

NSARB 2023-001

NOVA SCOTIA AQUACULTURE REVIEW BOARD

Applications by KELLY COVE SALMON LTD. for a BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES and LEASES for the cultivation of ATLANTIC SALMON (*Salmo salar*) - AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

Affidavit of Thomas Raddall

I, Thomas Raddall, of Liverpool, Regional Municipality of Queens, Nova Scotia, affirm as follows:

1. My wife Cathy and I live at [REDACTED] at Mersey Point, just outside the Town of Liverpool. Our home and property overlook the proposed site AQ#1433 for Cooke Aquaculture/Kelly Cove Salmon's ("KCS") industrial aquaculture operation.
2. I am a dentist by profession. I began practicing in Liverpool with my father in 1987 and have co-owned and operated the Elmwood Dental Clinic located at [REDACTED] in Liverpool since 1993.
3. My family immigrated to Liverpool several generations ago in the 1920s, and I was born and raised here. I have lived in Liverpool my entire life, except for eight years when I moved away to pursue my education at Dalhousie University in Halifax. I moved back upon graduation and have lived in Liverpool for the last 36 years.
4. I am an active member of the intervenor Protect Liverpool Bay Association ("PLBA").

My family home

5. Cathy and I built our home in Liverpool in 1991. Our home is located at [REDACTED] and sits on 7.1 acres of land (exhibit). I attach as **Exhibit A**, which is a printout from Google Maps showing the location of our property. **Exhibit B** is a screenshot from Viewpoint.ca which shows a "map view" our property, which can be identified by our civil number [REDACTED] on our property parcel. I also attach (as **Exhibit C**) a Viewpoint satellite view of our property. As shown on the above exhibits, our property includes a small beach at Mersey Point on Liverpool Bay. This beach is located about 600-700 metres from Kelly Cove Salmon Ltd.'s ("KCS")'s proposed open net pen salmon

farming site AQ #1433. If built, that site will be just offshore from Mersey Point, and directly in our view. We can already see KCS's current Coffin Island site (AQ#1205) from our back deck and, if it is built, the AQ#1432 site will also be visible from our home.

6. When we bought our property, it was a vacant lot that included only 5 acres of land. We did not have a lot of money at the time but took out a loan at a 15.5% interest rate to be able to buy the land and build our home. We began building our home and moved in when it was only partially completed. We did this because we love our home's location, particularly the proximity to the ocean, to the Town of Liverpool, and to my office (which is only 3 km away). **Exhibit D** is a photograph of our house that a friend of ours took using a drone camera in about September 2019.
7. A few years after we bought our land and built our home, a neighbor, [REDACTED] offered to sell us her waterfront property located next to ours. My wife and I decided to take advantage of the opportunity, and took on the risk of high-interest debt to buy [REDACTED] land and help make our dream of a waterfront home in Liverpool come true. Over the years, we have landscaped our property to improve the views from our home, including removing some trees that were detracting from our view of the water.
8. We have also renovated our home over the years to increase our enjoyment of the home and the value of the property. We recently built a wrap-around deck that cost \$40,000.
9. We are very concerned that if the expansion at the Coffin Island site and the new sites AQ#1433 and AQ#1432 are approved, our property value will suffer. Particularly, we are worried that we will not be able to recoup the significant investment we've made in our property.
10. We deliberately built our home to have direct views of Liverpool Bay and Coffin Island. We built a deck that has a firepit and beautiful views, where we often spend time enjoying the ocean air. Attached as **Exhibits E and F** are photos I took on August 21, 2016 and August 15, 2021 respectively. They are both views from our deck. Exhibit F shows the Bluenose II entering Liverpool Bay, very close to or within the footprint proposed for AQ#1433. My family and I have enjoyed views of the ocean from our home for over three decades, and the waters of Liverpool Bay have been the backdrop of many family memories.
11. **Exhibit G** is a photo of the beach on our property that I took on December 19, 2023. We spend a significant amount of time on our beach and on many occasions have seen debris that has washed up on the shore, particularly during storms. Part of my property, between the forested area and the beach, floods during storms and turns marshy and water and debris accumulates in this area. The solid red line on the aerial photograph of

our property **Exhibit H** indicates where ocean debris regularly accumulates on my property, and this area continues on to the neighbouring property, as shown by the dotted red line. Debris and even beach rocks are sometimes pushed high up on to my property during severe weather. **Exhibit I** is a photograph taken on December 19, 2023 of a piece of debris (indicated by an arrow) that lies approximately 80 or 90 feet from the regular water line.

12. I am worried that if KCS's projects are approved, fish farm debris, feces, and uneaten feed from nearby AQ#1433 and the other sites will be pushed by wind and wave action on to our beach and into the marshy area, and accumulate there. I am concerned that this will cause odours, and result in aesthetically unpleasing debris marring our property and the pristine views from my home.
13. I have reviewed the Fisheries and Oceans report entitled DFO Maritimes Region Science Review of the Proposed Marine Finfish Aquaculture Boundary Amendment and New Sites, Liverpool Bay, Queens County, Nova Scotia (Science Response 2022/039). My entire property falls within the Predicted Exposure Zones for AQ#1433 set out in Figures 5 and 7 in that report (see excerpts from pages 13 and 16 respectively attached as **Exhibit J**). It is of great concern to me that my property and the beaches and waters used by me and my family would be within the predicted exposure zones for fish feces from 660,000 fish, and for chemicals that are used, or might be used, in the fish farming process that could be conducted so close to my home.

Impacts of the current KCS operation at Coffin Island

14. From our home, we have a direct view of the current Coffin Island fish farm site (AQ#1205). When KCS's employees are working at the Coffin Island site at night, they use bright lights that can be seen from our home and are sometimes disruptive.
15. Of greater concern to me is that AQ#1433 would be located very close to my home, just offshore at Mersey Point, and its lights, and the odours generated by that site will be intrusive and make it difficult to live nearby. When I still owned a boat, I would sometimes drive past the existing Coffin Island site, and often smelled very unpleasant odours coming from that site. As well, we will be subjected to noise from the diesel feeding barge. Together, I believe these problems will interfere significantly with our ability to use and enjoy our property and our beach.

My recreational uses of Liverpool Bay

16. One main reason that I chose to return to Liverpool after university is the natural beauty that Liverpool Bay has to offer, making Liverpool an ideal place for Cathy and I to raise our two sons. My family and I have regularly participated in recreational activities in

and around Liverpool Bay for over 30 years. These activities include spending time at the beach, swimming, fishing, and boating.

17. My family and I spend a lot of time walking on the various beaches around Liverpool Bay in all seasons. These beaches include the beach located on my property, Beach Meadows Beach, and Carter's Beach near Port Mouton. I have spent significant amounts of time on the beaches of Liverpool Bay since I was a child.
18. I have many fond memories of swimming in Liverpool Bay. My wife and I taught our children to swim on the beach in front of our home, and I still spend lots of time on our beach myself, and also with my family when my children are in town.
19. I am worried that the increased waste from AQ#1433, which would be located adjacent to our property, and the waste from AQ#1205x and AQ#1432, will pollute the water at the beaches in and around Liverpool, making it unsafe or unpleasant to enjoy exploring my own waterfront and for swimmers generally in Liverpool Bay.
20. I have been fishing recreationally in Liverpool Bay my entire life. When my children were young, I would often take them out on our boat fishing for mackerel, cod, and pollock. Sometimes friends would join us. We would release everything we caught, and these experiences with friends and family are very important to me. We would fish just off Mersey Point, in the precise location where KCS is now seeking to build and operate site AQ#1433. Attached as **Exhibit K** is a photo of my son I took in 2005, on our boat, fishing in that very spot. As that location is a prime fishing spot for mackerel, many other people also fish there, and I have seen many other people fishing in that same spot many times over the years, including in summer 2023.
21. In previous years, when I owned my own boat, I would take my family out boating as often as I could. My boat was in the water from May until October every year and was the backdrop of many fun family memories both within the Bay and beyond. These memories including long days out on the water, whale watching, and pulling inflatable tubes behind the boat for my kids.
22. One of my favorite ways to enjoy the beauty of Liverpool Bay is to go out with friends and family, find a good spot, drop anchor, and have a barbecue on the boat. In previous years I would take my family out for barbecues on our own boat, but since I sold my boat my family and I now join friends for barbecues on their boats. One ideal spot we often use for this activity is in the lee near Mersey Point, where there is shelter from the open ocean waves and wind. That spot is the same location where KCS now proposes to build and operate AQ#1433. It will not be possible to enjoy those waters at anchorage in that area any longer if KCS's proposed Mersey Point site is approved.

- 23. Before KCS began their farming operation in Liverpool Bay, I would frequently take my boat and family over to Coffin Island. We would have picnics or just enjoy the natural, untouched beauty of the island. I stopped regularly making this trip to Coffin Island in 2018 because doing so risks getting my boat caught up in all the ropes put out by KCS. I am also nervous to navigate around the Coffin Island site after dusk as it is difficult and dangerous to navigate the buoys and nets without sunlight. I am concerned that the same difficulties and problems with navigation will be present around AQ#1433 and AQ#1432 if they are approved.
- 24. Cathy and I enjoy kayaking and usually kayak in front of the western side of the Bay, in the lee of the prevailing winds. We prefer to stay around the edges of the Bay because the middle of the Bay can be more dangerous and difficult to navigate. Due to the proposed location for AQ#1433, if that site is approved and built off Mersey Point, it will obstruct the main part of the safest and preferred navigation channel and make it much more difficult and dangerous to kayak in those waters, effectively limiting kayaking to the Liverpool side of Mersey Point.
- 25. A dream I have held for many years is to purchase a sailboat and dock it at the Brooklyn Marina to enjoy during my retirement. I have long been interested in sailing; I even crewed on the Bluenose II during the summers of 1980-1982. But, if AQ#1432 and AQ#1433 are approved and built, sailing will be much less enjoyable as it will significantly restrict the area available to small sailboats to maneuver and to navigate in the Bay. As a result, I am holding off on purchasing a sailboat because, if the leases are approved, I would not be able to sail such a boat to my home marina.
- 26. I affirm this affidavit in support of PLBA’s intervention before the Aquaculture Review Board and for no other or improper purpose.

Affirmed before me on this)
 18th day of January 2024)
 at Liverpool, Nova Scotia)
)
)
)
)
)
)
)
)
)
)
)
)
)
)
)
)
)
)
)



 Thomas Raddall

James Gunvaldsen Klaassen
 A Barrister of the
 Supreme Court of Nova Scotia

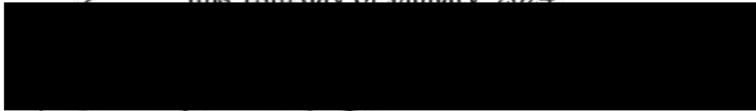
This is Exhibit "A" referred to in the affidavit
of Thomas Raddall, affirmed before me
this 18th day of January, 2024.



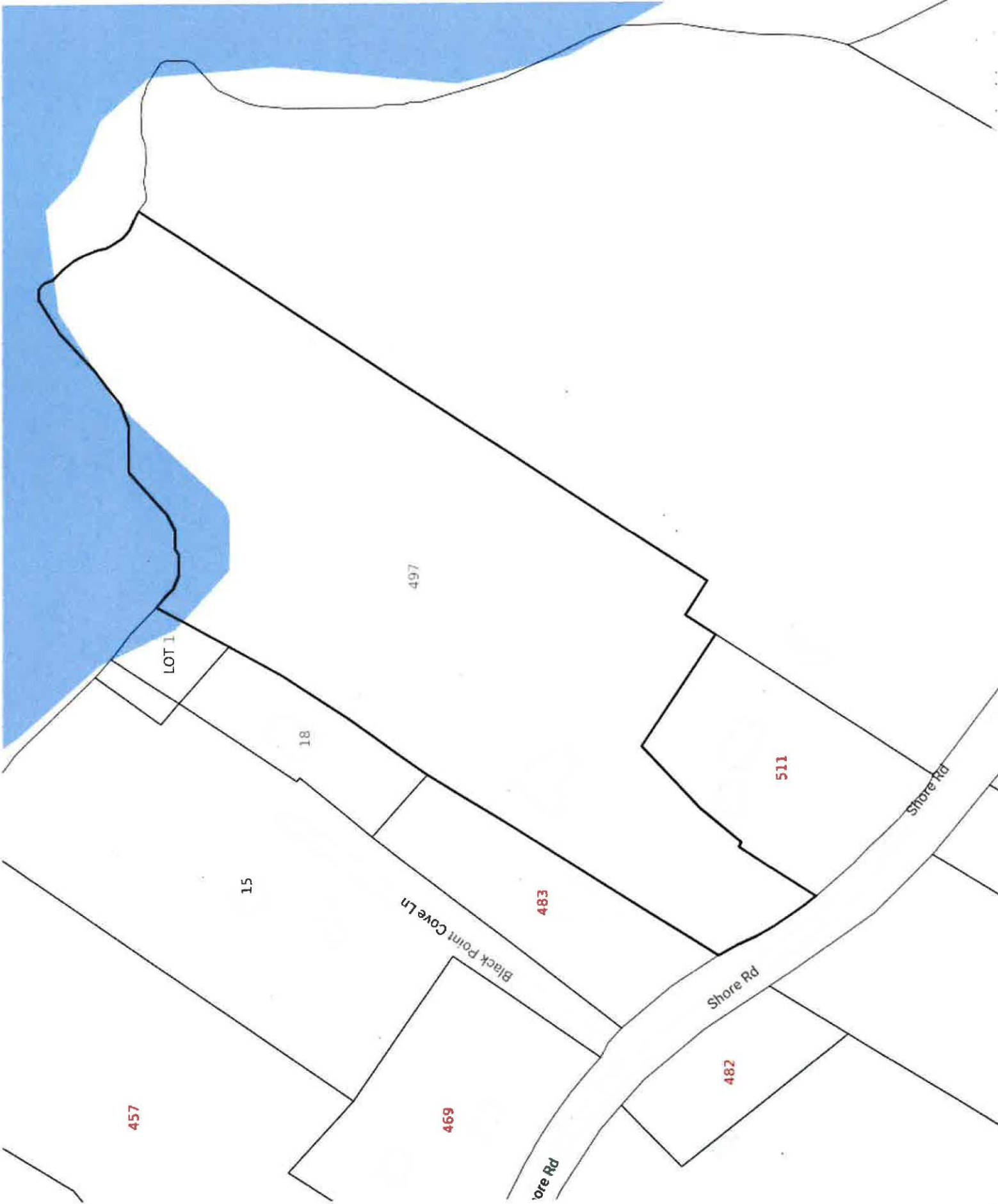
James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "B"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "C"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "D"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia




This is Exhibit "E" referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia




This is Exhibit "F" referred to in the affidavit
of Thomas Raddall, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "G"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen

A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "H"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia




This is **Exhibit "I"** referred to in the affidavit of
Thomas Raddall, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia



This is **Exhibit "J"** referred to in the affidavit of
Thomas Raddall, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia

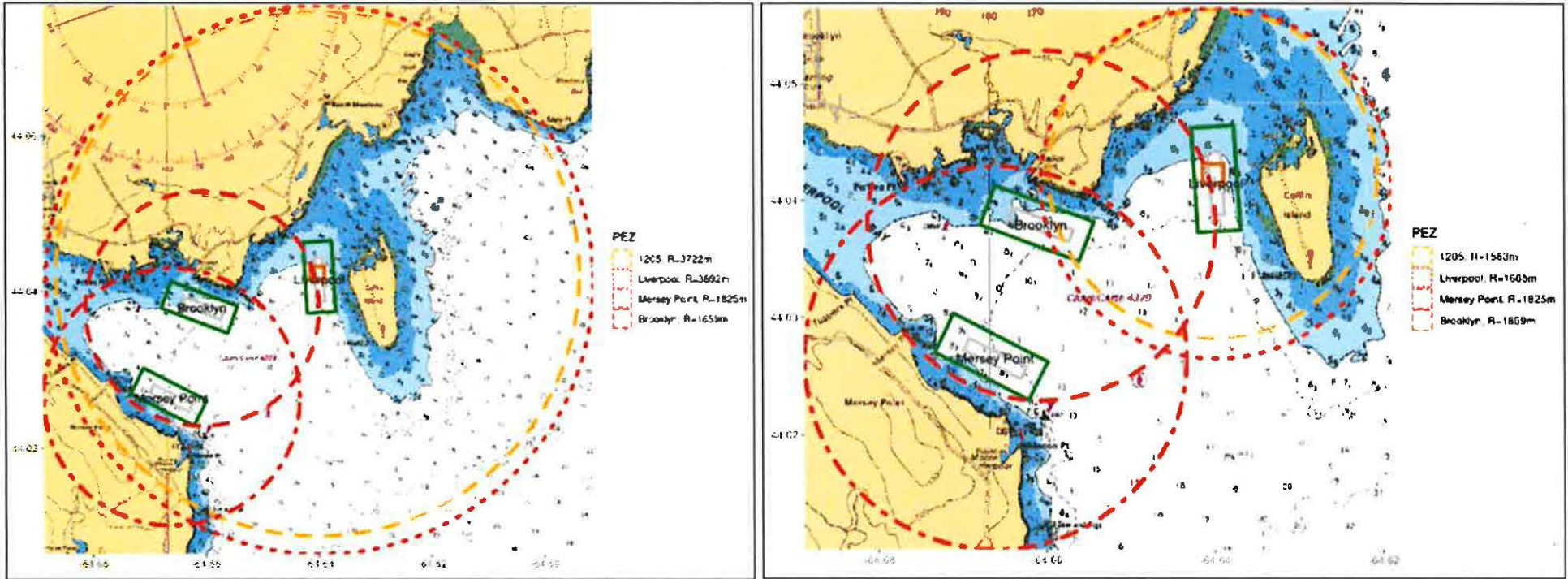


Figure 5. Benthic-Predicted Exposure Zones (PEZs) for the Liverpool (left: including storm event, right: excluding storm event), Mersey Point and Brooklyn proposed sites using the feces minimum sinking rate are shown in red overlaid on CHS chart #4379 (depths shown in fathoms). Cage arrays (grey) and lease boundaries (green) are shown. The existing #1205 Liverpool lease boundary and estimated benthic-PEZ are also indicated in brown and orange, respectively.

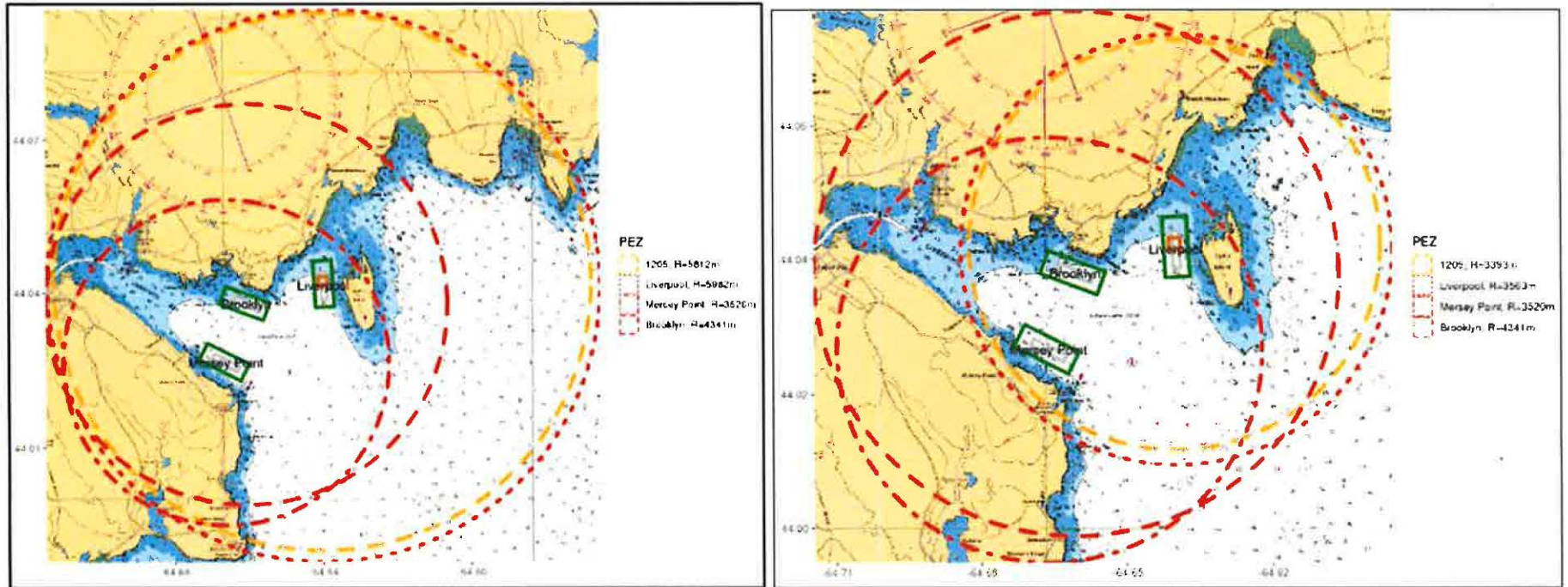


Figure 7. Pelagic-PEZs for the Liverpool (left: including storm event, right: excluding storm event), Mersey Point and Brooklyn proposed sites are shown in red overlaid on CHS chart #4379 (depths shown in fathoms). Net-pen arrays (grey) and lease boundaries (green) are shown. The existing #1205 Liverpool lease boundary and estimated benthic-PEZ are also indicated in brown and orange, respectively.

This is **Exhibit "K"** referred to in the affidavit
of **Thomas Raddall**, affirmed before me
this 18th day of January, 2024.



James Gunvaldsen Klaassen
A commissioner of the
Supreme Court of Nova Scotia

