

Dear Cumberland County Planning Department,

I understand that Cumberland County has placed a moratorium on wind development until its bylaws can better reflect the changing technology affecting current and future wind energy projects. This letter is in response to the Municipality of Cumberland's request for public input.

In drafting changes to the bylaws, I request changes addressing - setback distances, ensuring that funds are available for decommissioning, accountability, regulatory monitoring and a Community Protection Fund.

I would like the setbacks to be at least 5,000 meters to the nearest property line or residence. This distance should help lessen the impact of noise (including infrasound and amplitude modulation), flicker, visual impact, ice throw, and structural failure. These noise concerns from industrial scale turbines have become a concern around the world as wind development has proliferated especially in Europe. Proper setbacks will eliminate the issues many countries are now experiencing from wind turbines. We need to learn from those that have gone before us.

I also request that the issue of decommissioning be addressed by the requirement for a Decommissioning Bond. Currently, there are five wind turbines in Cumberland County which have not been functioning for several years. All proponents should be required to have a bond in place to cover the costs of decommissioning wind turbines. This should not be the responsibility of the tax payer. Nor should the tax payer be required to fund the remediation of any damage done to roads, lands or waterways caused by the construction of the turbines. The Municipality should be the beneficiary in the event that the proponent is unable or unwilling to perform the decommissioning responsibilities.

Another issue is accountability. Currently the option to approve a project lies with the County's Development Officer. In the interest of accountability to the community, there should be a Review Committee comprised of the Development Officer, members of Council, the planning department and the public before granting approval to any wind project.

If approval is given, then as in any development, there should be site inspections done by a qualified surveyor or engineer to ensure that each wind turbine conforms to the approved site plan. These site inspections should be done throughout the construction process - prior to and after the pouring of concrete as well as the installation of the turbines. Inspection reports should be posted for the public record.

The residents of the Municipality of Cumberland should be protected by a Community Protection Fund established by the proponent. This Fund could be a percentage of the project cost and would be held by the Municipality. The purpose of this Fund would be to adjudicate and pay out claimants who establish that they have suffered damage as a result of the failing to meet the stringent standards that the bylaws put forth regarding setback, flicker, noise etc.

Damages could take the form of negative impacts to health, diminished property values, and environment.

Prohibit two or more Wind Turbine Projects (One proponent with multiple turbines and one construction time frame) in close proximity to 5 or more residences where the residences are within 1 km of each other. This will reduce the negative and cumulative impacts on residents from multiple wind projects in a small area. (noise, flicker, health, environment, peace and enjoyment of the land).

Wind Turbines must have an Ambient Degradation Noise Standard no greater than 25 dB(A) as measured at existing residences. WHO recommends 30dB but for rural settings it is recommended to be 25 dB(A).

Municipality of Cumberland's Policy 4-53 of the Municipal Planning Strategy. Council should consider amending the Wind Turbine Restricted Overlay to add the Wentworth Valley as a tourism area and therefore no wind turbines would be permitted in this very valuable and narrow part of the valley.

There are many issues to be considered in the creation of a county's bylaws to address current and future wind turbine projects. The suggestions above consider the issues which most significantly affect residents within the Municipality of the County of Cumberland.

In closing, thank you for the opportunity to be part of the process.

Best regards,

