

Dear all,

I am writing to express my concern with respect to the proposed international industrial wind development projects in the Wentworth Valley Area. This is not the right place for wind turbines.

One of the projects is a 100MW site on Higgins Mountain / Stevens Mountain, on the high ridge from the top of Folly Mountain west of Highway 4 down into the Wentworth Valley. This development would consist of 18 industrial wind turbines that are 190 m (623 ft) high to the tip of the blade. They are twice the height of the tallest building in Halifax, Fenwick Tower; giants compared to those currently operating in our province and each is as high as a 57-story building. A second 100MW industrial wind turbine project is being proposed on property approximately 6kms Northwest of Debert including 16 to 20 industrial wind turbines. This project affects property from the Folly /Hart Lake area southeast of Highway 4, bordered by East Folly Mountain and moving back towards Central and East New Annan. These are projects currently proposed and do not reflect future proposals that would further the risk to the environment and quality of life in our communities.

Many residents of Londonderry, Folly, Wentworth, Westchester, and surrounding areas from Cumberland and Colchester counties support renewable energy and its importance for the environment. However, there are implications with these massive turbines for everything from wildlife degradation, endangered species, interference with all aspects of telecommunication services, huge environmental concerns, and general disregard for the citizens and visitors in this area for the peace and enjoyment of the land, and economic development.

The impact on the Wentworth Valley area would be catastrophic and irreversible.

We have outlined below many of the concerns expressed at the Protect Wentworth Valley Community Meeting held on November 27th and the Higgins Mountain Wind Project Community Meeting held on December 4, 2021 for your review and consideration. In summary, most attending believe sustainable wind projects may be of benefit in some areas of NS, but the Wentworth Valley is not the place for these massive projects:

1. **Loss of habitat and fragmentation.** Due to 18+ (623 ft tall) turbines, and the new power lines, widened roads, new roads, blasting, gravel pits, concrete foundations, and substations will have a huge impact on all creatures living in that wilderness.
2. **Biodiversity.** Conservation scientists recognise the wind project area as a critical bio-diversity connectivity area in NS to connect species with the rest of North America. As such the area should be protected and not developed with new roads and clear-cuts for turbines. Nova Scotia's endangered mainland moose frequent the area seasonally and travel through the project area as they connect between the Wentworth Valley Wilderness Area and the Portapique Wilderness Area. In late November the NS government released a long-delayed recovery plan for the mainland moose. Mainland moose are at a critical juncture of species recovery and one of the key challenges in these efforts is lack of

natural habitat. There is very little good core moose habitat in NS. However, the wind project areas are on essential core moose habitat. Projects of this size could be a direct threat to the survival of mainland moose.

3. **Future Tourism based development.** Wentworth is a rare gem for outdoor mountain recreation and enjoyed by about 100,000 visitors annually from across the Maritimes. Covid-19 pandemic has proven people need to get outdoors for mental and physical health. There is no other recreation area in mainland NS that offers what the Wentworth Valley does. This turbine project could seriously impact future nature-based tourism development in an area that is known for its outdoors.... quiet hiking trails, snowshoeing, cross country skiing, downhill skiing, snowmobiling, kayaking, mountain biking and fishing. We need to preserve the special areas we have and develop wind farms in remote and less used areas where the human and environmental impacts could be dramatically minimized.
4. **Local Content and Economic Benefit.** The land lease benefits of both projects go to the Indonesian-based owners of Northern Pulp, who inherited a \$75,000,000 NS taxpayer loan that purchased the property, and who is now suing NS taxpayers. The 3-year construction phase could possibly bring a few local benefits but there would very little long-term economic opportunity to local stakeholders. Tax revenues would be attractive to cash strapped municipalities but there are thousands of hectares in those same municipalities with excellent wind regime that do not threaten the significant local tourism industry. Wentworth area tourism and outdoor recreation has driven a flurry of homes to be built in the area in the past twenty years that brings significant tax revenue to the local governments. This is desirable tax revenue as well to the counties by land users who demand little to no services. These projects could limit future land development for outdoor recreational activities and home development. Wind turbine projects have an end date and wind energy trends appear to be moving offshore.
5. **Property values.** Proponents acknowledge property values usually drop when new wind projects are built. The last few years have seen increased housing and cottage building in the area due to the outdoor and recreational opportunities. These projects certainly could result in less housing/cottage development due to decreased property values which is one of many reasons that turbine projects are not developed in residential and recreational activity land. Our counties will miss out on the tax revenues of such development. Also, when land values go down, then county property taxes must go down.
6. **Telecommunications services.** To rural areas is paramount especially highlighted in our current pandemic. These projects will have impact on the delivery of these services. Landowners and local businesses are not willing to sacrifice these services for turbines. There are four telecommunications companies that provide essential services, tax revenue and permanent jobs in the proposed project areas of Colchester, Cumberland, and East Hants counties.
7. **Health & Mental Health Effects.** The Covid pandemic has exacerbated access to care in an already over taxed and under resourced mental health care system in Nova Scotia. Most will wait many months

for care of common mental health issues. Engaging in the natural environment and being in nature has been recognized as being a valid tool to managing stress, anxiety, and maintaining good mental health. During the pandemic, there has been exponential growth in people pursuing the outdoors, particularly natural areas that allow for reflection, meditation and exercise. Wentworth has long been a hotspot in the Maritimes for getting people outside in fresh air for exercise, relaxation and immersion in deep nature. The past two years have reminded everyone how important nature is for good physical and mental health.

The proponents have done little to ensure no ill health effects will be cast on the residents and thousands of visitors of Wentworth and the surrounding communities. Without testing of such large turbines close to residential homes and businesses, how can we be provided with assurance?

Studies confirm more research is required into health and mental effects of industrial wind farms from noise, ruined scenic views, and flicker. Light pollution impacts on natural areas include; stress, anxiety, sleep disturbance, nausea and dizziness. The proposed turbines have never had their effects tested here. What are the cumulative effects of 18+ untested towers in this unique amphitheater like area so close to population density? Wind turbines in the proposed location have the potential to contribute negatively to mental health and the burden of mental illness in Nova Scotia, issues that already weigh heavily on Nova Scotians, their health care providers and health care system.

8. **End Of Use.** Presently there is no requirement for decommissioning bonds to ensure the area is returned to its previous state at end of life. The current 3 turbines in this area linked to one of the proponents have not turned a blade in 3 years and despite being non-conforming to municipal by-laws the tear down or decommission is yet to happen. Not a good sign for the future. How will decommissioning at end of life of the equipment be addressed?

9. **Size and Scale of the project.** The scale of these 100MW turbine projects is the largest that has ever been installed in Nova Scotia and not tested yet in environments such as the Wentworth Valley areas with amphitheatre-like characteristics. How can projects of this magnitude be developed in a small narrow valley like Wentworth without proper testing? The testing does not involve actual industrial wind turbines on our unique terrain. How accurate can these types of tests be? Other wind turbine projects in NS gave assurances to residents that the turbines were properly tested and residents would not hear noise and see flicker. We know this not to be true. Some residents near wind turbine projects in NS have had to move and sell their property at a loss to escape the loud noises and flickering. Others, who have stayed, live with migraines, nausea, and anxiety daily due to no recourse through their county. Set backs for noise and flickering through By-Laws were not appropriate for the size of the turbines to prevent these noise and sight issues. Why would Nova Scotians want to be guinea pigs without testing? Who bears the result if the impacts are severely detrimental to species, health, etc.?

10. **Visual Resources.** Visual sightlines are a recognised area of concern in an Environmental Assessment for wind projects in Nova Scotia. However, the province does not offer much in the way of regulation and guidance for projects such as this. This should not be confused with "not in my backyard arguments". Visual sightlines are views with historical, scenic, cultural, and economic importance. The Wentworth Valley Scenic Loop as designated by the province (reference the sign at the entrance to Scenic Wentworth Valley) as a place with the oldest ski hill east of Quebec and a recognised high value

tourism area for skiers, hikers, bikers, fishers and home owners alike. These concerns have not been taken into consideration by the proponents. There is plenty of land to develop turbine operations ... why would it be developed in a strong residential and recreational mecca in NS?

11. **Intensified Industrialization of the narrow valley.** This small valley is already subject to a major quarry, primary rail line serving all of Nova Scotia, industrial forestry and now proposals for the largest industrial wind turbine projects in the province. Was the cumulative impact of these elements considered in the siting?

12. **Higgins Mountain Windmill Project.** Held a community meeting in Wentworth on Tuesday October 5, 2021, to provide information to and receive information from the people living in the community who would be most affected by this project. For some, it was the first they had heard of such project. For others who work full time, it was not possible to attend. It was very apparent from the meeting that they were not well prepared. There were 3 maps that were presented and all three were different. Questions about the placement, number of turbines, and site lines were not able to be answered by the project partners. Each level of government requires different permitting applications and studies for such projects to proceed. The consortium partners did not seem to understand nor explain the processes except that an Environmental Impact Study was required and is being done. This has caused considerable concern that a project with significant implications for this area is not taking the community concerns seriously. On December 4, 2021 Higgins Mountain Wind Proponent held a second community meeting. It was quite evident from the meeting that there is little community support for the Higgins Mountain project. Their 10-minute allocated question period expanded into 2 hours with multiple concerns on this project. Most in attendance were not in support of this project in the Wentworth Valley.

There has not yet been a community meeting with the other proponent.

Protect Wentworth Valley ASKS of the Nova Scotia Government:

- **Prohibit industrial wind turbines** in areas of important moose habitat and connectivity in Colchester/Cumberland, which includes Higgins Mountain and Stevens Mountain. Wentworth Valley is not the right place for industrial wind turbines.

- **Enact Protection of the mainland moose core habitat** designated in Colchester/Cumberland, which includes Higgins Mountain and Stevens Mountain, in the Nova Scotia Mainland Moose Recovery Plan.

- **Designate** the Colchester/Cumberland core habitat area of the endangered mainland moose, which includes Higgins Mountain and Stevens Mountain, **as wilderness area under Nova Scotia's Wilderness Areas Protection Act**, to connect to the Portapique River and Wentworth Valley Wilderness Areas. This will help the Nova Scotia Government meet its **mandate to protect at least 20% of the total land and water mass of Nova Scotia** for nature conservation by 2030.

Thank you so much for taking the time to consider this important issue. The above implications to the Wentworth Valley need extensive research and consideration. We hope that after considering the impacts to the Valley you will agree that this project should not be in the location proposed. Wentworth Valley is a treasure to be protected now as wilderness by the province of Nova Scotia.

Respectfully submitted,