



**DENMAN ISLAND
LOCAL TRUST COMMITTEE
AGENDA**

**REGULAR BUSINESS MEETING
OF THE DENMAN ISLAND LOCAL TRUST COMMITTEE**

held at 10:30 am on Tuesday, November 26, 2013 at the Denman Seniors Hall,
1111 Northwest Road, Denman Island, BC

LATE ITEMS, ADDITIONS

**AMENDMENTS/ADDITIONS
TO ITEMS:**

8.	DELEGATIONS	Page No
8.1	The Association of Denman Island Marine Stewards regarding Marine Issues	1
8.1.1	Submission - <i>attached</i>	
9.	TOWN HALL DISCUSSION	
9.1	Submission dated November 26, 2013 from Louise Bell regarding Draft Bylaws 206 and 208 - <i>attached</i>	3
9.2	Submission dated November 26, 2013 from Harlene Holm regarding Staff Report and Bylaw Amendments dated November 7, 2013 - <i>attached</i>	6
10.	CORRESPONDENCE	
10.10	Compilation of Correspondence dated November 12 to November 21, 2013 regarding Aquaculture Applications 1414123 to 1414128 - <i>attached</i>	8
10.11	Email dated November 21, 2013 from David Critchley regarding Geoduck Aquaculture and Article in the Comox Valley Record - <i>attached</i>	58
10.12	Email dated November 16, 2013 from Ralph McCuaig, Hornby-Denman Tourist Services Society regarding Visitor Accommodation and Cooking Facilities - <i>attached</i>	61
11.	REPORTS	
11.3	Trustee and Local Expenses	
11.3.2	Expenses posted to November 30, 2013 - <i>attached</i>	62
13.	NEW BUSINESS	
13.2	Local Trust Committee Submission to BC Ferries Public Engagement Process – <i>for discussion</i>	

ADIMS Delegation notes for Nov. 26, 2013
LTC Meeting

Edi Johnston, speaking for the Association for Denman Island Marine Stewards. Thank you for the opportunity to speak today.

ADIMS, the residents and visitors of Denman Island have spoken against the expansion of the aquaculture industry on our shores and in our waters time after time for good reason.

For over a decade, we have watched our beaches and off shore waters being drastically changed from it's natural state to one of industry.

For over a decade, we have watched our marine ecosystems being negatively impacted by this industry.

For over a decade we have picked up over **20 tons** of escaped and derelict equipment belonging to this industry.

For over a decade we have asked the federal, provincial, local governments and the BC Shellfish Growers Assoc. to stop the abuse generated by this industry.

For over a decade the federal and provincial governments have been funding, encouraging and supporting expansion of this industry.

For over a decade we have wondered why a Trust Island who under the Trust Act created by the Province in 1974 (upon the realization that the Gulf Islands **were** a unique area threatened by **over-development**) created the Trust mandate "to preserve and protect the environment and unique nature of the islands" has to suffer the destructive practices of this industry.

The Problem-

Fisheries and Oceans Canada (DFO) have to both promote and police this industry thereby creating a conflict of interest.

The Province is funding and encouraging expansion of these "resources" and neglecting the damage that is being done to the environment and the negative impacts being felt by other stakeholders ie residents, tourists, and established, well-monitored and lucrative wild fisheries.

While most local governments focus their energy on exponential growth, Trust islands are mandated to preserve and protect the environment and unique nature of the islands which conflicts with federal and provincial interests to generate revenue from exploited resources.

The Solution-

DFO needs to return to protecting habitat, for without habitat there will be no fisheries.

The province needs to re-think its current aquaculture gold rush mentality of extraction of all marine related plants, animals etc. and respect the environment and mandate of the Islands Trust by:

- changing the application system to attaining Local Trust Committees approval **before** issuing licenses of occupation and
- the creation of marine reserves on Trust islands through the use of Map Reserves, Order In Council Reserves, Land Act Designations or Prohibition of Use for aquaculture purposes.

The Local Trust Committee needs to use any and all tools at its disposal and with support from Trust Council to take control over its shores and waters. We also expect our Trustees to take the lead in making decisions and not abdicate to Staff to the degree that they lose sight of their responsibility to the Trust mandate and their constituents. Parkland on Denman is abundant yet we have **no** marine parks with over 90% of our western shore being industrialized. Why isn't the last 10% being preserved, not to mention the new interest in our eastern shores where we now have 2 waterfront park areas in jeopardy? Creation of bylaw 207 speaks to regaining some control of our beaches and we encourage our LTC to proceed to first reading with one correction in the wording which would be to "ban vehicular driving on the foreshore" -period - not just W3 zones. Precedents have already been set to deny structures in W3 zones and could be used again for new applications.

Islands Trust Council needs to become more engaged, assertive and supportive of LTCs in fulfilling the Trust mandate and give the attention to its shores and waters that land based issues have had in the past. Trust decision makers should be meeting with federal and provincial decision makers not planners meeting with planners whose training is to plan- for growth.

In response to the non-compliant tenure issue at Henry Bay, the Trust Regional Planner made this comment in a letter to our LTC- "Given the limits to the role of local government in addressing these issues, **community advocacy** may be better aimed at these agencies directly **rather than through the Denman Island Local Trust Committee**".

This amounts to an abdication of the Islands Trust's duty to 'preserve and protect the unique amenities' of the Trust areas. This is unacceptable and illegal in our view. We expect our Trustees and the Trust Council to do their duty in accordance with this mandate.

Also on the non-compliant tenure being allowed to operate in our Marine Conservation waters at Henry Bay , I shall now ask John Johnston to speak on ADIMS behalf.....

Town Hall Presentation to the Denman Island Local Trust Committee
Tuesday, November 26, 2013
From Louise Bell

I have now read over the two draft bylaws on cottages and suites and have several comments. My comments today relate to the short term. These bylaws no doubt have long-term implications for this community, but I am not yet prepared to speak about those.

For now, the following seem to be problems:

1. To me, the bylaws seem inconsistent with Objective 3 and Policy 11 in Part E.1 of the OCP.

Objective 3 sets a cap on the residential density of the Island parallel to that achievable with current land use regulations but also promotes a range of housing options. Policy 11 flows from this objective re-stating the density cap but allowing an increase in residential density of up to 5% to accommodate zoning amendments for special needs and affordable housing.

The provisions within the draft bylaws are not explicitly for special needs and affordable housing. Although the secondary suites and dwellings most probably will be rentals and may well provide affordable housing or house persons with special needs, there is no guarantee that they would and thus would meet the stipulation of Policy 11. Thus, the draft bylaws conflict with Objective 3 and Policy 11.

I note that project charter indicates that the density cap is outside the scope of this project. This situation poses a conundrum. As I see it, either the bylaws must limit the housing provisions to special needs and affordable housing, regardless of the issues that accompany that stipulation, or the project must be expanded so that the bylaws also amend Objective 3 and Policy 11.

2. As I read through the bylaws I noticed the following small problems.

Draft Bylaw No. 206 (OCP amendments):

Schedule A

- Item 1, line 1 deals with Section H.2, citing it a part of OCP Schedule A. In fact, it is part of Schedule B.
- Item 1, replacement paragraph: I think the last sentence is unclear. It needs to indicate whether a dwelling on a lot under 4.0 ha can or cannot have a similar suite as described for lots of 4 ha and whether the same proof of water is a requirement. Also, the sentence should say "One dwelling unit should be permitted on a lot that is less than ...", rather than "One dwelling...on lots that are....".
- Item 4: This amendment deletes Policy 16, but makes no reference to the part of Policy 11 where Policy 16 is cited. If the policies from 15 on are renumbered, Policy 11 would be changed.

Draft Bylaw 207 (LUB amendments):

- Item 1a., definition of "Secondary dwelling unit: A comma is needed on the second line between "unit" and "that" to close the non-restrictive modifier "which may be a moveable housing unit."

- Item 1b. This addition to the definition of “occasional” would mean that anyone living in a moveable housing unit could remain on any particular lot for no more than 45 days. If these units are intended to provide a further option for affordable housing, I would think that any such limit should be something like 1 or 2 years, not a short time like 45 days.
- Item 2. This item should start with “Part 2.1, “Uses Buildings and Structures”” not “Part 2, “General Regulations”” Or, it should be “Part 2.1, “Uses Buildings and Structures” under “Part 2, “General Regulations””. The important thing is that 2.1 should be cited.
- Within item 2, #4: I think that “in the Denman Island Land Use Bylaw” should be cut. Given this text would be inserted into the LUB, these words are redundant and confusing. (For comparative purposes, see regulation 8 in section 2.6 of the LUB, where no such additional text is used.)
- Within item 2, #5 d): To be consistent with the style elsewhere in this list, this regulation should be in the present tense and thus should read “... from the exterior of the building is separate from the....”.
- Within item 2, #5 e): I suspect this should read “... is no more than 40% of the floor area....”, not “is 40% of the floor area....”
- Within item 2, #5 f). As for #5 d) this part of the regulation should be in the present tense (i.e., “...off street parking space is provided....”.
- Within item 2, #5 g). This part of the regulation does not follow on from item 5 (namely, “A secondary suite is permitted within a dwelling unit provided that:”). It needs either to be reworded so the syntax is correct or pulled out and expressed as a separate regulation.
- Within item 2, #6). Insert “for” between “Temporary use Permit” and “a secondary dwelling unit.”
- Within item 2, #7: This regulation does not make sense. I suggest it be revised so that the start parallels # 9 and #10, namely, “Where the water supplied to a secondary dwelling unit or a building containing a secondary suite is to be taken from the groundwater supply, the potable water supply must be provided....”.
- Within item 2, #8: I suggest this regulation be revised so it parallels the other regulations that address water supply (parallel structure always assists the reader). It could read, “Where water is to be supplied to a secondary dwelling unit or a secondary suite from rainwater collection, the rainwater system must....”.
- Within item 2, #9 and #10: These regulations fail to say to whom the written plans are to be provided. I think they should say “to the Local Trust Committee.” I also think that they should say when the plans should be provided (i.e., before the secondary dwelling or suite is built? rented out? occupied? other?)
- Within item 2, #11: The same concern about time applies here. The regulation needs to say that the owner must obtain a water license, from the Province, for the required amount of water, by such-and-such a time. Also, I think it should be a requirement that a copy of this license be provided to the LTC.

- Item 3 and Item 4: Remove the initial capital on "Suites" in the phrase "Secondary suites and secondary dwelling units"
 - Item 5, Part 5, under "Area 2": See my comment above for Item 2, #4 (about removing "in the Denman Island Land Use Bylaw").
 - Item 5, Part 5, under "Objective": The abbreviation "OCP" should be spelled out as "Official Community Plan" (as is the case elsewhere in the bylaw).
 - Item 5, Part 5, under Guideline 1, line 2: Change "lands" (at the start of the line) to "land."
 - Item 5, Part 5, for Guidelines 1 and 2: Again, see my previous comment about removing "in the Denman Island Land Use Bylaw."
 - Item 5, Part 5, for Guidelines 3, line 2: Add a comma after "Commission." (Because the clause "which may be to requested...." is a non-restrictive modifier, it should be preceded by a comma.)
 - Item 5, Part 5, for Guidelines 5 a):
 - First, I suggest changing "home occupation" to home occupations."
 - Second, I suggest removing "secondary suites," given that a TUP is not required for a homeowner to have a secondary suite. If this idea is important, as I suspect it is, it needs to be expressed as a regulation elsewhere in this draft bylaw.
 - Third, I suggest that the LTC consider carefully the limitation that "no home occupation" would impose on the residents of a secondary unit, be it a suite or dwelling unit. Some low-impact home occupations (e.g., a business office) may be suitable and may be necessary for some renters to make their living.
-

November 26, 2013 Denman Island Local Trust Committee meeting

Observation re: the Staff report and proposed bylaw amendments dated November 7, 2013

A. The October 22, 2013 resolutions neither reflect the affordable housing topic focus nor the majority of concerns expressed by the August 25/13 Community Meeting on housing policy review.

1) The Project Charter title should be changed accordingly, perhaps using Trustee Busheikin's "attainable housing". Given that the Land Use Bylaw, via Bylaw 204, contains a definition of "dwelling unit, affordable housing" and the bylaws in the proposed amendments as dated November 7/13 do not have reference to that definition: "a deed restricted and/or rent controlled dwelling unit that is secured by a housing agreement, and is available to persons of low income as defined by the housing agreement for the dwelling unit", the suites and Temporary Use Permit dwelling units referred to in the November 7/13 staff report and proposed in the bylaws are something quite different.

2) Islanders genuinely support provision of care giver or family member suites to meet the needs of an aging population. Temporary Use Permits (TUP) might offer a quick resolution to these needs. However, the November 7/13 legislative direction does not apply a TUP to regulate suites and is limited to land parcels of 4 hectares—aside from proof of adequate water, a separate entrance and some limits to size. The bulk of Denman Island's aging population lives on parcels less than 4 hectares in size. And, while a neighborhoods would not likely object to caregiver/granny suites to meet an immediate need, neighbors are not part of the equation and no agreement exists to allow a basis for complaint.

3) The use of Temporary Use Permits and mobile dwelling units for housing were not envisioned by the community forum as long term solutions (indeed the only housing solutions) for affordable housing. A TUP has a limit of 6 years and depends on LTC renewal after three years. No landowner is going

to build a high quality accessory dwelling with no guarantees past 3 years and a majority of costly conditions to be met prior to the TUP even being considered.

What might prove worthwhile is for two individual purchasers to acquire land with the understanding that two dwellings would be permitted, thus a doubling of density. With TUP violations complaint driven and the LTC record for enforcement, the likely long term result will be a doubling of density on all lots at or over 4 hectares.

B. The November 7/13 staff report, changes to the Project Charter and proposed bylaws show significant changes which should be part of the “clear, proactive communication” with “homeowners” (not residents) the charter outlines as in homeowners “interests, expectations, concerns”

1. Several *In Scope* items have vanished: “affordable housing agreements” and “relevant density and population growth concerns.” Moved from “In Scope” to “Out of Scope” is “Multi-use projects (i.e. co-housing or senior housing).” Moved from “Out of Scope” to “In scope” is “OCP amendments.” These are changes which move senior/ affordable housing and density issues out of the discussion and open the OCP to significant alteration.

2. Apparently the scheduled November community forum has vanished and the next community input will be shaped by the short-comings of reviewing draft bylaws a process which, though accessible to trustees and planners, is a brick wall to ordinary residents who are relegated to reading, writing and speaking bylawese.

I would like the LTC to set their review aside until islanders have been objectively informed of the proposed changes/impacts and had the opportunity to discuss the ideas from August 25/13 and today’s staff report package in an open community forum.

Harlene Holm

Compilation of Correspondence
November 12, 2013 to November 21, 2013
Regarding Aquaculture Applications
1414123, 1414124, 1414125, 1414126,
1414127 and 1414128

Association for Denman Island Marine Stewards
P.O. Box #7, Denman Island, B.C. V0R 1T0
e-mail; shelleymckeachie@gmail.com or, edijohnston@gmail.com

Nov. 12, 2013

The Authorizing Agency.Nanaimo@gov.bc.ca

To Whom it may concern: Re: applications for disposition of Crown Land file #1414123 1414124, 1414125, 1414126, 1414127 & 1414128 for a Licence of Occupation-Shellfish made by Salish Sea Farms

The Association for Denman Island Marine Stewards (ADIMS) is opposed to the granting of a Licence of Occupation for file #1414123, 1414124, 1414125, 1414126. 1414127 & 1414128 for the following reasons-

- ***“little is known on the potential impacts of subtidal or intertidal culture and harvest on the marine environment.”*** statement from the document done in 2013 by Fisheries and Oceans - Canadian Science Advisory Secretariat (CSAS) titled Assessing Potential benthic habitat impacts of small scale
- also stated- ***“high density culture of clams and/or harvesting to a depth of a metre or slightly more could have profound effects on the local benthic environment, but little research has examined the possibility.”***
- also stated-***“The silt and clay fraction of the sediment increased significantly immediately after harvesting....returning to baseline values within 123 days after harvesting.”***
- also stated- ***“Potential impacts of geoduck culture on the marine environment may be caused by three main activities. 1) change in material processes (ie. Filter feeding, biodeposition), 2) addition of physical structure (tubes or netting), and 3) sediment disturbance caused during out-planting and harvesting”***
- also stated- ***“Eelgrass occurs with geoducks in both shallow subtidal and intertidal sand habitats and could be affected by geoduck culture/harvest.***
- additional concerns also identified in this document are- **phytoplankton depletion, altered nitrogen and phosphorous pools, increase in organic carbon and nitrogen content of sediment, change in community structure, increased microbial activity, increased benthic oxygen demand and potential anoxia and affected local hydrodynamics from equipment placement.**
- Lastly- ***“Repeated geoduck culture at the same site may cause a greater impact on the marine environment”***
- the areas in question have great ecological value to resident and transient animals and would result in a serious loss of habitat no matter what species was being cultivated.
- Socioeconomic values would be negatively impacted as well- for example, the herring fishery has stated that the vast areas of netting over the proposed subtidal geoduck tenures in Lambert Channel pose a serious threat to spawning herring (by-catch). As well, the wild geoduck fishery would lose a vast area now open to their fishery with possible unknown ramifications from mixing of cultivated and wild species of geoduck. Large tenures producing large amounts of product will cause prices to decline for both cultivated and wild geoduck.
- management plans including cultivated or harvested species can be changed with no notice to or input from other stakeholders. Sea cucumber would pose a considerable threat to herring as a

- single sea cucumber can consume 9000 herring eggs per day.
- 3 of these tenures # 1414124, 1414125 & 1414126 are in the Denman Islands Trust jurisdiction and these waters are currently zoned W1 Marine Conservation which does not allow for commercial aquaculture and are situated near valuable recreational areas (Morning Beach and Fillongley Park) on Denman Island.
- the applicant, Salish Sea Farms LP, is owned by the same entity as Pentlatch Seafoods Ltd.- the K'omoks First Nations. Pentlatch Seafoods Ltd. has ignored the conditions of licence requiring them to comply with the local zoning in the case of their tenure application in Henry Bay. It is likely that Salish Sea Farms LP will do the same as with these new applications as they are owned by the same entity. It is essential that you require that the applicant comply with **all** conditions of licence **prior to the granting of the tenure and licence**. The conditions of licence set out in the Pacific Shellfish Aquaculture Application states: "**All applicable components of this application package must be complete,**" and one of those components is "**initiating a re-zoning process**".
- additionally, the Land Use Operational Policy - Aquaculture states: "**8.1.11-Issuing Documents - If the application is approved, tenure documents are offered to the applicant. All preconditions must be satisfied prior to the Authorizing Agency signing the documents. It is the applicant's responsibility to obtain all necessary approvals before placing improvements or commencing operation on the tenure**".
- the Land Act states under Offences 60. "**A person commits an offence if the person does any of the following: (a) occupies or possesses Crown land without lawful authority; (b) uses Crown land without lawful authority;**" which the proponent is in the process of doing but with no consequences being imposed.
- enforcement of Conditions of Licenses are not being imposed on existing tenures and are unlikely to be on these tenures, should they be approved.
- Socioeconomic values would be negatively impacted as well- for example, the herring fishery has stated that the vast areas of netting over the proposed subtidal geoduck tenures in Lambert Channel pose a serious threat to spawning herring. As well, the wild geoduck fishery would lose a vast area now open to their fishery with possible unknown ramifications from mixing of cultivated and wild species of geoduck.
- management plans, including cultivated or harvested species originally applied for can be changed with no notice to or input from other stakeholders.

We ask that you stop processing these applications based on the concerns listed above and inform the applicant, Salish Sea Farms LP, that their applications, or any application by a related entity, will not even be considered until the current Pentlatch Seafoods Ltd. tenure in Henry Bay complies with local zoning.

This is the only response that will confirm your commitment to the requirements of the aquaculture licensing process, demonstrate respect for local Islands Trust government's zoning authority, and that won't further complicate an already unnecessary and untenable situation.

ADIMS looks forward to your response at your earliest convenience. Thank you for your time and consideration in these matters.

Sincerely,

Edina Johnston
Co-Chair ADIMS

Cc:

Mr. Tim Sheldan, Deputy Minister MFLNRO FLNR.deputyministersoffice@gov.bc.ca

Kathy Evans

BC Crown Lands Operations and Aquaculture Manager kathy.evans@gov.bc.ca

Denman Islands Trustee Laura Busheikin lbusheikin@islandstrust.bc.ca

Denman Islands Trustee David Graham dgraham@islandstrust.bc.ca

The Honourable Steve Thomson, MLA, Minister of Forests, Lands and Natural Resource Ops.
steve.thomson.mla.@leg.bc.ca

Gail Shea, Minister of Fisheries and Oceans gail.shea@parl.gc.ca

March Klaver Regional Manager, Aquaculture Resource Management
Fisheries and Oceans Canada Aquaculture Resource Management March.Klaver@dfo-mpo.gc.ca

Brenda McDorquodale, Senior Aquaculture Management Coordinator, DFO
brenda.mccorquodale@dfo-mpo.gc.ca

Diana Trager, Director, Aquaculture Management Division, DFO Diana.Trager@dfo-mpo.gc.ca

Bruce Jolliffe- Area A Director CVRD bjolliffe@comoxvalleyrd.ca

From: Joan Prater [jprater@hawaii.rr.com]

Sent: November 16, 2013 11:19 PM

To: AuthorizingAgency.Nanaimo@gov.bc.ca

Cc: kathy.evans@gov.bc.ca; bjolliffe@comoxvalleyrd.ca; don.mcrae.mia@leg.bc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mia@leg.bc.ca; dennis.chalmers@gov.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: Opposition to application for License of Occupation for Aquaculture, File #1414125;
File#1414126

Authorizing Agency:

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

My husband and I purchased our property, Lot: 8 PL: 23960 SEC: 16 Denman Island, at 1600 Dalziel Road, Denman Island, on Lambert Channel, in 1987.

I am absolutely opposed to the License of Occupation for Aquaculture File #141125 and File #1414126, also File #1444123, File #1414124, File #1414127, and File #1414128.

I strongly believe there should be an impact and assessment study prior to any additional tenures granted.

The concentration of farmed geoduc will disrupt the marine ecology of Lambert Chanel, Baynes Sound and the associated marine environment. One addition to the marine environment can drastically affect the delicate balance because all marine life is interdependent.

Geoduc aquaculture using high-power hoses is extremely destructive and fatal to marine animals living in that habitat.

This area is a critical habitat for migratory birds which would be entangled in the predator netting protecting the geoduc.

A study needs to be conducted on the impact of the farmed geoduc on the herring spawning areas.

Joan E. Prater

1600 Dalziel Road

Denman Island, B. C., V0R 1T0

From: Bill Peters and Shirley Ward [smwwmp@gmail.com]
Sent: November 16, 2013 11:44 AM
To: Laura Busheikin
Subject: Salish Sea Letter of Opposition to Salish Sea Farms Ltd. ApplicationsFarms

Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca
To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)
File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction
File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

Mounting evidence of the cumulative effect of industrial sea farms indicates that the precautionary principle must be followed. Yet more large scale industrial farms like these will destroy the naturally functioning marine ecosystem. It is time to stop and to work with Denman ecology.

***Signature** _____

***Print Name** __William Peters 2575 Jemima Rd Denman Island V0R 1T0

From: Bill Peters and Shirley Ward [smwwmp@gmail.com]

Sent: November 17, 2013 9:52 AM

To: kathy.evans@gov.bc.ca; don.mcrae.mla@leg.bc.ca; john.duncan@parl.gc.ca; gail.shea@parl.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; David Graham; Laura Busheikin; Peter Luckham; bjoliffe@comoxvalleyrd.ca; dennis.chalmers@gov.bc.ca; march.klaver@dfo-mpo.gc.ca

Subject: Salish Sea Farms aquaculture application (Denman Island)

Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)

Ministry of Forests, Lands & Natural Resource Operations

2500 Cliffe Avenue, Courtenay, BC V9N 5M6

Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

1. Aquaculture is an important part of the local economy, but Baynes Sound has many other values that are vital to the ecological and economic health of Denman Island and surrounding areas. **90% of the Sound is already allocated to aquaculture.** Further expansion should not be approved without thorough independent, peer-reviewed research on the environmental, social and economic impacts of all existing and proposed aquaculture activities.
2. There are already obvious negative effects from the existing scale of aquaculture on Denman's coast:
 - predator nets interfere with herring spawning areas and with migratory birds (Baynes Sound is a vital feeding area for overwintering birds)
 - plastic debris is a hazard to marine life and creates an unsightly mess that reduces the beauty of our shores
 - recreational use of the waters around Denman is limited by the extensive netting and rafts
 - Baynes sound is a critical herring spawning area and aquaculture not only damages spawning habitat, it poses hazards for the commercial herring fishery
3. The proposed area for this license is zoned by the Islands Trust for marine conservation. This zoning, which explicitly excludes aquaculture, is in place for very good reasons. No tenure should be granted in the absence of proper zoning.

Shirley Ward

2575 Jemima Road

Denman Island, BC V0R 1T0

From: Miho Baird [mihonb@gmail.com]

Sent: November 17, 2013 7:14 PM

To: AuthorizingAgency.Nanaimo@gov.bc.ca; kathy.evans@gov.bc.ca; don.mcrae.mla@leg.bc.ca; bjolliffe@comoxvalleyrd.ca; john.duncan@parl.gc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; dennis.chalmers@gov.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: Letter of Opposition to Salish Sea Farms Ltd.

To: BC Manager Aquaculture (MFLNRO)

Ministry of Forests, Lands & Natural Resource Operations

2500 Cliffe Avenue, Courtenay, BC V9N 5M6

Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

The size of the tenures are huge compared to the average tenure size. Why is this much public land being given over to one company?

The applications are in W1 Conservation Waters and therefore are currently under conservation zoning. Denman Island is already totally overwhelmed with industry and the current zoning has been put into place for a reason!

A tenure in Henry Bay, Denman Island (File #141213) was granted approval by MFLNRO and DFO in 2012, for a huge industrial aquaculture operation (40 rafts) prior to getting rezoning by local government. It commenced commercial activity in 2013. Salish Sea Farms is a corporation owned by the same entity. The new applications that lie within the Denman Island Trust zoning jurisdiction are in areas zoned W1 Conservation Waters, which does not allow aquaculture activities.

Rezoning is clearly a requirement as stated in your application form and conditions of licence. Tenures should not be granted when these requirements are not met.

Lambert Channel and Henry Bay in Baynes Sound are some of the most important herring spawning areas in BC. An impact and assessment study on herring spawning needs to be done prior to any approval of such huge tracts of important marine areas for industry. We believe that if these Applications are approved, it will create conflict issues with the commercial herring fishery, such as entanglement of gear and nets and will destroy herring spawning habitat.

It is public knowledge that these applications areas are prime wild geoduck areas that are crucial to the continued success of the Strait of Georgia wild geoduck fishery. Loss of this area would jeopardize this sustainable fishery. These applications would give the applicant access to harvest wild geoducks without any ability to distinguish them from cultivated geoduck and there would be no way to monitor or limit this.

The public also wonders about the capacity to produce seed for such a huge area in Baynes Sound. Since planting, growing, and harvesting geoducks takes 8-12 years, it creates further suspicion that the Applicant will be focused on harvesting wild geoduck to full capacity until the 8-12 year period is reached.

61% of the critical bird habitat is under predator netting on the west side of Denman Island and the east side of Vancouver Island. Baynes Sound is a globally important migratory bird overwintering feeding area which has already been overly industrialized.

Exclusion predator netting over the clams will trap and kill herring and other marine animals, and create entanglement hazards for all other commercial users i.e. herring fleet, prawn fleet, fishing fleet, crab fleet, recreation fishers, partners, crabbers, etc.

Geoduck aquaculture planting and harvesting method with high power hoses is extremely destructive to the marine habitat.

There are many other harmful practices in the aquaculture industry such as driving on the beach, beach modification, and killing of 'predators' (starfish, moon snails and crabs).

There will be an increase in plastic debris leeching into the marine environment as well as increased garbage debris in Baynes Sound.

The Applications areas are not appropriate as they are adjacent to treasured local parks, recreational, anchorage and residential areas, and will devalue our tourism economy.

There would be a dramatic drop in real estate values along these tenures since these areas would become a commercial aquaculture zones.

There is no mention of sea cucumbers in the ad in the paper. However, there are clearly bags of oyster shells for sea cucumber nurseries in each of the Applications. One wonders if the identification of the species as "sea cucumbers" intentionally left off as the species in the ad which appeared in our local papers. We believe the consultation process is flawed if people are not aware that sea cucumbers are part of the application.

There is no DFO policy for sea cucumber aquaculture, except that sea cucumber ranching is not allowed. The Province has clearly stated there is a harmonization process in place, whereby DFO and the Province will proceed together in the approval process. Given that DFO is not approving sea cucumber applications, why is the Province considering this application?

Scientific evidence clearly indicates that the culture of sea cucumbers could present a risk to herring spawn in the impacted areas. Estimated daily rations of these animals to be about 9000 eggs/d. (Haegele) (1993)

90% of the coastline of Baynes Sound is under shellfish tenure. How much is too much? There should be a moratorium on further expansion and on both deep water and intertidal geoduck cultivation until independent, long-term, peer reviewed research is conducted on its potential impacts on the marine ecosystem, and other stakeholders.

In a nutshell, these Applications are too expansive and are in the wrong place.

Sincerely,

(signed) Miho Baird
2396 Jemima Road, Denman Island, BC, V0R 1T0

From: Ed Varney [evarney@shaw.ca]
Sent: November 18, 2013 4:26 PM
To: Laura Busheikin
Subject: Aquaculture applications

Dear Madam,

The beaches in and around Baynes Sound are a public resource. Already, most of the shoreline of the Sound is under aquaculture tenure and Baynes Sound produces about 50% of BC's shellfish. I'm sure you already know these facts and figures.

There are a number of good reasons why aquaculture tenure applications number 1414123, 1414124, 1414125, 1414126, 1414127, and 1414128 in and around Bayne's Sound should be rejected.

These applications for goeduck and/or sea cucumber cultivation are for unprecedentedly large areas off Kye Bay, the Cpmox Bluffs, Denman Island, and Henry Bay, some of the prime recreational areas in and around Baynes Sound. The preferred method of goeduck cultivation seems to be driving thousands of plastic tubes into the sand, placing the goeduck seed into the tubes, and then some years later harvesting by using high pressure hoses to uncover the goeducks. Not only would this "muddy the waters", it would effectively clean the area of any eel grass and other seaweed or sea life. There would also be acres of nets attached to the bottom to ward off predators. Seems like we have heard this before, radically changing an ecosystem so that a few can profit from the use of a public resource.

These applications cover 521.4 hectares (1288.5 acres) in the heart of the Comox Valley recreational area and beaches. Along with 2 other applications which have already been filed, it would more than double the shellfish tenures in Baynes Sound with all the attendant debris, noise, and unsightly alienation of our beaches. Keep in mind that the average of 440 tenures in Baynes Sound is now 4.35 hectares. It's hard to believe that BCMFLRO would seriously consider these applications but the lure of the oriental market is very attractive. We can't let it happen. (I'm reminded of how 3 years of copper mining fouled the Tsoulem River for over 3 decades.)

These applications seem like a clear case of an underwater land grab – alienating large tracts of sandy seafloor so that if and when goeduck (the real money makers) and sea cucumber (the cover species) processes are approved, these applicants will have claimed the best places to raise them. This is opportunism at it's worst.

A survey by Vancouver Island University at Deep Bay reports that 50% of the respondents don't want to see more aquaculture tenures in Baynes Sound. I agree.

The areas covered by these applications are prime herring spawn locations. It is also critical bird habitat and part of the migratory grounds for other bird species. The predator netting will also affect the prawn fishery, the crab fishery as well as recreational fisheries.

Rather than designating these huge areas as aquaculture tenure areas, they should be the heart of a Bayne's Sound and area recreation and nature reserve. Therefore, I ask that you reject these applications and declare a moratorium on further aquaculture applications in this critically sensitive public resource.

Ed varney

Royston

evarney@shaw.ca

250-703-0477

From: Darlene Lessard [denmandar@yahoo.ca]

Sent: November 18, 2013 7:24 PM

To: AuthorizingAgency.Nanaimo@gov.bc.ca

Cc: kathy.evans@gov.bc.ca; bjolliffe@comoxvalleyrd.ca; ohn.duncan@parl.gc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; dennis.chalmers@gov.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: License of Occupation for Aquaculture - Geoduck

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

- The size of the tenures are huge compared to the average tenure size. Why is this much public land being given over to one company?
- The applications are in W1 Conservation Waters and therefore are currently under conservation zoning. Denman Island is already totally overwhelmed with industry and the current zoning has been put into place for a reason!
- A tenure in Henry Bay, Denman Island (File #141213) was granted approval by MFLNRO and DFO in 2012, for a huge industrial aquaculture operation (40 rafts) prior to getting rezoning by local government. It commenced commercial activity in 2013. Salish Sea Farms is a corporation owned by the same entity. The new applications that lie within the Denman Island Trust zoning jurisdiction are in areas zoned W1 Conservation Waters, which does not allow aquaculture activities. Rezoning is clearly a requirement as stated in your application form and conditions of licence. Tenures should not be granted when these requirements are not met.
- Lambert Channel and Henry Bay in Baynes Sound are some of the most important herring spawning areas in BC. An impact and assessment study on herring spawning needs to be done prior to any approval of such huge tracts of important marine areas for industry. We believe that if these Applications are approved, it will create conflict issues with the commercial herring fishery, such as entanglement of gear and nets and will destroy herring spawning habitat.

- It is public knowledge that these aquaculture areas are prime wild geoduck areas that are crucial to the bottom-dwelling species of the Strait of Georgia wild geoduck fishery. Loss of these areas would jeopardize the sustainable fishery. These aquaculture would give the aquaculture industry the opportunity to harvest wild geoducks without any additional to the harvesting of the clam from cultivated geoduck and there would be no way to monitor the limits.
- The public also wonders about the capacity to produce seed for such a huge area in Baynes Sound. Since planting, growing, and harvesting geoducks takes 8-12 years, it creates further suspicion that the Applicant will be focused on harvesting wild geoduck to full capacity until the 8-12 year period is reached.
- 61% of the critical bird habitat is under predator netting on the west side of Denman Island and the east side of Vancouver Island. Baynes Sound is a globally important migratory bird overwintering feeding area which has already been overly industrialized.
- Exclusion predator netting over the clams will trap and kill herring and other marine animals, and create entanglement hazards for all other commercial users i.e. herring fleet, prawn fleet, fishing fleet, crab fleet, recreation fishers, partners, crabbers, etc.
- Geoduck aquaculture planting and harvesting method with high power hoses is extremely destructive to the marine habitat.
- There are many other harmful practices in the aquaculture industry such as driving on the beach, beach modification, and killing of 'predators' (starfish, moon snails and crabs).
- There will be an increase in plastic debris leaching into the marine environment as well as increased garbage debris in Baynes Sound.
- The Applications areas are not appropriate as they are adjacent to treasured local parks, recreational, anchorage and residential areas, and will devalue our tourism economy.
- There would be a dramatic drop in real estate values along these tenures since these areas would become a commercial aquaculture zones.
- There is no mention of sea cucumbers in the ad in the paper. However, there are clearly bags of oyster shells for sea cucumber nurseries in each of the Applications. One wonders if the identification of the species as "sea cucumbers" intentionally left off as the species in the ad which appeared in our local papers. We believe the consultation process is flawed if people are not aware that sea cucumbers are part of the application.
- There is no DFO policy for sea cucumber aquaculture, except that sea cucumber ranching is not allowed. The Province has clearly stated there is a harmonization

process in place, whereby DFO and the Province will proceed together in the approval process. Given that DFO is not approving sea cucumber applications, why is the Province considering this application?

- Scientific evidence clearly indicates that the culture of sea cucumbers could present a risk to herring spawn in the impacted areas. Estimated daily rations of these animals to be about 9000 eggs/d. (Haegele (1993)
- 90% of the coastline of Baynes Sound is under shellfish tenure. How much is too much? There should be a moratorium on further expansion and on both deep water and intertidal geoduck cultivation until independent, long-term, peer reviewed research is conducted on its potential impacts on the marine ecosystem, and other stakeholders.
- In a nutshell, these Applications are too expansive and are in the wrong place.

***Print Name**

DarleneLessard

***Address _PO Box 35, 3401 Kirk Rd. Denman Island , BC
V0R1T0_**

*Live simply, that others may simply live!
Blessings*

From: Janet Thomas [janetthomas@shaw.ca]

Sent: November 17, 2013 5:49 PM

To: Kathy FLNR:EX Evans

Cc: authorizingagency.nanaimo@gov.bc.ca; FLNR.deputyministersoffice@gov.bc.ca; Bruce Jolliffe; Don McRae.MLA; john.duncan@parl.gc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; dennis.chalmers@gov.bc.ca; steve.thomson.mla@leg.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: Corrected Version of my Submission to oppose 6 Aquaculture Applications

Note: Please use this Submission instead of my previous one. I made an error on an Application number in my previous Submission and have added new information about the immense size (516 hectares) of the Applications.

Janet Thomas

TO:

Ms. Kathy Evans
BC Crown Lands Operations and Aquaculture Manager
Aquaculture, Ministry of Forests, and Natural Resources
2500 Cliffe Avenue
Courtenay, BC V9N 5M6

RE: In Opposition to Salish Sea Farms Applications - Application File #1414123 (South of Seal Bay), Application File #1414124 (Henry Bay), Application File #1414125 (Komass Bluff-East Side of Denman Island), Application File #1414126 (Comox Bar-NE side of Denman Island), Application File #1414127 (Willemar Bluff - Cape Lazo), and Application File #1414128 (South of Little River, NE of Kye Bay)

Dear Ms. Evans:

I'm in opposition to the above six Licences of Occupation - Shellfish (Geoduck on bottom) - for the following reasons:

There is no mention of sea cucumbers in the ad in the paper. (See attachment.) However, there are clearly bags of oyster shells for sea cucumber nurseries in each of the six Applications. One wonders if the

identification of the species as "sea cucumbers" intentionally left off as the species in the ad which appeared in our local papers? I believe the consultation process is flawed if people are not aware that sea cucumbers are part of the application.

There is no DFO policy for sea cucumbers aquaculture yet; and my understanding is that sea cucumber ranching will not be allowed. The Province has clearly stated there is a harmonization process in place, whereby DFO and the Province will proceed together in the approval process. Given that DFO is not approving sea cucumber applications, why is the Province considering this application?

The size of the six tenure Applications is huge compared to the average tenure size. The six Applications total 516.44 hectares! (1414123 is 55.75 ha; #1414124 is 7.29 ha; #1414125 is 118.7 ha; #1414126 is 135.7 ha; #1414127 is 105.3.7 ha; and #1414128 is 93.7 ha.)

Why is this much public land being given over to one company? According to Centre for Shellfish Research/Vancouver Island University, the average tenure size throughout BC is 4.39 hectares. Approximately 35% of all tenures are less than 2 hectares in size, while less than 10% of the tenures are more than 10 hectares; only 5 are greater than 30 hectares. See -

<http://www.viu.ca/csr/industry/industrybackground.asp>

Because these six Applications are so immense and so much larger than the usual tenure, it seems more like a "land grab" to many in the community.

The six new Applications are in W1 Conservation Waters and therefore are currently under conservation zoning. Denman Island is already totally overwhelmed with industry and the current zoning has been put into place for a reason.

Tenure Application #1411213, a previously approved one in Henry Bay by MFLNRO and DFO in 2012, is operating without rezoning and is non-complying because this area is in the Denman Island Trust zoning jurisdiction and is zoned W1 Conservation Waters which don't allow aquaculture activities. The Applicant for #1411213 is also the same Applicant as the six new Applications but is under a new company name. The new Applications are also in W1 Conservation zoned areas and require rezoning. This rezoning should be

applied for to the Denman Island Local Trust Committee and received before a tenure and licence are issued.

The Tenure Area is the most important herring spawn area in BC. Has the impact on herring spawning behaviour been assessed? I have close friends who make their living in the herring industry; and I strongly believe that if these Applications are approved, it will create conflict issues with the commercial herring fishery such as entanglement of gear and nets used for subtidal or deep water geoduck enhancement will interfere with the herring spawning.

According to my fishermen friends and neighbours, all of the six Applications are considered to be locations with prime, wild geoduck beds. These Applications would give the Applicant the right to harvest geoducks without limitation. Furthermore, there are no limitations in the Applications to ensure sustainability of the wild product.

Aquaculture should be aquaculture i.e. planting, growing, and harvesting a product. There is no reason for the Applicant to apply for such big tenures. I also wonder about the capacity to produce seed for such a huge area in Baynes Sound. Since planting, growing, and harvesting geoducks takes 8-12 years, it creates further suspicion that the Applicant will be focused on harvesting wild geoduck to full capacity until the 8-12 year period is reached.

61% of the critical bird habitat is under predator netting on the west side of Denman island and the east side of Vancouver Island according to the GIS mapping as presented in "Application of aerial photography in combination with GIS for coastal management at small spatial scales: a case study of shellfish aquaculture" by Leah I Bendell and Peter C.Y. Wan (Springer Science and Business Media, BV, 2010).

Exclusion predator netting over the clams trap will kill herring and other marine animals, and create entanglement hazards for all other commercial users i.e. herring fleet, prawn fleet, fishing fleet, crab fleet, recreation fishers, prawners, crabbers, etc.

There are other harmful practices in the aquaculture industry such as driving on the beach, beach modification, and killing of "predators" (starfish, moonsnails and crabs).

There will be an increase in plastic debris leeching into the marine environment as well as increased garbage debris in Baynes Sound.

The six Applications are not appropriate since they are adjacent to treasured local parks, recreational areas, anchorage areas and residential homes.

There would be a dramatic drop in real estate values along these tenures since these areas would become a commercial aquaculture zones. This drop in real estate values will lead to decrease assessed values of ocean-front homes and will thus, create a drop in property taxes collected for a very large area.

90% of the coastline of Baynes Sound is under shellfish tenure. See Attachment labeled Figure 14 which I obtained from scientist Dr. L I Bendell. The key of the diagram is as follows: estuarine habitat: blue; oyster grow-out: red; and anti-predator netting: yellow.

I was shocked when going on an aerial survey last July, 2013 by the expansive use of predator nets, marker buoys, as well as rafts in Baynes Sound as seen from the air! Please take a look at this video which I put together which shows the visuals of what I consider to be the over expansion of the aquaculture industry. See - <http://www.youtube.com/watch?v=g5NSm3goUiA>

How much is too much? It is my belief that there should be a moratorium on further expansion.

In closing, these Applications are too expansive and are in the wrong place.

I sincerely hope that these Applications will not be approved.

Janet E. Thomas
4810 Kilmarnock Drive
Courtenay, BC V9N 9S5

cc: Authorizing Authority - Aquaculture, Ministry of Forests, Lands and Natural Resources
cc: Tim Sheldan - Deputy Minister, Ministry of Forests, Lands and Natural Resources
cc: Bruce Jolliffe- Area "A" Director, Comox Valley Regional District
cc: The Honourable Don McRae - MLA, Minister of Social Development and Social Innovation
cc: The Honourable John Duncan - MP, Vancouver Island North
cc: The Honourable Gail Shea - MP, Minister of Fisheries and Oceans
cc: March Klaver - Senior Aquaculture Advisor, DFO
cc: Michelle Manning - Aquaculture Management Coordinator, Aquaculture Resource Management, DFO
cc: Diana Trager, Aquaculture Management Division, Director, DFO
cc The Honourable Steve Thomson, MLA, Minister of Forests, Lands, and Natural Resource Operations
cc: Dennis Chalmers - Fisheries Management Officer Provincial Government
cc: Laura Busheikin, Islands Trust, Denman Island Trustee
cc: David Graham, Islands Trust, Denman Island Trustee
cc: Peter Luckham, Denman Island LTC, Chair

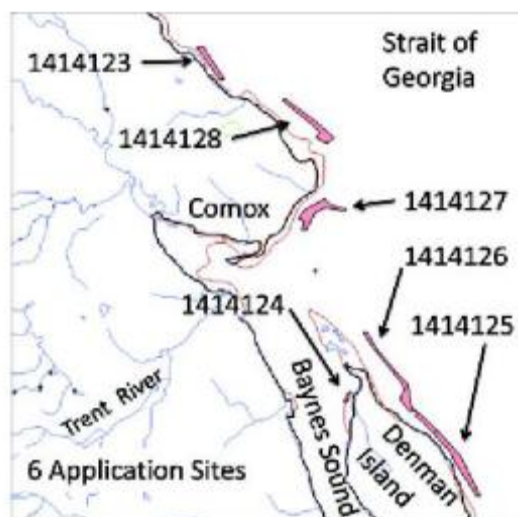
Land Act: Notice of Intention to Apply for a Disposition of Crown Land

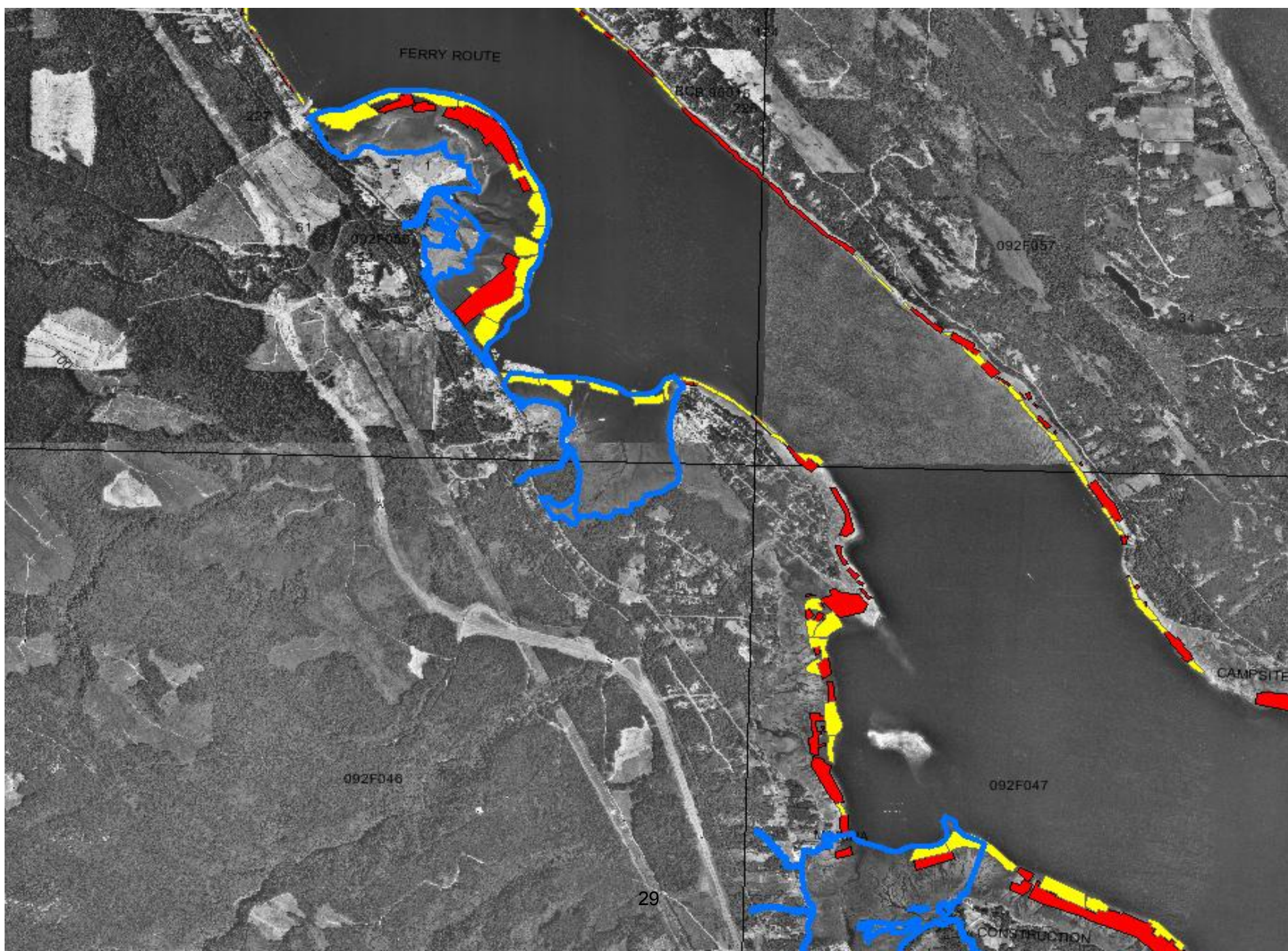
Take notice that **Salish Sea Farms LP of Comox, BC**, intends to make six applications to Ministry of Natural Resource Operations (MFLNRO), West Coast Service Centre, for a **Licence of Occupation – Shellfish** (Geoduck on bottom) situated on Provincial Crown lands located within the core territory of the K'omoks First Nation.

The following Land File Numbers have been established for the applications; **1414123, 1414124, 1414125, 1414126, 1414127, 1414128**. Written comments concerning these applications should be directed to the Manager, Aquaculture, Ministry of Forests, Lands and Natural Resource Operations 2500 Cliffe Avenue, Courtenay, BC, V9N 5M6, or emailed to: **AuthorizingAgency.Nanaimo@gov.bc.ca**. Comments will be received by MFLNRO until November 28, 2013. MFLNRO may not be able to consider comments received after this date. Please visit our website:

<http://arfd.gov.bc.ca/ApplicationPosting/index.jsp>
for more information.

Be advised that any response to this advertisement will be considered part of the public record. For information, contact the FOI Advisor at the Ministry of Forests, Lands and Natural Resource Operations regional office.





Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

- The application includes beaches adjacent to our provincial parks, including both Fillongley and Sandy Island. I wonder about the legacy donated by George Beadnell who sold the Fillongley lands to the province for the sum of \$1 in 1953. I do not think we can allow this development to take place so close to such a legacy which was trusted to the BC government to maintain and hold for the enjoyment of all British Columbians and Canadians
- We have more than enough industrial legacy on our small island including the ravages of logging during the 1990s and the existing industrial shellfish farms in the Lambert Channel, Henry Bay and the Oyster lease south of Fillongley. I appreciate the applicant is local and therefore wants to leverage their infrastructure, but this operation should be hugely scaled down or spread over a much larger area, yielding lower localized impact
- The impact on our local wildlife including salmon (spawning in Fillongley), bald eagles and herring, which are the basis of the food chain for other larger wildlife is far from clear, but it seems to me that we are putting native species at considerable risk and are attracting considerable risk of a 'dead zone' around Denman Island

***Signature**



***Print Name**

Jonathan Hirst

***Address**

1441, Dalziel Road, Denman Island BC. V0R1T0

List of CCs

cc: Kathy Evans: Aquaculture Manager (MFLNRO) kathy.evans@gov.bc.ca
cc: Bruce Jolliffe- CV Area "A" Director bjolliffe@comoxvalleyrd.ca
cc: The Honourable Don McRae - MLA, don.mcrae.mla@leg.bc.ca
cc: The Honourable John Duncan - MP, john.duncan@parl.gc.ca,
cc: The Honourable Gail Shea – MP Minister Fisheries & Oceans gail.shea@parl.gc.ca
cc: March Klaver - Senior Aquaculture Advisor, DFO march.klaver@dfo-mpo.gc.ca
cc: Michelle Manning - Aquaculture Management DFO michelle.manning@dfo-mpo.gc.ca
cc: Diana Trager- Aquaculture Management Division, DFO, diana.trager@dfo-mpo.gc.ca
cc The Honourable Steve Thomson, MLA, Minister of FLNRO steve.thomson.mla@leg.bc.ca
cc: Dennis Chalmers - Fisheries Management Officer BC dennis.chalmers@gov.bc.ca
cc: David Graham - Islands Trust, Denman Island Trustee dgraham@islandstrust.bc.ca
cc: Laura Busheikin -Islands Trust, Denman Island Trustee lbushiekin@islandstrust.bc.ca
cc: Peter Luckham, Denman Island LTC, Chair pluckham@islandstrust.bc.ca

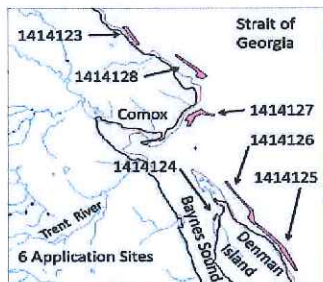
Land Act: Notice of Intention to Apply for a Disposition of Crown Land

Take notice that **Salish Sea Farms LP of Comox, BC**, intends to make six applications to Ministry of Natural Resource Operations (MFLNRO), West Coast Service Centre, for a **Licence of Occupation – Shellfish** (Geoduck on bottom) situated on Provincial Crown lands located within the core territory of the K'omoks First Nation.

The following Land File Numbers have been established for the applications; **1414123, 1414124, 1414125, 1414126, 1414127, 1414128**. Written comments concerning these applications should be directed to the Manager, Aquaculture, Ministry of Forests, Lands and Natural Resource Operations 2500 Cliffe Avenue, Courtenay, BC, V9N 5M6, or emailed to: **AuthorizingAgency.Nanaimo@gov.bc.ca**. Comments will be received by MFLNRO until November 28, 2013. MFLNRO may not be able to consider comments received after this date. Please visit our website:

<http://arfd.gov.bc.ca/ApplicationPosting/index.jsp>
for more information.

Be advised that any response to this advertisement will be considered part of the public record. For information, contact the FOI Advisor at the Ministry of Forests, Lands and Natural Resource Operations regional office.



a. Location Map

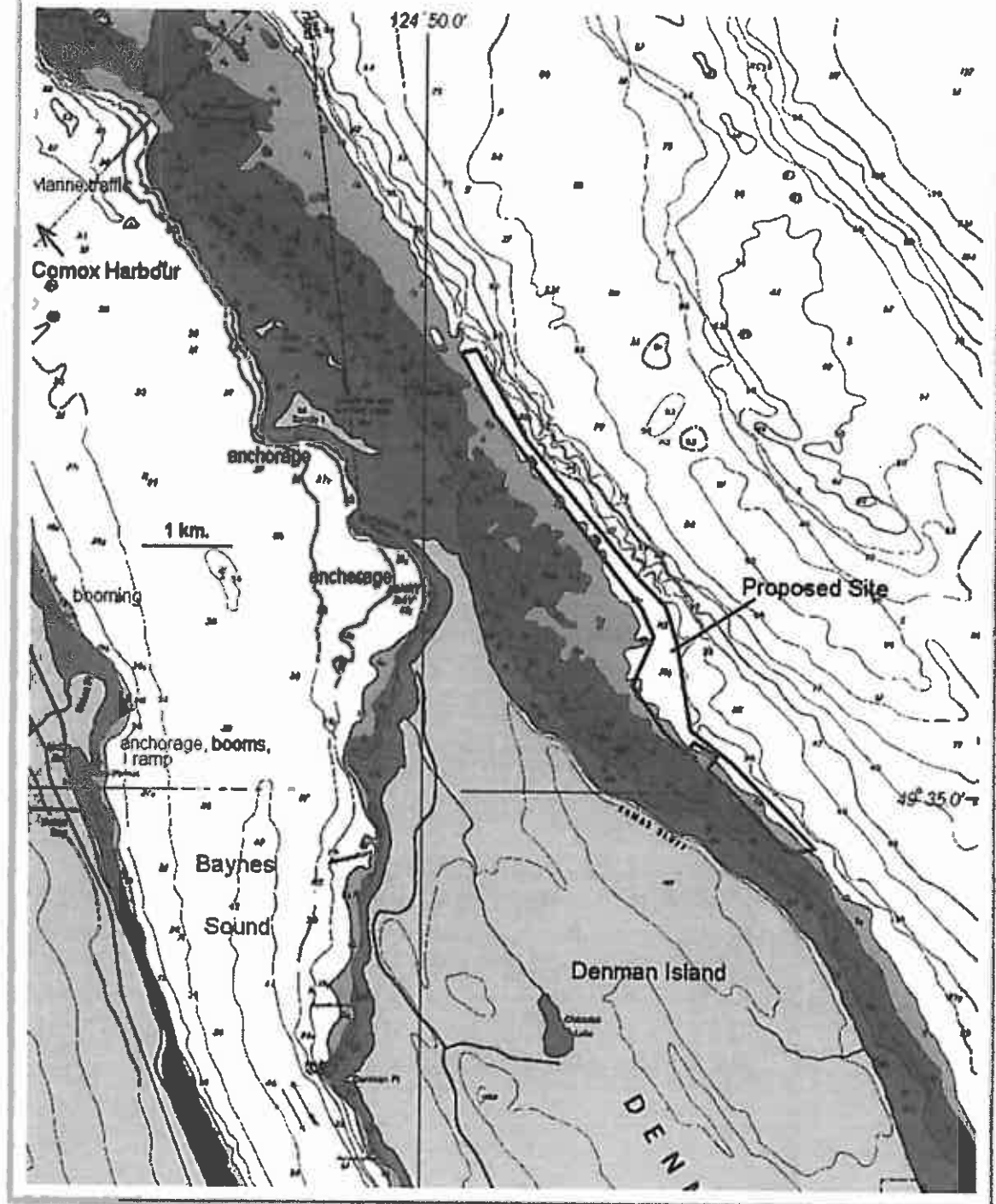


Figure a i. Location map for applied area (adapted from CHS Chart 3527)

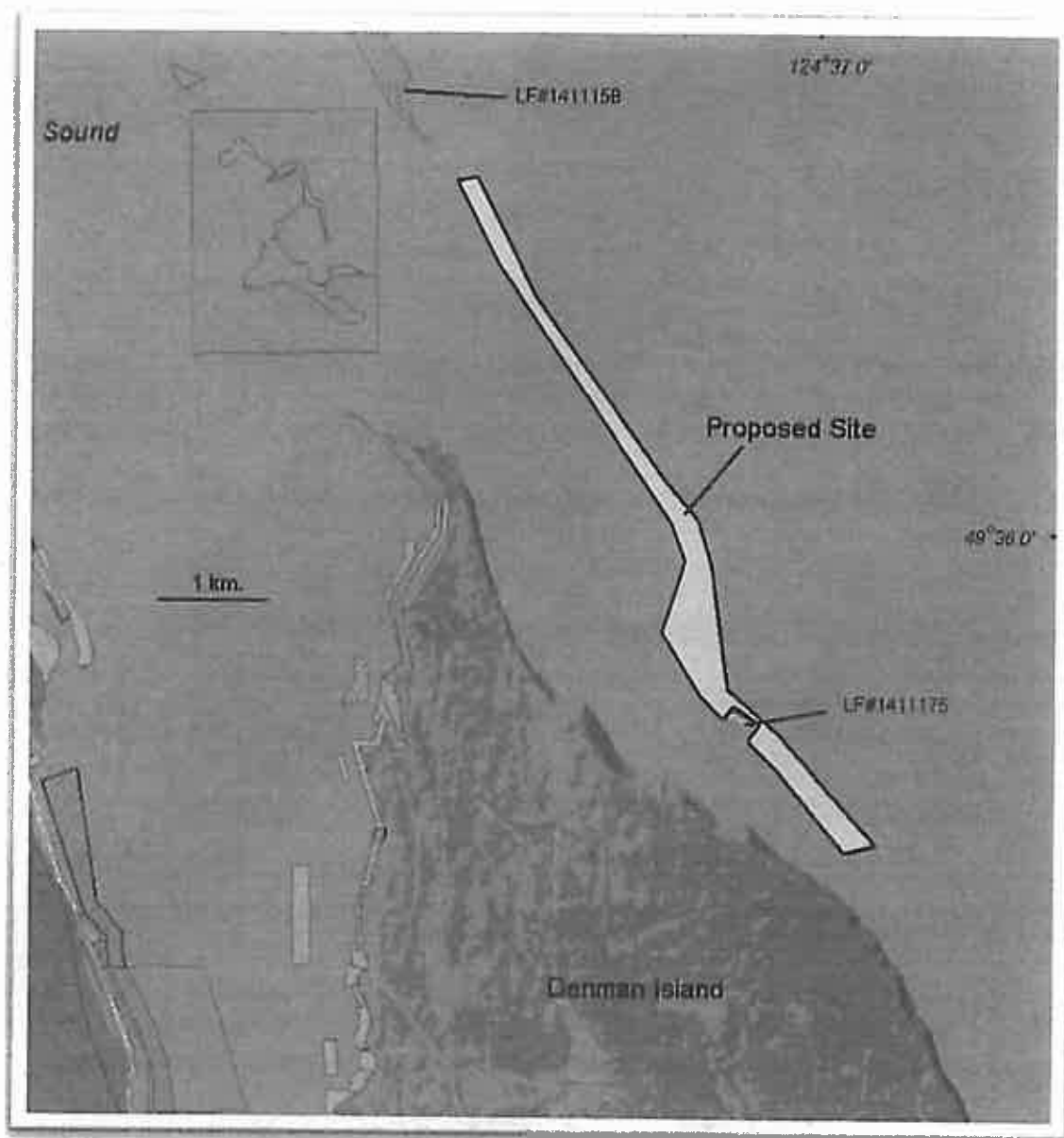


Figure a II. General area with proposed site added and highlighted in yellow
(adapted from IMAP website <http://webmaps.gov.bc.ca/imfx>)

c. Operational Diagrams

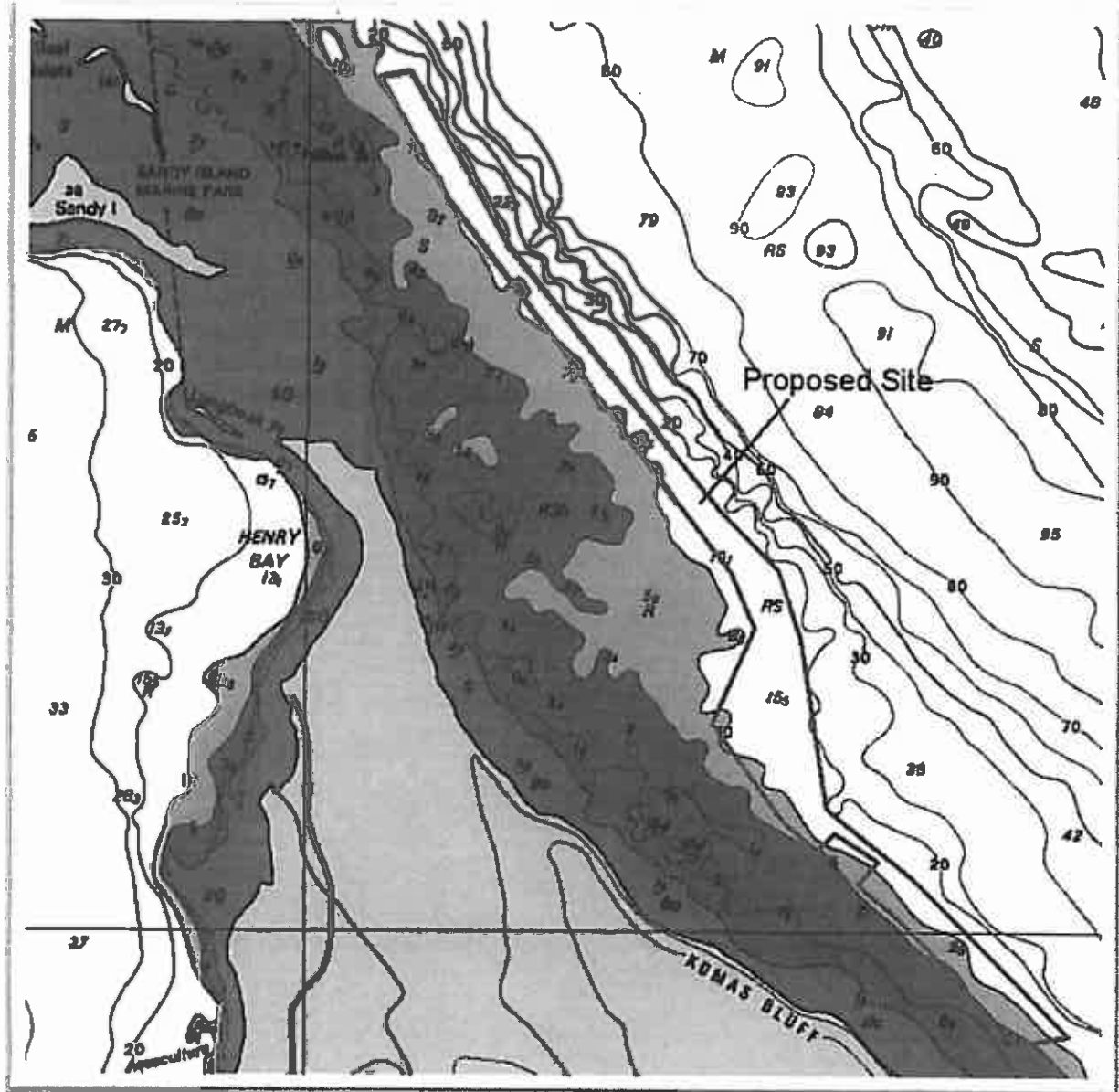


Figure b I. Section of CHS chart 3527 adapted to show application area depth detail.

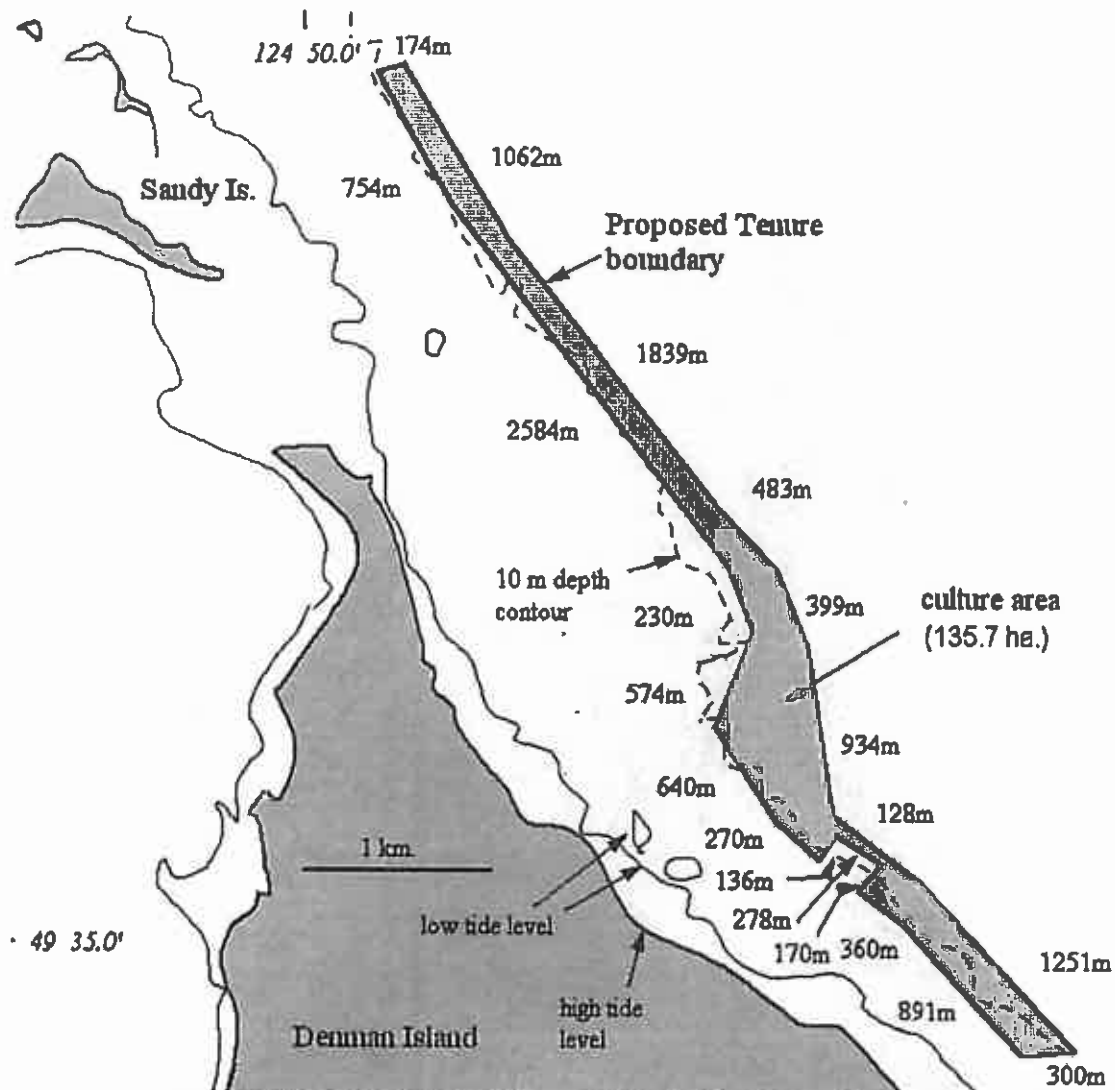


Figure b i contd. Location map for applied area (adapted from CHS Chart 3527) showing proposed tenure perimeter distances. Culture area to contain BIB and predator protection as shown in Figure b ii.

Letter of Opposition to Salish Sea Farms Applications

To: BC Manager Aquaculture

Ministry of Forests, Lands & Natural Resource Operations (MFLNRO)

2500 Cliffe Avenue, Courtenay, BC V9N 5M6

Email: AuthorizingAgency.Nanaimo@gov.bc.ca

I'm opposed to the Licences of Occupation - Shellfish (Geoduck on bottom) -
Application File #1414123, #1414124, #1414125, #1414126,
#1414127, #1414128, for the following reasons:

- ① THIS TENURE WILL DESTROY THE HERRING SPawning AREA
- ② THE BEACHES WILL BE DESTROYED
- ③ THE BIRD HABITAT WILL BE SERIOUSLY AFFECTED
- ④ REAL ESTATE VALUES WILL GO DOWN
- ⑤ NO FINANCIAL BENEFIT TO B.C.
- ⑥ NO IMPACT ASSESSMENT DONE
- ⑦ TOO CLOSE TO PROVINCIAL PARKS (SANDY ISLAND -
PILGRIM'S PARK)

THIS APPLICATION MUST BE STOPPED

*Signature John Hargrove Anna Hargrove
*Print Name JOHN HARGROVE ANNA HARGROVE
*Address 1550 DALLAS ST DENMAN IS. VORITO
SINCE 1972

(use back of document for additional opposition statements)

36

Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)
File #1414126 (NE Side of Denman Island)

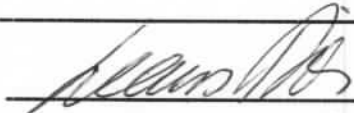
Re: Applications within Comox Valley Regional District Jurisdiction
File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

- The applications are in W1 Conservation Waters and therefore are currently under conservation zoning. Denman Island is already totally overwhelmed with industry and the current zoning has been put into place for a reason!
- A tenure in Henry Bay, Denman Island (File #141213) was granted approval by MFLNRO and DFO in 2012, for a huge industrial aquaculture operation (40 rafts) prior to getting rezoning by local government. It commenced commercial activity in 2013. Salish Sea Farms is a corporation owned by the same entity. The new applications that lie within the Denman Island Trust zoning jurisdiction are in areas zoned W1 Conservation Waters, which does not allow aquaculture activities. Rezoning is clearly a requirement as stated in your application form and conditions of licence. Tenures should not be granted when these requirements are not met.
- The public also wonders about the capacity to produce seed for such a huge area in Baynes Sound. Since planting, growing, and harvesting geoducks takes 8-12 years, it creates further suspicion that the Applicant will be focused on harvesting wild geoduck to full capacity until the 8-12 year period is reached.
- 61% of the critical bird habitat is under predator netting on the west side of Denman Island and the east side of Vancouver Island. Baynes Sound is a globally important migratory bird overwintering feeding area which has already been overly industrialized.
- Exclusion predator netting over the clams will trap and kill herring and other marine animals, and create entanglement hazards for all other commercial users i.e. herring fleet, prawn fleet, fishing fleet, crab fleet, recreation fishers, partners, crabbers, etc.

- Geoduck aquaculture planting and harvesting method with high power hoses is extremely destructive to the marine habitat.
- There are many other harmful practices in the aquaculture industry such as driving on the beach, beach modification, and killing of 'predators' (starfish, moon snails and crabs).
- There will be an increase in plastic debris leeching into the marine environment as well as increased garbage debris in Baynes Sound.
- There is no mention of sea cucumbers in the ad in the paper. However, there are clearly bags of oyster shells for sea cucumber nurseries in each of the Applications. One wonders if the identification of the species as "sea cucumbers" intentionally left off as the species in the ad which appeared in our local papers. We believe the consultation process is flawed if people are not aware that sea cucumbers are part of the application.
- In a nutshell, these Applications are too expansive and are in the wrong place.
- ng sea cucumber applications, why is the Province considering this application?

*Signature



*Print Name

Klaus Biebach

*Address

2071 Northwest Rd Denman Island
VOR 1 T0

(add second page for any further opposition statements)

Letter of Opposition to Salish Sea Farms Ltd. Applications #1414128,

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca
To: Manager, Aquaculture (MFLNRO)
Re: Applications within Comox Valley Regional District Jurisdiction
File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (Geoduck on bottom) for the following reasons:

Kye Bay provides a valued public recreational resource with multiple public beach accesses, leading to one of the finest recreational beaches in the Comox Valley area. To change that use to industrial is a betrayal of the public trust. There is little or no public benefit to this application, what economic benefits that do accrue are only to the benefit of the Applicant, while damaging the economic interests of the local landowners, and devaluing a treasured public recreational resource.

I see no provision in the Application documents for compensation to the land owners of Kye Bay for the dramatic reduction in property values which must follow the change from recreational use to industrial use of the Kye Bay area. The increase in industrial pollution as a result of the operations must also be considered. In addition, Geoduck aquaculture planting and harvesting methods, using high power hoses is extremely destructive to the marine habitat.

No recognition appears for the legal costs of the applicants, landowners and citizens of the region which will be incurred in the legal actions which must ensue should the application be approved.

There are a myriad of alternative locations available which do not affect the public in such a dramatic and destructive manner. To approve this application and as a result damage such a sensitive location, solely for the convenience of the applicant, would be an error of public policy.

Scientific evidence clearly indicates that the culture of sea cucumbers could present a risk to herring spawn in the Kye Bay area, and as I understand it such sea cucumber operations are not being approved by the Federal Government.

Please act responsibly and refuse this application!



Michael Rae
1400D Kye Bay Rd.
Comox British Columbia

Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)
File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction
File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

While I support a reasonable amount of somewhat more responsible aquaculture in Baynes Sound, the plan for geoduck industrialization as per the referenced applications is way over the top and destined to destroy the pristine natural resource we now have. Please exercise some caution.

***Signature Bill**

Engleson _____

***Print Name _Bill**

Engleson_____

***Address** _____

(add second page for any further opposition statements)

List of CCs

cc: Kathy Evans: Aquaculture Manager (MFLNRO) kathy.evans@gov.bc.ca
cc: Bruce Jolliffe- CV Area "A" Director bjolliffe@comoxvalleyrd.ca
cc: The Honourable Don McRae - MLA, don.mcrae.mla@leg.bc.ca
cc: The Honourable John Duncan - MP, john.duncan@parl.gc.ca,
cc: The Honourable Gail Shea – MP Minister Fisheries & Oceans gail.shea@parl.gc.ca
cc: March Klaver - Senior Aquaculture Advisor, DFO march.klaver@dfo-mpo.gc.ca
cc: Michelle Manning - Aquaculture Management DFO michelle.manning@dfo-mpo.gc.ca
cc: Diana Trager- Aquaculture Management Division, DFO, diana.trager@dfo-mpo.gc.ca
cc The Honourable Steve Thomson, MLA, Minister of FLNRO steve.thomson.mla@leg.bc.ca
cc: Dennis Chalmers - Fisheries Management Officer BC dennis.chalmers@gov.bc.ca
cc: David Graham - Islands Trust, Denman Island Trustee dgraham@islandtrust.bc.ca
cc: Laura Busheikin -Islands Trust, Denman Island Trustee lbusheikin@islandtrust.bc.ca
cc: Peter Luckham, Denman Island LTC, Chair pluckham@islandtrust.bc.ca

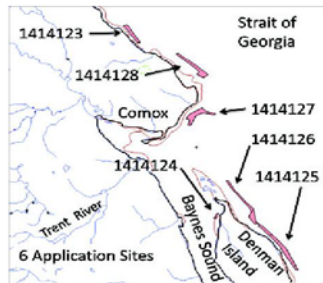
Land Act: Notice of Intention to Apply for a Disposition of Crown Land

Take notice that **Salish Sea Farms LP of Comox, BC**, intends to make six applications to Ministry of Natural Resource Operations (MFLNRO), West Coast Service Centre, for a **Licence of Occupation – Shellfish** (Geoduck on bottom) situated on Provincial Crown lands located within the core territory of the K'omoks First Nation.

The following Land File Numbers have been established for the applications; **1414123, 1414124, 1414125, 1414126, 1414127, 1414128**. Written comments concerning these applications should be directed to the Manager, Aquaculture, Ministry of Forests, Lands and Natural Resource Operations 2500 Cliffe Avenue, Courtenay, BC, V9N 5M6, or emailed to: **AuthorizingAgency.Nanaimo@gov.bc.ca**. Comments will be received by MFLNRO until November 28, 2013. MFLNRO may not be able to consider comments received after this date. Please visit our website:

<http://arfd.gov.bc.ca/ApplicationPosting/index.jsp>
for more information.

Be advised that any response to this advertisement will be considered part of the public record. For information, contact the FOI Advisor at the Ministry of Forests, Lands and Natural Resource Operations regional office.



From: Angela Robinson [angelarobinson@shaw.ca]

Sent: November 19, 2013 9:49 PM

To: AuthorizingAgency.Nanaimo@gov.bc.ca

Cc: kathy.evans@gov.bc.ca; bjolliffe@comoxvalleyrd.ca; don.mcrae.mla@leg.bc.ca; john.duncan@parl.gc.ca; gail.shea@parl.gc.ca; camichelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; David Graham; Laura Busheikin; Peter Luckham; march.klaver@dfo-mpo.gc.ca; dennis.chalmers@gov.bc.ca

Subject: Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca
To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)
File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction
File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

- One of the Province of B.C.'s logos is SUPERNATURAL BC. This is proudly stated to tourists, residents and the world. With 90% of the coastline of Baynes Sound under shellfish tenure this area is anything but SUPERNATURAL. Beach walking is becoming hazardous and ugly with the nets, rebar protruding, and debris. Numerous, extended floats are ugly. Kayaking along the shoreline is a hazard with rebar sticking up.
- This is important **bird habitat and migratory bird overwintering feeding area**. Habitat disturbance from the extensive shellfish industrialization makes this a hazard for birds.
- The requested large scale tenure area will have a devastating impact on the **herring population**.
- This is prime **wild geoduck habitat**. Don't let it be destroyed or let overharvesting of the wild geoduck population happen.
- This is an incredibly destructive industry that cannot be allowed in Baynes Sound.

Angela Robinson
112-1635 Martin Drive, Surrey, BC

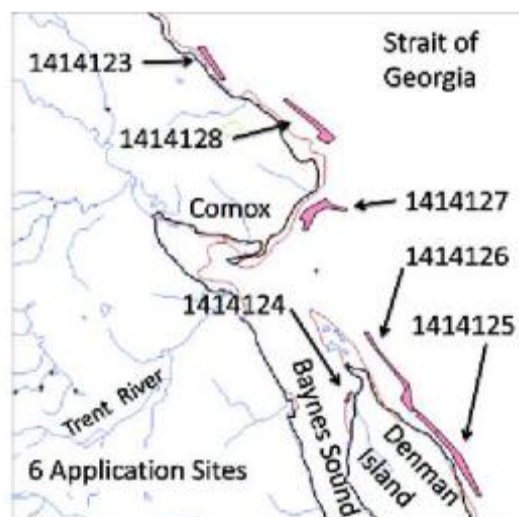
Land Act: Notice of Intention to Apply for a Disposition of Crown Land

Take notice that **Salish Sea Farms LP of Comox, BC**, intends to make six applications to Ministry of Natural Resource Operations (MFLNRO), West Coast Service Centre, for a **Licence of Occupation – Shellfish** (Geoduck on bottom) situated on Provincial Crown lands located within the core territory of the K'omoks First Nation.

The following Land File Numbers have been established for the applications; **1414123, 1414124, 1414125, 1414126, 1414127, 1414128**. Written comments concerning these applications should be directed to the Manager, Aquaculture, Ministry of Forests, Lands and Natural Resource Operations 2500 Cliffe Avenue, Courtenay, BC, V9N 5M6, or emailed to: **AuthorizingAgency.Nanaimo@gov.bc.ca**. Comments will be received by MFLNRO until November 28, 2013. MFLNRO may not be able to consider comments received after this date. Please visit our website:

<http://arfd.gov.bc.ca/ApplicationPosting/index.jsp>
for more information.

Be advised that any response to this advertisement will be considered part of the public record. For information, contact the FOI Advisor at the Ministry of Forests, Lands and Natural Resource Operations regional office.



From: Marion McGaffney [mfmcgaffney@gmail.com]

Sent: November 19, 2013 6:35 PM

To: AuthorizingAgency.Nanaimo@gov.bc.ca

Cc: kathy.evans@gov.bc.ca; bjoliffe@comoxvalleyrd.ca; don.mcrae.mia@leg.bc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mia@leg.bc.ca; dennis.chalmers@gov.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: Applications within Denman Island Trust Zoning Jurisdiction and within Comox Valley Regional Jurisdiction

We have owned our property on Denman since 1972 (1430 Dalziel Road) and feel very blessed to have enjoyed the beauties of this Northern Gulf Island for so many years. We are disturbed and opposed to the License of Occupation for Aquaculture File # 141125, #1414126, #1444123, #1414124, #1414127 and #1414128 due to the environmental damage that will occur from these licenses. We feel that further studies need to be conducted in order to assess the impact these licenses will have on the marine environment.

We already have many aquaculture rafts anchored off our shores and they are extremely unsightly not to mention the amount of debris that washes up on our beaches from these aquaculture practices. We feel that 'enough is enough' - further expansion could cause immense damage to our marine environment which would affect the annual herring spawn, migrating bird populations, sports fishing and other activities that are important to our treasured lifestyle.

These applications are adjacent to local parks, recreational anchorage and residential areas and will devalue the tourism industry along with a dramatic drop in real estate values along these tenures as these areas would become commercial aquaculture zones.

We also have concerns over the ownership of these tenures and the possibility of off-shore investment which would control and/or dictate the activity.

Please reconsider these tenures and protect our valued islands and lifestyles from the ravages of commercial aquaculture - we have enough already!!

**Frank and Marion McGaffney
1430 Dalziel Road
Denman Island, B. C., VOR1T0**

From: michael white [selmik@telus.net]

Sent: November 19, 2013 2:22 PM

To: kathy.evans@gov.bc.ca; bjolliffe@comoxvalleyrd.ca; don.mcrae.mla@leg.bc.ca; john.duncan@parl.gc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; dennis.chalmers@gov.bc.ca; David Graham; Laura Busheikin; Peter Luckham

Subject: Geoduck Applications

To: BC Manager Aquaculture (MFLNRO)

Ministry of Forests, Lands & Natural Resource Operations

2500 Cliffe Avenue, Courtenay, BC V9N 5M6

Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction: Bruce Jolliffe- CV

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction

File #1414123 (S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

We oppose the application for License of Occupation for Aquaculture for the following reasons:

- The size of the tenures are huge compared to the average tenure size. Why is this much public land being given over to one company?
- The applications are in W1 Conservation Waters and therefore are currently under conservation zoning. Denman Island is already totally overwhelmed with industry and the current zoning has been put into place for a reason!
- A tenure in Henry Bay, Denman Island (File #141213) was granted approval by MFLNRO and DFO in 2012, for a huge industrial aquaculture operation (40 rafts) prior to getting rezoning by local government. It commenced commercial activity in 2013. Salish Sea Farms is a corporation owned by the same entity. The new applications that lie within the Denman Island Trust zoning jurisdiction are in areas zoned W1 Conservation Waters, which does not allow aquaculture activities. Rezoning is clearly a requirement as stated in your application form and conditions of licence. Tenures should not be granted when these requirements are not met.
- Lambert Channel and Henry Bay in Baynes Sound are some of the most

important herring spawning areas in BC. An impact and assessment study on herring spawning needs to be done prior to any approval of such huge tracts of important marine areas for industry. We believe that if these Applications are approved, it will create conflict issues with the commercial herring fishery, such as entanglement of gear and nets and will destroy herring spawning habitat.

- It is public knowledge that these applications areas are prime wild geoduck areas that are crucial to the continued success of the Strait of Georgia wild geoduck fishery. Loss of this area would jeopardize this sustainable fishery. These applications would give the applicant access to harvest wild geoducks without any ability to distinguish them from cultivated geoduck and there would be no way to monitor or limit this.
- The public also wonders about the capacity to produce seed for such a huge area in Baynes Sound. Since planting, growing, and harvesting geoducks takes 8-12 years, it creates further suspicion that the Applicant will be focused on harvesting wild geoduck to full capacity until the 8-12 year period is reached.
- 61% of the critical bird habitat is under predator netting on the west side of Denman Island and the east side of Vancouver Island. Baynes Sound is a globally important migratory bird overwintering feeding area which has already been overly industrialized.
- Exclusion predator netting over the clams will trap and kill herring and other marine animals, and create entanglement hazards for all other commercial users i.e. herring fleet, prawn fleet, fishing fleet, crab fleet, recreation fishers, partners, crabbers, etc.
- Geoduck aquaculture planting and harvesting method with high power hoses is extremely destructive to the marine habitat.
- There are many other harmful practices in the aquaculture industry such as driving on the beach, beach modification, and killing of 'predators' (starfish, moon snails and crabs).
- There will be an increase in plastic debris leeching into the marine environment as well as increased garbage debris in Baynes Sound.
- The Applications areas are not appropriate as they are adjacent to treasured local parks, recreational, anchorage and residential areas, and will devalue our tourism economy.
- There would be a dramatic drop in real estate values along these tenures since these areas would become a commercial aquaculture zones.
- There is no mention of sea cucumbers in the ad in the paper. However, there are clearly bags of oyster shells for sea cucumber nurseries in each of the Applications. One wonders if the identification of the species as "sea cucumbers" intentionally left off as the species in the ad which appeared in our local papers. We believe the consultation process is flawed if people are not aware that sea cucumbers are part of the application.
- There is no DFO policy for sea cucumber aquaculture, except that sea cucumber ranching is not allowed. The Province has clearly stated there

is a harmonization process in place, whereby DFO and the Province will proceed together in the approval process. Given that DFO is not approving sea cucumber applications, why is the Province considering this application?

- Scientific evidence clearly indicates that the culture of sea cucumbers could present a risk to herring spawn in the impacted areas. Estimated daily rations of these animals to be about 9000 eggs/d. (Haeghele) (1993)
- 90% of the coastline of Baynes Sound is under shellfish tenure. How much is too much? There should be a moratorium on further expansion and on both deep water and intertidal geoduck cultivation until independent, long-term, peer reviewed research is conducted on its potential impacts on the marine ecosystem, and other stakeholders.
- In a nutshell, these Applications are too expansive and are in the wrong place.

Thank you for considering all of the above concerns. Please do everything possible to stop this madness.

Sincerely,

Michael and Selinda White
6225 Lacon Road
Denman Island

P.S. This letter also mailed to the BC Manager of Aquaculture

Letter of Opposition to Salish Sea Farms Ltd. Applications

To: BC Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC V9N 5M6
Email: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)
File #1414126 (NE Side of Denman Island)

I oppose the application for License of Occupation for Aquaculture (geoduck on bottom) for the following reasons:

- a) Over 90% of the western inter-tidal coastline of Denman Island is occupied by the shellfish industry, and has now expanded to the sub-tidal area. There must be no further expansion of the industry in these areas surrounding Denman Island. There is already too much for a Trust Island whose unique amenities and “marine” environment is supposed to be preserved and protected for the benefit of all B.C. people – not for the exclusive use of the shellfish industry.**
- b) Much of the inter-tidal area is already covered by netting, creating a serious hazard for boaters and swimmers. Boaters have had their motors caught in the netting, and swimmers are an accident waiting to happen. There are no warnings of the danger of being caught in netting that is not properly secured and floats at mid and high tide and often not visible. This licence of Occupation would simply add to an area already overwhelmed with too much industry that is currently not adequately inspected and controlled.**
- c) The process of approval of applications should be changed. If re-zoning is required as a condition of licence, it should be applied for and approved by Islands Trust before approval is sought by DFO and MFLNRO. Without Islands Trust approval, a tenure is not legal. This is the current situation in Henry Bay (file # 141213).**
- d) If areas are zoned W1 Conservation Waters they should remain W1 and not be re-zoned for aquaculture. Otherwise, what is the point of zoning specific areas for conservation if they can be easily changed for commercial activity. It is apparent the industry does not believe it is necessary to apply for re-zoning if their application is in a W1 Conservation area as evidenced by the above mentioned tenure in Henry Bay (file # 141213). 14 of 42 rafts have already been located and the industry operating there without the necessary re-zoning approval by Islands Trust.**
- e) Geoduck planting and harvesting by using high power hoses has a negative impact on the surrounding marine environment. If plastic tubing is used in the seed planting process it will add one more area where plastic debris will increase in Baynes Sound. Already 2-4 tons of garbage (over 90% from the shellfish industry) is gathered on our ADIMS (Association for Denman Island Marine Stewards) annual beach clean-up.**

These are but a few of the reasons for opposing the current applications for geoduck aquaculture in Baynes Sound, specifically Henry Bay. There seems to be no recognition of

Denman Island as a “Trust Island” whose mission is “to preserve and protect its unique amenities and environment”. In this case it is the marine environment that needs protection. Neither the shellfish farmers nor the government seem to represent these important unique environmental interests.

Patricia J. McLaughlin
7161 Komas Road
Denman Island, B.C., V0R 1T0

***Signature**

 P.J. McLaughlin

***Print Name** _

Patricia McLaughlin_____

***Address** _7161 Komas Road, Denman Island, B.C., V0R
1T0_____

(add second page for any further opposition statements)

List of CCs

cc: Kathy Evans: Aquaculture Manager (MFLNRO) kathy.evans@gov.bc.ca
cc: Bruce Jolliffe- CV Area "A" Director bjolliffe@comoxvalleyrd.ca
cc: The Honourable Don McRae - MLA, don.mcrae.mla@leg.bc.ca
cc: The Honourable John Duncan - MP, john.duncan@parl.gc.ca,
cc: The Honourable Gail Shea – MP Minister Fisheries & Oceans gail.shea@parl.gc.ca
cc: March Klaver - Senior Aquaculture Advisor, DFO march.klaver@dfo-mpo.gc.ca
cc: Michelle Manning - Aquaculture Management DFO michelle.manning@dfo-mpo.gc.ca
cc: Diana Trager- Aquaculture Management Division, DFO, diana.trager@dfo-mpo.gc.ca
cc The Honourable Steve Thomson, MLA, Minister of FLNRO steve.thomson.mla@leg.bc.ca
cc: Dennis Chalmers - Fisheries Management Officer BC dennis.chalmers@gov.bc.ca
cc: David Graham - Islands Trust, Denman Island Trustee dgraham@islandstrust.bc.ca
cc: Laura Busheikin -Islands Trust, Denman Island Trustee lbusheikin@islandstrust.bc.ca
cc: Peter Luckham, Denman Island LTC, Chair pluckham@islandstrust.bc.ca

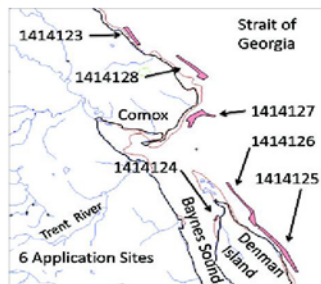
Land Act: Notice of Intention to Apply for a Disposition of Crown Land

Take notice that **Salish Sea Farms LP of Comox, BC**, intends to make six applications to Ministry of Natural Resource Operations (MFLNRO), West Coast Service Centre, for a **Licence of Occupation – Shellfish** (Geoduck on bottom) situated on Provincial Crown lands located within the core territory of the K'omoks First Nation.

The following Land File Numbers have been established for the applications: **1414123, 1414124, 1414125, 1414126, 1414127, 1414128**. Written comments concerning these applications should be directed to the Manager, Aquaculture, Ministry of Forests, Lands and Natural Resource Operations 2500 Cliffe Avenue, Courtenay, BC, V9N 5M6, or emailed to: **AuthorizingAgency.Nanaimo@gov.bc.ca**. Comments will be received by MFLNRO until November 28, 2013. MFLNRO may not be able to consider comments received after this date. Please visit our website:

<http://arfd.gov.bc.ca/ApplicationPosting/index.jsp>
for more information.

Be advised that any response to this advertisement will be considered part of the public record. For information, contact the FOI Advisor at the Ministry of Forests, Lands and Natural Resource Operations regional office.



Letter of Opposition to Salish Sea Farms Ltd. Applications

To: B.C. Manager Aquaculture (MFLNRO)
Ministry of Forests, Lands & Natural Resource Operations
2500 Cliffe Avenue, Courtenay, BC, V9N 5M6
E-mail: AuthorizingAgency.Nanaimo@gov.bc.ca

To: Manager, Aquaculture (MFLNRO)

Re: Applications within Denman Island Trust Zoning Jurisdiction:
File#1414124 File (Henry Bay), File#1414125 (Komas Bluff East Denman Island), File#1414126 (NE side of Denman Island)

And

Re: Applications within Comox Valley Regional District Jurisdiction:
File#1414123 (S. Seal Bay), File#1414127 (Lazo Point), File#1414128 (NE Kye Bay)

We oppose the applications for License of Occupation for Aquaculture (Geoduck on bottom) for the following reasons:

- Applications are in W1 Conservation Waters and should not be industrialized, particularly to the extent of these applications.
- W1 Conservation Waters zoning should not be changed to allow commercial activity.
- Re-zoning is a requirement for granting licences, but tenure has been granted in Henry Bay in W1 Conservations Waters without re-zoning.
- Henry Bay is an important anchorage for boats and should remain free from aquaculture clutter.
- Geoduck planting and harvesting is invasive and destructive to the marine environment.
- Predator netting already covers huge areas of the west side of Denman Island and the east side of Vancouver Island and has extremely negative effects for wildlife.
- 90% of the Baynes Sound coastline is under shellfish tenure, why should we have to put up with more?



Peter Mason



Helen Mason

7761 Komas Road, Denman Island, B.C., VOR 1T0

From: Kerri davis [kerridavis61@gmail.com]

Sent: November 20, 2013 8:10 AM

To: AuthorizingAgency.Nanaimo@gov.bc.ca

Cc: kathy.evans@gov.bc.ca; john.duncan@parl.gc.ca; bjolliffe@comoxvalleyrd.ca; don.mcrae.mla@leg.bc.ca; gail.shea@parl.gc.ca; march.klaver@dfo-mpo.gc.ca; michelle.manning@dfo-mpo.gc.ca; diana.trager@dfo-mpo.gc.ca; steve.thomson.mla@leg.bc.ca; dennis.chalmers@gov.bc.ca;

David Graham; Laura Busheikin

Subject:

TO: Manager

Aquaculture (MLNRO)

RE: File# 1414124 (Henry Bay, west coast of Denman Island)

File# 1414125 (Komas Bluff, East Denman Island)

Dear Sir, I am writing to express my wholehearted opposition to the applications that have been made (or are about to be made) by Salish Sea Farms Ltd. to develop the areas described above for aquaculture. I am not opposed to the aquaculture industry as it exists at present, but I understand and believe that any further expansion without the necessary environmental assessments would prove to be disastrous to the marine life of this very beautiful and fragile area. I ask you to develop a strict and controlled management program before allowing any more expansion of the aquaculture industry in Baynes Sound and the East coast of Denman Island.

As an upland land owner of the area adjacent to Henry Bay on Denman Island, I admit my interest in the applications being made on the west side of Denman are of special interest to me. I find the fact that aquaculture rafts, owned by Pentlatch Seafoods Co., which have been placed in the area under discussion without any approval or change of zoning laws (as required by the Dept. of Fisheries) to be a flagrant disregard for the law. How did this happen? Can they continue to develop their presence in this area with impunity? Thank you for your time and attention on this matter. Your truly, Kerri Davis and John Andrew

7001 Komas Rd.
Denman Island, B.C.

VOR 1T0

From: ChinaMoon B&B [info@chinamoon.ca]
Sent: November 21, 2013 12:55 PM
To: Laura Busheikin
Subject: OPPOSED TO SALISH SEA FARMS APPLICATIONS

**A LETTER OF OPPOSITION TO SALISH SEA FARMS ltd.
APPLICATIONS**

November 22, 2013

TO: Kathy Evans (Aquaculture Manager (MFLNRO) <kathy.evans@gov.bc.ca>

CC: Bruce Jolliffe-CV Area A Director <bjolliffe@comoxvalleyrd.ca>
TheHonorableDonMcRae-MLA <don.mcrae.mla@leg.bc.ca>
TheHonorableJohnDuncan MP <john.duncan@parl.gc.ca>
TheHonorableGailShea-MP Min of Fisheries & Oceans <gail.shea@parl.gc.ca>
MarchKlaver-Senior Aquaculture Advisor DFO <march.klaver@dfo-mpo.gc.ca>
MichelleManning-Aquaculture Management DFO <michelle.manning@dfo-mpo.gc.ca>
Diana Trager-Aquaculture Management Div. DFO <diana.trager@dfo-mpo.gc.ca>
TheHonSteveThomson, MLA, Min/FLNRO <steve.thomson.mla@leg.bc.ca>
DennisChalmers, Fisheries Mgt Officer BC <dennis.chalmers@gov.bc.ca>
DavidGraham-- Islands Trust-Denman Is.Trustee <dgraham@islandstrust.bc.ca>
LauraBusheikin- Islands Trust Denman Is.Trustee <lbusheikin@islandstrust.bc.ca>
PeterLuckham, Denman Is. LTC, Chair <pluckham@islandstrust.bc.ca>
Denman Island Marine Stewardship Committee <dmsave@telus.net>

Dear Sir or Madam,

As a long-time resident of Denman Island and member of the Denman Island Marine Stewardship Committee I am writing to urge you to deny the applications for a disposition of Crown Land being put forward by Salish Sea Farms of Comox B.C.

There is a list of compelling reasons why granting an application for geoduck and sea cucumber harvesting would be ill-advised, and I know that many of my fellow islanders have written to you detailing the prospective damage to the environment inherent in the geoduck industry. I am not going to specify each and every reason against granting further expansion of the aquaculture already saturating Denman Island, Baynes Sound, Lambert Channel and beyond; I just want to say that the goal of short-term profits has a way of generating long-term damage to a part of the world that has already been compromised by the depredations of man.

I'm sure you are aware of the scope of aquaculture already burdening our shores-- some of which is in DIRECT CONTRAVENTION to the zoning restrictions of W1 Conservation Waters. In approving further applications you will become complicit in what many feel to be an environmental abuse-- and a blatant disregard for future generations who will surely wonder how their forebears could have been so short-sighted.

You were elected to act for the public good-- please show the strength of character necessary to oppose corporations who manifest the two worst characteristics of *homo sapiens*, that is to say: greed and stupidity.

Respectfully,

Oliver Cobb 3700 Lake Road Denman Island, B.C. V0R 1T0 11/22/13

Typed copy of a hand written letter for distribution of ccs and legibility only.

From:

Peter Karsten

5741 Stanehill Place

Denman Island, B.C., V0R 1T0

(Copy of a hand written letter)

To:

Ms. Kathy Evans, BC Manager Aquaculture (MFLNRO)

Ministry of Forests, Lands & Natural Resource Operations

2500 Cliffe Avenue, Courtenay, BC, V9N 5M6

Email: AuthorizingAgency.Nanaimo@gov.bc.ca

November 21, 2013

Re: Applications within Denman Island Trust Zoning Jurisdiction:

File # 1414124 File (Henry Bay) # 1414125 (Komas Bluff East Denman Island)

File #1414126 (NE Side of Denman Island)

Re: Applications within Comox Valley Regional District Jurisdiction File #1414123

(S. Seal Bay), File #1414127 (Lazo Point) File #1414128 (NE Kye Bay)

Dear Ms. Evans

Thank you for the opportunity to make my views known.

I oppose the above applications for License of Occupation for Aquaculture for the following reasons:

Environmental concern:

1. The tenures' expanse and technology pose threats to the marine ecosystem which has to my knowledge not been sufficiently researched and assessed to consider it harmless to the environment. The natural history of all of affected species is not known. It may include species which are not yet described and recorded in this region.
2. The affected area is critical for the wintering of migratory birds. We are concerned that the sequestration of nutrients and fat reserves to successfully reproduce will be compromised by the cultivation method.
3. Single species cultivation displaces biodiversity in marine (and terrestrial) habitats. The expanse of the tenure and is unacceptable for that reason.
4. Introduction of plastic material into natural, complex biotopes conflicts with habitat conservation principles.

Economic concerns:

1. The proposed cultivation of geoduck (sea cucumber expected to follow) interferes with the harvesting of sustainable herring and wild geoducks harvests.
2. The increasing aquaculture industry diminishes eco-tourism and community recreation opportunities. These are benign and renewable resources supporting economic diversity, quality of life for B.C. residents and visitors and a multitude of service related businesses.*
3. The expanse of the tenures conflicts with the concept of sharing the common natural resources by the wider community.
4. Degradation of the residential area depresses the real estate values and market Including related tax revenues.

Ethical concern:

1. The geoduck and sea cucumber cultivation will unfairly compete with the herring fisheries and wild geoduck harvests due to lack of stringent scientific oversight and enforceable regulations of landed harvests.
2. Allowing one private industry to occupy and exploit extraordinary large size of tenures at the cost of fair business competition, functionality of the marine life system, "soundscape" and esthetic landscape view sheds does not serve the common good.
3. The harvest of geoducks does not serve the production of food with high nutritional value and is driven by unproven attributes which contribute to the extinction of charismatic species globally. I see a conflict with Canada's scientific status by promoting geoduck harvest based on economic gains alone at the risk of degrading our healthy and natural environment.
4. The apparent lack of recognizing the W1 Conservation Waters and zoning application process of the Island Trust is irreconcilable.

*) I, together with many Islanders, have invested and still invest a significant amount of volunteer effort into the creation and maintenance of the Morning Beach Park (MBP) at Komas Bluff and other CVRD parks. This is a unique place that has one of the very few, small sandy beaches on Denman Island which are suitable for family recreation. Visitor numbers have sharply increased since its opening in the fall of 2011 and exceed 1000 annually. The total economic impact (sum of direct, indirect and induced) may have a multiplier of >\$300 \$ per visitor.

I appeal to you to reject the above applications.

Sincerely,

Peter Karsten (signed)

List of CCs

cc: Bruce Jolliffe- CV Area "A" Director bjolliffe@comoxvalleyrd.ca
cc: The Honourable Don McRae - MLA, don.mcrae.mla@leg.bc.ca
cc: The Honourable John Duncan - MP, john.duncan@parl.gc.ca,
cc: The Honourable Gail Shea – MP Minister Fisheries & Oceans gail.shea@parl.gc.ca
cc: March Klaver - Senior Aquaculture Advisor, DFO march.klaver@dfo-mpo.gc.ca
cc: Michelle Manning - Aquaculture Management DFO michelle.manning@dfo-mpo.gc.ca
cc: Diana Trager- Aquaculture Management Division, DFO, diana.trager@dfo-mpo.gc.ca
cc The Honourable Steve Thomson, MLA, Minister of FLNRO steve.thomson.mla@leg.bc.ca
cc: Dennis Chalmers - Fisheries Management Officer BC dennis.chalmers@gov.bc.ca
cc: David Graham - Islands Trust, Denman Island Trustee dgraham@islandstrust.bc.ca
cc: Laura Busheikin -Islands Trust, Denman Island Trustee lbusheikin@islandstrust.bc.ca
cc: Peter Luckham, Denman Island LTC, Chair pluckham@islandstrust.bc.ca
cc: ADIMS

From: David Critchley [denmanlaw@gmail.com]
Sent: November 21, 2013 2:40 PM
To: David Graham; Peter Luckam; Laura Busheikin
Subject: Fwd: Geoduck Denman/ Article in today's Record newspaper

Dear Trustees,

I note that the attached article states an expectation of starting operations next Spring. Given that time-frame, it can be inferred that the company has no intention of seeking a change in zoning (which I understand is Conservation). There also is mention of the activities being "within their traditional territories" and "in their core territory". It appears there could be a collision of claimed jurisdictions here. I hope that you are taking, and will take, all possible steps to assert the mandate of the Islands Trust in these matters.

Best regards,
David Critchley

----- Forwarded message-----

K'ómoks company hopes to start preparing in spring to grow geoducks

By [Renee Andor - Comox Valley Record](#)

Published: November 18, 2013 2:00 PM

Salish Sea Farms Ltd. hopes to start work this spring in preparation for geoduck cultivation, according to Richard Hardy.

Salish Sea Farms submitted applications for tenure in September to the provincial Ministry of Forests, Lands and Natural Resource Operations, totalling an area over 500 hectares in Comox Valley waters. Hardy, representing K'ómoks First Nation's Salish Sea Farms, says the applications for sub-tidal aquaculture licensing to the federal Department of Fisheries and Oceans focus on geoduck farming.

Although the DFO is updating its management approaches for geoduck aquaculture, Hardy hopes the applications move along fast enough for work to start next year.

"I'm anticipating us being able to get out and work on our sites sometime in the spring — that's the goal of the K'ómoks First Nation," Hardy says. "We feel that we have the support of the Province of British Columbia with regards to moving forward on our initiative; we're just trying to gain the support from the Department of Fisheries and Oceans."

The application areas include 55.75 hectares south of Seal Bay; 93.7 hectares northeast of Kye Bay; 105.3 hectares at Willemar Bluff; 7.3 hectares in Henry Bay; 135.7 hectares northeast of Denman Island; and 118.7 hectares on the east side of Denman Island. All application areas are sub-tidal, and Hardy notes the cultivation would occur 30 feet below the surface of the water.

According to plans in the applications, PVC piping and predator netting would be used to protect the geoducks for the first two years of their growth cycle.

Hardy notes geoducks take eight to 10 years to grow to size and, if the project moves ahead, the investment Salish Sea Farms will make before seeing profits is huge.

"We're looking at setting up our crop rotations where you're doing 50 hectares annually that you're harvesting and reseeding," he says, noting Salish Sea Farms expects to spend about \$10 million annually for the first eight to 10 years. "So, there's a substantial investment by Salish Sea Farms for \$100 million before we start generating any significant revenues."

Once up and running, he expects Salish Sea Farms' geoduck cultivation to generate \$50 million annually, pointing out indirect revenue generated for the local economy should be double that — \$100 million per year.

K'ómoks First Nation started growing oysters and clams via Pentlatch Seafoods Ltd. about 10 years ago, and took over a seafood processing plant this year, via Salish Seafoods. Hardy says cultivating geoducks is the next step in KFN's plans.

"It's the K'ómoks First Nation again managing the marine resources within their traditional territory, and most notably, right in their core territory," he says.

While Hardy says the current applications for aquaculture licences to the DFO focus on geoducks, the applications for tenure refer to sea cucumber cultivation, too, and Hardy said sea cucumbers are a possibility for Salish Sea Farms in the future.

"Anybody that's involved in the aquaculture industry, I think everybody looks at what opportunities are available to them with regards to species," he says. "I think once DFO has developed policies revolving around sea cucumbers then yes, we would probably look at including sea cucumbers as a species on our tenures."

DFO is updating its policy around sea cucumber aquaculture, according to a DFO spokesperson, and will not approve any sea cucumber aquaculture licence applications, until this work is complete. The policy work is expected to be complete in 2014.

MFLNRO will accept comments from the public about the applications until Nov. 28. Written comments can be sent to the Manager of Aquaculture at MFLNRO, (2500 Cliffe Ave. Courtenay, B.C. V9N 5M6), or via e-mail to AuthorizingAgency.Nanaimo@gov.bc.ca.

• • •

Some Friends of Baynes Sound Society concerns:

- Worry that there is too much aquaculture in Baynes Sound — want moratorium on expansion until more research completed, such as research on water quality, acidity levels and temperature;
- Tenure sizes are large compared to average tenure size on B.C. coast;
- Potential impact to herring spawn area and conflict with commercial herring fishery;

- Potential increase in plastic debris leeching into marine environment and increased industry debris.

For more about FOBSS concerns, visit <http://friendsofbaynessound.wordpress.com>.

writer@comoxvalleyrecord.com

--

Association for Denman Island Marine Stewards

From: Ralph S. McCuaig [rmccuaig@telus.net]

Sent: November 16, 2013 8:08 PM

To: David Graham; Laura Busheikin; Peter Luckham

Cc: Gang Margie-honey; Palmer Simon; info@chinamoon.ca; s.chandraherbert.mla@leg.bc.ca; French Sara - Robert; Jolliffe Bruce

Subject: Visitor Accommodations & cooking facilities

2013-11-16

Denman Island LTC

Dear Trustees,

I was out of the country & not able to attend the October, 2013 LTC meeting on Denman Island. Apparently Vacation Accommodation cooking facilities was separated, by way of a motion, from in-law suites & secondary suites in terms of bylaw modifications & the LTC priorities list.

As tourism is the second largest economic activity on Denman Island I feel allowing cooking facilities in Vacation Accommodation rentals should be a priority issue. If visitors to our island cannot find/prepare food when they visit our island, they are not likely to return. Since visitor services contributes, possibly, as much as half a million dollars annually to Denman's economy, this would have a most negative effect on the island's economic/social health.

I request that the Denman LTC ensures, with a formal motion, that the issue of guest cooking facilities remains on the LTC's works/projects list for the 2014-2015 year. I remind you 22 Visitor Accommodation operators, 45 islanders at a public meeting and 230 signatures from Denman Islanders on a petition, are in support of this issue being dealt with through the requested changes to our bylaws, LUB & OCP.

I would like to hear your individual views on this very important topic. I will be attending the November LTC meeting & will bring it up during the Town Hall session of that meeting.

Sincerely,

Ralph S. McCuaig

Hornby-Denman Tourist Services Society

Denman Resident

*"The only limits in our life are those
we impose on ourselves."*

- Bob Proctor

Islands Trust
 LTC EXP SUMMARY REPORT F2014
 Invoices posted to Month ending November 2013

Late Item

11.3.2

615 Denman	Invoices posted to Month ending November 2013	Budget	Spent	Balance
65000-615	LTC "Trustee Expenses"	1,100.00	374.07	725.93
LTC Local				
65200-615	LTC - Local Exp - LTC Meeting Expenses	2,500.00	2,148.17	351.83
65210-615	LTC - Local Exp - APC Meeting Expenses	1,000.00	0.00	1,000.00
65220-615	LTC - Local Exp - Communications	500.00	10.66	489.34
65230-615	LTC - Local Exp - Special Projects	2,000.00	511.61	1,488.39
65240-615	LTC - Local Exp - Miscellaneous	500.00	0.00	500.00
TOTAL LTC Local Expense		<u>6,500.00</u>	<u>2,670.44</u>	<u>3,829.56</u>
Projects				
73001-615-3001	Denman RAR	42,000.00	0.00	42,000.00
TOTAL Project Expenses		<u>42,000.00</u>	<u>0.00</u>	<u>42,000.00</u>