking, we and the whole region will be devastated by the negative impacts of this potential degradation of the valued and valuable features here.

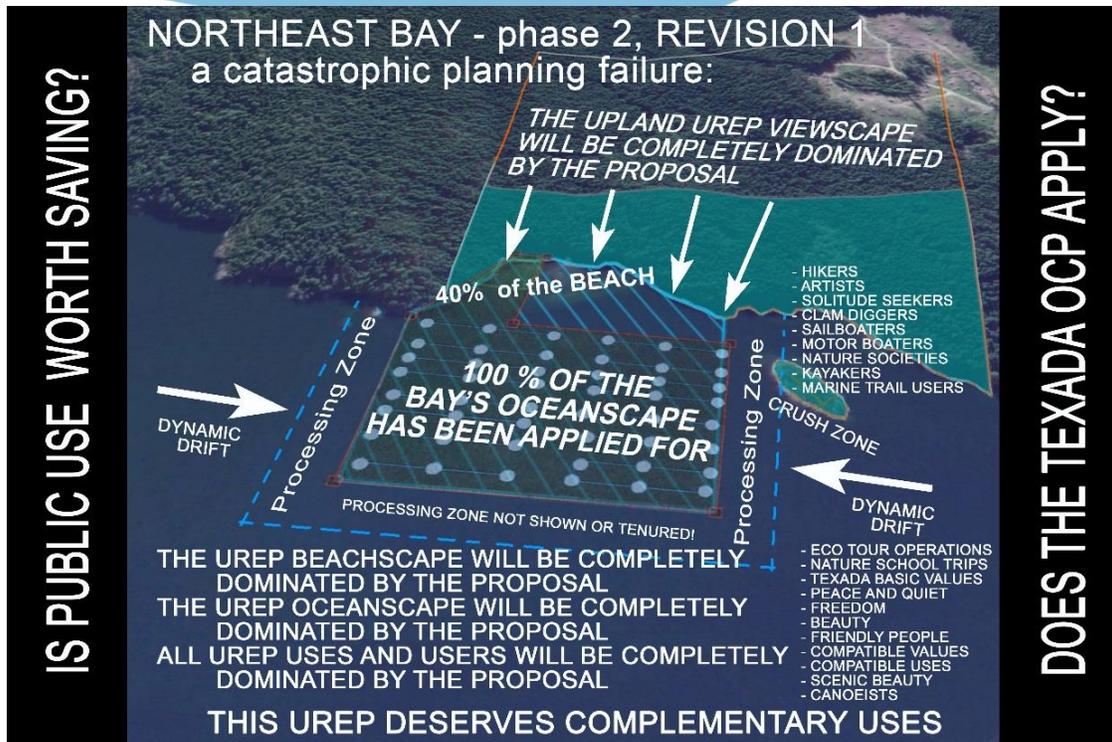
At the local level, sites like this provide a great way for all manner of island residents to spend a few days circumnavigating and enjoying their Island. But at the tourism level, these linking sites will in the future provide all manner of tourism experiences, culture opportunities and business opportunities for the whole region.

Russ Creek is a jewel of a site, in a picturesque bay, in a critical location.

- 8) And finally, simply stated - the proposal in this location would be a planning failure. The multitude of current uses have minimal conflict and maximal overlap to the benefit of the neighbouring and wider public community. But the revised proposal conflicts directly with all of these.



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a diagram demonstrating the multiple conflicts

It does not make planning sense to foster conflict and negatively affect this wide user base and uses for the questionable benefit of only one.

North East Bay and the many cascading waterfalls of Russ Creek is a star location that is held as a special place by so many. Let's attempt to keep the few stars we have left in this steadily developing world.

Yours truly,

Mick Allen

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