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Review of Wind Turbine Regulations
Public Engagement Report Addendum:
Comments on Recommendations

MAY 2022

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Credits

This report was prepared by planning staff of the Municipality of Cumberland in consultation with the residents of Cumberland County, wind turbine proponents and various government agencies. We greatly appreciate people taking the time to talk with us and sharing their concerns, ideas and vision.

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Appendix A: Responses from Wind Proponents

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FORWARD

The Municipality is grateful for the time taken by so many people to provide input on wind turbine regulations. In total, over 300 responses were received at the time of preparing this report.

Responses were received with a wide variety of questions, concerns, statements, and opinions. Many of the responses were specific to a wind farm proposal in the Wentworth area. Many responses likely originate from those residing outside Cumberland County however, no attempt was made to isolate or identify non-Cumberland responses.

While some individual responses were very brief and may have only raised one or two issues others were lengthy, well written and presented and were a delight to read. All provide valuable insight and help tailoring wind energy policy to Cumberland.

INTRODUCTION

Public engagement is an essential element in any planning exercise as it gives stakeholders a voice and identifies concerns and questions. For the second part of this review, ads were placed in the *Cumberland Wire* and direct emails were sent to all those who responded in the first round of engagement. Notice was also placed on the Municipality of Cumberland and PlanCumberland websites along with posts on Facebook and Twitter. These ads and notices informed the public that Council is reviewing wind turbine regulations and invited submissions by email or regular mail.

In addition, a public open house was held on May 9 at the Upper Nappan Service centre which was very well attended.

Again, we have tried to reflect responses as accurately as possible. Responses were also received from four wind developers. The purpose of this report is to provide an overview of the input people so graciously took the time and effort to provide.

Comments in the second round of engagement spoke to several aspects of wind turbines:

- Adding Wentworth to the restrictive Overlay.
- A desire for larger setbacks.
- Concerns related to the siting of turbines including impacts on lifestyle and eco-tourism industry in Wentworth, moose habitat and loss in property values.
- Concerns about Post-construction operations and maintenance including issues related to monitoring, accountability, and a complaints process.
- Decommissioning of turbines at the end of their useful life.

WHAT WE HEARD

Adding Wentworth to the Restrictive Overlay

In the second round of engagement, the vast majority of respondents were specific to Wentworth and most of those support the idea of restricting turbines from the Wentworth area. Comments spoke to the need for peace and tranquility, recreation opportunities and how the area is unique in Nova Scotia. There were also numerous comments on the need for a comprehensive tourism plan for the area.

Wind developers are concerned over such an overlay. One suggested that Council follows a rigorous local tourism plan process before adding to the restricted overlay. Another suggests that any restricted overlay be precise and based on reasonable data. Another is concerned that the restricted overlay shouldn't add to the wildlife corridors ad hoc and point to work done in Halifax Regional Municipality on cultural landscape frameworks as an example of the type of process that should be followed. Council shouldn't rush to designate Wentworth Valley as a Culturally Sensitive Area without a proper planning process. Yet another developer suggests that if a restricted overlay is imposed in the Wentworth area that it be limited geographically, explicitly described and mapped and that the ability to see a turbine not be grounds for rejection.

Larger Separation Distances

Numerous comments were received suggesting that 750m separation distance is not large enough. The dominant reasoning for the suggestions of larger separation distances is to minimize negative impacts of turbines such as noise and shadow flicker.

Respondents continue to recommend separation distances from 2 km to as large as 5 km from dwellings or even property lines. There were several suggestions that large setbacks are "best practice" or are common in "northern Europe" or other areas. While there are outliers where individual Municipalities, townships or regions have larger setbacks these are exceptions, not the norm. At a national level staff haven't found requirements larger than 1km from dwellings. Scotland does require 2 km but from larger communities with over 3000 people, not individual dwellings. Some jurisdictions also exclude or have reduced requirements for remote or seasonal dwellings.

Siting of Wind Projects

Again, a common theme for the responses, particularly concerned with the Wentworth area, was how turbines would have a negative impact on enjoyment of the land, their quality of life and potential for more recreational properties. Additional comments were received on the importance of the Wentworth area as core moose habitat.

Similar comments describe the value of the scenery as the key to eco-tourism in the area and suggest that there are alternatives to wind to grow the economy. At least one respondent suggested compensation for anyone who can see turbines. Concerns were also raised on loss of property values from turbines.

Economic Benefits

Many respondents were critical of wind projects on land owned by Northern Pulp. These people opposed the idea of despoiling the landscape for the benefit of a large multi-national corporation and wind developers that don't reside in or otherwise contribute to the local community. Very few comments were received that spoke to economic benefits from turbines either in community benefits funds or tax dollars.

During the Open House, more positive comments were provided on how farmers can greatly benefit from an expansion to the wind farm on the marsh and that the taxes from turbines help throughout the Municipality.

Appropriate Regulatory Requirements

As in the first round of engagement, many people, regardless of their stance on wind turbines expressed appreciation in having the opportunity to provide input. Several passed on congratulations on the quality of research. Similarly, several people commented on the review process with suggestions to improve various aspects of the research such the cumulative effect of turbines, socio-economic analysis, impacts of construction on drinking water, visual impact analysis, a larger notification area for meteorological test towers and several responses suggesting Council revisit these regulations more frequently.

Wind projects demand large amounts of time, expertise, and financial resources. Developers ask for fair, predictable, and transparent rules and processes. One wind developer opposes development agreements as they are a lengthier process and add a considerable degree of uncertainty. Others have asked for the development agreements process be permitted to run concurrently with the provincial EA process rather than require that the EA process be approved and power purchase agreements in place.

Health & Noise Concerns

Several respondents raised concerns on noise and shadow flicker as health concerns. This was especially evident at the open house where two attendees discussed their personal experiences living with both and the frustration of not being able to get resolution to their complaints. Many of those requesting large separation distances from dwellings were basing their suggestions on noise and shadow flicker effects. Noise and shadow flicker limits were not included in the recommendations as research conducted in the *Best Practices* review indicated that the Provincial EA process covers this adequately.

Operations, Maintenance and Oversight

Only a handful of responses suggested the need for ongoing monitoring or reporting with a smaller number recommending some type of complaint process. Monitoring, reporting and especially a transparent complaint system were discussed by several attendees of the Open House.

Several wind developers suggest that clarity is needed in both the reporting and a complaint system. One developer has suggested that the usual municipal compliance tools

available under the MGA should be adequate. Unfortunately, the MGA provides very little in enforcement or compliance and leads to obtaining court orders to obtain compliance.

Decommissioning of turbines

Some respondents expressed concern regarding the decommissioning of turbines, referencing existing non-functioning turbines as an example of why such requirements are necessary. These responses typically support bonding as a means of ensuring cleaning up turbines and remediating sites but otherwise don't speak to details such as bonding levels or timing.

Some of the wind developers have suggested that decommission bonds aren't necessary as there are existing protections in place and that this will double-up existing commitments with landowners. All of the wind developers suggest that decommission bonds of 100% are adequate and that overshooting them isn't necessary. One has suggested starting with 100% and escalate over time. It has also been suggested that the bond not occur before the commercial operation date or be delayed for five years to allow the developer to recoup some of the initial investments. Another suggestion was for the landowner to be a co-obligee, presumably to eliminate doubling up commitments.

Regarding malfunctioning of turbines, the developers suggest that malfunctions are outside of the Municipalities purview, not within the control of developers and are covered under the power purchase agreements. It has also been suggested that it be clarified that notification only occur after six months of continuous malfunction.

By: Natural Forces
 For: Municipality of Cumberland
 Date: May 5, 2022
 Re: Wind Turbine Recommendations (document dated April 14, 2022)

Introduction

This documents summarizes Natural Forces’ comments on the draft “Wind Turbine Recommendations” prepared by the Cumberland County planning staff as part of the ongoing review of their wind turbine regulations. This document is formatted to use the same headings as used in the “Wind Turbine Recommendations” document for ease of review. For further clarity, only the recommendations for which Natural Forces has comments are included here.

Where many of the recommendations are high level in nature, Natural Forces would like to be involved, as stakeholders, in further discussions as the actual policies are developed and the language is refined. Natural Forces is a stakeholder as an owner and operator of the currently operational Amherst Community Wind Farm and the developers of the Westchester Wind Project.

Recommendations

Cumberland Recommendation	Natural Forces Comment
<i>Public Engagement</i>	
Notification to property owners within 2 km of a proposed site prior to any meteorological testing.	<p>This should not be necessary for meteorological towers. This part of the development process happens very early-stage to establish whether a wind project would even be feasible. Therefore, notification to community members is premature.</p> <p>If this does become policy, it is recommended that there be a municipal process established to support developers in meet this requirement. In particular, support in compiling a list of all relevant addresses to send the notice.</p>
Three public meetings with a list of concerns raised and actions/accommodations.	It is recommended that policy on this topic allow for the meetings to be held in parallel with the application and review process.
<i>Shared Economic Benefits</i>	
That Council encourages community benefit funds and pooled leasing.	The terms agreed upon in the contracts between the developer and land owners are commercial arrangements. The municipality should not be involved in these

	negotiations. This portion of the recommendation is misplaced.
<u>Regulators Requirements</u>	
That Council approve large and medium wind turbines by Development Agreement.	<p>It should be clarified if a Development Permit will also be required.</p> <p>If the Development Agreement process becomes policy, it should be able to be done in parallel or prior to the environmental assessment process. This will allow any project changes required due to the Development Agreement to be integrated into provincial permitting.</p> <p>To provide more fulsome comments on this recommendation, a draft template Development Agreement and/or a listing of the proposed items to be included in the Development Agreement should be provided.</p>
That Council simplify the restrictive overlay by removing it from around individual dwellings as this duplicates separation distances making the overlay unnecessarily complex.	This needs to be clarified. We are not clear on which aspects of the restrictive overlay this impacts.
Turbine Classification: Maximum Height	It is recommended that this be clarified as the blade tip height.
Requirement: Permit Period	It is assumed this development permit period aligns with the existing Cumberland Land Use Bylaw in that it is the time period in which construction must have started, not be completed.
Setback: Streets and railway rights-of-way	It is assumed this refers to public streets, being those vested in the Province or Cumberland, as per the existing Land Use Bylaw.
<u>Operations & Maintenance</u>	
That Council require a reporting and monitoring system for large turbines.	<p>It is unclear what would be required for reporting/monitoring. Reporting should only be requested for items regulated by the Cumberland bylaws and no more often than annually.</p> <p>To provide more fulsome comments on this recommendation, a list of potential reporting requirements should be provided.</p>
<u>Decommissioning</u>	

<p>That Council require a bond/surety, or other guarantee for 125 percent of the cost of turbine removal and site remediation determined at the time of the granting of the permit by a qualified engineer, less salvage value.</p>	<p>There are already protections in place as they relate to decommissioning wind turbines through contracts with the province, project lenders, and the landowners who lease their land. As such, if a developer is in breach of their contracts there are steps to remedy the situation. Therefore, there is no need to place a bond/surety for turbine removal at the municipal level. Placing such a bond creates an additional financial burden on projects in Cumberland County, which will ultimately discourage development.</p> <p>Additionally, it is important to consider how other similar land uses are regulated. In this case, other power generation related equipment is not required to have an associated bond. Examples include telecommunication towers and transmission lines. Therefore, it is prejudicial to regulate wind energy infrastructure in this financial way.</p> <p>If this recommendation is to be put into policy, it is recommended that the bond be reduced to at most 100% of the cost of turbine removal and site remediation less the salvage value.</p> <p>Additionally, the landowners should be named as the beneficiary or co-obligee on any bond or financial security arrangement with the same right to enforce the bond.</p>
<p>That Council require a bond/surety, or other guarantee for the performance of large turbines with regards to noise, shadow flicker, malfunction and/or ceasing to produce power for a period of six months or more.</p>	<p>If necessary, the process for compensation/mitigation for unanticipated impacts to the local community should be part of the Development Agreement or Development Permit. No bond is necessary.</p> <p>Ceasing to produce power is a matter only relevant to the owner of the Project. This should be removed.</p>
<p>That Council require notice from the operator of a large turbine if the turbine has malfunctioned and/or ceases to produce power for a period of six months. In such</p>	<p>There is often no other option when going into idle mode, especially where this refers to malfunctions. Therefore, obtaining permission from Council seems misplaced.</p>

<p>cases the operator shall be required to secure the turbine from vandalism, causing damage or noise and <u>obtain permission from Council to place the turbine in an idle state until repairs can be made</u>. The operator shall complete repairs within 18 months unless an extension has been granted by Council. Council shall recognize the complications of repairing or replacing such turbines and shall not withhold approvals or extensions without due consideration.</p>	<p>It is recommended that this be changed to a notice to Council.</p>
<p><i>Adding Wentworth to Restricted Overlay</i></p>	
<p>-</p>	<p>The 'Wentworth Valley' is not well defined. To be able to fully comment, the definition should be made clear. If Wentworth Valley is to be added to the restricted overlay, it is imperative that this be limited geographically. This area must be explicitly described and mapped to ensure clarity. It must also be made clear that the ability to see wind turbines from within such an area is not grounds for an application to be rejected.</p>



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May 4, 2022

cc: Gregory D. Herrett, Chief Administrative Officer

RE: Comments on Draft Wind Turbine Recommendations

Dear Mr. Bezanson,

Please accept this letter in response to the Municipality of Cumberland's (Municipality) recent *Wind Turbine Recommendations (Land Use Bylaw: 22-4)* that were released by the Municipality's Planning & Development Department on April 14, 2022. SWEB Development LP (SWEB) would like to commend your staff and regional stakeholders for your diligence and efforts on these matters. For context, SWEB is currently developing the Blueberry Acres Wind Energy Project (Project) in the Municipality, project details found here: www.blueberryacreswindenergy.ca. We have reviewed the proposed *Wind Turbine Recommendations* and are generally in support of the suggested changes and updates to each of the recommendations pertaining to: Public Engagement; Shared Economic Benefits; Regulatory Requirements; and Operations & Maintenance. With regard to the Decommissioning security, we understand the Municipality's unique experience relating to a wind project that has not operated for an extended period of time, however we think it is high compared to what we see elsewhere in the industry. SWEB suggests setting the security at 100% of the decommissioning cost, less salvage value.

With respect to the recommended addition of a Restricted Overlay for the Wentworth Region, SWEB has applied rigorous environmental analysis and collected feedback from the community, and as a result sited our project in an area distant from the Wentworth valley, while utilising the higher elevations found in the region to site turbines due to more efficient energy production at such sites. To date SWEB has held two project specific public open houses, and the Project has been well received and seen as a good alternative to other projects proposed in the area. If the Municipality chooses to implement a Restricted Overlay it must be precisely located and based on reasonable data. Without such reasonable approach, and allowing other projects that have been meaningfully sited based on community concerns, the Municipality would significantly limit its ability to be a leader in low cost renewable energy and mitigate climate change, given the improved wind resources at higher elevations, as well as exclude itself from significant economic activity stimulating the local economy and municipal tax revenue.

SWEB welcomes and supports this process and is amenable to providing more general information, and / or specific information regarding its proposed Blueberry Acres Wind Energy Project. We look forward to addressing the items outlined in the *Wind Turbine Recommendations* as we continue to develop our project and are hopeful that more engagement with your community, council, and staff will further benefit this process.

Kind regards,



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May 5, 2022

Nelson Bezanson
Plan Cumberland

Dear Mr. Bezanson

Re: Wind Turbine Recommendations

We have reviewed with interest the Planning Fact Sheet (Best Practices for Wind Turbine Development), Policy Gaps in Wind Turbine Development, Public Engagement Report, and finally, the April 14, 2021, Wind Turbine Recommendations. These additional comments are submitted as part of the second public engagement opportunity. The comments are organized in accordance with the recommendations and with reference to the ***Municipal Planning Strategy (MPS)*** and ***Land Use Bylaw (LUB)*** of the Municipality of Cumberland County. We have provided comments on the specific recommendations we have feedback on.

Public Engagement

- ***Notification to property owners within 2 kms, Planning Staff and Council prior to any meteorological testing***

A meteorological testing tower is considered a structure for which a development permit is required. Accordingly, Planning Staff already receives notification of application prior to testing. To the extent Council requires notification, in the normal course, it would be Planning Staff who reports to Council rather than a wind developer. If notice to Council is required, a route for communication should be established.

As far as notification to property owners, as assessed ownership information is confidential within the hands of the Municipality, a mechanism must be put in place to either provide such information to the wind developer to provide the notice or, Municipal Planning Staff should provide notice. The LUB, s. 5.1.22 could be amended such that staff provide notice of application for the erection of a meteorological test tower.

- ***Three public meetings with a list of concerns raised and action/accommodations***

We concur that community consultation and engagement is important in the site selection and development of a wind energy project. We would caution that community opposition, in and of itself should not be policy criterion for rejection of a wind project which otherwise meets all regulatory standards.

In terms of the timing of the public meetings, we would recommend that the timing be left with the developer and coordinated with the developer's project development / permitting timelines. Should other regulatory processes such as an environmental assessment require public meetings, the meetings / public comment periods should be coordinated to maximize engagement and minimize engagement fatigue.

Shared Economic Benefits

- ***Council be "satisfied" that wind projects provide an economic benefit to the local community as part of the approval process.***

- ***Council “encourages” community benefit funds and pooled leasing.***

The *Municipal Government Act* allows for statements of policy respecting the objectives of the municipality respecting its economics, but the focus of the policies is on creating a planning environment which is supportive of economic development while ensuring that planning decisions don't compromise the financial viability of particular sectors.

We are confident that wind energy development does provide many benefits to the local community (direct, indirect and induced, all of which will be outlined in the socioeconomic impact statement submitted with the Environmental Assessment (“EA”)), but we do not believe that the Municipality has the jurisdiction to mandate that any particular project provide economic benefits *as a condition of approval*. We caution that any such language could be beyond the authority of the Municipality and subject to challenge.

Regulatory Requirements

- ***That Council approve large and medium wind turbines by Development Agreement.***

We disagree with the above proposed policy change. Wind developers (and those financing them) benefit from a well-defined and clear regulatory path to approval. Policy 4-56 and the LUB contains wind energy turbine classification and regulatory requirements to control height, scale, permit period, permitted zones, setback, and separation distances of such facilities and rights-of-way. The Wind Turbine Restrictive Overlay identifies inappropriate areas for wind turbines.

The MPS currently enables the LUB to establish requirements for information to be provided, and process to be followed for permitting, maintenance and decommissioning of wind turbines (Policy 4-58).

Any other requirements to adequately address operational needs, safety concerns and the mitigation of impacts to adjacent properties can be addressed at the bylaw level.

The Development Agreement (“DA”) process is longer and creates considerable uncertainty where the final outcome relies on a discretionary decision of Council. Moreover, as the DA takes the place of some or all of the zoning requirements on the land, they are typically used where some flexibility is needed so policies can be weighed and balanced and the strict requirements of the LUB need not be followed. Given the intended requirements for strict compliance with the LUB, the DA process serves no useful purpose beyond lengthening the process and adding uncertainty.

In order to address the bonding requirements for decommissioning, this could be addressed at the bylaw level by expanding upon the decommissioning provisions, further addressed below.

The Implementation policies that must be considered for DA's are MPS policies 6-12, 6-13, and 6-19. A review of those policies quickly shows how they are ill-suited and generally inapplicable to wind development. Many of the criteria are already reflected in the LUB and others overlap with provincial and federal requirements.

We also note that a DA is an agreement between Council and a property owner that runs with the land and binds the landowner and successors in title. While the landowner *could* be the wind developer, it is more common that the developer is a distinct legal entity. The legal implications of this would need to be addressed.

If the Municipality proceeds with the DA process, it is recommended that wind-specific implementation policies be developed, and that the process proceeds in parallel with the Environmental Assessment process, without duplication.

- ***That Council adopt the following classifications and associated requirements.***

Turbine Classification and Regulatory Requirements				
	Domestic	Small	Medium	Large
Capacity	< 15 KW	15 KW <100KW	100KW <500kw	500Kw or More
Max Ht	50m	75m	100m	NA
Min ground Clearance	3m	5m	5m	7.5
Approval Method	Dev Permit	Dev Permit	Dev Agreement	Dev Agreement
Permit Period	1 yr	1 yr	2 yr	3 yr
Zones Permitted	All	All	Ag/ RRsc/Com/Ind	Ag/ RRsc/Com/Ind
Restricted Overlay	NA	NA	Yes	Yes
Minimum Separation Distances/ Setbacks				
Habitable buildings external to the wind energy project	50m or 1.25x Ht	75m or 1.5 x ht	200m or 2x ht	750m or 3.5 x Ht
Habitable buildings internal to the wind energy project	1.1 x ht	1.25 x ht	1.25 x ht	1.25 x ht
Property lines external to the wind energy project	1.1 x ht	1.25 x ht	1.25 x ht	1.25 x ht
Property lines internal to the wind energy project/owner	NA	NA	NA	NA
Streets and railway rights-of-way	1.1 x ht	1.25 x ht	1.25 x ht	1.25 x ht
Natural gas pipeline rights-of-way	85m	85m	85m	85m
Small- and large-scale wind turbines external to the wind energy project, including wind turbines that have a valid development permit but have not yet been constructed	1.25 x ht	2 x ht	2 x ht	4 x ht

It is understood that the above table is intended to replace Table 3 in the LUB, (which is limited to separation distances). The above requirements set a maximum height and increase the separation distance/setbacks. It is understood that the “notwithstanding sections” will remain which follow the existing Table 3 and allow a reduction with the consent of adjacent owners.

Subject to the comments above regarding the DA process, we support the above Turbine Classification and Regulatory Requirements.

- ***That Council Amend Policy 4-54: to clarify that such local tourism plan must be adopted by Council.***

Policy 4-54: Council may consider amending the Wind Turbine Restricted Overlay to add locations where a local tourism plan concludes that small- and large-scale wind turbines are not compatible with the goals of the tourism plan.

We concur that clarity is required for Policy 4-54. Such clarity could be provided by way of a definition of “Local Tourism Plan”, or within the body of Policy 4-54, or as a sub-policy, to confirm that prior to considering amendments to the Restricted Turbine Overlay, a Local Tourism Plan must be adopted by Council.

Land use planning best practices mandate that any such Local Tourism Plan (“LTP”) would be developed through a process of public engagement, with a project team of qualified tourism consultants, staff representation, as well as industry and sector involvement. If best practices are followed, the LTP should define the vision of the Municipality, the goals of the LTP, the strategic

initiatives to achieve those goals, the financial implications and activities required. It also should define responsibilities, set priorities and establish measurable outcomes.

A Local Tourism Plan would be complementary to (and potentially build on) the MPS policies regarding “agritourism”, offering a broader vision of economic development and tourism. We agree that any such LTP would need to be approved by Council through a public process, and that adoption of an LTP should precede any proposed amendments to the Wind Turbine Restricted Overlay due to a Local Tourism Plan.

Operations & Maintenance

- ***That Council require a well-defined complaint process.***

The need for a Municipality to have a well-defined complaint process is self-evident but land use planning documents are not the regulatory vehicle for such a process. We agree that the Municipality should have a process to receive, document, investigate and direct compliance with any regulatory breaches¹, failing which, the usual Municipal compliance tools are available as outlined under the MGA.

Decommissioning

- ***That Council require a bond/surety, or other guarantee for 125 percent of the cost of turbine removal and site remediation determined at the time of the granting of the permit by a qualified engineer, less salvage value.***
- ***That Council require a bond/surety, or other guarantee for the performance of large turbines with regards to noise, shadow flicker, malfunction and/or ceasing to produce power for a period of six months or more.***
- ***That Council require notice from the operator of a large turbine if the turbine has malfunctioned and/or ceases to produce power for a period of six months. In such cases the operator shall be required to secure the turbine from vandalism, causing damage or noise and obtain permission from Council to place the turbine in an idle state until repairs can be made. The operator shall complete repairs within 18 months unless an extension has been granted by Council. Council shall recognize the complications of repairing or replacing such turbines and shall not withhold approvals or extensions without due consideration.***

The existing MPS Policy 4-58 enables the LUB to establish requirements for maintenance and decommissioning.

Policy 4-58: Council shall, through the Land Use By-law, establish requirements for the information to be provided and process to be followed for permitting, maintenance, and decommissioning of wind turbines.

In turn, the LUB requirements are in s. 5.1.17- 5.1.19:

¹ For example, there is an existing policy and complaint process to report dangerous and unsightly premises, with authority delegated to an Administrator.

Operation and Decommissioning Requirements

5.1.17 Facilities for the assessment of wind energy resources (test towers) may be erected for the life of the wind energy project. Otherwise, they shall be removed within one year of inactivity.

Operation and Decommissioning Requirements

5.1.18 If a small- or large-scale wind turbine or wind energy project discontinues power production for 12 continuous months the operator shall provide the Municipality with a status report identifying future plans for the site.

Operation and Decommissioning Requirements

5.1.19 In accordance with the decommissioning plan, all above ground components of the large-scale wind turbine or the wind energy project, including all buildings and storage facilities, wind turbines wind testing facilities and above ground accessory infrastructure (such as overhead transmission lines and substation) shall be removed from the site (unless, in the opinion of the Development Officer, it can reasonably established that there is another probable near term future use for any of the said components) and the applicable surface site areas, except for roads, shall be restored to a reasonable natural state within 18 months of the time at which the wind turbines cease to produce power continuously for a period of 6 months or, in a case where construction of the large scale wind turbine or wind power project is not completed, the time at which the development of the wind power project ceases.

The recommendations seem to contemplate two bonds/surety or other form of guarantee. The first is to secure decommissioning (generally, "**Decommissioning Bond**"), to be set at 125% of the cost of removal/remediation, less salvage value. It will be a condition of permitting, which, if the DA process is followed, would be accepted by the Development Officer. This would mean that LUB s. 5.1.20 which sets out the permit application requirements, would be amended to include a requirement for this Decommissioning Bond.

The second is with respect to performance with regards to noise, shadow flicker, malfunction and/or ceasing to produce power for six months or more ("**Performance Bond**").

With respect to the Decommissioning Bond, while we agree with the concept of a Decommissioning Bond, we have a number of points:

1. so long as the value is determined by a qualified engineer and includes salvage, we do not object to the requirement to submit a Decommissioning Bond;
2. the Decommissioning Bond should be set at 100% of the estimate, rather than 125%. So long as there is a mechanism to escalate, there would be no need to oversize;
3. a Decommissioning Bond should be submitted no earlier than Commercial Operation Date rather than on application for permit. Practically speaking, financial investment decisions will not yet have been made on the project at the time of application so it would be premature to bond the project.

With respect to the Performance Bond, there is a lack of clarity regarding the purpose, basis and recourse. The imposition of a Performance Bond, on top of a Decommissioning Bond has the potential to greatly increase the costs of wind development, particularly as compared to solar or other forms of renewable energy which do not carry that same requirement. Moreover, a

Performance Bond is not required in order to address “malfunction” or respond to noise or shadow flicker complaints. To the extent there are costs associated with those issues, any wind farm developer is required to put in effect and maintain construction and operational insurance, including property insurance (including machinery/equipment breakdown) covering not less than full replacement cost for the property and a minimum \$5,000,000 Commercial General Liability (“**CGL**”) policy as a condition of the PPA.² Claimants with quantifiable losses would have recourse to the CGL policy; regulatory compliance would be dealt with under the complaints process in the MGA.

Dealing with the third recommendation, the most material changes proposed are the triggers to act (a reduction from 12 months discontinuance of power production to 6 months of ceasing to produce power “and/or malfunction”); and a change from notification to requirements a) secure the site; and b) obtain permission of Council to place the turbines in an idle state. Additionally, repairs must be completed “within 18 months”, unless an extension has been granted by Council.

Our comments on this recommendation is as follows:

1. Current policy 5.1.18 triggers action upon “discontinuance of power production for 12 continuous months”. We do not object to reducing this to six months. However, it is important that the word “continuous” not be removed from the policy. Operationally, there may be periods of inactivity interspersed with generation which, cumulatively could total six months over a period of time. This should not trigger actions under the policy.
2. We would not support inclusion of the word “malfunction”. Again, a transient malfunction is an operational issue and has a degree of subjectivity to it. The clarity of six continuous months should be the only objective trigger under this policy.
3. Staff’s recommendation is that Council shall recognize the complications of repairing or replacing such turbines and shall not withhold approvals or extensions “without due consideration”. If there were an operational event that resulted in a shut-down for 6 months, and was continuing, whether or not Council granted “approval to idle”, if it could not be operated, it would not be operated. The requirement for approval implies some discretion on the part of Council and some ability on the part of the wind farm operator to respond to the exercise of that discretion. That is a false premise. Accordingly, we recommend continuation of the notice requirement (after six months rather than 12 months).
4. Regarding extensions, it is recommended that the scope of what may be considered by Council be inclusive and not exclusive.
5. There is a lack of clarity what is the trigger date for “within 18 months”. It should be clarified that it runs from the date of notification i.e. 6 months of continuous non-operation.

Adding Wentworth to Restricted Overlay

It is not clear from the Recommendations Memo that planning staff have a specific recommendation in this regard. As noted, there are two policies in the MPS related to the Restricted Overlay: Policy 4-53 and 4-54.

Policy 4-53: Council shall, through the Land Use By-law, establish a Wind Turbine Restricted Overlay that identifies inappropriate areas for small- and large-scale

² Approved PPA, s.3.2 Insurance Covenants

wind turbines and includes lands such as, but not limited to, drinking water supplies, bird conservation areas, important cultural areas, historic sites, and ecologically-significant lands.

Policy 4-54: *Council may consider amending the Wind Turbine Restricted Overlay to add locations where a local tourism plan concludes that small- and large-scale wind turbines are not compatible with the goals of the tourism plan.*

Policy 4-54 has been addressed above, regarding the requirements for Council approval of a Local Tourism Plan.

As noted in the Recommendations Report, to include “Wentworth” in the Restricted Overlay, Council must be satisfied that such a change is reasonably consistent with Policy 4-53.

Among the grounds included to justify exclusion are lands which are “ecologically significant”. It is noted that the MPS Schedule B designates Sensitive Environments and Core Wilderness areas in which development is restricted or regulated. The Restricted Overlay should reflect MPS Schedule B and not add to it on an *ad hoc* basis.

We agree that Council could not exclude turbines from Wentworth under the guise of protecting core moose habitat, as most of Cumberland County has been identified as core habitat for mainland moose. Moreover, environmental issues – including the protection of moose – will be addressed in the environmental assessment required to be submitted to the Province.

The policy also allows for exclusion of lands which are “important cultural areas”. The discussion in the Recommendations Report notes that there is no guidance on the criteria for determining if an area is culturally significant and so more general planning theory may be referenced. Thereafter, the Report discusses some work in the Baltic region.

Halifax Regional Municipality undertook a comprehensive cultural landscape framework study which would seem to be much more proximate and useful resource than looking to the Baltic region. ([linked here](#)). That study discusses accepted international definitions of cultural landscapes and outlines theory and practice for their treatment *in accordance with North American practice*, as well as the 5-step process for best practices in the study and management of cultural landscapes in land use planning. We recommend a reading of that study to Cumberland.

As a matter of practice, Council should not quickly designate “Wentworth Valley” as a whole as “culturally significant” and therefore subject to the Restricted Overlay, without the proper due diligence to identify, analyze, evaluate the significance of potential cultural landscapes in Cumberland, as well as risks caused by specific activities. It is anticipated that First Nations would have traditional knowledge and would be an interested party in contributing to any such cultural landscape study. Simply identifying Wentworth (as a whole or in part) as culturally significant isn’t the end of the enquiry. Council (or staff) would need to identify the character-defining elements and the risks to the integrity of those elements. Ultimately, wind farms may not be inappropriate or create a risk to the perceived cultural value.

Similar to the recommendation regarding the requirement for Council approval of a Local Tourism Plan, we recommend a requirement for Council approval of a Cultural Landscape Plan, developed

in accordance with land use planning best practices, as a preparatory step to consideration of additions to the Restricted Overlay on this basis.

Conclusion

The Cumberland MPS was adopted in April 2018; it is a modern plan which embodies Council's vision and policies, established in close consultation with residents and business owners. The current recommendation is for review of the wind policies every ten years. Here, we are only four years into the current regime; little has changed since 2018. The existing approach does not require substantial revisions.

In the MPS, it outlines the plan for future land use. Schedule A, Future Land Use Wentworth, designates the vast majority "Resource", with some specific areas "Open Space". The preamble to the Resource Designation, section 5.5 states that:

...These resources form the bedrock of Cumberland's economy...In recent years, the vast open spaces in Cumberland have also provided opportunities to harvest new resources: the sun and the wind, in the form of solar panels and wind turbines.

Moreover, Policy 5.23 prioritizes resource uses over residential and commercial development. The fact that the policies prioritize resource development – including wind turbines – in this area is a recognition of their economic value to the municipality and of their environmental value to the province as a whole as we all work together to meet increasingly stringent Renewable Energy Standards, GHG emissions caps and mandated coal plant shutdowns.

As noted in the context of MPS policy 4.7, "Cumberland has, to date, played an important role in the development of renewable energy generation in Nova Scotia". We look forward to continuing to play an important role and thank you for the opportunity to submit these additional comments.

Yours truly,



Dan Eaton, P.Eng
Director of Project Development, Elemental Energy
On behalf of Higgins Mountain Wind Farm Limited Partnership

c. Nancy G. Rubin, Q.C., Stewart McKelvey

May 4, 2022

Via Email planning@cumberlandcounty.ns.ca

Nelson Bezanson
Planning Department
Municipality of the County of Cumberland
Upper Nappan Service Centre
1395 Blair Lake Road
Upper Nappan, NS B4H 3Y4

RE: Capstone Response to Wind Turbine Recommendations, Land Use Bylaw: 22-4

Dear Mr. Bezanson,

Capstone Infrastructure Corporation (Capstone) is providing this written response to the Draft Recommendations for changes to the Municipality of Cumberland land use bylaws as they pertain to wind turbines. Our responses below will follow the same sequence as provided in the Recommendations that were available online at the Cumberland County website: <https://www.plancumberland.ca/windreview>

Public Engagement

We believe the recommendation to hold three public meetings for installing a met mast would be premature in the early project planning stage for a wind farm. Wind measurement campaigns are conducted to test commercial viability of a site, as such, a wind measurement campaign may ultimately prove that a project is not viable.

To extrapolate from our experience in response to initial public meetings at the onset of environmental impact assessment stage over the past 15 years in several provinces, it is our informed view that holding a public meeting for a met tower would likely create frustration by nearby residents as there would be little project details known at this time, and residents attend public meetings to learn about proposed developments. If not a source of frustration, the other likely outcome is lack of attendance, and increased costs prior to project scoping and viability. As such, taking lessons learned from other jurisdictions in North America, it is our recommendation that notification to nearby residents would be an appropriate requirement.

Shared Economic Benefits

We recognize the Cumberland County's desire for all residents to share in the economic benefits of a project and can say that Capstone has seen the revenue pooling model applied in certain circumstances where it suited the project or market opportunity. That being said, every project is unique and different market opportunities can shape whether such pooling is employed for a project. For Cumberland County to stipulate such a requirement would adversely affect projects to be competitive in request for proposal processes. Capstone recommends removing this as this is commercial in nature and out of purview of county regulation.

Regulatory Requirements

With respect to setbacks and distances in the proposed table, we would suggest that a clause be included to consider the 4x setback for large turbines not apply to turbines owned by the same company on a different project. Furthermore, prevailing wind direction should also be a factor so as not to adversely impact the existing project turbines.

For setbacks from streets and railway rights-of-way, Capstone recommends that the measurement be blade length plus 10 metres, which is an industry standard setback used in the majority of jurisdictions with road setbacks developed across Canada. Wind turbines are engineered structures, and not subject to falling in the same manner a communication tower might.

For setbacks from natural gas pipeline rights-of-way, Capstone recommends this is not needed. Land rights dictate where works can be constructed, e.g., any wind turbine would not be constructed within any easement or ROW for a pipeline. Capstone has secured regulatory approvals for multiple wind and solar farms in Alberta where pipelines cross-cross the landscape and can share further experience on how crossing and proximity agreements are managed.

Operations & Maintenance

It is mentioned in the operations and maintenance section that Council would require a reporting and monitoring systems for large turbines. What would a compliance report look like for this type of information, and would Council have a qualified expert reviewing this type of technical report? Would a template for this type of report be developed by Council for proponents to complete, or would the proponent be required to develop this report at their cost?

With respect to the suggestion of a complaint process, is Council considering a complaint process managed by Council or the wind farm operator? As Capstone is an owner and operator of all our projects in Nova Scotia, including two in Cumberland County, our locally employed staff are accessible and have always been responsive to feedback from community members. We assume this is an area where Council is looking to manage potential feedback that comes to Council, and not is not something the wind farm operator needs to manage however we would appreciate any clarity.

Decommissioning

With respect to the proposed bond/surety requirement, Capstone recommends a report be filed with county council at least 2 years prior to end of contract life/operations term. Wind farms nowadays are expected to be operated for up to 40 years (pending contract renewal with NSPI) and posting bonds earlier in the project operations represent a material economic burden to projects. There is no rationale for such costs, and second, this would again adversely impact the competitiveness of projects in Cumberland vs elsewhere. Unless it is the County's intention to block long term revenue-generating projects in the County that will benefit generations to come, we strongly recommend that the County remove this requirement,

We note that decommissioning obligations are standard in EIA approvals and land agreements with host landowners. Capstone suggests an "OR" condition, whereby the developer can show proof of a decommissioning commitment with landowners through lease agreements, and in lieu of "doubling up" on commitments with the county.

Noise compliance is normally assessed/monitored with provincial regulations.

Bonding for non-performance is not needed, as the PPA requires the project to operate unless force majeure or some major grid issues. Capstone recommends that “Proponent to provide a report on project operation to council” in the event that the site is shut down for 6 or more months, continuously. Furthermore, council should get an operations report in the unlikely situation where the project (or any given turbine) ceases to operate for 6 months or more.

With respect to extensions granted for repairs, Capstone believes this should be under the purview of the PPA with NSPI. Contractual obligations between the proponent and the utility serve to ensure that operational availability requirements are being met. Capstone believes this is an issue that should not be considered as part of the jurisdiction of the county much like land use and issues which are directly under the county’s jurisdiction and knowledge.

In closing, we appreciate the opportunity to provide comments to the County on the proposed bylaws. Capstone is the largest independent power producer in Nova Scotia, and we develop and operate wind farms in 5 Canadian provinces, thereby providing a wide breadth of experience and industry context. In addition, we speak from direct experience in Nova Scotia with our oldest wind farm in Nova Scotia, the Lingan Wind Farm near Glace Bay, having been one of the first wind farms in the province to be re-contracted with NSPI, and continue operations as inferred above in relation to decommissioning and project end of life.

We would be happy to consult further on any particular matter should there be any follow up questions from the planning department or Council.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Mark Grant', with a stylized, swirling design.

Mark Grant
Senior Development Manager
Capstone Infrastructure Corporation

Feedback From Open House, May 9, 2022.

Approximately 20-30 people attended.

Revamp Capacity ratings:

Small/Domestic Under 15 kw

Medium= m15kw-100 kw

Large 100kw to 500Kw

Very Large= 500kw +

Are we protecting the general public?

Are we concerned about revenue?

How good is a guarantee? Isn't a bond better protection for the Municipality?

The complaint process should be transparent

Bonds should be delayed 5 years to allow developer to recoup some of the initial investment.

Cleanup clause of landowner contracts should say to be cleaned up to standards of the day of cleanup of day of cleanup, an unknown at signing.

Complaints should be public if complainants are willing.

Council should understand that the attitudes towards turbines near Amherst are much more positive than those in the Wentworth area.

Why aren't terms and conditions same for all turbines that are under development agreement?

Council require reporting and monitoring and compliance system for any turbine over 15 kw.

Cumberland needs the tax dollars new turbines can provide

Unique high points in Mainland NS important for climate adaptation and mitigation.

Use citizen modeling for overlay

Farmers can use the lease payments turbines can provide.

Biological diversity to be protected for sake of climate crisis

Chris Miller offered ecological significance evidence. Canadian Parks & Wilderness Society Exec. Director.

Setbacks should be from property lines and a minimum of 2km away from external

Review regulations 2 years after this round and every 5 years after that.

How much revenue will the County earn from the wind turbines versus the loss of future rec properties?

Why is the info session being held after the bylaw recommendation input period is over?

From: Conor Scallion <conor.scallion@gmail.com>
Sent: May 6, 2022 7:41 AM
To: Planning
Subject: Wind

To whom it may concern;

Regarding the proposed Wentworth wind project. I have some concerns:

1. I am a full time resident trying to raise my family here. I'm concerned the turbines can have long term negative health implications.
2. Setbacks should be a minimum of 5KM from permanent dwellings. This ensures impact is minimized.
3. Before anything new is built, the existing derelict turbines must be removed. Furthermore a surety must be provided to allow for decommissioning abandon turbines to prevent future turbines from littering the landscape.
4. I am part of a group promoting and building hiking and biking trails in Wentworth. These turbines will be located in and on some of these trails. The project will take us several years backwards in promoting healthy outdoor exercise.
5. This project will lead to clearcutting on top of the mountains which increases springtime melt speed and increases runoff which in turn silts up one of the few remaining salmon rivers in NS. The road construction will have similar effects.
6. Turbines are not green energy. Turbine construction when all parts are factored in, will not produce enough energy in it's lifecycle to balance the energy required build, construct, and manufacture it.

Thank you,
Conor Scallion

Sent from my iPhone From: Karen Henderson <hendersonkc.home@gmail.com>
Sent: May 5, 2022 10:12 PM
To: Planning
Subject: Wind

Thank you very much for the opportunity to comment on your Wind Turbine Recommendations. Following are my comments:

Public Engagement

I fully support the notification of residents regarding the proposal of new industrial wind developments. I think the area for notification should be larger than the proposed 2 km. I would suggest it be at least 10 km, and that there also be notice in provincial newspapers and through other means as many residents do not have local mail delivery.

The developer should be required to file a report with the Municipality on the measures taken to inform residents, including details of notices and public meetings. Public engagement should not be just a box that's ticked by the developer.

Shared Economic Benefits

I believe a formal economic impact study should be carried out by the proponent of any project and that it's findings should be a key component in the Municipality's consideration and approval of any project. This issue has not been given nearly enough consideration in the assessment and permitting of large scale projects such as wind developments.

Regulatory Requirements

I feel the minimum separation distances and in particular the proposed setbacks from habitable buildings external to the wind energy project are not adequate. I believe the current science particularly around the health effects of industrial wind turbines would support much greater distances (at a minimum 2-3 km) from habitable buildings. I believe that the distance from the property lines external to the wind project should be in addition to the setbacks from the habitable buildings external to the wind energy project. I believe there should also need to be noise restrictions which are supported by science as well.

Operations and Maintenance

I believe that the post-construction compliance report should be provided within 6 months of commissioning and arguably, should be provided before commissioning. Also, I believe any exceptions to the original development agreement must be reported and approved by the Municipality pre-construction.

Adding Wentworth to Restricted Overlay

I fully support and recommend that Wentworth be added to the restricted overlay as a culturally significant area as described in the recommendations. I also support its designation on the basis of Wentworth's tourism and recreation value which I believe is of significance to both the Municipality and the Province. Wentworth continues to be a place for Nova Scotians and those from outside Nova Scotia to come and enjoy our "four seasons of adventure". It is "a place which means a great deal to people" both residents and visitors alike. This and all of the other ways your recommendations describe a "culturally significant area" apply in spades to Wentworth. I urge Council to rely on the general planning theory that is spoken to in the recommendations and add Wentworth to the restricted overlay. The current investment and development by Ski Wentworth, Trails Nova Scotia and Bike Nova Scotia as well as seasonal residents of the area are examples that speak volumes to the level of commitment to further developing the area. Wentworth will be very negatively impacted by the presence of industrial wind turbines. Your most thoughtful assessment of how the culturally significant area designation might apply is heartwarming and I thank you so much.

Thank you again for a very concise yet thorough document. If I can provide additional input I would be most happy to.

Sincerely,

Karen Henderson
80 Frosty Hollow Lane
Wentworth
(902) 402-2525

From: Cheryl MacKay <cheryl@mackayvsp.com>

Sent: May 5, 2022 10:02 PM

To: Planning

Cc: Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Carrie Goodwin; Murray Scott; Municipal Clerk's Office; Greg Herrett

Subject: WIND - Cumberland Wind Turbine Bylaw Draft Recommendations

To Whom It May Concern:

It is hard to voice concern about wind turbine projects without sounding like a Luddite. Everyone knows renewable energy is going to save us, most notably those who believe conservation a necessity, but for others, and those who choose not to grapple with the complexities of electrical generation.

While grave reservations persist some practical concerns come to mind. Nova Scotia is a tourist destination. I believe we should be doing everything we can to maintain and enhance the County's beauty. Enhancement is the subject of another forum, however, blighting the natural beauty of the terrain, in essence our product, with huge, expediently placed industrial machinery seems more that a little short-sighted.

All of the proposed locations seem to have been selected to save someone money, or so that others can make money, with no regard for their impact on anyone else. There are many places where wind turbines would affect virtually no one, yet short term gain always prevails. The definition of insanity is doing the same thing over and over and expecting different results. Can the guidelines require the least possible damage to community, nature and heritage, and zero damage to these when any other option exists, despite cost implications.

With so much money available and green-washed governments everywhere giddy to spend it, vendors are coming out of the woodwork. All equipment has a lifespan. Can we be forward thinking enough to bind those installing this equipment to the cost of its subsequent removal? This could be done with an irrevocable bond that survives the collapse of the shell entities created to install and operate the systems. Anything less is downloading hidden, yet predictable cost to taxpayers.

If wind is the way of the future, can we require the meaningful participation of local firms in order to facilitate knowledge transfer. With few exceptions, proponent firms risk nothing and yet are compensated generously over the systems multi-year lifecycle. Sharing knowledge seems only fair.

Thank you for your attention.

Cheryl MacKay

From: Jane Bigelow <jane@armbrae.ns.ca>
Sent: May 5, 2022 9:11 PM
To: Planning
Subject: Wind

Hello

I would just like to make a few quick comments related to the mps and lub review of wind turbine regulations

I endorse the idea of developing a restricted overlay for the wentworth valley based on protecting community cultural values and its economic benefits.

I also endorse the use of development agreements for medium and large scale turbines

I strongly feel that the setbacks for large and medium size turbines are far to small. 2-3 km from habitable buildings is appropriate based on other jurisdictions with extensive experience with wind energy

Sincerely
Jane

From: Susan Moffatt <SMoffatt@mmfi.ca>
Sent: May 5, 2022 8:13 PM
To: Planning

Subject:WIND

Dear Cumberland Draft Bylaw,

I am writing with regard to the planned influx of wind turbines throughout the Wentworth valley. Residents have not taken the prospect of these giant skyscrapers lightly. We have had many discussions in the past months.

We are told that we need to support green energy. I have spent many hours reading pros and cons and you can find just about anything to backup your opinion. I also have listened to residents who live within the acceptable distances set by environmental assessment companies. These residents trusted the distances set but it has made their lives difficult to say the least. Any discussion around a 750 metre setback is missing the science that should be applied to these giant turbines being considered. While doing my research, I have read that turbines of this size should be set back as far as 5 km.

Our local area is rich in biodiversity with many species of birds and mammals living in the vicinity. The lengthy construction of a windfarm will irreversibly destroy their habitats and put these species under increased pressure.

Wentworth Valley is visited by well over 75000 people a year. They participate in hiking, skiing, biking, running, and snowmobiling just to name a few. Turbines are an eyesore on a beautiful, natural landscape. The Wentworth Valley should be protected!

I ask, when is enough, enough? Turbines will scar the skyline, destroy biodiversity and impact negatively on the quality of life for those living in close proximity?

Susan Moffatt

From: Peter Bigelow <peter.bigelow@developns.ca>

Sent: May 5, 2022 6:14 PM

To: Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Murray Scott; Municipal Clerk's Office; Greg Herrett; Planning

Subject:Wind

Dear Mayor and Council

Thank you for the opportunity to give feedback on the proposed amendments to the Cumberland County Land Use By-law and Municipal Planning Strategy as it pertains to wind turbines. Generally, I appreciate the work of the County and its staff in developing and providing the background studies, Current Regulations, Best Practice and Policy Gap Sheets. I am supportive of many of the amendments that are being put before Council for deliberation. I will, therefore, focus on where I disagree or want to make additional recommendations.

Public Engagement

To carry through on the best practices for Public Engagement that is outlined in the recommendations I would recommend that the notification area be increased to three km for medium and large-scale turbines. Wind turbines are enormous installations the size of 50 story buildings that generate noise and light. Metrological testing is early in a wind farm's planning and engineering process. It often takes place at a central point in the potential wind farm, often whose boundaries are not known. The testing can often be on a small property, but the wind installation may span 10kms in any direction and multiple properties. Therefore, in a major farm, the testing is unlikely to even be near to other properties or homes, however, the final turbine locations certainly

can be. If the County's intention is to have property owners have early notice, the testing phase is a good time but for the reasons above the notification should be expanded to 3km and the County should post its notification received from proponents on its public information platforms.

In addition to the County requiring a minimum of three public meetings the Municipal planning strategy should seek to encourage proponents to work with communities to develop a good plan that fits with the community and works to mitigate issues. This should be woven into the development agreement process in a meaningful way.

Regulatory Requirements

Regular Review - Council's review of wind turbine regulations should be every eight years owing to the rapid rate of change in the industry and the forecast for general population growth in the province including rural Nova Scotia. Population growth, the changing nature of the workplace, and changes in the energy sector means that the intersection of that change, in terms of land use regulation, is going to be especially dynamic. Therefore, Council will need up-to-date tools and thinking to allow them to deal with it.

Setbacks - The setback of 750 m is nowhere near enough distance for locating a turbine near a habitable building. Instead 2km min is required according to northern European regulations and industry folks who tell us that they need greater setbacks to meet sound and flicker regulations. Other jurisdictions have been steadily increasing set back distances for the last 20 years owing to the problems associated with minimum distances such as 750 m.

Another setback issue in the proposed changes is driven by the evolution of odd combinations of energy output (kw) and height of the turbine (m) that the industry is producing. It used to be that big turbines are on big towers and smaller turbines on shorter towers. That is not the case anymore as lower output turbines are placed on taller towers to improve efficiency in low wind situations. Under the definition of Medium vs Large turbine it is unclear how a 420kw turbine, such as the Vestas V150-4.2 Mw which is 250m tall but is under 500kw, would be treated as it is going to be higher than 100 m but is less than 500kw. Perhaps it is easier to just define medium and large turbines by height.

Development Agreements

I support the use of development agreements for medium and large sized wind turbines. However, the list of what Council can consider in the creation of a development agreement listed in the recommendations is very narrow and does not necessarily correspond with what the community and council will want the DA process to address. Under the Municipal Government Act, Council can embed policy in the MPS to outline what must be considered when considering discretionary development agreement applications for wind turbines. I believe it possible to include some aspects of community benefit and community considerations and values in the development agreement application. What is presently outlined as DA considerations seems to be more germane to operation of the machines (yes important) and not to siting of them (also important). Impact on the community needs to be part of what is negotiated as part of the development agreement application process. This would, for example mean that a visual impact analysis would be part of the municipality's requirements for consideration.

I found the following language in another jurisdiction that uses development agreements to regulate large scale wind turbines and I think it is in line with what the County is thinking however the last two items are outside what is being recommended and should be included and enabled through the MPS.

In reviewing applications to enter into a Development Agreement for the development of a wind turbine facility it shall be the policy of Council to have consideration for the following:

(a) that the proposed development does not create an unacceptable impact on surrounding habitable uses in terms of noise, shadow flicker/ strobing and public safety. In the evaluation of this criterion Council shall have regard to the following:

- (i) noise level information supplied by the manufacturers of the wind turbines;
- (ii) the duration of expected noise exposure by adjacent properties;
- (iii) the extent to which shadow flicker and strobing is a factor on residential uses;

(iv) the turbines are located such that collapse, blade throw or ice throw does not affect adjacent properties.

(b) the impact of the proposed development on surface water, storm water, streams, lakes or wetlands and other environmental matters.

(c) the impact of the proposed development with respect to soil stability and retention and potential for erosion.

(d) a project decommissioning and site reclamation plan.

(e) Visual impact of wind turbine facility or facilities. In assessing visual impact, attention shall be given to Siting and location, spatial extent and scale, cumulative effects, spacing of turbines, height of turbines, colour and lighting.

(f) any other relevant matter of planning concern

This is probably more information than you require at this stage in the process. However, my main point is the development agreement process should be enabled through the MPS and LUB to provide the Development Officer the ability to request all relevant information to make a recommendation to Council. Council is responsible for ensuring that the wind development is positive for the community and that the community values are protected. Things like visual impact assessment, protection of special places and assets should be part of the application and form part of the recommendation to Council who then authorize entering a DA. While you can't include everything in a DA itself, you can ensure you get as much info as possible upfront to assess the application.

Restricted Overlay

The County's idea of adding a restrictive overlay for the Wentworth Valley is a good one. In all our discussions with proponents they stated that if they know the rules, they must work within they can design a better proposal which responds to the community.

The Overlay could be approached in two ways; 1) a uniform setback from the valley center could be instituted or 2) a boundary for the restricted area could be developed based on community values, scenic resources, topography and special and ecological places. The first approach would be course grained and not site specific, thus likely being onerous to wind developers in some parts of the valley and ineffective in the eyes of residents in others. The second method is what is proposed by the County (BaltSpace Group example referenced in the Plan Cumberland Wind Turbine Recommendations doc) and would be a process that I could get behind. The BaltSpace Culturally Significant Areas approach appears to be a good method with strong community participation and could be tailored to address any unique aspects or concerns related to the Wentworth Valley. There are other tools which could also be used within that process. This approach is also one that industry could also participate in alongside community as part of a voluntary planning process. The output would be a recommendation for the consideration of Council. My belief is it is likely the most satisfactory path to balancing the preservation and growth of the economic, social, and cultural assets of the valley and giving room for needed renewable energy. It would bring stability for both turbine and community investment.

Other

Something that does not appear to be addressed and which I have concerns, is how we might address the incremental impact of subsequent proposals. Is there an opportunity through the development agreement process to consider the number of turbines already in an area. Currently there are 68 turbines which have been sited in the Folly Lake/Wentworth/ Westchester Area. Each of these has been sited, based on the necessary engineering due diligence, to the point that they are being proposed in the latest Wind Energy call by the Province. While all proponents will not be successful, it is possible that in the future there could be 68 turbines or more in the hills surrounding the valley. The bylaw certainly is designed to deal with individual turbines and not the potential for large clusters. I don't know if the proposed by-law is able to deal with with the next proponent through the door and the next and the next. I think the Development Agreement application process is a good tool to consider incremental impacts of additional turbines and should be enabled in the MPS as part of the Development Process.

Finally, my previous correspondence in March outlined the value of the Wentworth Valley area. This has recently been re-emphasized by Mayor and Council with their objection to the property tax levy for out-of-province owners recently brought into force and, as of just today, rescinded by the province. This is strong evidence that Cumberland values areas such as Wentworth, the Amherst Shore, Pugwash etc. The County recognizes that these areas and who they attract are part of Cumberland's natural advantage bringing money, family, friends from outside the county and the province for local economic and social well-being. Add to this an increasing uptake of outdoor adventure and nature which continues to drive investment in supporting facilities (eg mountain bike facilities, ski hill, trails) and building of more homes and accommodation and it is clear that the benefit of these types of areas will only grow as we continue to grow in-migration of people and business to Nova Scotia. I hold special confidence is the growth of rural areas with the advent of "ability to work from anywhere" that emerged during the pandemic. The lifestyle choice that are offered by of like Wentworth is very attractive and needs to be protected.

My hope is that Council moves forward with a strong by-law to shape wind turbine development and protect its assets like the Wentworth Valley as we will all be better off.

Thank You

Peter Bigelow

From: Lynne Gaunce <jlynnegaunce@gmail.com>
Sent: May 5, 2022 5:30 PM
To: Planning; Kathy Redmond; Murray Scott; wind.info@novascotia.ca
Subject: Response to Wind Turbine Bylaw Recommendations

?Planning department and Council of Cumberland:

My family and I have owned two properties in Wentworth Valley, Cumberland county for many years and enjoy the beauty the area offers. My grandchildren are now starting to enjoy this beautiful natural area.

Thank you for the opportunity to review the draft of the amended bylaws and provide further input. Having reviewed the Bylaw recommendations by your staff I would like to make the following comments.

750 M SETBACK

In the early to mid-2000's when Wind Turbines were about 80 m to 100 m tall, many jurisdictions in Canada as well as Europe and Australia had setbacks of

1km to 2 km. Even with small turbines these distances at times have had serious issues in terms of noise levels and flicker issues in the residential areas.

In a recent community meeting with one of the proponents in the Wentworth Valley, the proponent told me personally that the current standard for 190 m turbines is 2.5 km (2500m) setbacks. I find it difficult to reconcile a proponent indicating 2500 m as acceptable minimum standard with a 750 m recommendation by Cumberland Planning.

As well there have been many issues with noise and flicker complaints around the world at 1Km to 3km distances. Even in our own backyard there have been serious issues to residents. In Colchester County a 1 km distance has had a significant impact on the lives of residents in terms of acceptable noise levels . Also Glen Dhu Wind turbine project has witnessed unacceptable noise and flicker at 1500 m setbacks.

As a resident in the area of the proposed wind turbine projects, I think it is important that our community be heard and that the setbacks consider population density, cultural sensitivity, rural environment, and geography in establishing appropriate setbacks for individual areas.

At a minimum the setback should be at 2.5 km providing acceptable noise levels and flicker are attainable at that distance with the proposed brand and height turbines.

WENTWORTH SHOULD BE ADDED TO THE RESTRICTED OVERLAY THROUGH POLICY 4-53.

Wentworth Valley is a culturally significant area and is inappropriate for Industrial size wind turbines. Wentworth is the most unique area in all of Nova Scotia along with Cabot Trail for its wilderness, biodiversity, ecologically significant land and historic sites.

Examples follow:

Wentworth meets the criteria for bird conservation area.

Cumberland County consists of Core Mainland Moose habitat throughout but the Mainland Moose Recovery plan states that the Wentworth Valley part of the county is considered "essential" Moose Habitat. Without this protection mainland moose will not survive.

The first, second, third and sixth tallest peaks of mainland NS are centred 3 to 4 km around Folly Lake in Cumberland County. This makes the area unique for climate change adaptation /medication, geographically, metrologically , biodiversity and recreation.

It is a key ecological corridor and connectivity bottle neck area between Cumberland County and the western Colchester county with the rest of Nova Scotia.

It has a significant cluster of protected areas, a provincial park, and conservation areas with more being proposed.

Wentworth is the oldest mountain sport recreation area in Atlantic Canada. The Wentworth region has some of the best mountain sport recreation terrain in the Maritimes. There are more than 100 km of trails in the immediate Wentworth area exist.

Hiking, downhill skiing cross country skiing snowshoeing, fishing, have existed here for 100 years. Throughout the pandemic, there was increased activity in the Wentworth Valley as people sought out the peace and quiet enjoyment of Wentworth outside of the larger cities and towns. This increased activity continues to grow.

I believe it is most appropriate that the overlay protected area exist from the top of Folly mountain to and including the New Annan Road on Hwy 4 with a North and south 4 km buffer. We need to protect this very unique area of your County and our province. "Natural ecosystems, including our forests, are now widely recognized as the foundation upon which all life on earth ultimately depends and therefore must be protected and used sustainably."

OTHER REQUESTS

I request that a review of the wind turbine bylaws initially be done in two years following the current changes being implemented and then every five years thereafter. Technology is changing dramatically every year and we have seen the size of turbines almost triple for energy requirements in the past 10 years.

As a homeowner, property value decreases have been found in areas of industrialized wind turbine developments. It has been reported in Ontario at 30-55 percent drop.

A very detailed complaint process should be implemented in the bylaws to ensure that property owners have a fair and effective process to resort to when noise, flicker and other issues impact their property and health .

I think it is absolutely essential that any community near proposed industrial wind turbines be provided detailed information on the specific location of the proposed turbines. Ideally, that information would include images that simulate what views will be if and when the proposed turbines were to be erected. It is also essential that if a project is approved that the proposed site locations be confirmed prior to any installation.

From participating in the community engagement process in Wentworth, it is clear that the people in Wentworth are concerned about the proposed wind turbine projects affecting a very unique part of our province. As councilors, I know you will listen to your constituents and ensure the Wentworth Valley is part of the restricted overlay and that appropriate bylaws protect all County residents who may find themselves living near a wind turbine development in less culturally significant areas.

Thank you
Lynne Gaunce

From: Frame, Nancy <Nancy.Frame@ca.gt.com>
Sent: May 5, 2022 4:19 PM
To: Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Murray Scott; Municipal Clerk's Office; Greg Herrett; Planning
Cc: ea@gov.ns.ca; wind.info@novascotia.ca
Subject: Response to Cumberland County Wind Turbine Bylaw Recommendations

Dear Mayor, Councillors and Staff

As a member of the Protect Wentworth Valley committee I wanted to forward my personal support and endorsement of the submission of our group . I also want to extend my personal appreciation for the commitment of staff and Council to review these Bylaws to ensure that our communities and residents (including wildlife) are protected from the risk and negative impact of these massive industrial wind turbines .

As has been previously stated once built these structures will bring irrevocable change to a truly unique and culturally significant area of our province . It is imperative that decisions and the restrictions that govern these developments be made with utmost care and consideration to best protect both current residents and future generations .

I am very proud of the submission that our group has provided to Council and the passion that our Committee members has ignited with many Community members who are equally committed to ensuring that our voices are heard related to Industrial Wind Turbine Developments

I will highlight two items that I consider are critical to ultimately getting the Cumberland County Wind Turbine Bylaws "right"

1. Set Backs- As stated in our submission we are extremely concerned that the 750 M set back as is being recommended to Council is not adequate to provide the security and protection against risk that residents deserve. Our submission does reference numerous jurisdictions and evidence that a set back of 750 M for these massive structures is no longer acceptable . The size and specifications of the Wind Turbines as currently proposed are much larger than those previously built and Bylaws need to be reflective of the increased size and potential risk to Communities
2. The Wentworth Valley is a Culturally Significant Area as defined in the Bylaw Recommendations and needs to be added to the Restricted Overlay as defined in the Protect Wentworth Valley submission (ie approximately 5km east and west of Hwy 4) . As is provided in the PWV submission the Wentworth Valley does meet all of the criteria as presented in the Bylaw recommendations to be designated a Culturally Significant Area . We are so fortunate to have this unique gem that Nova Scotian's have been benefiting from through tourism opportunities, recreation opportunities , solitude , economic development, support of biodiversity and wildlife habitat etc . We want to ensure that future generation have these same opportunities

Again , Thank- you to staff and Council for allowing me this opportunity for me to voice my support and pride in the Protect Wentworth Valley Submission in response to the Bylaw recommendations and provide additional highlight to Set Back concern and request to added the Wentworth Valley to the Restricted Overlay .

Best regards

Nancy Frame

From: Brian Johnston <briangjohnstonqc56@gmail.com>
Sent: May 5, 2022 4:04 PM
To: Planning; Murray Scott; Kathy Redmond
Subject:Protect Wentworth Valley - WIND - Cumberland Wind Turbine Bylaw Draft Recommendations

Dear Mayor and Council.

I am providing my feedback on the draft recommendations related to the municipal review of wind turbine regulations.

Along with my family, I have owned a cottage on Folly Lake, enjoying all four seasons and obviously spending a lot of time in Cumberland County.

Wentworth Valley is a special place deserving your protection. People are investing in homes, cottages and camps in the area to enjoy its natural beauty and the activities which abound. There is nothing that compares in Nova Scotia with its easy access from larger population centres. It is a traditional gathering place which has grown in popularity for families and friends, whether enjoying hiking, cycling, fishing and cross-country skiing (which are my favourite outdoor activities) or like so many, participating in downhill skiing.

As you know, the hundreds of families who enjoy Wentworth Valley on Thanksgiving weekend as their annual fall tradition stands out as proof of its cultural significance. From Covid we have learned how essential outdoor activities are to maintaining individual and societal resilience.

The placement of Industrial Wind Turbines in excess of fifty stories in height will be a blight on this unique area. They will overwhelm nature, the mountains and all of us.

The peaceful enjoyment of nature will be lost. Industrial Wind Turbines make noise, they create flicker, they flash at night (surely the night sky that we value is worth preserving) and they will dominate for a generation. We know they have a limited operational lifespan (20 years or so) and even during that time, they don't always work as planned or not work at all. And then after 20 or so years, they need to be removed at some considerable cost (which should not be borne by the taxpayers) to remove the scars of their placement

I understand that the proponent's turbines are bigger than any others operating in Canada. Wind technology may be proven but the application of it at this scale and in this place is "breakthrough". It is reminiscent of the construction of the first Glace Bay heavy water plant in the 70's. It was not the first such plant in Canada, but it was on a scale and in a place which caused it all to be scrapped and required rebuilding at huge cost.

At that time there was some social justification for the project, employing hundreds of then out of work coal miners. Employment is not a justification for this project.

The debate continues as to whether wind turbines are "net helpful" for the environment, but placing them in the Wentworth Valley is clearly and demonstrably destructive of the local environment and this part of your Municipality. There are alternative locations in Cumberland County. With appropriate setbacks and protections, such may find favour with the people you serve. However, Wentworth Valley is not the place for this project.

Thank-you for your consideration of this and recognize your service to the residents of Cumberland County.

Brian Johnston

From: cathjohnston@eastlink.ca

Sent: May 5, 2022 3:56 PM

To: Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Murray Scott; Municipal Clerk's Office; Greg Herrett; Planning

Cc: toryrushtonmla@bellaliant.com; tom.taggartmla@gmail.com; mindnr@novascotia.ca;

Minister.environment@novascotia.ca; PREMIER@novascotia.ca; ea@gov.ns.ca; wind.info@novascotia.ca

Subject:RE: Response to Wind Turbine Bylaw Recommendations

Planning department and Council of Cumberland:

I applaud your decision to place a moratorium on any wind turbine projects until your staff had the opportunity to research current practices in bylaws and modify them so that you are considered best in class. I also recognize that there are no internationally accepted standards for addressing some of the most controversial issues surrounding Wind Turbine energy (including noise.)

Thank you for the opportunity to review the draft of the amended bylaws and provide further input. Having reviewed the Bylaw recommendations by your staff I would like to make the following comments.

750 M SETBACK

In the early to mid-2000's when Wind Turbines were about 80 m to 100 m tall, many jurisdictions in Canada as well as Europe and Australia had setbacks of 1km to 2 km. Even with small turbines these distances at times have had serious issues in terms of noise levels and flicker issues in the residential areas.

In a recent community meeting with one of the proponents in the Wentworth Valley, the proponent told me personally that the current standard for 190 m turbines is 2.5 km (2500m) setbacks. I find it difficult to reconcile a proponent indicating 2500 m as acceptable minimum standard with a 750 m recommendation by Cumberland Planning.

As well there have been many issues with noise and flicker complaints around the world at 1Km to 3km distances. Even in our own backyard there have been serious issues to residents. In Colchester County a 1 km distance has had a significant impact on the lives of residents in terms of acceptable noise levels . Also Glen Dhu Wind turbine project has witnessed unacceptable noise and flicker at 1500 m setbacks.

As a resident in the area of the proposed wind turbine projects, I think it is important that our community be heard and that the setbacks consider population density, cultural sensitivity, rural environment, and geography in establishing appropriate setbacks for individual areas.

At a minimum the setback should be at 2.5 km providing acceptable noise levels and flicker are attainable at that distance with the proposed brand and height turbines.

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Examples follow:

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Cumberland County consists of Core Mainland Moose habitat throughout but the Mainland Moose Recovery plan states that the Wentworth Valley part of the county is considered "essential" Moose Habitat. Without this protection mainland moose will not survive.

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It is a key ecological corridor and connectivity bottle neck area between Cumberland County and the western Colchester county with the rest of Nova Scotia

It has a significant cluster of protected areas, a provincial park, and conservation areas with more being proposed.

Wentworth is the oldest mountain sport recreation area in Atlantic Canada. The Wentworth region has some of the best mountain sport recreation terrain in the Maritimes. There are more than 100 km of trails in the immediate Wentworth area exist.

Hiking, downhill skiing cross country skiing snowshoeing, fishing, have existed here for 100 years. Throughout the pandemic, there was increased activity in the Wentworth Valley as people sought out the peace and quiet enjoyment of Wentworth outside of the larger cities and towns. This increased activity continues to grow.

I believe it is most appropriate that the overlay protected area exist from the top of Folly mountain to the New Annan Road on Hwy 4 with a North and south 4 km buffer. We need to protect this very unique area of your County and our province. "Natural ecosystems, including our forests, are now widely recognized as the foundation upon which all life on earth ultimately depends and therefore must be protected and used sustainably."

OTHER REQUESTS

I request that a review of the wind turbine bylaws initially be done in two years following the current changes being implemented and then every five years thereafter. Technology is changing dramatically every year and we have seen the size of turbines almost triple for energy requirements in the past 10 years.

As a homeowner, property value decreases have been found in areas of industrialized wind turbine developments. It has been reported in Ontario at 30-55 percent drop.

How is the county going to reimburse those who loose 50% of their investment? Is the increased economic return going to offset the decrease in property assessment values?

A very detailed complaint process should be implemented in the bylaws to ensure that property owners have a fair and effective process to resort to when noise, flicker and other issues impact their property and health .

I think it is absolutely essential that any community near proposed industrial wind turbines be provided detailed information on the specific location of the proposed turbines. Ideally, that information would include images that simulate what views will be if and when the proposed turbines were to be erected. It is also essential that if a project is approved that the proposed site locations be confirmed prior to any installation.

From participating in the community engagement process in Wentworth, it is clear that the people in Wentworth are concerned about the proposed wind turbine projects affecting a very unique part of our province. As councilors I know that you will listen to your constituents and ensure the Wentworth Valley is part of the restricted overlay and that appropriate bylaws protect all County residents who may find themselves living near a wind turbine development in less culturally significant areas..

Thank you
Catherine Johnston

From: Mark and Alexandria Nunn <eastriverretreat@live.com>
Sent: May 5, 2022 3:53 PM
To: Planning
Subject: WIND TURBINES PROJECT

Dear Cumberland County,

We are STRONGLY OPPOSED TO WIND TURBINES IN THE WENTWORTH VALLEY, an Area of Outstanding Natural Beauty.

Setbacks from dwellings

750m from a 60 story WIND TURBINE THAT VIBRATES AND MAKES NOISE 24 HOURS A DAY will prove intolerable to live with and certainly detrimental to mental health - which is already a grave concern for the population of Canadian citizens and residents.

Depression in Canada is already amongst the highest in the World. We have to consider the future, not just the present, and 3 kms would be safer.

We submit our concerns both as residents of Wentworth and also as therapists with 30 years' experience in mental health issues, such as stress, anxiety, depression.

Wilderness Areas of Outstanding Natural Beauty are vital for the healthy future of our Planet Earth; for Environmental and Ecological reasons and also for the quality of life for those who live here and those who visit here to find succour and peace and tranquillity. To destroy the serenity, the incomparable beauty of nature in the Wentworth Valley and surrounding area feels too shocking to contemplate.

Corporate interest will always try to push the envelope but surely we can see what havoc this has wreaked to nature in many parts of the World, where so much has already been irrevocably destroyed and lost.

We understand there is documentation of instances of Wind Turbines catching fire, falling to the ground and/or simply left in place when de-commissioned.

We realise this is a tough call but please, please protect our outstandingly beautiful area for all our sakes.

Yours sincerely,

Alexandria Nunn, n.d.

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Mark and Alexandria Nunn, n.d; Sevalight Associates; Pure Meditation Teachers; Dip.PureSpH; Dip IntuitiveCouns; Dip HY ; Energy Care & WellBeing Teachers

From: Sandy Martin <smartie55@ziggo.nl>

Sent: May 5, 2022 3:15 PM

To: Planning

Subject:wind

good afternoon,

I am writing to share my thoughts regarding the draft recommendations related to the municipal review of wind turbines in Cumberland County.

1. We build and erect wind turbines to decrease the use of fossil fuels. Why? Because burning fossil fuels releases greenhouse gases. Why? Because fossil fuels are derived from decomposed plant materials that sequester huge volumes of CO₂, methane and nitrous oxide
2. In order to erect windturbines on land, large areas of forest are clearcut and very often wetlands are destroyed in order to accommodate their construction.
3. Trees and other vegetation draw down and absorb CO₂. The top 1 meter of soil sequesters the most in a normal, healthy forest. Wetlands, on the other hand (usually referred to as unusable swamps) sequester tonnes and tonnes of carbon, methane and nitrous oxide otherwise known as greenhouse gases (WWF-Canada 2022)
4. Cut trees retain 30% of their stored carbon. The rest is emitted when they're cut. The heavy equipment tears up the soil, releasing even more carbon into the atmosphere. Disturbed wetlands release greenhouse gases by the tonnes and depending on the size of the wetland- by the megatonnes.
5. So, why does it make sense to destroy a carbon sink asset turning it into a liability to erect structures that can't even come close to offsetting the greenhouse gases that have just been released in order to establish the wind farm. It makes matters worse. And it makes no sense.

The climate crisis in which we find ourselves is caused by the atmospheric over-saturation of carbon dioxide, methane and nitrous oxide. By destroying forests and wetlands, we are pushed further towards the tipping point of no return. This destruction is closely linked to the decline in biodiversity. All of these elements are the bottom layers of our house of cards. Pull anyone of these cards out of position, and our house of cards will collapse.

Positioning windturbines in any location that requires cutting trees, disturbing or destroying wetlands or destroying habitat is foolhardy to say the least.

Kind regards,
Sandy Martin

From: Adam Wyllie <adam@fultonins.ca>
Sent: May 5, 2022 2:55 PM
To: Planning
Cc: Murray Scott; Kathy Redmond; Fred Gould; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Greg Herrett
Subject: Wind- Cumberland draft comments

Comments to draft findings surrounding Industrial Wind development bylaws in Cumberland County.

To: Planning, Cumberland County, Cumberland County Council

Thank-you to all for looking at the current bylaws. As an avid Snowmobiler, Skier, Hunter and part-time resident of Folly lake, myself like other citizens of the Wentworth Valley rely on strong bylaws and regulations to protect us from the negative impact of any wind development. Once built it is almost impossible to remedy in the future. Cumberland County has the opportunity to be a world leader when it comes to creating these bylaws and make them relevant to the size and scale of these huge projects.

My response to the draft recommendations is that we need to create bylaws to protect the citizens of the Wentworth area first and then Second look to facilitate and promote wind development . A setback of 750 meters is not enough when looking at the height of the proposed towers.

I truly believe that there are places in this world that wind development should not happen and Wentworth Valley is one of them. The below 4 points all apply to Wentworth Valley & Higgins Mountain Areas

- 1) Environmentally sensitive and important ecosystems
- 2) High value exiting tourism as well as potential for tourism growth
- 3) Historic and culturally important sightlines
- 4) Conflicts with current and future residential development

These points and so many others line up against wind development in Wentworth Valley, please support a no-wind overlay or zoning as part of the by-laws.

As a Snowmobiler and member of both the Sutherlands Lake Trail Groomers Association and the Fundy Trail Snowmobile club. The Wentworth Valley - Higgins mountain area is a crucial corridor connecting northern Nova Scotia with the rest of the province. When I look at the map with the proposed number, size and placement of the windmills I can't see how snowmobile trail access won't be affected or eliminated.

It would have be very easy for me to have been enticed by the windmill proponents as they mentioned several times that they would support various local community organizations and initiatives. I believe this piece is a mandatory part of their bid. They didn't have much in the way of details at the Wentworth Rec center open house presentation on how much money was available or who could apply. It was a bit misleading and could have been misconstrued as funding or a line item for the local snowmobile clubs that I have been a member of for many years. It would be short sighted to put the potential of financial support over the trail access or elimination.

Wentworth Valley is not the right location for industrial wind turbines.

Sincerely,

Adam Wyllie

From: Adam Davies <adam.davies.ns@gmail.com>
Sent: May 5, 2022 2:18 PM
To: Planning
Subject:Wind

Good Afternoon,

Thank you for this opportunity to provide feedback on the draft recommendations concerning the wind turbine regulations in the Land Use Bylaw.

My comments fall on two specific points:

- 'That Council review wind turbine regulations no less than every ten years'. This recommendation, if implemented, would mean that two councils could be elected (in years 2024 and 2028) with no obligation to review the regulations. That seems odd in an industry that is growing, with technological gains being made quickly, and with public interest in developing the green economy here in Cumberland County. Our elected representatives need to find the balance between developing clean, renewable energy and local interests, and,

since that is a moving target, council should be obligated to review the regulations, as well as the policy, once during each term. To do that, the recommendation should specify a review every four years.

'Council may determine that the Wentworth Valley is a culturally significant area....' If this is indeed Council's plan, the recommendation should prioritize and differentiate the needs of local residents, seasonal residents, and visitors to the area. All must certainly have a say in the decision-making but the voices needed to be weighed. Local residents have to live with the decisions made, usually over a long period of time, whereas visitors to the area will not be so impacted by the decisions.

Again, I thank you for the work you have done to make these recommendations and I look forward to learning how the process now unfolds.

All best wishes,

Adam Davies

156 Black St
Pugwash, NS
B0K 1L0

Email: adam.davies.ns@gmail.com <mailto:adam.davies.ns@gmail.com>

Telephone: 902 243 3599

From: Rick Parker <parkers@seasidehighspeed.com>

Sent: May 5, 2022 2:16 PM

To: Planning

Subject: Wind

Good afternoon Nelson,

Again we would like to acknowledge the efforts by Municipal Council, its Planning Department and yourself in studying the issue of permitting large wind turbine projects in our County. Your approach to collecting information and engaging the public has been welcome. We encourage you to give priority attention to submissions by both those with recognized independent expertise and by those that would be most affected with wind turbines located in their communities.

We believe many of the letters submitted to your department are from individuals that do not have a stake in the future of our community. Of note, there are the many form letters from several Dalhousie University students and indigenous individuals that have no connection to Wentworth. We are disappointed that our submission to you (dated Feb 28th) was not included in the report or its Appendix, yet so many of these form letters were included. Is there a reason our letter was not included? Are there submissions from other long time property owners or residents of Wentworth that were not included? This causes us concern.

We strongly agree with the position that the Wentworth area be excluded from the development of such large wind turbine projects. The many valid reasons for this position have been put before you and we urge you and Council to support this position going forward with any Bylaw development.

Several of your recommendations make good sense. One critical issue that requires significantly more analysis and consideration is that of appropriate set-backs, particularly in regards to any 'giant' wind turbine projects.

Respectfully submitted,
Rick and Donna Parker

Wentworth, NS.

From: Ryan Wood <jryanwood@gmail.com>

Sent: May 5, 2022 11:58 AM

To: Planning

Cc: Angela McCormick; Murray Scott; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office; Greg Herrett

Subject: WIND - Feedback on Cumberland Wind Turbine Bylaw Draft Regulations

To whom it may concern:

As a property owner and resident of the Wentworth Valley area I would like to offer the following feedback on the Cumberland Wind Turbine Bylaw Draft Regulations.

Proposed setback distance is too short

The new proposed setback distance of 750 m or 3.5xHt from "Habitable buildings" is far too small. The large 500Kw+ industrial wind turbines proposed for the Wentworth Valley area are 190 m in height so the setback in our case would only be 665 m. These turbines will be twice the height of Halifax's tallest building, Fenwick Tower, and in many cases, will have the added elevation of sitting a few hundred feet above us on the Higgins Mountain ridge line. This is completely unacceptable to potentially have such imposing structures looming over our homes.

The Wentworth Valley is a culturally significant area

I support the five criteria outlined in your proposed policy sections 4-53 and 4-54 that determine what is a "culturally significant" area, and I believe that the Wentworth Valley area meets them:

Uniqueness

The Wentworth Valley is a very unique and growing eco-tourism destination in Nova Scotia with many well-developed recreational facilities and areas that have already been protected by the Province. It is home to year-round recreational pursuits, the highest peak in mainland Nova Scotia, old growth Acadian forests, a valuable mainland moose corridor, many waterfalls, trail systems and is also a well-known fall colours destination. About 100,000 visitors come to the Valley every year.

Broad Cultural/Community Reliance

The Wentworth Valley is home to a very resilient community of full-time residents, many of whom have been in the area for many generations with a celebrated history, historical society and a vibrant community centre. In addition, the Valley is home to a rapidly growing community of part-time residents drawn to the area by its natural beauty and the many recreational pursuits available there, Ski Wentworth key among them.

Importance to Resilience

The economic lifeblood of the Wentworth Valley area has evolved over the years with the decline of traditional farming and forestry industries and the opening of the Cobequid Pass Highway that drew traffic out of the valley. The area's focus on recreation and ecotourism began many decades ago as it became known as an eco-tourism and recreation destination for "Four Seasons of Adventure". The boom in recreational home owners in the area (many of which have been converted to full-time retirement homes) is testament to the popularity of the Wentworth Valley. To have large industrial scale wind turbine farms looming over this "jewel in the crown" for Nova Scotia, would ruin the natural beauty of this area that so many have worked so hard for many decades to sustain and enhance. If they were built in this area, I feel that the growth in the area would decline greatly.

Degree of Tradition

As I mentioned above, the area has a very rich history with a vibrant and resilient full-time population for hundreds of years in this beautiful enclave. This coupled with the many part-time residents who have been in the valley for multiple generations has really cemented the traditions of the valley for all. In addition skiing has been a draw in the valley for almost 90 years and Ski Wentworth has become the true comic driver of the area. Simply put, the Wentworth Valley holds a special place in the hearts of everyone! It is not a place for industrial wind operations.

Dramatic Cultural Change

The unique context of the Valley, with its natural beauty and the many opportunities for recreation, is essential to support the culture that now exists in this area. The harsh dramatic impact of invading this area with dozens and dozens of huge wind turbines (3x larger than any currently in the Province) would reverse decades of effort to create such a beautiful recreation culture for all.

The Wentworth Valley is a Mainland Moose Corridor

The Wentworth Valley ecosystem has been recognized by the province of Nova Scotia in the recently released Mainland Moose Recovery Plan as core habitat that offers “those conditions most likely to secure habitat and connectivity requirements that are spatially appropriate to recover a viable population from one that is currently small, declining, and fragmented.” It is the responsibility of government to balance ecology and economy by preserving such important lands and look toward alternative locations for wind energy projects while also considering the other options for renewable power generation outlined in the provincial plan including marine renewable, hydropower, geothermal, solar, biomass and energy storage. As stated in the provincial plan: “No single resource can supply all our energy needs - fossil fuels will continue to play a role in our energy needs for decades to come, but we can reduce that role and create a diverse mix of energy resources”. Current operating and decommissioned wind energy sites have been found to create significant environmental impact including habitat destruction and fragmentation as well as impacts to local hydrology. We must realize that alternatives exist allowing us to do the right thing and protect core habitat and places in our province that represent important areas of biodiversity.

I urge you to consider these facts in your decision making process when reviewing municipal regulations controlling small and large wind turbines in your municipality. At a minimum there should be a planning committee established to review all wind projects that includes the public and turbine setbacks should be at least 1000 meters and preferably 5000 meters from conservation lands and private property to help reduce impacts. Damage to roads, habitat and waterways must be strictly monitored and recognized as the responsibility of the land owner and proponent. Decommissioning and environmental restoration must also be funded by the proponent and part of any proposal. You have the opportunity to correct the oversights of past governments that did not balance economy and ecology and to protect and promote the Wentworth Valley ecosystem as a pristine example of environmental balance. It is part of the job of elected officials to protect the interests of future generations by making balanced decisions.

Adding Wentworth to Restricted Overlay: With reference to Cumberland Policy 4-53 and Policy 4-54, I believe that the Wentworth Valley meets the criteria laid out for its protection. It is not an area where industrial wind turbines should be erected.

The first reason is because it is an area frequented by Nova Scotia’s endangered mainland moose as they move between the Wentworth Valley and Portapique Protected Wilderness Areas. Second, the Wentworth Valley is an area that is of vital healthful importance and cultural significance for its year-round and seasonal residents. The negative health impacts of wind turbines are well documented and should be articulated more clearly in the county’s policy documents. Third, industrial wind turbines will have severe negative impacts on tourism plans for the area. It is said that about 100,000 visitors annually come to enjoy the Valley from across the Maritimes.

I believe that Cumberland County should coordinate its policy on industrial wind turbines with neighbouring Colchester County. I hope that the two counties will agree that there should be a 10 km-wide restricted overlay corridor that runs from the top of Folly Mountain in Colchester on through the Wentworth Valley in

Cumberland. That area along Highway 4 is a wonderful landscape and view-plane that has been enjoyed by Canadians and foreign tourists for well over a century—ever since the advent of train and automobile traffic. It's a landscape comparable to the scenery of the Cabot Trail. Industrial wind turbines would mar it irrevocably.

I trust that you will take these points into consideration as you review the Cumberland Wind Turbine Bylaw Draft Regulations.

Thank-you for consideration in support of the future of the Wentworth Valley.

Regards, Ryan Wood

From: Audrey Conroy <conroyaudrey@gmail.com>
Sent: May 5, 2022 10:42 AM
To: Planning
Cc: Murray Scott; Kathy Redmond
Subject: WIND

Hi Nelson

After reviewing the first draft of the proposed Cumberland wind turbines, I am pleased to see some of our suggestions were incorporated, and very encouraged by the suggestion "that Wentworth be added to the restricted overlay, preventing additional large turbines in the area." Policy 4-53 and Policy 4-54

We all know and love the Wentworth Valley for its beauty, it is a destination that draws people here year round. Whether it be in the annual autumn drive to enjoy the fall foliage or the traditional hike to the "Look Off" the high vantage point from which to see the entire valley and its beauty (part of the Hostel trails). Others are drawn here year after year (for generations) to participate in sporting competitions in the winter, everything from downhill skiing, snowboarding, and freestyle. The area plays host to local annual events, provincial events, Atlantic Cups and even hosted the Canada Winter Games. In the summer the area is enjoyed by x country running groups, mountain bikers and orienteers. They come for the beauty and the challenges offered by the surrounding mountains. Like winter sports they also host competitions that draw people from all over. The Wentworth Valley is a unique place where people come to challenge their limits of endurance and skills in amazing ways.

Policy 4-53 Restricted Overlay speaks perfectly to the restriction of this area for the above mentioned reasons. Restrict 5 kms along both sides of HWY 4 from the Provincial Park in Wentworth through to the top of Folly Mountain.

This would indeed see that Wentworth Valley is protected for local residents, fellow Nova Scotians and visitors.

Setback not great enough - given the size of the new generation Industrial Wind Turbines - 750m is just too close.

<https://novascotia.ca/nse/ea/docs/EA.Guide-Proponents-WindPowerProjects.pdf> pg14

"Locate wind turbines far enough away from domestic dwellings so that the turbines do not unreasonably affect the amenity of such

properties through sound, shadow flicker, visual domination, or reflected light. The advisable distance between residences and a proposed wind development to avoid any disturbance

of neighbours depends on a variety of factors including local topography, climate, character and level of background noise, and overall size of the development".

Setbacks factors:

Total sound power: Given different size (megawatts)

Number of dominant wind turbines. Setbacks typically do not take into consideration the residences in front of a line of turbines.

Development Agreement for medium and Large wind turbines -this is new, would like to know the wording of this agreement, what will it include? Is there public engagement?

Encouraged to see that the council will be approving each Development Agreement.

Turbine Classifications to:

Large Scale - any Wind Turbine which has a Nameplate Capacity greater than 100KW.

Small Scale - Nameplate Capacity less than 100KW

Noise - No mention in this first draft of acceptable Noise standards. Feel this should be addressed at the municipal level so should there be complaints once the turbines are operating

it was clearly stated in the By-Laws or Development Agreement. Maximum Ambient Degradation Noise Standard no greater than 35dB(a) as measured at existing residences.

The noise standard must include the existing noise of other industrial projects in the area in combination with the new proposed wind turbine project.

The World Health Organization WHO recommends 30dB, but for rural settings it is recommended to be 25dB(A). Night time levels need to be lower.

There needs to be strict guidelines on how to measure the sound levels. Time of the year, day, is it a maximum level, a ten minute average, an hour average?

<https://www.euro.who.int/en/publications/abstracts/environmental-noise-guidelines-for-the-european-region-2018> page 97

Complaint Process - This needs to be spelled out in the Bylaw or Development Agreement to protect the residents.

- It must include - Process of filing a wind turbine noise complaint.
- how testing will be triggered
- noise testing protocols to be used in the event of testing.
- the appeal process in the event the resident contests the testing results.

We can learn from others on what this should look like, eg. Ontario NPC-350 protocol. Needs to include the hiring of a good Acoustic Engineer specializing in the field of Industrial Wind Turbines.

<https://www.scirp.org/journal/paperinformation.aspx?paperid=90562>

Hope this information can assist in the re-drafting of the By-Laws so they can work for the wind industry, but more importantly protect what already exists in the area. Protect the nature, protect the residents, biodiversity and wildlife in the areas where the projects are going.

Please do not look at the calendar to hurry this through, we need to get this right as there is too much that will be damaged irrevocably if we don't.

Sincerely

Audrey Conroy

Folly Lake

From: Carol Hyslop <carolhyslop@yahoo.ca>
Sent: May 5, 2022 10:37 AM
To: Planning
Subject: wind Farm comments

When I was a child, I used to hear people say:

"Don't throw the baby out with the bathwater."

I believe this is just what the proposed wind farm projects plan to do.

Yes, we need to do what we can to mitigate the effects of climate change but we need to examine the cost of our efforts.

I feel the proponents of these projects are stuck in the 'same old, same old' mode, that is the capitalist notion that big is better and that all projects must be money makers for the few. The proposals for wind farms....which seem to be popping up all around us....are touted as being the answer to decreasing our civilization's carbon output. In fact, anyone in disagreement is accused of preventing attempts to deal with climate change.

Climate change, which humans have helped bring about, is going to change life as we know it and I don't think the process is going to be pretty. We have been made aware that this threatening change has been in a great part caused by decisions and actions made by us, humans, for the purpose of increasing wealth for the few. We like our gadgets, our cars, our homes, accessible food supply, clean water, etc. but having all this has caused a deterioration in the health of the planet. We have forgotten we are creatures of the earth, our lives intertwined with all earthly things and our actions affect all of the earth and its creatures.

In my lifetime (80 years) I have seen the natural health of my home (Wentworth) decrease due to what has been termed 'progress'. One of these progressive actions has been the ceaseless clearcutting, promoted as supplying needed jobs in our area, (but in fact did not because of the use of really terrifying machines). Clearcutting on what was crown land on the mountains has resulted in the destruction of habitat for the flora and fauna of our area...there has been a large decrease in the number of birds and animals like bears are regularly in our back yards... and has also caused water run-off after rain, making brooks that once ran clear and clean enough to supply us with drinking water turn brown with silt. It is disgusting.

The wind farm proposals are very much like the clearcutting. We are told they are a good thing because they will combat climate change. Period. No question. The proposed projects involve actions that will harm the natural environment, threaten the existence of plants and animals and make human lives miserable. Is that not what climate change will do?

Wind power is something that can be accessed to help reduce carbon output and it should be. But there is more than one way to produce power from wind and, if we want to go that route, we should not be building big industrial turbines that will result in ecological harm and human discomfort. I believe the proponents of these projects need to shake their heads and start thinking about the future and what it is we are trying to protect...a world that will support human existence. That will not happen by chipping away at what natural habitat we have left for the purpose putting money in a few pockets.

To monitor these projects is a difficult thing. Money is power when it comes to propaganda....it is loud and clear from the proponents of the proposed wind farms: they are absolutely necessary to save us from climate change. But will we want to live in the world that will result?

From: vivian jeremy <vandjgodfree@gmail.com>
Sent: May 5, 2022 10:33 AM
To: Planning
Subject:Wind

Dear Mr Bezanson,

Thank you for your update on Cumberland's Review of Wind Turbine Regulations, and the draft recommendations.

I am impressed how thoroughly you have researched the subject.

I hope that the draft recommendations are passed, and plans for wind power in this county can progress.

I am in agreement that the Wentworth Valley itself should be a restricted area, however if the Valley is to be an Eco-Tourism area, then there should be other restrictions as well on development, and clear cutting. A designated restricted area should not preclude any wind turbines between the Valley and the Cobequid Pass.

It would seem that wind turbines could be successfully incorporated in the vicinity of an Eco-Tourism area, especially as the ski hill uses large amounts of energy to make snow and run ski lifts. Wind turbines, I would think, would be a major draw as an "eco-ski hill" using renewable energy.

The Higgins Mountain Wind Farm does not seem to impact the Wentworth Valley itself or the ski hill, and uses clear cut land and existing roads.

I hope to see wind power development soon in Cumberland County.

Sincerely
Vivian Godfree
Pugwash NS

From: Gerald Pearson <judgay@eastlink.ca>
Sent: May 5, 2022 9:32 AM
To: Planning
Subject:Protect Wentworth

I would first like to commend Cumberland Council for establishing a six month moratorium on wind turbines so a revised view could be made on this important issue.

After reading your recent recommendations I would like to comment on two areas:

1) the setback for large turbines(750 meters) is much too short. Can you imagine a 620 foot tower only being that far away from your house- the noise and flicker affect would be overwhelming and destroy your peace and eventually your health. I believe a 4000 meter setback would make more sense.

2) In your list of Culturally Significant Areas I believe the Wentworth Valley fits each of the criteria. It would be a disaster to destroy this area for the sake of getting a few tax dollars. I hope council is not overwhelmed by these large companies waving dollar bills

In their presentations.

Thank you again for listening to the residents of the valley and hopefully we can trust you to make your decisions in the best interest of our beautiful valley (as many have said- A Gem).

Jud and Gay Pearson

Would you be so kind as to forward this to the mayor and council members.

From: Kate Fitzgibbons <katefitz@eastlink.ca>
Sent: May 5, 2022 9:18 AM
To: Planning
Subject: Wind Turbine Regulations, Restrictive Overlay for the Wentworth valley

Dear M. Bezanson,

I would like to thank Cumberland county for the opportunity to participate in the review of wind turbine regulations. Having been a resident of both Cumberland county and Colchester county, I have long appreciated the Wentworth Valley and Folly Lake area. And I am not alone. The active outdoor lifestyle which is such an integral part of the Wentworth community is enjoyed not only by those who live here but by people from all over Nova Scotia and New Brunswick. It is the reason why I have been a resident of the area since 1994 and the reason why people have been coming here since the 1930's. Isn't this the type of lifestyle our leaders should be promoting?

If these massive wind turbines were permitted, the impact would be profound - from the night sky, to the wildlife in the hills, the streams, the lake, the flickering at sunset, the noise degradation, the damage to roads, the loss of trees, to future recreational development... the list goes on. It would impact the quality of life of not just of residents and wildlife but of skiers, mountain bikers, hikers, fishers, and all of the businesses that support these activities. In looking at our land use bylaws wouldn't we be short sighted not to recognize what really makes the Wentworth Valley such a treasure? One that needs protecting?

I sincerely hope that council includes a restrictive Overlay to at least 5 km either side of the Wentworth Valley and adopts a tourism plan for the region.

Thank you for giving me this opportunity to have input into an issue that has such profound long term consequences for our community.

Best regards,

Kate Fitzgibbons
136 Peninsula Drive, Folly Lake

From: Kate Fitzgibbons <katefitz@eastlink.ca>
Sent: May 5, 2022 8:15 AM
To: Planning
Cc: Murray Scott
Subject: Wind

Dear Mr. Bezanson,

Thank you for the opportunity to participate in the process to determine land use recommendations specifically regarding wind turbines in Cumberland County.

I have read the Wind Turbine Recommendations prepared by the Planning and Development Department for Cumberland and would like to speak to the proposed changes. I was particularly happy to see that there was a possibility to include Wentworth in the Restricted Overlay as a Culturally Significant Area and would hope that council will take steps to adopt a tourism plan for the community.

However, I was disappointed to see that the proposed minimum setbacks be only 750m or 3.5 x Ht of the turbine to a habitable building external to the wind energy project. This is too close and does not take into consideration future recreational property development. If wind turbines are permitted to be so close to properties, people will not invest in recreational homes in the Wentworth community. These new cottagers would support local businesses and pay property taxes. I believe that the minimum setback should be 5 km from the turbine to an external property line.

Thank you very much for providing me with the opportunity to participate in a matter that has profound implications for our community.

Best regards,

Kate Fitzgibbons
136 Peninsula Drive, Folly Lake

From: John Mayfield <john.m.mayfield@gmail.com>
Sent: May 5, 2022 1:17 AM
To: Planning
Subject: Wind

Hello,

I've taken a very long time to submit my response to the proposed changes because I found the measures and reasoning severely lacking in human consideration. It left me frustrated, upset, and concerned. I know this feedback will come across as harsh, please understand where that comes from and that it is directed at the situation, not the individuals who did the work.

We have lived with the significant impact of wind turbines for eight years and I am deeply troubled by the proposed projects across the province since they are larger in size, and more turbines in number, than what we deal with. I had really high hopes when I heard of Cumberland Country's moratorium that there would be serious protections for people and property and I just don't see it in these suggestions.

Unfortunately what I read in the reports and proposals such as "best practices" was a lot of industry support, a lot of industry phrasing, and a lot of dismissal of citizen concerns and lived experiences. In the "best practices info sheet" it's stated: "The regulated setback distances for wind turbines can be very important in addressing issues related to visual impacts, shadow flicker, and noise. These distances can vary by jurisdiction but must provide enough distance to avoid any safety concerns while also not being too stringent to prevent wind development altogether."

These recommendations do not meet that safety criteria in my opinion and experience in relation to the previous sentence of noise and shadow flicker.

There appears to be a lot of research done on what other countries have for guidelines. I found the recommendations for this pretty selective, but I also know the scope is very large and likely take more time than available to explore deeper. Problem is these guidelines likely come from the wind industry and their very powerful lobby groups. I did not see any, or enough, research into the issues citizens in these areas have, the court cases where citizens won against turbine facilities (typically for nuisance/noise), discussion around the most stringent policies for protecting citizens, places that have outright rejected facilities and why, or enough weight given to first hand accounts such as ours. I found the best practices report in particular to contain a lot of pages from industry and their lobby groups, and very little for citizens - almost dismissive. I don't believe it was the intent, but that's how it came across to me. It feels very one sided.

That being said I will give feedback on a few things specifically:

- 750 meter set back (for largest turbines). This is insufficient for the turbines currently in the province let alone ones that will be much bigger. For that matter most proponents generally use 1km anyway, this gives them permission to get 250m closer than they may have already planned. Setbacks should be in the order of 2km from the property line, not dwelling. Doing measurements to the dwelling gives industry use of people's property without consideration. It potentially robs property owners of enjoyment of their land since only the dwelling is considered. If proponents find "to the property line" restrictive they should negotiate with the land owners for easements. We are 1 to 1.5km away and 750m would be insufficient for our comparatively smaller turbines (80m at the hub). Our neighbour is 1.4 to 2km away from the turbines and occasionally hears them inside his house. This means they can frequently be heard on his property also. This is not a visual issue, this is a sound/noise issue. This is verifiable, lived, and can be told/experienced first hand. I have a list of names of people across the province that experience similar or worse impacts than we do. I can provide this list privately since I do not know if this feedback will be publicly shared and if those names and contact would be redacted. Out of respect for their privacy and safety I won't include them here.

The setback topic is, in my opinion, the single biggest issue in this report when it comes to protecting citizens and their property. These recommendations put industry first and the protection and safety of citizens second. Please, my wife and I are begging you, please do not put industry ahead of people. Industry will be just fine, but people stand to lose a whole lot more.

- The notion that natural sounds will mask the turbines. This is not our experience. On occasion can it happen? Yes. Is it the norm? Not even close. With respect, this is industry speak and does not come from a place of experience. On any given night, and a majority of day times, this can be disproven at our place and I would wager many

places near turbine facilities across the province. The way turbines generate noise is different and far too technical for me to speak to competently but it is not comparable to naturally generated sound such as wind in the trees. Kristen Overmyer (contact info available) can give a much better technical explanation. In addition it seems to assume that wind levels are the same at all heights and they aren't. Otherwise we could just place turbines closer to ground level and harvest wind at the same rate. We've all experienced days where it's pretty much dead calm at tree level but clouds or fog is flying by. Wind speed is not the same from ground to sky and at the heights turbines operate - more so for ones that will be the largest in Canada. If there is no or little wind at tree level but there is wind at turbine level there is no way for it to mask the sound, that only makes sense. The noise at our place from turbines that are 80m at the hub can be loud enough to disturb sleep. The noise impacts cause stress, anxiety, and sleep disruption. This has nothing to do with visuals and dovetails with setbacks. The only solution for noise, which impacts enjoyment of property, home, and in my opinion health through stress and sleep disturbance, is distance.

I believe I sent this link before, it's recordings done at our house. There is harsh language and I apologize for that, but it's frustrating. There is no natural masking of turbine noise. This is from a greater distance than 750m proposed in the bylaw recommendations, again we are 1 to 1.5km away from the turbines: <https://soundcloud.com/johnns-1>

Please, come to our place day or night and experience it. Come during low, medium, and high noise times. During good and poor weather. I feel that until this is done it's just people looking at words and not gaining first hand knowledge. I don't think many could experience medium to high impact days and say it's acceptable. I don't think many would hear hydraulics going non-stop on a nice, low wind day, and say it's acceptable.

The last topic is the order of how this is being done. Feedback on the bylaw recommendations is due May 5th, but on May 9th there's a community presentation. If there isn't a feedback period after the open house, or the deadline is extended, I'm left to wonder how things will be presented on May 9th and how people that are newly informed at this meeting will be able to leave feedback. I assume they can at the meeting, but there should be a period after also. This would give time for people to digest the information, investigate further, and allow for a more informed response.

I applaud the suggestion of protecting the Wentworth Valley area for a variety of reasons, but that's one of the few things in this report that I can support.

Thank you for the opportunity to give feedback,
-John Mayfield
902-324-1344
741 Loch Haven Lane

Old Barns

From: john conroy <jdconroy115@gmail.com>
Sent: May 4, 2022 11:06 PM
To: Planning
Subject: Wind

4 May 2022

Planning and Development Department

County of Cumberland N.S.

Re: Land use by law 22-4 regarding wind turbine installations in Cumberland County.

I greatly appreciate this opportunity to express my concerns and wishes regarding the revisions of the 1st draft of the by-laws pertaining to the development wind turbines installation in the Cumberland County as follows:

- * Setbacks from dwellings (habitable buildings), parks and recreational areas should be a minimum 3 kilometers from the associated property lines. Large wind turbines with a total height of 150 meters or more (tower base to highest position of rotor tip) should have the minimum distance increased to 5 KM.
- * Sound is a major concern. Testing should be carried out by an independent qualified authority prior to granting construction permits to help ensure the wind turbine generated noise does not exceed an acceptable level for extended periods of time. These machines do generate noise both from the spinning of the rotors to the rotation of the nacelle. The locations and the set backs of all wind turbines should take into account prevailing wind direction relative to nearest habitable buildings and the sound testing and calculations should be done when there are no leaves on trees. Also elevation of wind turbines relative to habitable buildings should be taken into account.
- * There are many areas such as the Wentworth Valley that have dug wells in surface aquifers. These wells could be contaminated during the construction of roads and wind turbine bases or foundations. The larger wind turbines require even larger excavation for the thousands of kilograms of steel and concrete that makes up the bases. This would require blasting to create these large excavations. This could expose elements such as uranium which would almost certainly contaminate water run off. The area of Higgins Mountain is one of the areas targeted for wind development. It should be noted that the headwaters for both the Wallace River in Cumberland County and the Great Village River are on Higgins Mountain. The bylaw should have strict rules regarding the locations of the wind turbine installations as well as strict environmental protection procedures that are enforced to prevent contamination of wetlands and waterways as mentioned here.
- * Light pollution both from the flashing beacons on the wind towers and the possible strobe effect should be covered in the revised by-laws. The location, setback and wind tower nacelle height should be taken into account here.

Thank you,

John Conroy
14 Peninsula Drive
RR#1 Londonderry NS
B0M 1M0

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

From: vivian jeremy <vandjgodfree@gmail.com <mailto:vandjgodfree@gmail.com> >

Date: Wed, May 4, 2022 at 2:45 PM

Subject: Comments on the wind recommendations

To: jennifer houghtaling <jenniferhoughtaling@gmail.com <mailto:jenniferhoughtaling@gmail.com> >

Hi Jenn

I am impressed at how thoroughly Nelson Bezanson has researched the issue of wind development. I hope that the Municipality will adopt the draft recommendations.

I fear there will be push back - quite a number of the submissions advocated for a 5 km set back, which effectively would rule out any wind development in the county. I am not sure where this figure was obtained (it seemed the specific distance of 5km came up again and again, as though someone in the no turbine group had circulated this figure) but it is arbitrary and unreasonable - effectively saying that they don't want to be anywhere near or even see a turbine. I am sure their concerns will come up again. (By the way your house is about 4km from my house)

I am in agreement that the Wentworth Valley itself should be a restricted area, however the restricted area should be limited. The Protect Wentworth Valley Group demands should not preclude any wind turbine development between the Valley and the Cobequid Pass. Also if the Valley is designated an Eco-Tourism area, then there should be other restrictions such as no quarries, no clear cutting, limited cottage development, and limited other commercial development.

Many places in the world have successfully incorporated wind turbines in areas bordering eco- tourism areas. It would seem appropriate to have wind turbines in the vicinity of a ski hill, which is a major consumer of energy for snow making, and ski lifts.

The Higgins Mountain Wind Farm is planned for an area which has already been clear cut - they plan to use existing roads. There appears to be minimal or no impact on the valley itself.

Your life must be busy keeping up with all these matters!

Best Wishes

Vivian

From: Larry Weatherall <lawrencepweatherall@gmail.com>

Sent: May 4, 2022 8:03 PM

To: Planning

Subject: WIND

Good day

Once again, I am reminded of the fact that we are not a democracy. I say this because what the people of the Wentworth Valley want, the same people that elect representatives municipally, provincially and federally, representatives that are to uphold the wishes of their electorates are the same people that are going to cave into conglomerates that don't live here, don't pay taxes here and don't vote here. In other words, they have no say here by any elected representative.

Why promote the Wentworth Valley as a beautiful travel site if you are going to blot the scenic beauty with unsightly towers? who wants to see that?

Do you think these conglomerates care about the Bald eagles that live in the Valley that will be impacted by the wind generators? Of course they don't! It's about profit and that is all. If you didn't know, wind is free. I can guarantee that with this addition of these eye sores, my electricity rates aren't going to decrease. Profit is what this is all about and nothing more. Climate changes everyday. These will do nothing to change that. The only thing they will do is make Wentworth an ugly location to visit and to live in.

You can all talk about the future for our children and the save the planet B.S., but really, when it comes right down to it, and let's be honest, it's all about making money or they would do it for free!

so, to wrap this up

(1) Not really Democratic (no one elected has ever asked for my opinion)

(2) Only profit driven

(3) They don't care about the environment

(4) They definitely don't care for the wild life (Eagles, Moose, deer etc)

Larry Weatherall

12032 Hwy 4

Wentworth, NS

B0M 1Z0

From: Heather Wood <heather.ewm@me.com>

Sent: May 4, 2022 11:29 AM

To: Planning

Cc: Murray Scott; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office; Greg Herrett

Subject: WIND - Feedback on Cumberland Wind Turbine Bylaw Draft Regulations

To whom it may concern:

As a property owner and resident of the Wentworth Valley area I would like to offer the following feedback on the Cumberland Wind Turbine Bylaw Draft Regulations.

Proposed setback distance is too short

The new proposed setback distance of 750 m or 3.5xHt from "Habitable buildings" is far too small. The large 500Kw+ industrial wind turbines proposed for the Wentworth Valley area are 190 m in height so the setback in our case would only be 665 m. These turbines will be twice the height of Halifax's tallest building, Fenwick Tower, and in many cases, will have the added elevation of sitting on a few hundred feet above us on the Higgins Mountain ridge line. This is completely unacceptable to potentially have such imposing structures looming over our homes.

The Wentworth Valley is a culturally significant area

I support the five criteria outlined in your proposed policy sections 4-53 and 4-54 that determine what is a "culturally significant" area, and I believe that the Wentworth Valley area meets them:

Uniqueness

The Wentworth Valley is a very unique and growing eco-tourism destination in Nova Scotia with many well-developed recreational facilities and areas that have already been protected by the Province. It is home to year-round recreational pursuits, the highest peak in mainland Nova Scotia, old growth Acadian forests, a valuable mainland moose corridor, many waterfalls, trail systems and is also a well-known fall colours destination. About 100,000 visitors come to the Valley every year.

Broad Cultural/Community Reliance

The Wentworth Valley is home to a very resilient community of full-time residents, many of whom have been in the area for many generations with a celebrated history, historical society and a vibrant community centre. In addition, the Valley is home to a rapidly growing community of part-time residents drawn to the area by its natural beauty and the many recreational pursuits available there, Ski Wentworth key among them.

Importance to Resilience

The economic lifeblood of the Wentworth Valley area has evolved over the years with the decline of traditional farming and forestry industries and the opening of the Cobequid Pass Highway that drew traffic out of the valley. The area's focus on recreation and ecotourism began many decades ago as it became known as an eco-tourism and recreation destination for "Four Seasons of Adventure". The boom in recreational home owners in the area (many of which have been converted to full-time retirement homes) is testament to the popularity of the Wentworth Valley. To have large industrial scale wind turbine farms looming over this "jewel in the crown" for Nova Scotia, would ruin the natural beauty of this area that so many have worked so hard for many decades to sustain and enhance. If they were built in this area, I feel that the growth in the area would decline greatly.

Degree of Tradition

As I mentioned above, the area has a very rich history with a vibrant and resilient full-time population for hundreds of years in this beautiful enclave. This coupled with the many of part-time residents who have been in the valley for multiple generations has really cemented the traditions of the valley for all. In addition skiing has been a draw in the valley for almost 90 years and Ski Wentworth has become the true comic driver of the area. Simply put, the Wentworth Valley holds a special place in the hearts of everyone! It is not a place for industrial wind operations.

Dramatic Cultural Change

The unique context of the Valley, with its natural beauty and the many opportunities for recreation, is essential to support the culture that now exists in this area. The harsh dramatic impact on of invading this area with dozens and dozens of huge wind turbines (3x larger than any currently in the Province) would reverse decades of effort to create such a beautiful recreation culture for all.

The Wentworth Valley is a Mainland Moose Corridor

The Wentworth Valley ecosystem has been recognized by the province of Nova Scotia in the recently released Mainland Moose Recovery Plan as core habitat that offers "those conditions most likely to secure habitat and connectivity requirements that are spatially appropriate to recover a viable population from one that is currently small, declining, and fragmented." It is the responsibility of government to balance ecology and economy by preserving such important lands and look toward alternative locations for wind energy projects while also considering the other options for renewable power generation outlined in the provincial plan including marine renewable, hydropower, geothermal, solar, biomass and energy storage. As stated in the provincial plan: "No single resource can supply all our energy needs - fossil fuels will continue to play a role in our energy needs for decades to come, but we can reduce that role and create a diverse mix of energy resources". Current operating and decommissioned wind energy sites have been found to create significant environmental impact including habitat destruction and fragmentation as well as impacts to local hydrology. We must realize that alternatives exist allowing us to do the right thing and protect core habitat and places in our province that represent important areas of biodiversity.

I urge you to consider these facts in your decision making process when reviewing municipal regulations controlling small and large wind turbines in your municipality. At a minimum there should be a planning committee established to review all wind projects that includes the public and turbine setbacks should be at least 1000 meters and preferably 5000 meters from conservation lands and private property to help reduce impacts. Damage to roads, habitat and waterways must be strictly monitored and recognized as the responsibility of the land owner and proponent. Decommissioning and environmental restoration must also be funded by the proponent and part of any proposal. You have the opportunity to correct the oversights of past governments that did not balance economy and ecology and to protect and promote the Wentworth Valley

ecosystem as a pristine example of environmental balance. It is part of the job of elected officials to protect the interests of future generations by making balanced decisions.

Adding Wentworth to Restricted Overlay: With reference to Cumberland Policy 4-53 and Policy 4-54, I believe that the Wentworth Valley meets the criteria laid out for its protection. It is not an area where industrial wind turbines should be erected.

The first reason is because it is an area frequented by Nova Scotia's endangered mainland moose as they move between the Wentworth Valley and Portapique Protected Wilderness Areas. Second, the Wentworth Valley is an area that is of vital healthful importance and cultural significance for its year-round and seasonal residents. The negative health impacts of wind turbines are well documented and should be articulated more clearly in the county's policy documents. Third, industrial wind turbines will have severe negative impacts on tourism plans for the area. It is said that about 100,000 visitors annually come to enjoy the Valley from across the Maritimes.

I believe that Cumberland County should coordinate its policy on industrial wind turbines with neighbouring Colchester County. I hope that the two counties will agree that there should be a 10 km-wide restricted overlay corridor that runs from the top of Folly Mountain in Colchester on through the Wentworth Valley in Cumberland. That area along Highway 4 is a wonderful landscape and view-plane that has been enjoyed by Canadians and foreign tourists for well over a century—ever since the advent of train and automobile traffic. It's a landscape comparable to the scenery of the Cabot Trail. Industrial wind turbines would mar it irrevocably.

I trust that you will take these points into consideration as you review the Cumberland Wind Turbine Bylaw Draft Regulations.

Thank-you for consideration in support of the future of the Wentworth Valley.

Regards, Heather Wood

From: Eric Wood <ewmktng@me.com>
Sent: May 4, 2022 11:16 AM
To: Planning
Cc: Murray Scott; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office; Greg Herrett
Subject: WIND - Feedback on Cumberland Wind Turbine Bylaw Draft Regulations

To whom it may concern:

As a property owner and resident of the Wentworth Valley area I would like to offer the following feedback on the Cumberland Wind Turbine Bylaw Draft Regulations.

Proposed setback distance is too short

The new proposed setback distance of 750 m or 3.5xHt from "Habitable buildings" is far too small. The large 500Kw+ industrial wind turbines proposed for the Wentworth Valley area are 190 m in height so the setback in our case would only be 665 m. These turbines will be twice the height of Halifax's tallest building, Fenwick Tower, and in many cases, will have the added elevation of sitting on a few hundred feet above us on the Higgins Mountain ridge line. This is completely unacceptable to potentially have such imposing structures looming over our homes.

The Wentworth Valley is a culturally significant area

I support the five criteria outlined in your proposed policy sections 4-53 and 4-54 that determine what is a “culturally significant” area, and I believe that the Wentworth Valley area meets them:

Uniqueness

The Wentworth Valley is a very unique and growing eco-tourism destination in Nova Scotia with many well-developed recreational facilities and areas that have already been protected by the Province. It is home to year-round recreational pursuits, the highest peak in mainland Nova Scotia, old growth Acadian forests, a valuable mainland moose corridor, many waterfalls, trail systems and is also a well-known fall colours destination. About 100,000 visitors come to the Valley every year.

Broad Cultural/Community Reliance

The Wentworth Valley is home to a very resilient community of full-time residents, many of whom have been in the area for many generations with a celebrated history, historical society and a vibrant community centre. In addition, the Valley is home to a rapidly growing community of part-time residents drawn to the area by its natural beauty and the many recreational pursuits available there, Ski Wentworth key among them.

Importance to Resilience

The economic lifeblood of the Wentworth Valley area has evolved over the years with the decline of traditional farming and forestry industries and the opening of the Cobequid Pass Highway that drew traffic out of the valley. The area’s focus on recreation and ecotourism began many decades ago as it became known as an eco-tourism and recreation destination for “Four Seasons of Adventure”. The boom in recreational home owners in the area (many of which have been converted to full-time retirement homes) is testament to the popularity of the Wentworth Valley. To have large industrial scale wind turbine farms looming over this “jewel in the crown” for Nova Scotia, would ruin the natural beauty of this area that so many have worked so hard for many decades to sustain and enhance. If they were built in this area, I feel that the growth in the area would decline greatly.

Degree of Tradition

As I mentioned above, the area has a very rich history with a vibrant and resilient full-time population for hundreds of years in this beautiful enclave. This coupled with the many of part-time residents who have been in the valley for multiple generations has really cemented the traditions of the valley for all. In addition skiing has been a draw in the valley for almost 90 years and Ski Wentworth has become the true comic driver of the area. Simply put, the Wentworth Valley holds a special place in the hearts of everyone! It is not a place for industrial wind operations.

Dramatic Cultural Change

The unique context of the Valley, with its natural beauty and the many opportunities for recreation, is essential to support the culture that now exists in this area. The harsh dramatic impact on of invading this area with dozens and dozens of huge wind turbines (3x larger than any currently in the Province) would reverse decades of effort to create such a beautiful recreation culture for all.

The Wentworth Valley is a Mainland Moose Corridor

The Wentworth Valley ecosystem has been recognized by the province of Nova Scotia in the recently released Mainland Moose Recovery Plan as core habitat that offers “those conditions most likely to secure habitat and connectivity requirements that are spatially appropriate to recover a viable population from one that is currently small, declining, and fragmented.” It is the responsibility of government to balance ecology and economy by preserving such important lands and look toward alternative locations for wind energy projects while also considering the other options for renewable power generation outlined in the provincial plan including marine renewable, hydropower, geothermal, solar, biomass and energy storage. As stated in the provincial plan: “No single resource can supply all our energy needs - fossil fuels will continue to play a role in our energy needs for decades to come, but we can reduce that role and create a diverse mix of energy resources”. Current operating and decommissioned wind energy sites have been found to create significant environmental impact including habitat destruction and fragmentation as well as impacts to local hydrology. We

must realize that alternatives exist allowing us to do the right thing and protect core habitat and places in our province that represent important areas of biodiversity.

I urge you to consider these facts in your decision making process when reviewing municipal regulations controlling small and large wind turbines in your municipality. At a minimum there should be a planning committee established to review all wind projects that includes the public and turbine setbacks should be at least 1000 meters and preferably 5000 meters from conservation lands and private property to help reduce impacts. Damage to roads, habitat and waterways must be strictly monitored and recognized as the responsibility of the land owner and proponent. Decommissioning and environmental restoration must also be funded by the proponent and part of any proposal. You have the opportunity to correct the oversights of past governments that did not balance economy and ecology and to protect and promote the Wentworth Valley ecosystem as a pristine example of environmental balance. It is part of the job of elected officials to protect the interests of future generations by making balanced decisions.

Adding Wentworth to Restricted Overlay: With reference to Cumberland Policy 4-53 and Policy 4-54, I believe that the Wentworth Valley meets the criteria laid out for its protection. It is not an area where industrial wind turbines should be erected.

The first reason is because it is an area frequented by Nova Scotia's endangered mainland moose as they move between the Wentworth Valley and Portapique Protected Wilderness Areas. Second, the Wentworth Valley is an area that is of vital healthful importance and cultural significance for its year-round and seasonal residents. The negative health impacts of wind turbines are well documented and should be articulated more clearly in the county's policy documents. Third, industrial wind turbines will have severe negative impacts on tourism plans for the area. It is said that about 100,000 visitors annually come to enjoy the Valley from across the Maritimes. I believe that Cumberland County should coordinate its policy on industrial wind turbines with neighbouring Colchester County. I hope that the two counties will agree that there should be a 10 km-wide restricted overlay corridor that runs from the top of Folly Mountain in Colchester on through the Wentworth Valley in Cumberland. That area along Highway 4 is a wonderful landscape and view-plane that has been enjoyed by Canadians and foreign tourists for well over a century—ever since the advent of train and automobile traffic. It's a landscape comparable to the scenery of the Cabot Trail. Industrial wind turbines would mar it irrevocably.

I trust that you will take these points into consideration as you review the Cumberland Wind Turbine Bylaw Draft Regulations.

Thank-you for consideration in support of the future of the Wentworth Valley.
Regards, Eric Wood

From: Alexandria Nunn <alexandria.nunn1@gmail.com>
Sent: May 4, 2022 11:12 AM
To: Planning
Subject: WIND TURBINES - setbacks from dwellings

Dear Cumberland County,

We are **STRONGLY OPPOSED TO WIND TURBINES IN THE WENTWORTH VALLEY**, an area of outstanding natural beauty.

Setbacks from dwellings

750m from a 60 story WIND TURBINE THAT VIBRATES AND MAKES NOISE 24 HOURS A DAY will prove intolerable to live with and certainly detrimental to mental health - which is already a grave concern for the population of Canadian citizens and residents.

We submit our concerns both as residents of Wentworth and also as therapists with 30 years' experience in mental health issues, such as stress, anxiety, depression.

Yours sincerely,

Mark and Alexandria Nunn
1111 New Annan Rd/ Hwy 246
Wentworth
B0M 1Z0

From: Bruce MacNab [REDACTED]
Sent: May 4, 2022 10:35 AM
To: Planning
Subject: WIND

Dear Planning Staff,

Thank you for your work with Cumberland County.

Please accept this email as my submission to your request for feedback on the proposed wind turbine recommendations.

Windmills can be devastating to our property values. Many residents count on their home equity to fund their retirement and/or also to finance possible assisted living arrangements later in life.

Windmills placed within sight of homes immediately decrease property values and - in some cases - can make a home unsaleable.

Often these windmills are placed in deeply rural communities where residents are unable to finance the costs of fighting the installation.

It's wonderful how the residents and business owners of Wentworth have used their financial power and influence to ban windmills from their district. However, these windmills will simply be installed elsewhere in the Cobequid Mountains.

I would propose a system to compensate for loss of property value when windmills are installed in Cumberland County. If a homeowner can see a windmill from their property, they should be compensated.

Depending on setback distances and size of the turbines, a homeowner should receive somewhere between \$200 - \$1,000 per month - or more - indexed with inflation. This compensation should be tied to the property deed so when the house is sold future owners will receive this income, as well.

Please acknowledge receipt of this email.

Thank you.

Respectfully submitted,

Bruce MacNab

[REDACTED]
[REDACTED]
[REDACTED]
Bruce MacNab
Award-winning Author
Content Creator & Writer
Village Media [REDACTED]
[REDACTED]
[REDACTED]

From: A J B Johnston <ajbjohnston@gmail.com>
Sent: April 30, 2022 3:38 PM
To: Kathy Redmond <kredmond@cumberlandcounty.ns.ca>; Fred Gould <fgould@cumberlandcounty.ns.ca>; Jennifer Houghtaling <jhoughtaling@cumberlandcounty.ns.ca>; Mark Joseph <mjoseph@cumberlandcounty.ns.ca>; Dale Porter <dporter@cumberlandcounty.ns.ca>; Carrie Goodwin <cgoodwin@cumberlandcounty.ns.ca>; Murray Scott <mscott@cumberlandcounty.ns.ca>; Municipal Clerk's Office <clerk@cumberlandcounty.ns.ca>; Greg Herrett <gherrett@cumberlandcounty.ns.ca>
Subject: proposals for wind turbines

Dear Councillors and Your honour, the Mayor:

I believe that you have all heard a great deal in recent months about the proposal to erect industrial wind turbines on Higgins Mountain and in other locations.

I hope you will agree that we need to protect the mainland moose corridor and to minimize negative environmental, human health and economic impacts. In my opinion, the Higgins Mountain proposal will not do that. It should be rejected.

Further, I have come to believe that it is governments—municipal and provincial—that should be telling wind turbine companies where they might possibly go, not the companies coming up with various proposals on lands that should instead be protected for the good of all, local residents and Nova Scotians as a whole.

In a nutshell, what I recommend and hope to see is a 10-km wide corridor that begins near the top of Folly Mountain and continues the length of the Wentworth Valley. Such a corridor would protect one of the most beautiful view planes and ecosystems in the province, one that rivals the Cabot Trail.

Thank you.

A J B Johnston

Sent from Mail <<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows

From: Chris Topping <ctopping@hotmail.ca>
Sent: May 3, 2022 1:03 PM
To: Planning
Subject:Wentworth Valley wind turbines

As I said previously I believe Wentworth Valley is the wrong place for large industrial wind turbine facilities. and Council should add it to the Wind Turbine Restricted Overlay. For the local community, for the natural environment, and for a green economy, Wentworth Valley is well worth protecting. Large Industrial scale wind turbines looming over it put all of that at risk and will do so for generations.

I also have the following comments.

The idea that doing this will somehow prevent the development of wind power in all of Cumberland county is faulty thinking, to put it mildly. You have suggested this in the final sentence. It is not an either or decision. I would be surprised if you were not aware that there are numerous proposals being worked on even if the Westchester one is the only one to have submitted their EA to the province.

As you say the area fits in with a number of the criteria for protection as a culturally significant area. I am very concerned that the timing of the rfp process will be used as a reason to prevent Council from implementing that protection since there is not yet a formal consultation and reporting process supporting it.

If that is the issue then at least ensure there is time for the community to do that work.

Similarly, since there is a valid concern that runoff from the construction could cause high levels of uranium in the many surface wells in the area there needs to be time for the work to be done to find out what protection of our water is needed and possibly Council's designation of a Protected Water Area.

I know that the high radon levels in the area are related to uranium and that mining exploration for uranium was done in these very highlands something like 50 years ago. The risks to watersheds of mine tailings is well established. but the potential for damaging water quality by extensive construction projects of these wind turbines and whether mitigation during construction or full prohibition is warranted would need to be defined.

The requirement for a bond/surety against noise levels, shadow flicker is perhaps a good one but I have serious concerns about its effectiveness. My understanding is that the important part is that the purpose is to convince the developers during design and construction to go that extra step to ensure the standards are met over the life of wind facility. If noise or shadow flicker is too much the facility owners losing their bond does the affected community no good. To be effective its needs:

- Complete and clearly stated standards and measures.
- Independent verification and mandatory dispute resolution for violations.
- Iron clad financial and legal frameworks
- And finally a financial impact that if triggered that would be large enough to convince them to spend the extra money up front that prevents the problem.

Despite the challenges all of this might present for each proposal, I don't quite understand how them putting the penalty aside beforehand in a bond encourages them to build a better system, so I have to ask if you identified other alternatives.

Thanks

Chris Topping
Wentworth Valley

From: John Furneaux <rjohnfurneaux@gmail.com>
Sent: May 3, 2022 7:13 AM

To: Planning
Subject: Proposed Wind Turbines in Wentworth Valley

Wentworth Valley is one of Nova Scotia's beauty spots . Please do not ruin this area for a perceived short term gain and long term damage to the area .

If you review wind turbines properly you will realize they are not the answer to our energy needs . R John Furneaux P.Eng C.Eng FICE, FCICE.

Sent from my iPhone From: Gregor Wilson <gregorfwilson@gmail.com>
Sent: May 2, 2022 11:02 AM
To: Nelson Bezanson
Subject: Wind Energy Fact Sheet for NS Municipalities

Hi,
Wondering if you use the 2015 Wind Energy Fact Sheet for Municipalities for your research?

It is rather out of date, and clearly pro-wind industry with little critical reflection of possible negative effects.

Thanks,
Gregor

From: paul firminger <firmingerpaul@yahoo.ca>
Sent: May 2, 2022 6:51 AM
To: Planning
Subject: Wind Wentworth

Hello,

I have a question for Cumberland county regarding our drinking water, is there a plan in place if commercial operations are endorsed in the hills above our homes and they release elements like Uranium into our water supply?

In the Wentworth Valley many of the wells are shallow, providing clean water in abundance, I worry greatly that commercial operations in the hills like wind farming construction may release the naturally occurring elements into the runoff, this could very easily contaminate our water supply.

Thanks,

Paul Firminger

From: Bill Moffatt <topofthegame@msn.com>
Sent: May 1, 2022 8:55 AM
To: Planning
Cc: Murray Scott; Kathy Redmond; Fred Gould; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Greg Herrett
Subject: wind

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Sirs

The purpose of this email is to make comments on the recently completed and circulated planning document for wind turbine regulation in Cumberland County.

Firstly some background

my family resides at 44 Peninsula drive, Folly Lake Nova scotia

our residence is 400 or so meters south of the Cumberland County line.

Living at Folly Lake is the culmination of a lifelong dream...to live permanently in and around Wentworth Valley, and to enjoy the quiet rural life that the Valley area now provides. Our family and our parents' family have owned residences in the Folly Lake area since 1967. I have been involved in Wentowrth area environmental issues and have been studying wind turbine related issues for 14 years. I am no expert, but I humbly submit I am a well informed lay person.

The multiple applications that are surfacing to site and install multiple wind turbines (particularly those proposed for Higgins Mountain-Cumberland Co., and east Folly Mountain, Colchester Co.) will irrevocably negatively impact the rural nature of this area. For me, as a long time owner in the area, it is not a question of whether these industrial projects will negatively impact our rural life and our rural view planes but the degree and severity of that negative impact. Imagine 25,30 or 50 flashing red lights, all night long in your rural area as only one the certain negative consequences of these types of developments. Add the risks of noise pollution from 190 m turbines, west sun light flicker and the inestimable risk to all wildlife habitats and we have a recipe for 20 plus years of thinking we are doing right, with residents bearing risks that society gets it wrong.

The societal challenge is this...if wind turbine proponents, county councils and planning departments get elements of this evaluation wrong...the folks holding the bag ...and having to live with these (even if unintended) mistakes are the residents. The area residents are in effect in the greatest position of greatest weakness and vulnerability, yet we bear the greatest risks. Therefore, I believe it is incumbent upon council and its planning staff to develop regulations that have their overwhelming weight on the side of the residents. If the proponents fail to achieve their business objectives, in all likelihood they will have additional business opportunities. If all the parties get these regulations wrong, or they are insufficiently robust, the only choice residents will have it to bear up under the problematic issues or to leave the area (at best ...it always cost money to move). At worse, it could involve significant personal financial loss. Any turbine related problems that cause a person to move, will undoubtedly result in property value diminution.

The points raised in the planning document are substantial in number.

I will focus on a few points that are important to my family

The discussion with regard the special nature of Wentworth Valley is welcomed and warranted. If this area is indeed special, (and present provincial designations say so), why is there even a debate as to siting industrial turbines in this area??? It is a special area, deserving of a complete prohibition on additional industrial development.

When it comes to preserving natural areas the bar needs to be very high. I encourage both the planning department and the council to be multi decade and indeed perpetual in their thinking, and preserve this special spot ...forever.

If turbines are allowed then don't take the easy route and feel the job is done by developing regulations that are middle of the road. Turbines of the size that are being proposed are 3 times of the size of the turbines that have been in use in the last 15-20 years. Therefore, data that exists for smaller older turbines are not a natural overlay for evaluating today's monster turbines. Have set back restrictions that are in the 1 km and more range.

Place more risk on the proponents and establish third party administered liability funds. These funds (if necessary) could be used to mitigate the damages done by poor mitigation estimates and/or unforeseen

consequences. All risks should be on the developers. Little or no risks should be borne by the residents. The financial mitigation program is in addition to a requirement for decommissioning bonds.

The length of time the liability fund would need to be segregated , could be reduced from the entire length of service of the installation, to some period like 7-10 years...a period likely long enough for any long term negative impacts (if any) to be well established and well documented. Residents shouldn't be in jeopardy whilst the proponents achieve their financial goals. That is built in WIN/LOSE kinds of planning.

The proponent, council and robust regulations ought to mitigate these risks. If everything turns out "perfect"..and there are no negative consequences, then the liability fund could be returned to the proponent. In this instance the proponent would only be "out" the interest costs of supporting liability fund during the earlier years. This additional cost of protecting the local society, should be a cost of the development. If a proponent is so convinced that their project is benign...then conversely they ought not to worry about "losing money" due to the presence of a liability fund. After all...their thesis is "that everything will turn out fine ".

I am not so sanguine, that everything will turn out fine.

Often Things don't turn out fine in life..and issues like Boat harbour clean ups, and decommissioning oil wells in the Canadian west are unfortunate examples of human activity that had long term negative consequences ...now being paid for by taxpayers, while corporate entities are long gone and nowhere to be found.

Let's not stupidly make the same mistakes while we squander the natural future of our community and province. The right path requires forward thinking and courage. It does not require perfect vision, or Solomon like wisdom. It requires the ability to say we can get this wrong, and therefore we will build in mechanisms to protect the residents who will bear the costs.

Lastly, inherent in this dialogue is the altruistic platitude of balance. I submit it is not about balance. It is about tilting the scales to protect the natural landscape (which cannot speak for itself), and protecting the residents who will bear all of the negative consequences of any errors. If these protections result in lessor profitability to the proponents ..so be it. Less profitability doesn't make it certain that the project would not proceed. It could just mean that the proponents will make less then they might like. If the wind resource is so lucrative, why should the developers "make off" without protecting the residents.

If protections kill the projects economically, then the projects were wrong minded from the beginning. What smart, forward thinking society would throw away their future for a current bag of gold. ?

respectfully

William and Gail Moffatt, 44 Peninsula Drive
Folly Lake, Londondery, N.S. B0M 1M0
Bill

From: John Pattillo <johnpattillo@klmdconsulting.com>
Sent: April 30, 2022 12:19 PM
To: Planning
Cc: pattillo, kim
Subject:Wind

Dear Mr. Bezanson,

I have reviewed the multiple documents you shared on Wednesday, April 13, 2022 regarding the Municipality of Cumberland's ongoing review of Wind Turbine regulations. Both the Planning Fact sheets and Policy Gaps documents were well thought out and provided a better understanding of the complexities and policy decisions that the Cumberland council will have to make for their current and future constituents. I have a few comments on the Wind Turbine Recommendation you shared. Overall the term "turbine" is not a good definition for the work being done, you may want to consider "industrial wind developments or projects" instead.

Following are my comments and questions:

Heading Date: 2022 not 2021.

Public engagement:

- Suggest changing the wording in sentence one " public engagement for large wind turbine projects" to "public engagement for Medium and Large industrial wind developments or projects"
- What duration between the public meetings are recommended? What is a reasonable expectation for the actions/accommodations list publication? How, when where are they published/communicated or interested public notified?

Shared Economic Benefits:

- Suggest changing in sentence one " wind projects provide" to " industrial wind developments or projects provide"

Regulatory Requirements:

- Suggest replacing the word "turbine" with "industrial wind developments or projects" in points 2, 3 and 5 that refers to the Turbine Classification and regulatory requirements table.
- Within the classification and regulatory requirements there should be references to sound thresholds and shadow-flicker or glint limitations
- The best practises fact sheet references Norway's setback of 4x the turbine heights. Cumberland should increase the setback for the point labeled "habitable building external to the wind energy project" to 4x and make it consistent in both the small, medium and large industrial wind developments or projects.
- Is KW the right power rating for the table or is MW?

Operations and Maintenance:

- Within the best practices worksheet a reference is made to an Environment Management Plan. Recommending a more comprehensive plan may be a better approach than " That Council require a reporting and monitoring systems for large Turbines". Again the word "turbine" should be replaced with "industrial wind developments or projects".

Decommissioning:

- Remove the reference of the turbine size ie: large turbine and replace it with "industrial wind developments or projects" across all the points.

Adding Wentworth to Restricted Overlay:

- In referring to both Policy 4- 53 and Policy 4-54 can they be revised to include a medium scale wind turbine and again replace 'wind turbine with "industrial wind development or projects".
- Council should consider Wentworth as both ecologically and culturally significant and exclude a limited geography i.e. Higgins Mountain that can be justified and protected from future development for not only wind energy, but also forest clear cutting and precious mineral exploration and mining. It would also provide the council with an area for endangered or specific Nova Scotia Moose populations and migratory routes.

Thank you for the opportunity to review the material that formed the basis for your recommendations and look forward to the next public review.

Regards

John and Kim Pattillo
220 Peninsula Drive, Folly Lake, NS
3 Britton Court, Wasaga Beach, ON.

From: RC H <rch22william@hotmail.com>
Sent: April 30, 2022 11:23 AM
To: Planning
Cc: Kathy Redmond; Murray Scott; Greg Herrett; Municipal Clerk's Office; Carrie Goodwin; Dale Porter; Mark Joseph; Angela McCormick; Jennifer Houghtaling; Rod Gilroy; Fred Gould; Mark Rushton; taggartmla@gmail.com; Dr. Stephen Ellis; vlomond@colchester.ca; info@protectwentworthvalley.com; cblair@colchester.ca
Subject: Wind Turbine recommendations from the Municipality of Cumberland Planner

1.

Good morning

I am writing with regards to the Second Update on Cumberland's Review of Wind Turbine Regulations - Draft recommendations submitted by Nelson M. Bezanson, Municipal Planner, Municipality of Cumberland

After reviewing the recommendations, I would like to express my feedback

1. The Wentworth Valley is not the location for Industrial sized wind turbines or other large projects for the numerous reasons I and others have noted in previous emails. The area qualifies and meets all criteria as outlined in Policies 4-53 and 4-54 and should be added to the Restricted Overlay and I strongly urge the Planning department and Council to listen to their residents and designate the area as such. I recommend the Municipality of Colchester take a similar approach.

2. Turbine Classification and Regulatory Requirements section show N/A for Large projects Maximum Height. I believe this should have a defined specification. With Turbine towers and blades being much taller/longer now than in the past, and indications seem to suggest there will be even greater sizes in the future -this must be considered. Without a specification, a proposed turbine could not only be tall, but could be replaced after installation with an even taller one. I recommend you consider and propose a max height. Max height for any projects should be tied to the distance from homes/livable dwellings.

3. Minimum Separation Distances/Setbacks section shows 750m or 3.5xheight for habitable buildings external to the wind energy project. This is much too close. Distances should be in the 3.5km range minimum. In the Higgins Wind project, the turbine height is proposed at approximately 190m. This would be a very imposing structure in the current recommendations, compounding all other concerns raised (example: visual, shadow flicker, noise, health implications, property value effect, construction disruptions, cellular/internet connectivity potential disruptions, water/land potential contamination, hazards associated with a catastrophic failure, proximity to high power electrical lines/poles/towers/sub stations, etc). Quality of life and potential impacts to must be a paramount consideration.

4. The recommendations refer/mention wildlife in various sections, but not specifically that the Wentworth Valley is between 2 designated protected areas and is a natural and used corridor for species at risk to travel between them. It is logical to expect an industrial sized project such as this will disrupt and forever change the travel patterns of animals such as the endangered mainland moose - causing serious and irreversible damage to the species and not supporting the Provincial mainland moose recovery plan. Located at: New Mainland Moose Recovery Plan - Government of Nova Scotia, Canada
<<https://novascotia.ca/news/release/?id=20211125005>> . As stewards of the land, it is important to support the animal and plant life in our wilderness.

* Excerpts from the site:

* '... a recovery plan to address threats, protect and enhance habitat, improve connectivity...'

* '... factors affecting the mainland moose population include poaching, disease, road collisions, climate change, habitat and habitat connectivity loss'

5. Economic benefit should consider not only the benefits the Municipality as proposed, but the potential benefits if a project is located in a different area of the Municipality. Example: the current proposed Higgins Wind project has a foreign owner and if another site has resident ownership, Paid site rent would better serve the Municipality and residents if it stayed in the Municipality.

6. I did not see a recommendation on an acceptable noise level. I think this should be included in the bylaws with clear specifications. example: maximum 32db noise level at any habitual dwelling.

7. There should be a bylaw outlining the dispute process if a resident does not believe/has proven the project owner has not met the bylaw criteria. This may include a remediation plan, or purchase of the property by the project owner if satisfactory remediation cannot occur

8. For large projects such as proposed, there is a recommendation for public consultation. This seems to end or be informal after a project is approved. I would suggest a project of 25yrs lifespan plus is an ongoing project and ongoing public consultation should be a requirement. Perhaps in the form of a project owner organized committee with representative form the community and owners meeting regularly, with all working towards betterment for all parties.

9. There are numerous wind projects proposed for Wentworth Valley, and there are existing businesses that use land (example Quality Concrete Gravel quarry). There is no recommendation or mention of the cumulative effects of multiple projects in a designated area. I recommend this be considered and a recommendation be provided to council in the next draft version.

Thank you for requesting feedback to assist you in supporting the wishes of the community. If you have any questions, feel free to contact me

Craig Harris
902 921 1243

From: Mark and Alexandria Nunn <eastriverretreat@live.com>
Sent: Saturday, April 30, 2022 9:44:46 AM
To: Greg Herrett <gherrett@cumberlandcounty.ns.ca>
Subject: Proposed Wind Turbine projects

Good morning,

As residents of Wentworth, we would like to express our view that this beautiful area does indeed fit into the category of a unique Culturally Significant Area and strongly request that this is taken into account before granting any go-ahead to any wind-turbine project in our community.

Wentworth's natural and stunning beauty is very badly needed for not only the mental and physical well-being of its residents, but to all the other many people who visit here every year to enjoy, be uplifted and calmed in our busy and often stressful world. The sight of man-made wind-turbines and their ecological impact amongst all the natural beauty can only reduce these benefits.

We also feel strongly that a 750 metres setback from habitable dwellings is too short and should be at least 1 km.

Thank you.

Sincerely,

Mark and Alexandria Nunn
PURE MEDITATION CENTRE NOVA SCOTIA
MOUNTAIN SERENITY RETREAT
for Meditation, Healing, Counselling, Yoga, Retreats
Tel: 902 755-HEAL(4325)
1111 New Annan Rd, Highway 246
Wentworth, Cumberland Co, Nova Scotia
<http://www.eastrivermeditationcentre.com> <<http://www.eastriverretreat.com/>>
Mark and Alexandria Nunn, n.d; Sevalight Associates; Pure Meditation Teachers; Dip.PureSpH; Dip
IntuitiveCouns; Dip HY ; Energy Care & WellBeing Teachers

From: Judy Robertson <armdalecove@gmail.com>
Sent: April 29, 2022 7:02 PM
To: Planning; Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office; Greg Herrett
Subject:Wind

Good day, I am writing concerning the massive wind farm that is proposed for Wentworth Valley. First off I would like to say that I am not against wind energy however it is important to consider where these huge turbines are placed and the number being proposed.

I have been a long time property owner in the Wentworth Valley as were my parents dating back to the early 1960's.

Wentworth Valley is a rare find in Nova Scotia. There are very few places that have the density of forest and have not been cut for many years as is the case in Wentworth. Once the degradation of the beautiful stands of forest happens, there is no turning back. Animals roam freely through the Cobequid Mountains and with the amount of trees that will be cut for this installation, permanent damage will be done to their natural habitat. Besides the change in vegetation and habitat, the actual invasiveness of the turbines will cause stress to the wildlife.

Of course, there is also the impact on humans and the visual damage. The community of Wentworth has been doing an amazing job of building a respectful tourism industry that values the natural environment of the Valley. The natural aspect of the Valley is a huge economic engine for the entire area and destroying a large part of this would destroy what so many people have worked on and are continuing to enrich today.

Throughout the pandemic, Nova Scotians have grown to appreciate what we have in the beauty and naturalness of our Province and to have that ripped away now would be a huge loss to all.

Please consider seriously the damage that the installation of the wind turbines would have on Wentworth Valley. You are representing the residents of this Province and it is important to listen to their wishes and desires, not that of large corporations.

As Joni Mitchell sang, "You don't know what you have got, til it's gone. Paved paradise and put up a parking lot"...or in this case wind turbines.

Judy Robertson

"Twenty years from now you will be more disappointed by the things you didn't do than by the ones you did do. So throw off the bowlines, sail away from the safe harbour. Catch the trade winds in your sails. Explore. Dream. Discover." – Mark Twain <<http://www.cmgtw.com/historic/twain/>>

Judy Robertson
14399 Highway #4

Wentworth, NS
1-(902)-802-7730 mobile

judyrobertson1 SKYPE

<https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail> Virus-free. www.avast.com <https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail>

From: Debi atkinson <butchanddebi@live.com>
Sent: April 29, 2022 5:08 PM
To: Planning
Subject: wind

To Whom It May Concern

Please be careful where you decide to place an industrial wind-farm.

My biggest fear is our water! The entire Wentworth Valley – from the top of Folly Mountain, through the Wentworth Valley, to Westchester and the 246 highway to Tatamagouche - are all WATER-SHED areas .There are numerous year-round flowing streams, but after a 50 mm rainstorm, the run-offs are too numerous to count. All the water flows into the Wallace River – one of the most pristine rivers in the province, also an important salmon spawning river.

Many home-owners in the area have dug wells as their water source .The County of Cumberland approved the use of dug-wells as our water source – therefore it is the County’s responsibility to protect our water!

One of the decisions for by-passing the Wentworth Valley with the Trans -Canada highway was the fear of digging and blasting and the impact on the water – URANIUM was present in the rocks. Acidic soils are also typical in the area. Digging, blasting and clear-cutting will cause acidic drainage.

Noise – The Wentworth Valley acts as an amphitheatre, we can hear owls hooting kilometers away. Even acceptable decibels of sound will be overwhelming if heard continuously!

Railroad Tracks – We have one line entering and exiting the province. More clear-cutting causes more run-offs! CN has already repaired washed out tracks going through Higgins Mountain.

Be Careful where you choose to put wind-turbines. We realize with climate change alternative energy sources are needed BUT the entire Wentworth Valley is not the place for an industrial wind-farm!

Deborah DeHaan Atkinson
32 Miller Ct., Wentworth

From: Loland Design <info@lolanddesign.ca>
Sent: April 27, 2022 3:29 PM
To: Planning
Subject: Re: Wind

Good Afternoon Nelson,

My apologies, but it appears that my initial reply to you didn't make it out of my outbox! Not sure what happened there. Quite some time has passed since then so I have adjusted my responses slightly:

First of all, I want to say that I am not usually one to throw my hat in the ring with this type of thing. Our neighbours on Peninsula Drive are passionately opposed to the project so this has been a hot topic during the morning dog walk interactions. I was encouraged to speak up and I thought that I might be able to offer an opinion that is a bit different; focused on future development as well as landscape protection. I am invested in the community on a personal and professional level and hope that I can be part of both residential and commercial development that happens in the area moving forward. There are not many local architects so it seems like there could be some great opportunities here for my small firm in the future.

I will start by saying that I believe there is a dark side to all renewable energy that is not very transparent. On a large scale, I feel that turbines are probably the most "sustainable" method when you consider required land area, generation capacity, and life cycles assessment. I am not an expert, but I believe solar panels deal with more toxic chemicals and more energy intensive manufacturing. The social impacts of a large scale wind farm vs. solar farm would probably be similar as people would be equally (if not more) opposed to a 100MW solar field in the same location. I will also say that our landscape and climate are not well suited for a large scale solar project. Therefore, I think wind is currently the best answer for green power in NS. However, the social impact of these large projects needs to be given equal weight to the environmental and economic benefits.

For small projects, I would like to see small turbines become more common. I think they can be a great option for homes and small buildings that do not have a roof or landscape that is good for solar. Turbines take up less area and might even be a bit more reliable than solar panels as they can spin 24/7. There should be clear guidelines for small turbines as they could definitely disrupt people with noise, shadow, reflection, etc. But I do believe that a small turbine that is well placed should really have very little impact on neighbours. I think of residential turbines similar to a flag pole with a flapping flag. Our home on Folly Lake is actually not well suited for solar without removing trees on neighbouring property so we did quite a bit of research into small scale wind turbines. Unfortunately, the technology is not as readily available and the bylaws/guidelines about actually installing one on your property are a bit unclear. Regardless, it is definitely something we have and will continue to consider.

I think if someone truly wanted to be "off-grid" in Nova Scotia the optimal set up would be a combination of solar panels and small turbines with a battery storage system. The biggest concern I have run into with solar panels on small buildings is the need for a battery storage system and the limits NS power puts on customers. The battery storage systems are expensive and NS power does not want to pay you for electricity, so they limit your generation capacity to what they expect your building will consume. Another issue all together...

Regarding development at Ski Wentworth, I agree with you. It is a bit contracting as that type of land use can be very damaging to habitat and viewsheds. They also use a lot of water, a lot of fuel, and a lot of electricity. As far as I know, Ski Wentworth has plans to really expand their mountain biking trail network in the future and start operating their lifts in the summer months for bicycles so they are definitely going to become a more year-round operation. Skiing and mountain biking resorts across the globe are definitely being more heavily scrutinized these days for their negative impacts on the environment. However, I do feel that the general movement for skiing/biking resorts is towards a more sustainable future with regards to resort operation, maintenance, and future trail development. I can only hope that Wentworth has a similar plan. It would be great if they actually developed and released an official plan for future development and sustainability, as a good plan could be a catalyst for future residential and commercial development in the area. Perhaps this exists and I am not looking in the right place?

As damaging as Ski Wentworth may be on the environment, it does already exist. Likewise with the Lafarge quarry beside Folly Lake. If there was a plan to put a new ski hill or a new quarry in the Wentworth Valley there would probably be some opposition. More importantly, Ski Wentworth is different from a quarry or a turbine plot because it is made for people to enjoy. I think the positive social impact it has on users far outweighs the

economic gain the owners experience. The same can not be said about the quarry or a future wind turbine development.

I actually spent some time in Amqui/Val-d'Irene, Quebec this winter and noticed that the ski hill area is completely surrounded by turbines. Seeing the turbines in the distance actually made me feel better about being at the resort. I am not sure if that power actually was being used at the resort but I was hopeful that it was. However, it is very important to note that those turbines were at least 2km away from the ski area and nearby residential development. You definitely could not hear them.

That brings me to my final point: I am not against wind turbine development in Wentworth but I do believe the current setback requirements need to be increased to provide a buffer of at least 2km from privately owned land and/or residential development. I have seen the maps and realize the impact a 2km setback will have on the proposed plan. The proposed development will most likely not be feasible with a 2km setback and that should be a hint that perhaps this parcel of land is not a good location to begin with. The Proponents often refer to setbacks in rural municipalities like Yarmouth, Pictou, etc. as precedent to justify the existing 600m setback in place for Cumberland County. You and I both know that planning documents in these municipalities are not up to date with the scale of current turbine developments. So do the Proponents. Halifax County and even neighbouring Colchester County are conveniently not referenced, as their more modern/up to date bylaws do not suit the proposed plan and subsequently the economic objectives of the Proponent.

To conclude, I would like to see turbines in the Wentworth area but I definitely do not want to hear them. I do not trust the sound and light reflection modelling done by the Proponents and do not believe it adequately represents the sound environment of the Wentworth Valley. I have some experience with sound modelling and environmental assessment and know that this type of modelling is often a bit optimistic, assuming a very typical environmental context. For example, we are located on the peninsula in Folly Lake looking at the highway (west, or towards where some of the propose turbines would be located). I would suggest that the noise from cars on the highway and passing trains is often louder at our property across the lake than it is for landowners adjacent to the highway and train tracks due to refraction of sound over the water. I also do not agree that 40-50 dB is an "acceptable" consistent level of sound for a rural environment. As I currently sit at my desk and listen to my dishwasher and refrigerator run in the background, that level of sound is not something residents and area users in the Wentworth Valley should have to deal with.

Kristina MacKenzie
(902) 890 6239

From: Norah Topping <ntopping@hotmail.ca>
Sent: April 26, 2022 3:16 PM
To: Planning
Subject:Re: Second Update on Cumberland's Review of Wind Turbine Regulations

To the Cumberland Planning Department:

Thank you for including me on this communication. Clearly, a lot of work has gone into developing the new draft regulations and they look very thorough. It is good to see recommendations on the decommissioning issues, for example.

I think what is being suggested is that rather than make the setbacks bigger in general, it would be better to find a way to include the Wentworth Valley area in the restricted overlay. I am no expert, just a very concerned local resident who keeps up on her reading. If a large swath of land were to be protected in this way, that would be wonderful! We don't need protection from people building their cottages, just from the disruption of large scale industrial developments like these wind turbines.

I also note that solar power has been mentioned as a good way to address climate change in Cumberland County. My husband and I are looking into that possibility here at home. And the Wentworth Recreation Centre is currently seeking out assistance with funding for a large solar development on its roof. That seems to me like a much better way to help with the environment. No blasting or large permanent deposits of concrete, and no local issues with sound. Plus they can be established in already cleared areas - either roofs or fields that have fallen into disuse like the old blueberry fields. I think the animals would be less disrupted.

Do you need help justifying the protection of the Wentworth Valley? We certainly are at risk of our drinking water being corrupted. There are hundreds of streams after every rain storm bringing run-off. Most of us have crock wells which take advantage of the nearby (about 4 feet down) substantial groundwater. The blasting required for establishing giant turbines would likely stir up arsenic (from the pyritic slate) and maybe uranium which I have heard is prevalent in these hills.

And what about the development of a tourism plan? Do you need community involvement? Please let me know. In spite of the fact that it has no accommodations nor restaurants, or perhaps because of that fact, Wentworth has become a very popular destination for day-trippers. People want to get out into the forest to help improve their mental and physical health. On any given day, you will see cars parked all along the various parts of the highway where there are trailheads. And these trailheads are not even marked. People are researching the trails and navigating themselves here for a forest fix! Imagine how the county economy would improve if there was parking, outhouses and proper trail marking? I would think it would extend the tourist season for other places nearby like the North Shore and all of our lovely shorelines.

Thanks again.

Norah Topping
902 957-0630

From: Tim Johnson <TJohnson@colchester.ca>
Sent: April 26, 2022 2:43 PM
To: Planning
Cc: Audrey Conroy
Subject: Higgins Mtn Wind Farm Support Letter - Not the Case

Hi Nelson:

Audrey Conroy said you reached out to me by email but I have not received anything from you to date.

Regardless, the purpose of my email today is that I never consented or authorized anyone to send out a letter of support from me for any Wind Turbine proposal in the Wentworth Valley or anywhere else in my name. I did visit a Face Book site back on February 20, 2022, on The Higgin's Mtn. Wind Farm and requested additional information. Myself as well as other's I know had letters sent out stating they supported the Higgin's Mtn. Wind Farm development after visiting this site and requesting further information.

If you would like to contact me, you can reach me by return email or phone.

Yours truly,
Tim Johnson
District 5 Councillor
Municipality of Colchester
(902) 899-0590

From: Heather - NCS Managed Services Inc <heather@ncsnetwork.net>
Sent: April 25, 2022 2:30 PM
To: Nelson Bezanson
Subject: RE: Wind Turbine- Planning Committee Meeting

Ok- we've been in contact with Tim Johnson – I suspect you will hear from him after he speaks to council- he had no idea – as did Larry Weatherby who is a strong non supporter of wind farms....I'm sure there are more.....those are just two we've uncovered so far.....

Heather Allen-Johnson

NCS Managed Services Inc.

heather@ncsnetwork.net <mailto:heather@ncsnetwork.net>

From: Heather - NCS Managed Services Inc <heather@ncsnetwork.net <mailto:heather@ncsnetwork.net> >
Sent: April 25, 2022 1:59 PM
To: Nelson Bezanson <nbezanson@cumberlandcounty.ns.ca <mailto:nbezanson@cumberlandcounty.ns.ca> >
Subject: RE: Wind Turbine- Planning Committee Meeting

Ok the greatest outcry sees to be the setback- this is far smaller than what is even currently set in Colchester county- what cause you to go with the 750m- every comment I seen even from proponents was a minimum 1 km.....even Higgins Wind said 1.5 km minimum in their meetings with us?

Also are you aware of a bot/phishing email scheme that was being used to send out public comment emails?

Heather Allen-Johnson
NCS Managed Services Inc.
heather@ncsnetwork.net <mailto:heather@ncsnetwork.net>
Phone or Text 902-890-0669 Monday-Friday 9AM-5PM

From: cathjohnston@eastlink.ca
Sent: April 23, 2022 8:30 AM
To: Robert Zed
Cc: Planning
Subject: Re: WIND

Excellent!

Catherine

On Apr 23, 2022, at 6:37 AM, Robert Zed <robertzed@zed.ca> wrote:

Dear Cumberland County Planning,

I am sending a note to express my opinions regarding planning in Cumberland county. I am repeating many parts of the letter with my own signature as my points are identical and for ease of issue tracking for council i am assisting by using the same template with my own signature

I also agree, congratulations go to Nelson Bezanson for his work on wind turbines and land use. His documents are far superior to anything produced by the proponent companies championing industrial wind turbines who are happiest to keep communities in the dark without forthright accurate information. Their interest in the community is neither authentic nor genuine. They simply provide minimal consultation and even less information so they can tick a compliance box on an RFP form (but I digress).

That being said, I do have a few suggestions on the document recently produced by Mr. Bezanson.

Community engagement and action/accommodations: I think it is absolutely essential that any community near proposed industrial wind turbines be provided detailed information on the specific location of the proposed turbines. Ideally, that information would include images that simulate what views will be if and when the proposed turbines were to be erected.

Shared economic benefit: The current Higgins Mountain wind farm would bring little or no economic benefit to the communities in its vicinity, or to Cumberland County. I think this reality could be made clearer to the council members. Northern Pulp would enjoy the biggest share of annual revenue.

Decommissioning: Mr. Bezanson's recommendation for a 125% bond/surety applicable to the future repair and removal of the industrial wind turbines is excellent. Should there be a specific timeline for when that work would be carried out?

Appropriate Cumberland County wind energy zones: I would like to see Cumberland County (and other NS counties) telling the industrial wind turbine proponents where they have to locate (because of ecological, tourism, health and safety and economic concerns) rather than the wind turbine companies coming up with their proposals (and ignoring or downplaying the residents' concerns).

Adding Wentworth to Restricted Overlay: With reference to Cumberland Policy 4-53 and Policy 4-54, I believe that the Wentworth Valley meets the criteria laid out for its protection. It is not an area where industrial wind turbines should be erected. The first reason is because it is an area frequented by Nova Scotia's endangered mainland moose as they move between the Wentworth Valley and Portapique Protected Wilderness Areas. Second, the Wentworth Valley is an area that is of vital healthful importance and cultural significance for its year-round and seasonal residents. The negative health impacts of wind turbines are well documented and should be articulated more clearly in the county's policy documents. Third, industrial wind turbines will have severe negative impacts on tourism plans for the area. It is said that about 100,000 visitors annually come to enjoy the Valley from across the Maritimes.

I believe that Cumberland County should coordinate its policy on industrial wind turbines with neighbouring Colchester County. I hope that the two counties will agree that there should be a 10 km-wide restricted overlay corridor that runs from the top of Folly Mountain in Colchester on through the Wentworth Valley in Cumberland. That area along Highway 4 is a wonderful landscape and view-plane that has been enjoyed by Canadians and foreign tourists for well over a century—ever since the advent of train and automobile traffic. It's a landscape comparable to the scenery of the Cabot Trail. Industrial wind turbines would mar it irrevocably.

Let me leave with one entirely personal point of reflection for you which hopefully will move you to act swiftly to change the course of history. . I am writing to encourage your careful reconsideration and i have encouraged others to write before its too late and the irrevocable permanent stain on our pristine environment in both Cumberland and Colchester is destroyed forever. Council and administration cannot hide behind a decision but rather MUST be able to live side by side with the impact and face their neighbours (constituents) after they have ruined their homestead forever. How proud would you be to say my legacy as a planner or elected official, has stained this county and I was part of the desecration of my neighbours life and the town i represented .

Robert

Robert G. Zed. MHA, FACHE, ICD.D Chair Triangle Strategies, Founder ZedEvents, Adjunct Professor and Executive-in-Residence, Dalhousie University, Halifax/Toronto. 902-410-7933

From: EmBourque <embourque@eastlink.ca>
Sent: April 22, 2022 10:51 AM
To: Planning
Subject: Wind

We live on the Fort Lawrence Road and have a clear view of the 15 windmills on the south side of the TCH.

We heartily approve of the new additional windmills proposal as the marsh provides the best venue for such green projects with its constant winds.

There are far more plus features than not for the county to pursue such enterprises as our planet needs to do everything possible to limit fossil fuel usage.

We hope this project will be successful.

Sincerely,

Elaine & Paul Bourque

Elaine Bourque

From: Daniel MacLellan <DMacLellan@mmfi.ca>
Sent: April 22, 2022 9:26 AM
To: Planning
Cc: Amy MacLellan
Subject: WIND

My original email to the premier below, in conjunction with specific answers relating to bylaws that protect the Wentworth valley:

The governments reaction to the proposed changes NSP had made to the residential solar power farms was swift and fair, it showed a long term commitment to the province, and to the adoption of green energy, as well as to the protection of many Nova Scotian's investments in their homes and properties and your commitment to small business (the installers and providers).

So- Thank you for that. Nova Scotia will be a better place for our children for a long time because of that decisive action.

Let's keep the ball rolling on these quick decisive actions and review the wind farm proposals in the beautiful Wentworth Valley.

Recreation builds communities, I have seen firsthand in my own financial commitments to the Rath Centre in Truro how the community has been completely revitalized, young families are moving back and Colchester county is thriving again (and becoming an important bedroom community for Halifax with its growth and

housing problems), Victoria park and the mountain bike area is now known all over the Maritimes as top in class, and local businesses in the downtown core are thriving because of it.

(I am a Halifax resident with employees in the city and in Truro).

Ski Wentworth has always been integral to this community building (long before I was even born)- It is the premier ski hill (and soon to be mountain biking area) in our province. The Wilson family created and kept this alive in much part during early and lean years with their own personal money for the good of the community. It is time for the province to recognize their good work and back them in this upcoming battle.

Covid has had an unintended consequence of getting people outside and playing golf, hiking and skiing etc. and people from all over Canada are re-evaluating their priorities in life. The ski hill is booming, and development and real estate in that area is thriving (not just for seasonal owner/ renters).

The ski hill has already purchased a second quad and has begun construction and installation to increase capacity, and there are more improvements to come. The community in that valley will continue to grow and improve the lives of Nova Scotians in both Cumberland and Colchester County directly (as well as the rest of the province)

The two proposed wind farms in the area will destroy a beautiful part of our province, they will decimate the moose population, as well as simply the natural beauty of the waterfalls, hiking trails, lakes etc.

I am pro-wind farm, but these proposals are lazy and cheap, as the non resident owners simply want to access the powergrid in the least expensive way possible (reaching the powerlines along that rural highway with minimum cost), we can not let them move on this within this tourism area.

We as a province can still match our green energy goals, but we have to be very planned about where these farms end up (I am told the wind in that area is no where near as robust as it could be for these size wind farms, it is just inexpensive to build in that area).

I am not alone in this thinking as you can imagine, and there is an ever growing influential community of Nova Scotian's against the project. We cant take tis decision lightly, as the effects of getting it wrong will last forever.

Appreciate your time and review of this email.

Criteria for Culturally Significant Areas Description Uniqueness Is the area/feature unique within a region Broad Cultural/ Community Reliance How many people or groups rely on the feature/area?

How many functions does it fulfill? Fishing, Skiing, mountain biking, hiking, photography, canoeing, camping, picnic parks and general outdoor community based activities

Importance to resilience How essential is the area or feature to the cultural integrity of the community or to the group of users? The valley is nothing without this hill. The community would die. The valley is nothing without tourism.

What would happen if it were lost, changed or degraded? Degree of Tradition How long have people valued the area/feature? People have been into outdoor recreation in this area since the 60's likely beyond.

The area cannot be replicated elsewhere.

Thank you for your time on this. Windmills are a great step forward for green energy, but not while derogating a growing community of outdoor tourism showcasing the beauty of Cumberland county.

Daniel MacLellan, BRM, CHS
President, MacLellan & Moffatt Health Insurance Ltd.
Toll Free 1-866-710-2586
Office (902) 431-2586
Fax (902) 431-2586
dmaclellan@mmfi.ca <mailto:dmaclellan@mmfi.ca>

From: A J B Johnston <ajbjohnston@gmail.com>
Sent: April 22, 2022 9:01 AM
To: Planning
Subject: WIND

April 22, 2022

Dear Cumberland County Planning,

First, congratulations go to Nelson Bezanson for his work on wind turbines and land use. His documents are far superior to anything produced by the companies championing industrial wind turbines.

That being said, I do have a few suggestions on the document recently produced by Mr. Bezanson.

Community engagement and action/accommodations: I think it is absolutely essential that any community near proposed industrial wind turbines be provided detailed information on the specific location of the proposed turbines. Ideally, that information would include images that simulate what views will be if and when the proposed turbines were to be erected.

Shared economic benefit: The current Higgins Mountain wind farm would bring little or no economic benefit to the communities in its vicinity, or to Cumberland County. I think this reality could be made clearer to the council members. Northern Pulp would enjoy the biggest share of annual revenue.

Decommissioning: Mr. Bezanson's recommendation for a 125% bond/surety applicable to the future repair and removal of the industrial wind turbines is excellent. Should there be a specific timeline for when that work would be carried out?

Appropriate Cumberland County wind energy zones: I would like to see Cumberland County (and other NS counties) telling the industrial wind turbine proponents where they have to locate (because of ecological, tourism, health and safety and economic concerns) rather than the wind turbine companies coming up with their proposals (and ignoring or downplaying the residents' concerns).

Adding Wentworth to Restricted Overlay: With reference to Cumberland Policy 4-53 and Policy 4-54, I believe that the Wentworth Valley meets the criteria laid out for its protection. It is not an area where industrial wind turbines should be erected.

The first reason is because it is an area frequented by Nova Scotia's endangered mainland moose as they move between the Wentworth Valley and Portapique Protected Wilderness Areas. Second, the Wentworth Valley is an area that is of vital healthful importance and cultural significance for its year-round and seasonal residents. The negative health impacts of wind turbines are well documented and should be articulated more clearly in the

county's policy documents. Third, industrial wind turbines will have severe negative impacts on tourism plans for the area. It is said that about 100,000 visitors annually come to enjoy the Valley from across the Maritimes.

I believe that Cumberland County should coordinate its policy on industrial wind turbines with neighbouring Colchester County. I hope that the two counties will agree that there should be a 10 km-wide restricted overlay corridor that runs from the top of Folly Mountain in Colchester on through the Wentworth Valley in Cumberland. That area along Highway 4 is a wonderful landscape and view-plane that has been enjoyed by Canadians and foreign tourists for well over a century—ever since the advent of train and automobile traffic. It's a landscape comparable to the scenery of the Cabot Trail. Industrial wind turbines would mar it irrevocably.

Thank you for seeking comments.

Andrew Johnston
2683 Oxford Street, Halifax, NS

From: A J B Johnston <ajbjohnston@gmail.com>
Sent: April 14, 2022 11:05 AM
To: Planning
Subject: RE: Update on Cumberland's Review of Wind Turbine Regulations

Thank you for sharing this email with me. You have carried out a thoughtful analysis and I especially like the best practices you have summarized from around the world. I wish the NS government would follow your lead and implement those very practices adopted in other jurisdictions.

I continue to believe that the Wentworth corridor should be a protected area and wind turbines not allowed to impact its environmental integrity, beauty, or economic value to its year-round and seasonal residents.

It strikes me that governments, municipal and provincial, should be telling the wind proponents where they have to locate and the scale of the turbines that will be allowed, rather than those governments responding to the proponents' proposals. Wind turbines can definitely be a part of our energy future, but where they are to be placed needs to be carefully planned.

I look forward to reading your recommendations.

John Johnston

From: J. Cyne Johnston <cyneandmark@shaw.ca>
Sent: April 22, 2022 12:44 AM
To: Planning
Subject: Wind

Cumberland County Planning Dept

April 21, 2022

To whom it may concern,

I am writing to express my gratitude for the excellent work completed by Nelson Bezanson of the Municipality of Cumberland regarding the wind turbine land use recommendations and summary documents. I greatly enjoyed reading the summary of the literature, gaps in the current policy, the stakeholder feedback, and the recommendations to Council. The work was well written and thoughtfully summarized.

In addition, I have the following comments regarding the proposed recommendations.

1. **Appropriate community engagement and action/accommodations:** I welcome your suggestions for required community engagement. In addition to the recommendations you've stated it would be also be valuable to provide community members with the location of turbines and enhanced photos that will simulate what their views will look like with the proposed wind turbines. The current proposals in the Wentworth Valley have not met the current standards for public engagement that you have laid out in that they have not provided the community with an accurate list of their concerns and their actions/accommodations, or images of what the new landscape might look like. Enhanced community engagement is essential.
2. **Shared economic benefit:** As stated in your recommendations, the local community and the County of Cumberland should be ensured some economic benefit from any proposed wind project. A concern with "owning shares" or "profit sharing" as described is that wind projects are typically only profitable with implicit or explicit government subsidies. It is unlikely that these projects will make any profit that would be shared with the community. There is unlikely to be any economic benefits with wind turbines in general and the land lease benefits of both proposed projects go to the Indonesian based owners. The current projects will not benefit local residents in terms of lower energy costs or economic benefits.
3. **Decommissioning:** I welcome your requirement for a 125% bond/surety to be included in the case of disrepair, malfunction, and removal. Will there be a timeline for when the County would hire an external contractor to decommission a turbine following disuse? Could this be stated? The current projects do not have this included in their proposals and do not meet this requirement.
4. **Identifying appropriate locations within Cumberland County that are wind energy zones while maintaining the plan for tourism, species protection, and maintaining recreation spaces.** Currently, proposals are based wherever industry may find land to lease. Would it not be more appropriate to identify areas appropriate for wind turbines, rather than areas that are inappropriate?
5. **Adding Wentworth to Restricted Overlay:** The Cumberland Policy 4-53 calls for restriction of wind turbines in ecologically or culturally significant lands or and Policy 4-54 restricts wind turbines from areas in which they are not compatible with the tourism plan. The Wentworth Valley meets the criteria for being added to the restricted overlay due to these factors, as you have stated. I understand the challenge in balancing the cultural, ecological and unique characteristics of the Wentworth Valley with the demand for renewable energy but would like to emphasize the following:

This Valley ecosystem has been recognized by the province of Nova Scotia as core habitat for the mainland moose. Nova Scotia's endangered mainland moose frequent the area and travel through the project area as they connect between the Wentworth Valley and Portapique Protected Wilderness Areas. In late November, the Nova Scotia 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 core moose habitat remaining in Nova Scotia and the proposed wind projects areas are in essential core moose habitat. Projects of this size could be a direct threat to the survival of this species. It is the responsibility of government to protect this core habitat. How does this policy framework interplay with other provincial documents?

The Wentworth Valley is a culturally significant area in terms of its uniqueness and importance to resilience and wellness. Engaging in the natural environment and being in nature has been recognized as being a valid tool for

managing stress, anxiety, and maintaining good mental health. Negative health impacts of wind turbines are well documented and are not addressed in the current policy framework.

The Wentworth Valley is not compatible with wind turbines due to the tourism plan for the area. The Valley has long been such a spot for residents and visitors and it is enjoyed by about 100,000 visitors annually from across the Maritimes. It is a unique recreation area in mainland Nova Scotia. The proposed wind turbine project could seriously impact future nature-based tourism development in an area that is known for its outdoors.

I support renewable energy and its importance for the environment. However, there are implications with these massive wind turbines including but not limited to a lack of community benefit from these projects, wildlife degradation, environmental concerns, and a general disregard for the citizens and visitors in this area. I continue to feel that this is not the right place for industrial wind turbines generally, but specifically oppose the Higgins Mountain Proposal based on the recommendations and criteria set out by the Cumberland Planning and Development Department.

Respectfully,
Cyne Johnston
61 Folly Station Rd.
Londonderry NS

From: John Kitz <johnfkitz@gmail.com>
Sent: April 21, 2022 6:38 PM
To: Planning
Subject: Wind

I live at 216 Fountain Road and believe that an economy based on recreation and small wood lot owners ,North Nova members plus,could make a better economic model than big windmills. Look to PEI with its hiking tourism thrust to see if it could apply to Cumberland Co. as our hills ,rivers ,forests and views are pretty darn good. There is a better way,best John kitz

From: J. Cyne Johnston <cyneandmark@shaw.ca>
Sent: April 20, 2022 4:31 PM
To: Planning
Subject: Re: Second Update on Cumberland's Review of Wind Turbine Regulations

Dear Nelson,
Just a quick note of congratulations.
This work was exceptionally well done. The summary documents and recommendations provide an excellent synthesis of the literature, stakeholder feedback, and government documents.
Well done and kudos to your team,

Cyne Johnston

From: allen macnutt <nuttsandlinda@gmail.com>
Sent: April 20, 2022 11:39 AM
To: Planning
Subject: Wind

Good morning,
My name is Allen MacNutt and I represent the Hart Lake Cottage and Homeowners Association. We have 60 residences on the Lake 90% of them in Cumberland County. Seven homes are occupied year round and the

remainder are seasonal residents Most May to November. plus snowmobiling and skiing during the winter. The quiet tranquility of this beautiful area has been the attracting feature for all of us. It is a very special place and for generations families have passed these properties on to the future generations to enjoy. The stars are brighter here than anywhere in our Province. Whether one is a swimmer,kayaker,canoeist,boater,hiker,skier,fisher,biker,walker,bird watcher,hunter or plain old nature lover, this is why we are here. We are not against wind power, but we are totally against these turbines robbing us of the life we have come to cherish and the reason we live and enjoy this special area. We are a small village of lake lovers who respect every thing we all have worked our lives for and plan to pass on to our families and theirs. We don;t ask much from the County as far as any maintenance goes. We pay to have our roads plowed and maintain it as well. We appreciate that we are here because some 80 years ago someone saw a special place they realised was special and here we are today . We expect our concerns to be considered if or when this massive construction project is approved. We do not want them in our siteline or within hearing distance. Lighting from these turbines could ruin and rob us of our calm and beautiful starry nights. We have faith that our Hart Lake Village will be spared and a more suitable location for these huge projects will be found in a more remote location.

Respectfully submitted

Allen MacNutt

Hart Lake Association

From: Roger MacIsaac

Sent: April 19, 2022 4:19 PM

To: Nelson Bezanson

Subject:Wind turbine regulation work

Hello Nelson

I went through your work that was posted today and just wanted to congratulate you for doing (in my opinion) a great job. You put a lot of thought and effort into this and make me happy that I'm just an old, retired guy. Lol

Certainly, a lot of work!!!!

From: Frank and Shari <maine.johns@gmail.com>

Sent: April 15, 2022 3:45 PM

To: Planning

Subject:Wind

Hi there,

Some areas provide significant and direct benefits to the local community ex. towns, counties. In Maine, property taxes can be significantly lowered because of these payments.

Examples:

https://www.maine.gov/dep/ftp/projects/weaver-wind/applications/section_28_tangible_benefits.pdf

<https://www.nrel.gov/docs/fy09osti/44824.pdf>

Sincerely,

Frank John

Canning, NS

From: Mike & Fiona <mikeandfiona@eastlink.ca>

From: A Withrow <amyandjoeyswedding@hotmail.com>
Sent: April 4, 2022 8:14 PM
To: mindnr@novascotia.ca <mindnr@novascotia.ca>; Minister.environment@novascotia.ca
<Minister.environment@novascotia.ca>
Subject: Protect Wentworth Valley

Hello Tory Rushton and Tim Halman

WE URGENTLY NEED YOUR HELP

There are 4 industrial wind turbine projects being proposed in the Wentworth Valley area. The proposed projects would each consist of up to 100 MW and up to 18 industrial wind turbines. Each wind turbine would be up to 190 m (623 ft) high to the tip of the blade. The tallest of the turbines being proposed are twice the height of the tallest building in Halifax, Fenwick tower. These proposed wind turbines are not supported by local residents (myself included).

Massive turbines threaten wildlife, endangered species, telecommunication services, outdoor tourism and recreation. They also cause adverse visual impacts, adverse noise and infra sound and well water pollution. These projects disregard the peaceful enjoyment of the land by the residents and visitors in this area and will discourage future economic development.

We have been advised by government that communities who are not in support of industrial wind turbines do have a VOICE. I am expressing my concerns to you, see attached letter.

I am opposed to the industrial wind projects being proposed in the Wentworth Valley area. Please save our beautiful mountains and protect the wildlife.

Thank you so much for your time, please help make my voice heard on this important issue.

Respectfully
WENTWORTH Valley Resident

Amy Jordan

Sent: April 14, 2022 12:30 PM

To: Planning

Subject:RE: Update on Cumberland's Review of Wind Turbine Regulations

Thank you Nelson,

It is a circumspect and in depth response with a highly credible cross-representation of views. While I do not support this project in the Wentworth Valley for reasons that are well articulated in your report, I can certainly acknowledge the compelling nature of the arguments in favour.

Regards,

Mike Scott

Emails with Attachments

From: Wentworth Capsite <wcapsite@gmail.com>
Sent: April 14, 2022 11:48 AM
To: Nelson Bezanson
Subject: Protect Wentworth Valley (sent on behalf of Deborah Atkinson)
Attachments: Protect Wentworth Valley.pdf

See attached PDF sent on behalf of Deborah Atkinson.

April 10, 2022

To Whom It May Concern,

I wrote an article in 2004 when we formed a committee to oppose the first wind farm project being proposed in the surrounding Wentworth area. We retired to Wentworth Valley 12 years ago because of the lifestyle - 4 seasons of recreation, the beauty, wildlife, nature, peace and tranquility found here.

Three turbines were erected in the area which have not operated in the past 3 years, yet they are still standing. The size and scale of the new project is massive in comparison - 623 feet in height on top of our 900 ft. hills.

My biggest fear is our water - this is a watershed area. The Wallace River runs through our backyard. We and all our neighbors depend on crocks and springs for our drinking water. The proponent says there are only a few streams, yet drive through the valley after a 50 mm. rainstorm and you couldn't possibly count the number of run-offs coming down the mountain.

When the Trans-Canada Highway was going to pass through Wentworth, a major decision for by-passing the valley was the fear of blasting and the impact on the water. Uranium was present in the rocks.

Please read my article - I am so afraid that erecting a major industrial wind turbine site in the area is a major mistake, and once it is done, it will be too late. Thanks for your time,

Deborah deHaan Atkinson



32 Miller Ct., Wentworth

Debbie – Notes submitted to Protect Wentworth Valley

It is frustrating that little consideration is given to wildlife and the health and functioning of intact ecosystems when building a windfarm.

The Cobequid Mountains are characterized by deep incised valleys and fast flowing streams. To the west of the existing turbines the roaring river flows northward to the Wallace River. To the east a number of smaller, even more deeply incised valleys fall towards the Wentworth Valley. The area is full of steep water courses, headwater ponds and bogs. According to the Nova Scotia Department of Natural Resources significant habitat database, there are significant "other habitat" within approximately 800 metres of turbines 2 & 3. This habitat known as "Talus Slopes", provide important habitat for several mammal and plant species of concern. The Cobequid Hills provide habitat for a wide range of fauna, flora, and avian species.

Fauna – deer, backbear, fox, bobcats, coyotes, snowshoe hare, fishers, beaver, muskrat and lynx. Recently there have been sightings of cougar and of course, the mainland moose.

8 Amphibians, five freshwater mussels, three fish and one reptile of concern – the wood turtle were identified as being either known to the area or found in habitat similar to the project area.

In the watercourses of the area, brook trout are the predominant fish species. Brown trout and Atlantic salmon are also found in some of the small headwater streams and the Wallace River is a predominant spawning river for the Atlantic salmon. HAAD, a project under the federal fisheries act for "harmful alteration, disruption or destruction of fish habitat that reduces its capacity to support one or more life processes of fish – and should be considered in the construction of wind turbines.

Plant species – The Northern Bedstraw is listed on the ACCDC list as being known to the area.

The Great Horned Owl is known to nest in the forest on the slopes below Higgins Mountain Road. Goshawks, red-tailed hawks, barred owl, sharp-shinned hawk, the American Kestrel, broadwinged hawk were among the raptors that frequent the area. The bald eagle and turkey vulture are frequently seen along the Wallace River. There are a number of breeding bird species in the area, but the vesper sparrow and Bicknell's Thrush are of the most concern.

Bats – We had one of the largest bat hibernacula in the province at Lear Shaft. It is an abandoned but open vertical mineshaft located near Londonderry, Nova Scotia. According to Bridgette R. Tutty who wrote her thesis on bat hibernacula "The destruction and degradation of bat hibernacula is one of the most serious threats to global bat population". During hibernation bats are vulnerable to disturbance. Surviving depends on the amount of energy stored as fat prior to hibernation. Bats arouse naturally throughout hibernation for reasons that are unclear. The energetic cost of arousal represent 80-90% of the animals' fat store. Unnatural arousals due to any type of disturbance (which could include noise, both high and low frequency, which travel for miles) can have a significant effect on fat stores and can cause premature depletion of fat reserves and possible starvation. From the "Interim Guidelines to Avoid and Minimize Wildlife Impacts from wind turbines in the US Fish and Wildlife Service: #3: Avoid placing turbines near known bat hibernation, breeding, and maternity/nursing colonies, in migration corridors, or in flight paths between colonies and feeding areas. They go on to say wind turbines should not be installed on mountain

ridges...

Bird and bat fatalities at the existing 3 turbines on Higgins Mountain is hard to determine. I spoke with Andrew Horn, who did the count for the Maritime Breeding Bird Atlas and he said carcasses at the turbines only lasted a maximum of 2 days. He said he left chicken wings at the site several times and the longest they remained was 2 days. Therefore, unless someone checked the sites several times per day for an extended period of time over several seasons an accurate count could not be made.

Birds: We have a large number of birds and raptors that live in the proposed turbine area. (see copy of Maritimes Breeding Bird Atlas sheet for Wentworth area). As with bats, studies on actual fatalities have been few and often inconclusive. Songbirds mostly migrate at night and low enough to collide with the blades of large turbines. Wind power is a unique threat to raptors (hawks, eagles, owls, etc.). As with bats, raptors have very low reproductive rates and long life spans so any fatalities with turbines augment existing threats to their population. Bill Weber, Hawk Migration Association of North America, says "some hawk watchers across North America fear wind turbines may be the biggest man-made threat to these raptors, other birds and bats, since DDT caused massive population declines in the 1960s...adequate study of collision risk requires observation through whole seasons and several years, not the limited hours of non-expert observation typically cited in most feasibility studies.

Studies have been done on the effects of noise upon some bird species and quite clearly show that low frequency noise played a significant role in creating bird disturbance / displacement and was sufficient to cause serious reduction in breeding numbers in the study area. Location is the most important migrating displacement and collision risk. Current guidelines recommend avoiding areas with listed species, migration pathways or other areas where birds congregate. Cliff edges, mountain passes and areas of high prey abundance. Turbines placed on ridges appear to have a higher probability of causing bat and raptor fatalities than those at other sites.

The original EA concluded that the site is near a landform and that several provincial listed species might breed in the area. Uncommon species that might occur in proximity to the turbine location, Purple Martin, Bicknell's Thrush, Wood Thrush, Philadelphia Vireo, Eastern Meadowlark, and the Vesper Sparrow. The Bicknell's Thrush is of concern because of habitat change, low numbers, patchy distribution and low reproductive potential. This is a very secretive species so documented cases are hard to find.

Moose

Mainland moose of Nova Scotia are an endangered species. The higher elevations of the Cobequid Mountains are know to be an important moose range, especially in winter. (Tony Nette, N.S. Dept of Natural Resources). In 1996, provincial and territorial governments endorsed the "Accord for the Protection of Species at Risk (SARA). SARA protects plants and animals from the list of wildlife species at risk and makes it an offence to kill, harm, harass, capture or take an individual of a listed endangered, threatened or extirpated species, or its parts or derivatives; damage or destroy the Residence of one or more individuals of a listed endangered or threatened species, or a listed extirpated species if a recovery strategy has recommended its reintroduction into the wild in Canada.

The construction and maintenance of wind energy facilities alter ecosystem structure through vegetation clearing, soil disruption, and potential for erosion, and noise. Alteration

of vegetation, including forest clearing, represents the most significant potential change through fragmentation and loss of habitat. Low frequency noise, if wild animals were exposed to, would also describe disturbance and displacement, which would be contrary to the appropriate legislation in the case of endangered species. Building of new and larger roads, access is increased. Snow removal as well as servicing the turbines, power lines plus the indirect which would be increased motor vehicle use in the area (including off road vehicles) for recreation pursuits, would result in increased disturbance, fragmentation and habitat abandonment. Unfortunately better access – easier for poachers!

Moose have been shown to change behavior and are displaced from preferred habitat...up to 1.6 km from cross country ski trails and snow mobile trails. Hearing and their ability to detect predators by detecting movement is basic to survival and a sense of security. Imagine the effects of the construction, maintenance and running of wind turbines...and increased traffic would have on moose. According to Tony Nette at Government of NS, "At this time we simply don't have evidence to prove the nature and extent of these concerns. Research to better describe/understand is very costly and takes years. It remains to be seen if adequate time and resources are provided to properly understand these matters before going ahead with development. ****Update: Nov 2021 NS Mainland Moose Recovery Plan****

In the Endangered Species Act, the purpose of the act is to provide for the protection, designation, recovery, and other relevant aspects of conservation of species at risk in the province, including habitat protection, while recognizing the following:

- The goal of preventing any species in the province from becoming extirpated or extinct as a consequence of human activities.
- d. All Nova Scotians share responsibility for the conservation of species at risk and governments have a leadership role to play in this regard,
- h. the precautionary principle that a lack of full scientific certainty must not be used as a reason for postponing measures to avoid or minimize the threat of a species at risk in the province.

13 (1) No person shall (C) destroy, disturb or interfere with or attempt to destroy, disturb or interfere with the specific dwelling place or area occupied or habitually occupied by one or more individuals or population of an endangered or threatened species, including the nest, nest shelter, hibernaculum or den of an endangered or threatened species.

Wind power developments fragment the landscape and increasingly isolate herds and groups of moose from one another. In main pockets where mainland moose are found, the large viable herds are generally associated with the most remote wilderness areas, suggesting the cumulative threats of development, long term habitat loss and cumulative threats of development, long term habitat loss and cumulative loss of habitat...is perhaps the most serious challenges to maintaining long term viability of the mainland population. Geographic isolation increases the risk to moose of reduced health and productivity, and possibly progressive genetic deterioration and may eventually lead to local extirpations. Potential impacts of proposed wind farm

developments in high elevation area, or their cumulative impacts on mainland moose using these areas are unknown and poorly addressed by existing studies in eastern North America (Recovery Plan for moose in Mainland Nova Scotia)

Wood Turtles

Another vulnerable species listed in Nova Scotia is the wood turtle. There may be as few as 2500 widely dispersed across river habitats but info suggests that the species is declining. It is of concern because even low mortality rates of adults can have serious population impacts. Threats to wood turtles include alteration and disturbance of river and stream habitats, as well as possible harm during the construction of the turbines and site development. In the original EA report it stated "directly individuals could be killed during land clearing operations; indirectly they could be affected by a reduction in the quality and quantity of suitable habitat.

Fishers – Seldom seen by humans these solitary animals are protected. At best there are 150 fishers left in the province, mainly centered in Cumberland and Colchester Counties. Habitat loss is of major concern because a female normally occupies 4 square miles and a male 8 square miles; although between sexes, territory may overlap, apparently only one animal occupies each territory so any possible habitat loss is extremely detrimental to the existence of this species. According to the original EA study, it was stated in the report "directly individuals could be killed during land clearing operations; indirectly they could be affected by a reduction in the quality and quantity of their habitat." It goes on to say "...since the footprint was limited in extent, the loss is considered minimal. Where each fisher is so territorial and this project will cover such a wide area, it could have a significant effect on the population.

(This year 2021 – We spotted a fisher in Westchester, one on the slopes of Wentworth Ski Hill and another off Old Station Road.)

Invertebrates. In the original EA report, likely to be found inhabiting the lands in the general vicinity of the 3 turbines are 4 of the listed invertebrates, ie the Early Hairstreak, the Hoary Comma, the greenstriped Darner and the Satyr Anglewing. Again the EA states "directly individuals could be killed during land clearing operations; indirectly by a reduction in the quality and quantity of suitable habitat." Also expected to be present in the area is the Monarch Butterfly which is also on the list of endangered species.

The cumulative assessment in the original EA Report: There are no proposed new works known that will take place in, or in the vicinity of, the WTG sites that might add cumulatively with the construction, operation or decommissioning of the proposed turbines to cause a significant adverse effect on the identified species of concern.

Low frequency noise and infrasound; Concludes there is a case to answer to when land

based animals and freshwater creatures are exposed to noise at low Hz levels. Creatures have low acceptance levels, as their survival is more reliant upon instinct and interpretation of unusual sounds as a source of danger. Low Hz, if wild animals are exposed to, would describe disturbance and displacement, which in the case of protected species would be contrary to appropriate legislation. High levels could be lethal to animals and even low levels can be debilitating and create disturbance. Studies have been done on the effects of noise upon some bird species and quite clearly show low frequency noise played a significant role in creating bird disturbance / displacement and was sufficient to cause serious reduction in breeding numbers in the study area. Vocal communication plays an important part in the social interaction of many creatures and the imposition of noise from man-made sources could potentially disrupt the ability of species to communicate. It could introduce new and possibly disturbing behavioral factors into social groups. In captivity, it has been shown to cause increased heart rates, respiratory changes and reduction in feeding. Vibrations from wind farms have been picked up as far as 10 kilometres away. Many species use ultrasonic for a variety of tasks, communication, foraging, and navigation. Infrasound can travel long distances and has been identified as an important sound element that can be responsible for problems in reproduction in captive breeding programs. Literature suggests large animals use the infrasonic range for communication during courtship. It could have an impact in wilderness habitats for large animals such as moose. The area of acoustic environment related to wind turbines is one that should be more clearly defined. The generation of such signals be they sonic, infrasonic or ultrasonic ranges should be documented for any technologies being deployed in wildlife habitats. There are few published studies on the scope of the acoustic element for non-human activities. Most of the literature associated with wind turbines tend to dismiss noise as a significant issue. It is known that some humans have hearing acuity beyond the normal range, and there are documented cases of humans being able to detect sounds in the infrasonic range at distances of 10s of kilometers from point of generation. Noise perceived by those living some kilometers from wind turbines, and particularly downwind or in valleys below, is caused by the pressure wave that is generated each time a turbine blade passes the tower. For a single turbine these broad band pressure fluctuations are not excessively intrusive to humans, but when several turbines operate in proximity, the pulses move in and out of phase to create a doubling and tripling or more in the sound level, depending on how many are together. The noise heard directly underneath is no indication of the noise heard by those living some distance away. It will be worse at night. The Wentworth Valley should be considered as a quiet zone, and for those who live in a rural environment where background noises are exceptionally low, the noise is even more intrusive. In the animal kingdom this is even more magnified!

Water: Many people who live in the Wentworth Valley rely on springs, have dug wells or point-wells. The quality of surface water is extremely important. Many have tried to dig wells and have gone to depths of 400 feet or more and have not hit bed rock. Any construction, from putting in roads, improving existing roads, the building of turbine sites, excavation, blasting, etc. will have an affect on our drinking water! Added to this issue, the area is known to have uranium, which is very water soluble and is linked to MS. This should be a major concern for those of us who do not have drilled wells. Acidic soils are also typical in the area. Exposing sulphide minerals to the air triggers the oxidation of pyrrhotite which leads to the production of acidic drainage. The sulphide-

bearing veins do occur in the granite rock in the area. The Wallace River flows right through the valley – one of the cleanest salmon spawning rivers in the province.

In conclusion, the industrial wind farm proposed for the Wentworth Valley is going to affect many endangered and listed species of plants and animals. The best area to put in wind farms of this magnitude is already cultivated land where the impact is less felt. We are still in a learning phase...we have the opportunity to learn before plowing ahead and wishing later that we had done better research. Doing proper studies will be very costly and take time. That will be difficult for industry and much of the public to accept because there is an urgent need to develop alternate energy sources. Wentworth Valley is not the place to put an industrial windfarm.

“Any society which does not insist upon respect for all life must necessarily decay!”,
Albert Einstein.

To Whom It May Concern

Wentworth - Please read to understand the magic and beauty of our valley. Hopefully, if you spend a bit of time here you will want to keep it as a Four Season Recreation area. Thanks, Deborah DeHaan Atkinson, submissions from many volunteers who live and play in our special Valley.

"Four Seasons
of Adventure"

Wednesday, October 9, 1872 aboard the "Hercules" - "suddenly the train swept around a curve and exposed to our view a scene of grandeur and beauty unequalled by any other on the line and probably unsurpassed by any other in Nova Scotia. It was the Wallace Valley(now called the Wentworth Valley.)

...no wonder the ladies ceased their gossip, the card players threw aside their cards, the singers forgot their songs, and all gazed with admiration on

the beautiful scene spreadout before them . (from the Hfx Chronicle Herald May 30/59 about the train ride 87 years previously)

Trails are abundant in the Wentworth Valley for all levels of fitness and outdoor physical activities. Hiking, running, snowshoeing or cross-country skiing can be enjoyed throughout the valley. One such place is the Wentworth Provincial Park. Enjoy the trails or picnic and relax by the Wallace River which meanders through the park. Nearby, the Hostel trail system is enjoyed year round, especially the Look-Off Trail with breath-taking views through the valley to Folly Mountain. Ski Wentworth has numerous trails, the most famous, High Head, where on a clear day you can see the Confederation Bridge to P.E.I. The trails from Ski Wentworth connect to the protected Wentworth Valley Wilderness Area. There are numerous waterfall hikes and a hike to the highest point in mainland N.S.

The "Valley of Snow" is home to 4 snowmobile clubs, Fundy Trails, Sutherlands Lake, Route 6 and North Shore, with over 500 kms. of groomed multi-use trails in the Cobequid Highlands surrounding Wentworth Valley, that welcome snowmobiling, ATVing, cycling and nordic skiing. These trails make their way to beautiful waterfalls, look-offs, forests, lakes and provide welcome economic support to restaurants, stores, gas stations and businesses along its trails.

Ski Wentworth - The area was a logical choice to become the first ski area east of Quebec, as Wentworth is surrounded by the highest peaks on the mainland and is in the heart of mainland N.S. snowbelt. Down-hill skiing began in the 1930's in Wentworth, and new for 2022 a new chairlift is being installed which will transition Ski Wentworth from a skiing destination to a "four seasons of adventure" destination, allowing for more hiking and biking options through-out the

year.

Ski Wentworth Air Bag- Located just a few hundred meters from the base of Ski Wentworth, there is a unique year round training site for freestyle skiers and freestyle snowboarders, designed and built almost exclusively by volunteers after years of planning. This site is the only active artificial dryslope and airbag, east of Montreal. Athletes can ski down an artificial snow surface covered slope, hit a jump and land on an airbag, all year long. We are so fortunate to have this in Wentworth, and are the envy of many other programs from across the country!

Mountain Biking - The Wentworth Mountain Bike Association is a not-for-profit society based in the Wentworth Valley that is dedicated to promoting safe and sustainable mountain biking in the area. Formed in July 2020, in partnership with Ski Wentworth, has developed the valley's first authorized mountain bike trail network.. The Wentworth Valley is home to world-class

terrain that is suitable for all ages and abilities of mountain bike enthusiasts. With a season that stretches from April to December, bike season rounds out ski season for a full Four seasons of adventure.

Fall Colors that are as brilliant and beautiful as can be found anywhere are captured on cell phones by the thousands each year. Rising from the valley floor: reds, oranges, peach from the maples through a range of yellows intermixed with the strands of dark green colors up to the ridges above. Photographers also frame nature's beauty here at other times of the year: the water tumbling down over the rocks and moss in the many brooks, wild flowers of both the meadow and the forest, and for those with patience..wildlife doing their best to hide.

Road biking is becoming popular through the valley with Hwy 4 being designated as a blue route for cycling between Masstown and Mahoney Corner and Wentworth to Wallace on Hwy 307.

Wentworth is surrounded by Lakes, rivers, streams and bogs...perfect for fly-fishing, swimming, paddleboarding, kayaking and canoeing. The pristine waters of the Wallace River make it one of the best salmon spawning rivers in the province. Bald eagles and King Fishers are frequent flying visitors along its shores.

Old abandoned farmlands, apple orchards, blueberry fields, blackberry and raspberry bushes, maple trees for maple sugar and old hemlock forests , the perfect environment for wildlife to thrive. Owls, eagles, hawks, flocks of birds, mammals such as black bear, deer, the elusive mainland moose, fox, fishers, weasels, bobcats, raccoons...just to name a few. If you move quietly, you may be fortunate to be in the right place...at the right time...for a special encounter with nature!

Surrounding Wentworth are 5 golf courses and numerous campgrounds. Entering Wentworth from the east you

pass Masstown Market, listed as one of the top 10 roadstops of Canada. Wentworth has its own market entering from the west. Geocaching and the latest craze, disk golf, can be found in the area.

Because of the desirability of the Valley, cottage-owners and full-time residents are moving into Wentworth Valley. For those who live in or around the area, there are a number of centres and retreats.

Wentworth Rec Centre...has evolved into the gathering place for everything recreational, social and cultural in the Wentworth Valley. Pickleball, yoga, walking, car shows, ball games, bingo, card games, community dinners, dances, yard sales, wedding, funeral and birthday receptions, political debates and business meetings all take place throughout the year at the Rec Centre.

Historical Valley Schoolhouse, situated on the Barclay Rd., just south of Ski Wentworth. In the days of one room schools, it was to serve the

children within a two mile radius of the building. It served the children of Wentworth Station and Wentworth Valley until 1959 when a new "consolidated" school was opened at Wentworth Centre.. When the building was closed it was deeded to the community as a public hall. As interest in the building waned it was used less and less and the building was falling into disrepair. In 1995 a group of community members decided it should be preserved . The group was able to restore, upgrade the property and receive historical designation from the County of Cumberland. It now has a unique venue that hosts weddings, anniversaries, school visits, yard sales, an annual reunion attended by former students, teachers and relatives.

Wentworth Learning

Centre..provides inter-generational education oppurtunities and houses a library and a community access program site, a licensed and provinciallyregulated childcare centre, and other community services. The centre

is governed by an incorporated, not for profit co-operative. Founded in 2015 by community members, the organization is housed in the former elementary school with the focus on keeping education alive in Wentworth for all ages.

Mountain Serenity Retreat, pure meditation centre , Wentworth, Nova Scotia. Because of the outstanding beauty of the Wentworth area, it is so conducive to offering the peace and tranquility of nature that people need and so many do not have. The views around the centre are uplifting and deeply peaceful and help the patients and visitors feel a connection to nature that affects them profoundly - an important start to releasing stress, anxiety and tension, thus paving the way towards healing

An international guest who stayed at the hostel wrote... "I took a walk in the woods and came out taller than the trees!" L&J, SA

From: gandcdorsay@ns.sympatico.ca gandcdorsay@ns.sympatico.ca <gandcdorsay@ns.sympatico.ca>
Sent: April 28, 2022 7:21 AM
To: Planning
Subject:wind
Attachments: letter to county 2022.odt

ATT: Nelson Bezanson, attached is a letter I sent earlier to Fred. Hope my comments will be considered.

George D'Orsay
120 Fox Ranch Road, East Amherst.

Fred Gould, District 1, Councillor

Mayor Murray Scott and Councillors

Dear Fred.

In regard to our conversations regarding wind turbines and proposed wind farm expansions.

I notice that council is looking for input for new proposed by laws regarding wind turbines.

I realize there are some areas where these structures are not wanted and some areas where they should not be built.

However, there are some areas in the county where wind power can be produced with benefit to both the land owner and the county, the East Amherst marsh is one of those areas.

It has been my experience being involved in the current wind farm north west of Amherst that you will certainly get people very much against anything changing the look of the East Amherst marsh especially, it seems, wind turbines. People will speak up against such changes and projects but few to speak up for progress.

I am a land owner who is in favor of wind power on the East Amherst marsh. There is a group of land owners known as the East Amherst Fort Lawrence Marsh Body of which I am a member.

I am not speaking for the group, just advising you there is such an organization, which involves approximately 1100 acres between the land owners.

As land owners we have been involved with Sprott Inc., builder of the wind farm and Capstone Infrastructure the current owner.

During our first involvement and as wind farms were new to this area we as land owners put very much time in finding the ins and outs of wind farms. We contacted land owners in western Canada, Ontario and on PEI.

After doing so and finding out more positive than negative in 2017 we as a group decided to sign and lease our land for expansion for wind power.

I am sure you know NS Power is looking for renewable energy projects and by June 2022 companies interested in putting in a proposal to produce wind power must have the proposals presented.

Therefore I am hoping the county will have any new by laws in place so when applying for permits the companies interested putting in such proposals will know the by laws of Cumberland County.

As a land owner I hope the county will be careful to put in place any new by laws that may prohibit expansion of such an important project. The companies that I have been involved with were very mindful of setbacks and those sensitive areas where turbines cannot be constructed.

I hope council will take into consideration all the pluses of having wind energy produced in our area for the land owners and the county.

On many occasions I have spoken to persons who currently live in the area near to the wind farm and have received few negative comments and in most cases they don't know the turbines are there.

I know it is not possible to notify all those interested in any new by laws ahead of time, however, I would be very interested in discussing expansion of wind power on the East Amherst marsh area.

Thanks for being given a chance to express my opinion.

Yours truly,

George

From: Garfield Moffatt <GMoffatt@mmfi.ca>

Sent: May 3, 2022 1:07 PM

To: Planning

Cc: Murray Scott; Kathy Redmond; Fred Gould; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Greg Herrett

Subject:draft comments

Attachments: Draft response.docx

Hello all ,

Attached please find my thoughts on the wind by-law draft to be discussed next Monday's open house. Full disclosure I am directly impacted by a possible development on Higgins Mountain and serve on the Community Liaison Committee.

Best regards,

Garfield Moffatt, CFP CLU
MacLellan and Moffatt Group of Companies
18 Willow St., Suite 201
Truro NS B2N 4Z4
(o) 902 893 0508 X 225
(m) 902 893 0962

www.mmfi.ca <<http://www.mmfi.ca>>

www.mmgc.ca <<http://www.mmgc.ca>>

www.mmhi.ca <<http://www.mmhi.ca>>

May 3, 2022

Response to draft findings surrounding Industrial Wind development bylaws in Cumberland County.

To: Planning, Cumberland County, Cumberland County Council

Planning et al,

My thanks to Council and staff for the courage to tackle this issue in the midst of the ongoing provincial initiatives to add wind power to the provincial mix. Of the 25 projects that are responding to the bid there are at least 4 that are being proposed for the Cobequids and Cumberland County is squarely in the crosshairs of developers putting residents and wind proponents in conflict. Residents rely on robust bylaws and regulations that protect them from wind development that has shown to negatively effect receptor sites (homes) and that once built are all but impossible to remedy in the future.

Cumberland County has the opportunity to be a leader in regards to bylaws that need to be relevant to the size and scale of these new mega tower projects that dwarf those in play just 10 years ago. In addition, the science has evolved and stories of negative experiences abound from which we can learn from. Today we all like to quote science yet municipal bylaws seem to be stuck on averages and worse than that, local averages. The fact that most of the regs are at a municipal level rather than a provincial standard is unfortunate, it can pit one municipality vs another and a race to the lowest standards. The lessons that have been learned in Europe where wind has a far greater history has driven industrial wind facilities away from humans.

At the same time do not count on the Provincial Environmental Assessment process protecting your citizens, the eco system or the environment. Case in point is the fact that a disproportionate amount of time and effort is spent on migratory birds, bats and wildlife yet there has never been a wind facility declined a permit on the basis of birds, bats or animals. I find it difficult to square this.

I have been involved at a local level I fighting wind in the Cobequids since 2006, for the past 3 plus years I have chaired the Higgins Mountain Wind Community Liaison Committee with a sole purpose of mitigating risk to the community if a wind project were to be built in Wentworth. As of yet (except by my initiatives) Planning has yet to reach out for my suggestions. If we had, I can tell you that proponents themselves have told me that the 1kn setback would be insufficient to achieve noise targets set by the provincial EA so why would the County even consider a 750m setback.

My response to the draft recommendations is that we need to change the spirit and discourse so that rather than creating bylaws to facilitate and promote wind development for development and revenue reasons to a more robust set of rules and regulations that are squarely on the side of protecting residents who are in a far weaker position and in the case of Higgins Mountain/Wentworth have

provided no social licence for wind development and in contrary, substantial overwhelming opposition to this project.

Developers have also told me that they will adapt and adhere to the rules in-force at the time, projects will still be done even if you have a 3 km setback, setbacks cure most of the sore thumbs related to wind development.

In short my message is be bold, favor your residents over the proponents and set standards that are leadership rather than simply finding if we can fit in the “average”.

The next item I want to address is certainly within the purview of the County. There are places in this world that wind development should not happen, full stop.

- 1) Environmentally sensitive and important ecosystems
- 2) High value existing tourism as well as potential for tourism growth
- 3) Historic and culturally important sightlines
- 4) Conflicts with current and future residential development

Surely with the all the work done by area residents these points and so many others line up against wind development in Wentworth Valley, this supports a no-wind overlay or zoning as part of the by-laws and regulations.

Your residents and local stakeholders have been very vocal in opposition, yes some have been brief and may have deployed a common letter. This should not lessen their displeasure and need to be heard. And some while not taxpayers are users of the area none the less, a group we were told are still stakeholders and to be listened to as. In addition, none have been usurped in their intentions no coerced into writing to planning unless they feel impacted.

In contrary the developer proponent, in an effort to bring weight from the masses began a FB and social media campaign seeking support for wind development in Wentworth. Remember most of these people ended up on a list simply asked for more information and their names and postal codes were recorded and used by the proponent as the “in favour “contingent . We have had several complaints by individuals that this was in no way their intention. Regardless the relative weight should always be about protecting those being affected most over others who might simply be in favor of development with no skin in the game. Remember wind development will always be a rural blight and enjoys abundant support from the urban areas.

Respectfully,

Gar Moffatt, 902.893.0962

From: Trudy Comeau <trudycomeau@gmail.com>
Sent: May 4, 2022 2:54 PM
To: Planning; Murray Scott
Cc: Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling;
angmccormack@cumberlandcounty.ns.ca; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office;
Greg Herrett
Subject: Wind Turbines
Attachments: Planning for Cumberland County May 2022.pdf

Planning for Cumberland County

4 May 2022

Dear members of the Cumberland County Planning Committee, Mayor Murray Scott and Councilors,

I come from a long line of family (nee Craig) who have lived in Cumberland County since the mid 1800's. I was born in Amherst and lived in Oxford until my early teens and 20 years ago, my husband and I decided to acquire a residence in the Wentworth Valley. We are avid outdoor people, and the natural beauty of this area has always been an attraction for us and our children.

I firmly believe that the placing of an industrial wind turbine farm in a location such as Wentworth is nothing short of a disaster for this area. The impact on the native plants, both the forest and smaller flora, the animals and the undisturbed beauty of the area will be great. It is imperative for the well-being of Nova Scotia that there are some places in Nova Scotia that are set aside from foreign development and exploitation to remain as wilderness areas. The Wentworth Valley is one of them.

I also have real concern for the proposed setbacks for the large turbines which is simply not appropriate. To have a 30 story tower a mere 750 meters from an inhabited dwelling is wrong. The established 2000 meter benchmark should be mandated.

As industrial wind turbine farms creep into Nova Scotia, we are losing parts of the natural beauty of our province bit by bit. It is my view that if an undertaking should be necessary in Cumberland/Colchester counties, it should take place along the Cobequid Pass where there is already some encroachment on the natural environment.

Our cherished areas of Nova Scotia must be protected so our children and their children will grow up with love and respect for natural beauty. If it is destroyed, it will take generations to ameliorate a situation that did not need to be created.

Sincerely,

Trudy Comeau

1387 Valley Road,
Wentworth, NS B0M 1Z0
and
851 Tower Road,
Halifax, NS B3H 2Y1

Planning for Cumberland County

4 May 2022

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Sincerely,
Trudy Comeau

1387 Valley Road,
Wentworth, NS B0M 1Z0
and
851 Tower Road,
Halifax, NS B3H 2Y1

From: A Withrow <amyandjoeyswedding@hotmail.com>

Sent: May 4, 2022 3:02 PM

To: Planning; Murray Scott

Subject: Protect Wentworth Valley and Surrounding Area

Attachments: Letter of Opposition to Industrial Wind Turbines in Colchester and Cumberland April 2022.docx

Please see below concerns I have for "ALL" proposed wind farm projects. I have serious concerns as a local property owner, and I want my concerns tabled.

The proposed area of Wentworth Valley, and surrounding areas are unique, people travel from around the globe to see the Valley of Colors, countless Waterfalls, Mountains of beautiful trees, lakes, animals and outdoor trails and tranquillity. It has been many family's traditions to travel to this beautiful, mountain range to see the unique scenery and take photos. There is an abundance of diverse animals and a feeling of local pride in this area. Any proposed wind farm would destroy what God has made, the beauty and importance of protecting this land is important. Once this precious area is destroyed by Wind Farm Companies, you will lose the local residents respect for this area, you will lose the tourism and cultural connections people value. I can not think of one other place in Nova Scotia that is as Beautiful and Unique and the mountains of Wentworth/Folly/and surrounding area.

Please do Not be responsible for destroying a place of Cultural Significance.

Thank you

Amy Jordan and FAMILY

To whom it may concern,

I am writing to express my opposition to the industrial wind turbine projects being proposed in Colchester and Cumberland Counties. This is not the right place for industrial wind turbines.

Many residents of Londonderry, Folly Lake, Hart Lake, Wentworth, Westchester, Debert, and surrounding areas from Cumberland and Colchester counties support renewable energy and its importance for the environment. However, there are implications with these massive wind turbines including but not limited to wildlife degradation, endangered species, huge environmental concerns, interference with all aspects of telecommunication services, 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 Colchester/Cumberland mainland moose core habitat and connectivity would be catastrophic and irreversible.

We have outlined many of our concerns below:

- 1. Loss of habitat and fragmentation.** Due to each proposed site having 18+ (623 ft tall) turbines, new power lines, widened roads, new roads, blasting, gravel pits, concrete foundations. All of this infrastructure will have a huge impact on this wilderness area.
- 2. Biodiversity.** Conservation scientists recognize the wind project area as a critical biodiversity connectivity area in Nova Scotia 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 wind turbines. Nova Scotia's endangered mainland moose frequent the area and travel through the project area as they connect between the Wentworth Valley and Portapique Protected Wilderness Areas. In late November, the Nova Scotia 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 remaining in Nova Scotia and the proposed wind projects areas are in 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 Nova Scotia that offers what the Wentworth Valley does. The proposed wind turbine projects 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 turbines 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 Nova Scotia taxpayer loan that purchased the property, and who is now suing Nova Scotia 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. In rural areas this is paramount especially highlighted in our current pandemic. These industrial wind turbine projects will have an impact on the delivery of these services. Landowners and local businesses are not willing to sacrifice these services for wind 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 turbine projects from noise, ruined scenic views, and flicker. Light pollution impacts include; stress,

anxiety, sleep disturbance, nausea and dizziness. The proposed industrial wind turbines have never had their effects tested here. What are the cumulative effects of each proposal of 18+ untested towers in this unique amphitheater-like area so close to population density? Industrial 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 three industrial wind 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 bylaws the tear down or decommission has 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 industrial wind 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 industrial wind turbine projects in NS gave assurances to residents that the wind 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 industrial wind turbines without proper testing? Who bears the result if the impacts are severely detrimental to species, health, etc.?

10. Visual Resources. Visual sightlines are a recognized 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) is a place with the oldest ski hill east of Quebec and is a recognized 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 industrial wind turbine operations ... why would it be developed in a strong residential and recreational mecca in Nova Scotia?

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. Is the cumulative impact of these elements being considered in the proposed industrial wind turbine project sites?

Protect Wentworth Valley ASKS of the Nova Scotia Government:

- **Prohibit industrial wind turbines** in areas of important moose habitat and connectivity in Colchester/
Cumberland.
- **Enact Protection of the mainland moose core habitat** designated in Colchester/Cumberland, in the Nova Scotia Mainland Moose Recovery Plan.
- **Designate** the Colchester/Cumberland core habitat area of the endangered mainland moose, **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.

Respectfully submitted,

From: Nicole Gaskell (via Google Docs) <dr.nicolegaskell@gmail.com>
Sent: May 4, 2022 11:19 PM
To: Planning
Cc: Murray Scott; Kathy Redmond; Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin
Subject: Wind
Attachments: Wentworth Valley Letter.pdf

dr.nicolegaskell@gmail.com <mailto:dr.nicolegaskell@gmail.com> attached a document
<<https://ssl.gstatic.com/s2/profiles/images/silhouette64.png>>
dr.nicolegaskell@gmail.com <mailto:dr.nicolegaskell@gmail.com> has attached the following document:
<https://ssl.gstatic.com/docs/doclist/images/mediatype/icon_1_document_x64.png> Wentworth Valley Letter
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
You have received this email because dr.nicolegaskell@gmail.com <mailto:dr.nicolegaskell@gmail.com> shared
a document with you from Google Docs. <<https://www.google.com/>>
From: Heather - NCS Managed Services Inc <heather@ncsnetwork.net>
Sent: May 5, 2022 2:12 PM
To: Planning
Subject: RE: Protect Wentworth Valley- Response to Wind Turbine Bylaw Recommendations

Importance: High

Thanks Nelson- I'm glad you are able to, and took the time to view it. This really is a special area and we want to keep it that way!

All the best!

Heather

Heather Allen-Johnson

NCS Managed Services Inc.

heather@ncsnetwork.net <mailto:heather@ncsnetwork.net>

Phone or Text 902-890-0669 Monday-Friday 9AM-5PM

***PLEASE NOTE IF YOU ARE EXPERIENCING ISSUES WITH YOUR INTERNET CONNECTION CALL 1-877-473-3660
OPTION 103***

From: Planning <planning@cumberlandcounty.ns.ca>

When I came to the realisation that a huge windmill the size of a 52 story building was being put up 750m away from my dream home that I just purchased 2 years ago, I was appalled. Are windmills even allowed this close to peoples' houses? Up on a hill in the wilderness is one thing, but in your front yard is a completely different story.

When I purchased this property two years ago, I contacted the municipality to ask about the type of businesses that I could put on this land even before the sale went through. Londonderry is a farming, local fishing and forestry community. I have been writing up a business proposal that will be completed at the end of this summer that will bring people to the area and focus on farming and sustainable agriculture with a tiny home sustainable farming community. This not only focuses on farming, a culturally significant income maker in this area, but also helps deal with the housing crisis all of Canada is facing. I was also building off-grid cabins in the back 58 acres, which brings tourists to the area. All of this is absolutely not possible with a wind turbine in my front yard or surrounding me!!! All the work, time and effort I have put into this revenue stream is squashed. No one is going to want to live, build or visit an area with a huge windy, noisy monster close by. (in this case 17!) The noise pollution alone is astonishing and shouldn't be anywhere near humans, or animals. I have horses, dogs and I am getting turkeys and goats. Another extinguished dream.

Migratory birds. I routinely get barn swallows that come back to this property every year. The birds themselves and their flight paths will be destroyed, which wind turbines have been proven to do. This is a near extinct species!! I also get blue herons and many other birds, as well. Are the tourists going to want to bird-watch, dead, disfigured birds in the off-grid cabins?

Property values. While everyone else is enjoying property value increases and amazing selling prices, the whole town of Londonderry's locals will have properties worth nothing. No one in their right mind will want to live here because of these huge colossuses. I know I wouldn't. Now I will have to disclose that this is occurring to any potential buyer even if I want to sell some pasture in the front, for example, which I already have people interested in.

Local fishing. Unique to my property is three streams that all connect together. Locals have and still do fish in the river. Some for over forty years. Once again no one will want to do this with a huge, noisy, 52-story giant in their face. Not to mention it was more than likely an indigenous waterway historically. Trust me I will find out!

Sneaking in this monstrosity without properly informing the community. There was never a disclosed location on the one pamphlet I received. I assumed they would be far away from the population. There were meetings timed perfectly after the mandatory vaccination protocol. In fact, the next business day. Most of the farming community in the area were slow to have their bodies and freedom robbed from them and couldn't attend the meeting by one day. If that's not a political maneuver I don't know what is. I don't even think any of the community knows this is happening. For shame, councillors. Let me ask you, if it was your house that was next to a huge building the height of 52 stories and was so noisy you hated to go outside and your animals were going crazy, would you want it next door?

I will be contacting the medical community about the detriment to humans and animals this wind turbine will cause. I will be looking at historical fishing rights and pathways and I will be protesting on every media source that I can, that this government is endangering humans and animals and is preventing numerous businesses ventures, myself in particular. As a person with a disability, who was planning on using the businesses not only for the betterment of the

community, but as income for myself and loved ones. I will be contacting the disability community to fight back as well.

For shame councillors. Put yourself in our shoes. I would rather put these monstrosities on the back of my property away from all the locals, but I wouldn't be able to live here. The land won't be cheap. You've just stolen all my dreams, destroyed the place I had decided to live forever, destroyed my soon to be businesses and destroyed the culture and beauty of the community of Londonderry and its property values! I will fight this using every available community group I can and every media source. Better yet, I dare you to actually inform the locals properly and see the response you'll get.

Thank you,
Nicole Gaskell BSc, ND

May 2, 2022

Please consider the following points when making changes to Cumberland County's Wind Energy Development Plan as well as for the regulations you are considering for this Capstone project and all future wind turbine installations. Before we begin, we underline strongly that we are in favour of green energy and we support its generation with wind turbines. Our concern is with the totally insensitive location they propose.

Your current policy begins with, "encourage, discourage, or prohibit the building of large scale windfarms" This document presents the concerns of a group of Amherst (and County) residents whose homes will be between 1 and 2 kilometres from Capstone Infrastructure's proposed addition to their holdings on the Amherst Marsh. Between 300 and 350 residences will be directly affected if Capstone's 12 new wind turbines are approved by the County.

We ask that you prohibit all future wind turbines from the Amherst Marsh as well as from any areas of Cumberland within 5 kilometres of urban/residential areas.

In conversations with Capstone's representative, we found that the proposed tower height to the nacelle will be between 100-110 meters. The blade radius of the rotor will be approximately 60 meters. That means the total height will be 170 metres (557.43 feet).

Think about this: These towers will be close to twice the height of Halifax's tallest building. (Fenwick Tower – 97.5 metres or 399.9 feet.) That's 33 stories tall and about the same height as the peers on the MacDonald Bridge.

For comparison's sake, did you know that one of Toronto's tallest buildings, Hullmark Centre is 170 metres tall with 45 stories... the same height as the proposed wind mills?

Twelve 45 story skyscrapers do not belong 1 kilometre from a densely populated town like Amherst. This is entirely unacceptable. Other sites in Cumberland can generate and transmit the same power without impacting so many humans.

Amherst is the only community in Nova Scotia currently to have 15 + 2 wind turbines so close to residences. Enlarging the wind farm must be stopped.

Why do we feel this way?

1. Amherst Marsh is one of Amherst and Cumberland's best assets. It speaks to the history, the importance of natural world, and provides a soothing, calm atmosphere. Many longtime residents say that's why they choose to live where they do. It's this same thing that is bringing people here to live and to visit NOW.
2. A survey of literature from reputable sources suggests that considerable loss of **property value** are associated with proximity of wind farms. Five kilometres is mentioned as a better distance

3. Lights....300-350 residences will be within sight of the turbines. Most of them have windows facing the marsh. Even though attempts have been made to mitigate the effects of the Department of Transport's mandated **navigation lights**, they will still be a constant presence and impact sleep quality and enjoyment of the view at such close range.
4. Amherst was the centre of an important Acadian community. This is one of things that brings people to visit this area. An **understanding of history** means being able to visualize yourself in another culture's surroundings. The presence of a huge industrial complex with twelve 45 story towers will definitely detract from this.
5. People are just beginning to "migrate" to Amherst to get away from the "big city noise and confusion. Continued interest in Amherst and Cumberland as a destination will do much to reverse the long term impact of an "aging population".
6. Well-recognized sources are still saying that there are **health issues** associated with wind turbines.
7. From my own experience, wind **turbine noise** is at times audible from as far away as 2 kilometres.
8. Wentworth argued against a wind farm based on the impact it would have on their natural landscape and ski hills. Saying it would **negatively impact eco-tourism and eco-friendly living conditions**. Amherst residents feel the same way and ask for your help to prevent this.
9. Your document mentions that Cumberland has "several small towns". Amherst, with about 10,000 residents is the 6th largest community in Nova Scotia, after Halifax and Sydney.
10. Your Policy 4-53 identifies areas deserving special consideration because they are related to the drinking water supply, bird conservation, important cultural areas, historic sites, ecologically-significant lands. Amherst and its Cumberland residential areas are definitely qualify under the last three categories as well as acceptable quality of life.

.One of Cumberland County's greatest resources is wind power, and we have lots of under-used hilly terrain. Allowing 29 wind turbines so close to a major town benefits only the corporation installing them, a few land owners, and possibly the County. The Town of Amherst and its residents gain nothing financially and lose much of their quality of life and enjoyment of their property.

Please change your Wind Turbine Policy to ensure that wind farms are located at least 5 kilometres from residential/urban areas.

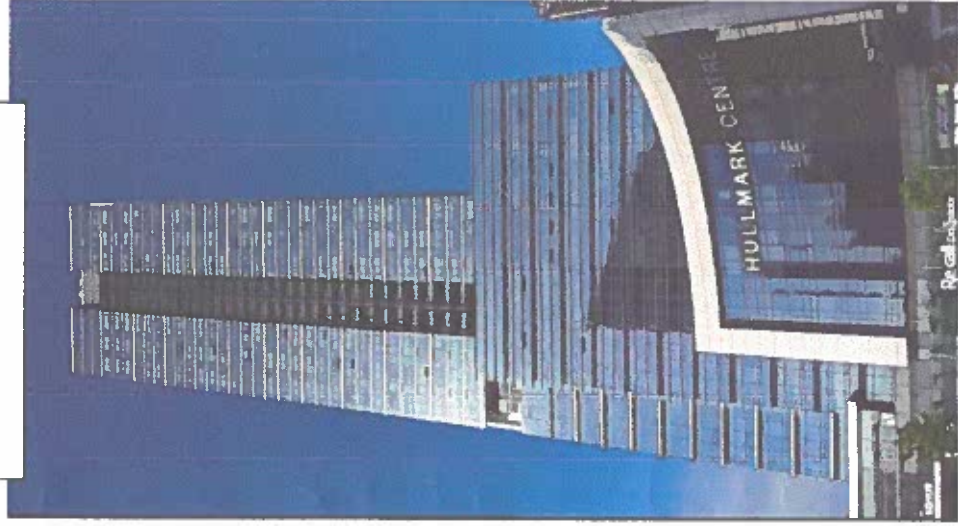
Thank you,

Jessie Childs
elchilds1248@gmail.com

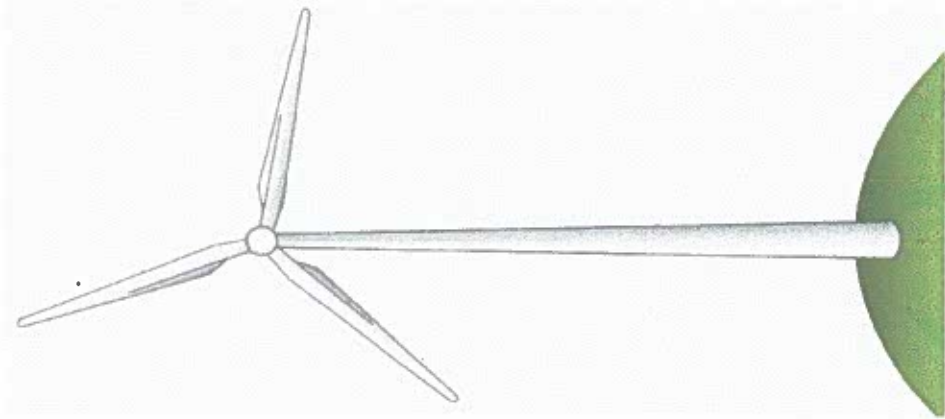
On behalf of a group of concerned residents

The term "wind farm" is misleading metaphor. A group of large wind turbines is a highly visible example of an industrial complex. Please consider adjusting your wording to a more factual description.

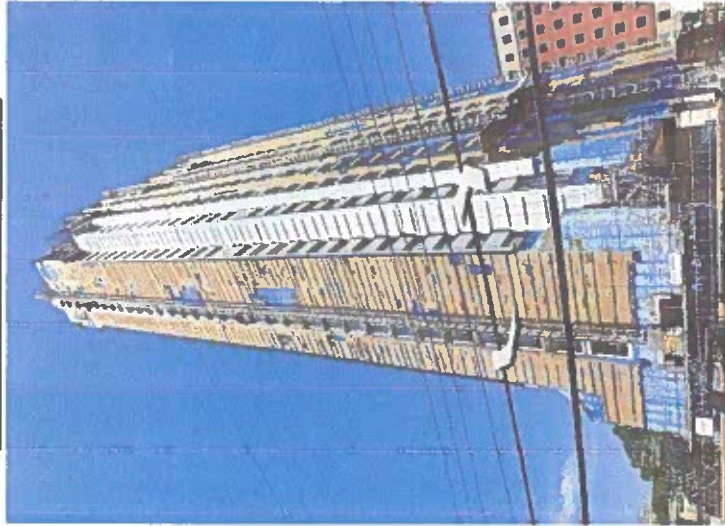
Hullmark Centre
Toronto
170 m 557 ft
45 stories



Wind Turbine
170 m 557.43 ft
45 stories



Fenwick Tower Halifax
97.5 m 399.9 ft
33 stories



From: Gregor Wilson <gregorwilson@gmail.com>
Sent: May 5, 2022 5:50 PM
To: Murray Scott; Kathy Redmond; Planning
Cc: Fred Gould; Rod Gilroy; Jennifer Houghtaling; Angela McCormick; Mark Joseph; Dale Porter; Carrie Goodwin; Municipal Clerk's Office; Greg Herrett; toryrushtonmla@bellaliant.com; Tom Taggart; mindnr@novascotia.ca; Minister.environment@novascotia.ca; PREMIER@novascotia.ca; ea@gov.ns.ca;
Wind Information
Subject: Cumberland County wind by-law review submission
Attachments: May 5 bylaw review submission GW Ski Went Kawaba.docx

Hello,

I respectfully submit an attached submission for the Municipality of Cumberland County wind by-law review submission at the bottom of this email below some attached photos.

This submission is on behalf of me personally, Wentworth Valley Developments Limited, and Kawaba Development Ltd. It is similar to a submission by Protect Wentworth Valley that I am involved with but it has numerous edits and differences related to my personal and business interests.

While it relates more to provincial matters under the EA, it believe it is worth sharing the potential harm to lost sequestered carbon to cutting down old forests to put up wind turbines is significant. Paul Pynn of Higgins Wind has been frequently quoted as saying their turbines are going on heavily forested lands. His statements are misleading. While there is obviously logging and some logging roads in their project area, that same area is home to huge areas of old, mature and old growth forests. Their project will lead to hundreds of hectares of healthy forests being cut down with the lost carbon greatly reducing any GHG benefits their project claims. But we can not calculate the number accurately as they have refused repeated requests to total hectares of new clearing their project requires.

It is illogical to cut down forests to install wind turbines. Projects of 100MWs in heavily forested areas is simply a terrible idea.

I would suggest the Province and councillors read a recent article to help better understand some of the conflicts and broader issues.

<https://www.saltwire.com/atlantic-canada/news/nova-scotia-requires-integrated-plan-for-crown-land-eacs-plourde-says-100724074/>

And the following recent article outlines conflict within NS land use planning and relates to the wind related issues;

<https://www.saltwire.com/atlantic-canada/opinion/dale-smith-tackle-nova-scotia-resources-departments-conflict-of-interest-head-on-100725115/>

Please see attached a few photos of some old tourism related photos from Wentworth Valley.

Sincere thanks,

Gregor Wilson

Hello,

I am sending the following wind by-law recommendations on behalf of Ski Wentworth, Kawaba Developments Ltd and myself personally. So I hope this letter should have more weight than that of a single individual.

As a co-author and researcher of the Protect Wentworth Valley (PWV herein) bylaw submission please note this is not an example of a cut and paste form letter. I have taken time to edit the following letter to better reflect my particular situation beyond the PWV perspective, so while it may look similar to other submissions it is different and I hope you can take the time to see the differences.

Ski Wentworth, Kawaba Developments Ltd and I are concerned about the impact of wind turbine projects on this environmentally, ecologically, and culturally sensitive area. Issues related to wind turbines are numerous, but most importantly, these projects will change the landscape and the communities in Cumberland forever with potential harm to the municipal economy.

PWV was thankful for the opportunity to have met with Nelson Bezanson to review the draft of the amended by laws. There are some very positive changes suggested:

- Business development agreements
- Protected overlay for Wentworth Valley
- Decommissioning requirements

However, we are extremely concerned by the 750 M recommendation to Council. Even in 2011, before turbines of 190 metres existed, setbacks of 1km or more were standard in many jurisdictions. Setbacks must also be from property lines and not just receptor sites. Summary of 2011 setbacks by country: Please click on this link to read more: [Summary of Wind Policies and Recommendations by Country](#).

PWV has reviewed the literature and have found jurisdictions in Ontario, Australia, Denmark, Sweden, and Germany with setbacks of 1-2Km. Turbine size is changing rapidly and the evidence is changing rapidly; what were accepted practices in early to mid 2000, is no longer acceptable. Evidence is mounting and expanding regarding the impact of turbine noise and flicker on quality of life, as well as the surrounding eco-system. Please see this link: [Energy Policy](#) as well as this : [Brief Review of Wind Power: Denmark, Germany, Swedan, Vermont, Maine](#)

We also are providing more links to references that support our stand that setbacks of 750 M are obsolete, and that 2 Km is becoming today's best practice given the degree of flicker, noise, and impact on the environment attributable to these large structures There is a direct co-relation of the degree of impact of flicker and noise based on the setback distances. The Council currently has the opportunity to prevent undue distress to it's constituents by putting in place a suitable setback distance that would help in preventing stressors on it's constituents.

Please click on these reference links:

[Potential Impacts of Wind Turbine Noise](#)

[Onshore wind energy use in spatial planning—a proposal for resolving conflicts with a dynamic safety distance approach](#)

The information included about Dutton Dunwich Ontario is relevant given similar population size, environmental and cultural interests to Cumberland County in Nova Scotia. See attached report. Also note that in March 2022, Dutton Dunwich County adopted a 2 km setback, consistent with Bavaria, Germany, Poland and Scotland where setbacks are between 1-2 km.

Reference Links: [Municipalities of OntarioRe: Setbacks for industrial-scale wind turbines](#)

[Assessing socially acceptable locations for onshore wind energy using a GIS-MCDA approach](#)

PWV recommends reviewing the literature attached that discusses the need to consider factors such as population density, cultural sensitivity, rurality, environment, and geography in establishing appropriate setbacks for individual areas. An important principle is the need for the community to be heard and to benefit from the projects, and that these projects are consistent with community planning and development.

Regarding Shared Economic Benefits- we request

- A socio-economic impact study shall be completed prior to a development agreement
- Shared Economic benefits require reporting, monitoring and to be to a development agreement
- If a development agreement is supported by a socio-economic impact study, a development agreement shall determine what the Community Benefits will be.
- Property Value decreases have been found in areas of Industrialized wind farm development. Has a study been done to determine if the loss of such property tax will be offset by the income from these wind turbine farms? Please see this reference: [Ontario court says wind turbines reduce property values](#)
- visual impact analysis must be certified by an engineer, and receptor locations must include input from locals including scenic areas, look-offs, future development areas such as Kawaba Development Properties located around the very popular Wentworth (Higgins Brook) Falls, etc...

In Response to Regulatory Requirements-

A review on bylaws initially be done in 2 years following the current changes being implemented and then every 5 years thereafter. The technology is swiftly changing- we have seen the necessary size of turbines almost triple for energy requirements in just the past 10 years. This is critical. The Wentworth community was shouting for a wind by-law review when the county last held a general by-law review but excluded wind considerations.

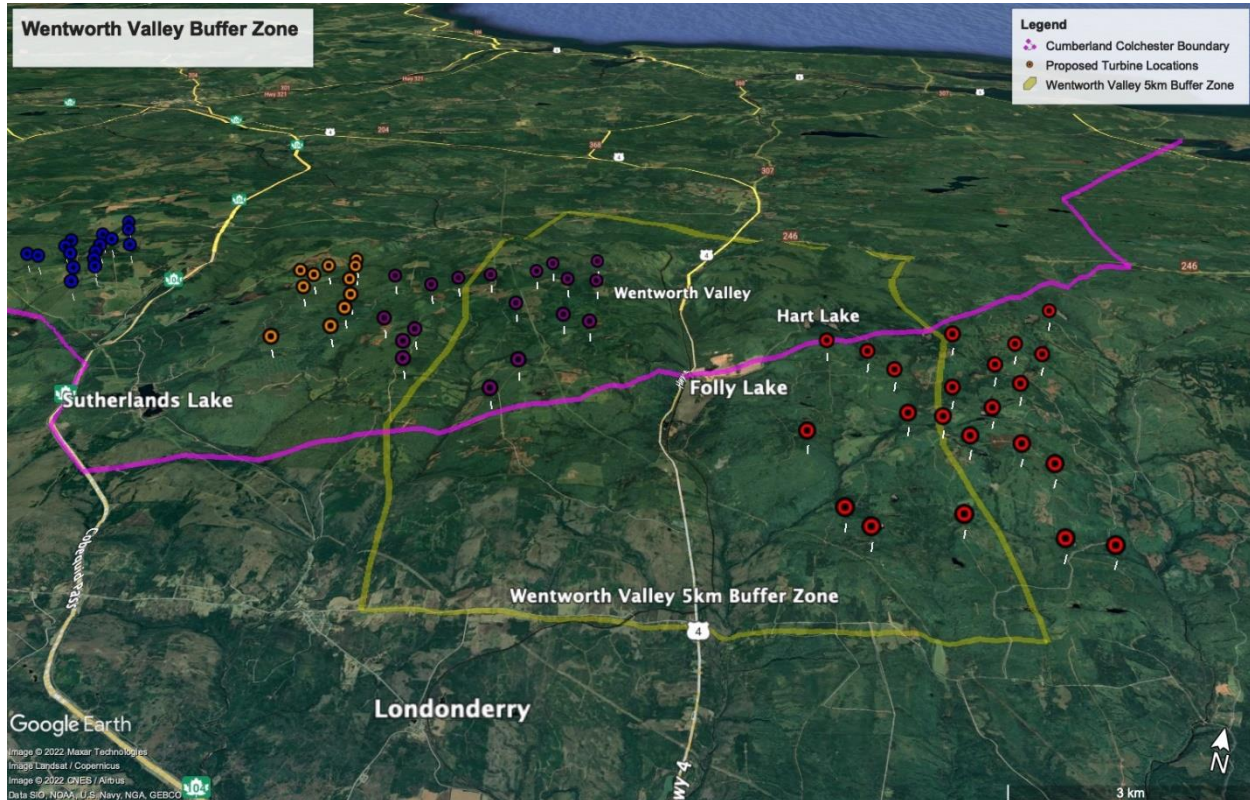
Operations and Maintenance

- That council require a reporting and monitoring system for projects 15mw or more. Only reviewing Large project seems meaningless based on county project size definitions.
- That Council define a thorough complaint process including pre-installation and road building and turbine location site confirmation. Please review this reference: [Wind Turbine Incident/Complaint Reports in Ontario, Canada: A Review—Why Are They Important?](#) Examples exist of significant differences of plans versus what was actually built on the ground. Once these mistakes are made it is near impossible to undo.

Adding Wentworth to Restricted Overlay

Wentworth needs a Restricted Overlay. I believe the following 5km suggestion along Hwy 4 is too limited. It should also extend 5km south of Hwy 246 and the Valley road to help better protect those extremely scenic sightlines. I'm sure you all have driven from Wentworth to Tatamagouche which is arguably one of the prettiest roads in NS.

See this Map Link of what a 5 KM Buffer Zone looks like from Hwy 4, not including Hwy 246 and Valley Road is only a starting point, not an end result:



We must also take into account the topography of this buffer zone- slope and topography can greatly affect the symmetry of the buffer zone- visual impact analysis of receptor locations must be performed to determine the ideal boundaries for the restricted overlay.

Policy 4-54:

Wentworth should easily meet criteria for bird conservation areas (protected areas with SAR birds), important cultural areas, historic sites, and ecologically significant lands. Please consult with conservation scientists and conservation groups to confirm importance of the area. It seems the counties understanding of the importance of the area is lacking. Dr Karen Beazley, Bob Bancroft, Chris Miller (CPAWS), Nova Scotia Nature Trust staff, Birds Canada, Nature Conservancy of Canada, NSE staff, scientists at the Atlantic Canada Conservation Data Centre and many others understand and accept the the biodiversity and ecological connectivity significance of the area. Just today I walked a property with NS Nature Trust staff as we prepare to do an conservation easement on properties surrounding the Wentworth (Higgins Brook) Falls. The province has also identified other properties in the area to protect with two more protected areas likely being added in the very near future.

Policy 4-54:

While Wentworth does not have a local tourism plan, residents of Wentworth have been asking the Municipality of Cumberland County for administrative support to develop a Wentworth Community Tourism Plan for the past several years. The Wentworth Community Development Council has offered to help manage such a program with other supports.

Explore Cumberland identifies Wentworth as one of Cumberland County's three core tourism regions.

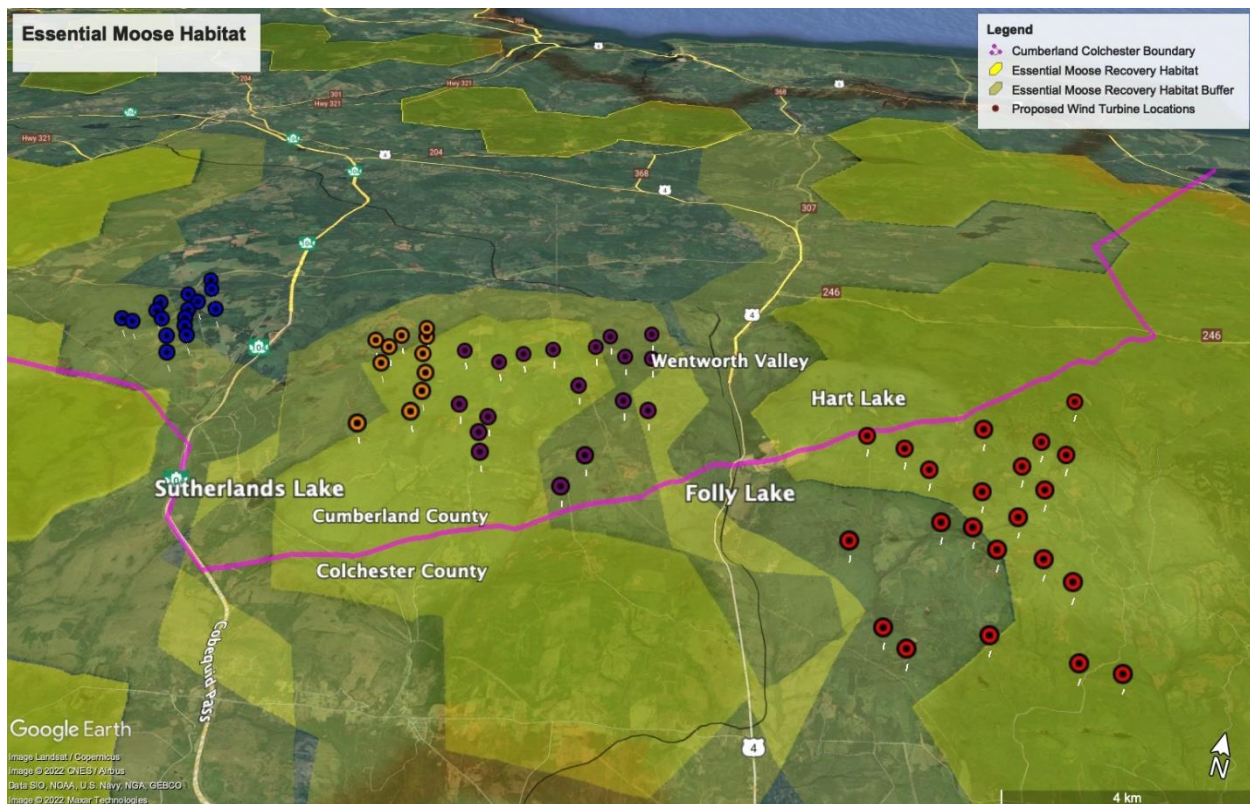
Ski Wentworth is one of Nova Scotia's largest tourism operators receiving twice as many annual visitors as Kejimikujik National Park.

Based on a Technical Assessment and Master Plan by Ecosign Mountain Resort Planners, Ski Wentworth is transitioning to a four-season tourism model. Mayor Murray Scott and Councillor Kathy Redmond have seen this plan.

Kawaba Developments also has a master site plan completed to develop an eco-tourism site based around the Wentworth Falls. It will include permanent infrastructure for free public waterfalls access, parking, trails, skating pond, etc... It will also include a small café, limited camping sites and up to 10 cabins. The goal is for this to be a social enterprise that will return most profits to the local community.

Wentworth and Folly Lake area are a bottleneck of 'essential' moose habitat between larger core habitat areas. While much of Cumberland County consists of core mainland moose habitat, the Folly Lake part of the county is considered 'essential' moose habitat. The mainland moose recovery plan confirms the significance of the area. A map has been developed to show the overlay of the Moose Habitat.

If the RES, Higgins Mountain and SWEB projects move forward mainland moose have little chance for long term survival in Nova Scotia. This can be confirmed with talking to any number of provincial moose experts. Comparing Wentworth/Folly habitat in with the greater Cumberland habitat is apples to oranges.



Culturally Significant Area:

Based on the recommendations and criteria for Culturally Significant Areas: We believe Wentworth matches all these criteria. A video presented to you in the body of PWV shows a diverse group of citizens, each with their own view of the resilience of the users of this area.

To add to that:

Uniqueness:

- The 1st, 2nd, 3rd and 6th tallest peaks of mainland NS are centered 3-4km around Folly Lake in Cumberland County. Confirmed by Director Geographic Information Services, Internal Services, NS. This makes the area unique; for climate change adaptation/ mitigation, geographically, metrologically, for biodiversity, and recreation.
- Mountain sport hub of the Maritimes located halfway between Atlantic Canada's two largest populations. Wentworth is the oldest mountain sport recreation area in Atlantic Canada.
- Key ecological corridor/ connectivity bottleneck area between Cumberland County and western Colchester County with the rest of Nova Scotia.
- Has a significant cluster of protected areas, a provincial park, and conservation areas with more proposed.

Broad cultural/community resilience:

- 100,000+ visitors for mountain sports, scenery, and nature immersion.
- Ski Wentworth 1,500-acre recreation and wilderness area, 24 ski trails & 35km of trails
- Ski Wentworth entering 90th year in outdoor recreation business.
- Ski Wentworth, one of Cumberland County's largest employers, over 250 employees during winter peak.
- Wentworth Hostel recreational area, 30km of trails
- Wentworth Freestyle Racing Club
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- Wentworth Recreation Centre
- Old Wentworth Schoolhouse Association
- Tiny Changes Disc Golf
- Wentworth Recreation Centre
- Fundy Snowmobile Club
- Wentworth Community Development Council

Importance to resilience

Most groups listed above exist because the Wentworth region has some of the best mountain sport recreational terrain in the Maritimes as noted in Cumberland County Strategic Tourism Plan. More than 100 kms of trails in the immediate Wentworth area, including fly fishing access, scenic look-offs, and dozens of waterfalls.

If the area were degraded it would be devastating to hikers, skiers, mountain bikers, fly fishers, waterfallers, birders, snowshoers, Nordic skiers, trail runners, orienteers, snowmobilers, ATV'ers and anyone seeking refuge in wild terrain and old forests.

Degree of tradition

- Popular hiking, waterfall and lookoff area for over 100 years
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- Hostel trails built in the 70's
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- Host of Winter Special Olympics and 2011 Canada Winter Games
- Celebrated on the cover of two different NS waterfall guidebooks

- Home to some of Canada's hardest trail running endurance events; Beat to Snot, Breakfast Club and Wascilly Wabbit

We hope that Mayor, Councillors, and Staff have the opportunity to read our referenced links and understand our concerns. Destroying our environment to 'save' our environment negates any benefits of these industrialized wind farms in our area. We have confidence in our Council to set precedent and protect not just it's citizens but the ecological and biological diversity of the Wentworth Valley and surrounding areas that make us the envy of visitors from around the world.

Sent: May 5, 2022 2:10 PM

To: Heather - NCS Managed Services Inc <heather@ncsnetwork.net>

Subject: RE: Protect Wentworth Valley- Response to Wind Turbine Bylaw Recommendations

Great job on the video Heather!

Nelson

From: Heather - NCS Managed Services Inc <heather@ncsnetwork.net <mailto:heather@ncsnetwork.net> >

Sent: May 5, 2022 2:01 PM

To: Planning <planning@cumberlandcounty.ns.ca <mailto:planning@cumberlandcounty.ns.ca> >

Subject: Protect Wentworth Valley- Response to Wind Turbine Bylaw Recommendations

Cumberland County Mayor, Councillor, and Staff,

As you know, our group, Protect Wentworth Valley, is committed to protecting the ecological and biological diversity of this area and also to protect the personal enjoyment that many experience from our area.

We are passionate, that this area be recognized and the respect and admiration of the diversity of this area is maintained for present and future generations.

I've attached our response to the Wind Turbine Bylaw Recommendations draft presently prepared by Nelson Bezanson for council review.

We have also prepared a video that we feel also emphasizes why the Restricted Overlay of this Valley is so desired. We hope you enjoy watching this video and understand the depth of passion those that live and visit this area feel for it.

Please click on this link to view our video- PWV Video

<https://drive.google.com/file/d/181s1f3GVytcEZHyGz23ZPvqT9xGt7RIQ/view>

Thank you for your time in reading our response, and the opportunity to be part of the process!

Heather Allen-Johnson- on behalf of Protect Wentworth Valley

Heather Allen-Johnson

NCS Managed Services Inc.

heather@ncsnetwork.net <mailto:heather@ncsnetwork.net>

Phone or Text 902-890-0669 Monday-Friday 9AM-5PM



PROTECT WENTWORTH VALLEY

Wind Turbine Bylaw Recommendations Draft- Protect Wentworth Valley Response

May 5- 2022

Protect Wentworth Valley commends the Cumberland Council for enacting the current 6-month moratorium to review land use bylaws, and specifically wind turbine by-laws.

We are a volunteer committee who have been researching the impacts of wind energy and related policy and by-laws since fall 2021. We have several hundred supporters. We are empathetic to the limited resources Cumberland has available to address these bylaws, the complexity of the issues and impacts from numerous perspectives. We are providing several links to papers and publications in our response that may help in better understanding our responses. We hope you will take the time to read them.

Protect Wentworth Valley is concerned about the impact of wind turbine projects on this environmentally, ecologically, and culturally sensitive area. Issues related to wind turbines are numerous, but most importantly, these projects will change the landscape and the communities in Cumberland forever.

We are thankful for the opportunity to have met with Nelson Bezanson to review the draft of the amended by laws. There are some very positive changes suggested:

- Business development agreements
- Protected overlay for Wentworth Valley
- Decommissioning requirements

However, we are extremely concerned by the 750 M setback that Mr. Bezanson is recommending to Council. He explained this recommendation is based on a lack of evidence for larger setbacks. Even in 2011, setbacks of 1km or more were standard in many jurisdictions. Setbacks must also be from property lines and not just receptor sites. Summary of 2011 setbacks by country: Please click on this link to read more: [Summary of Wind Policies and Recommendations by Country](#).

We have reviewed the literature and have found jurisdictions in Ontario, Australia, Denmark, Sweden, and Germany with setbacks of 1-2Km. The evidence is changing rapidly; what were accepted practices in early to mid 2000, is no longer acceptable. Evidence is mounting and expanding regarding the impact of turbine noise and flicker on quality of life, as well as the surrounding eco-system. Please see this link: [Energy Policy](#) as well as this : [Brief Review of Wind Power: Denmark, Germany, Swedan, Vermont, Maine](#)

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We would recommend reviewing the literature we have attached that discusses the need to consider factors such as population density, cultural sensitivity, rurality, environment, and geography in establishing appropriate setbacks for individual areas. An important principle is the need for the community to be heard and to benefit from the projects, and that these projects are consistent with community planning and development.

Regarding Shared Economic Benefits- we request

- A socio-economic impact study shall be completed prior to a development agreement
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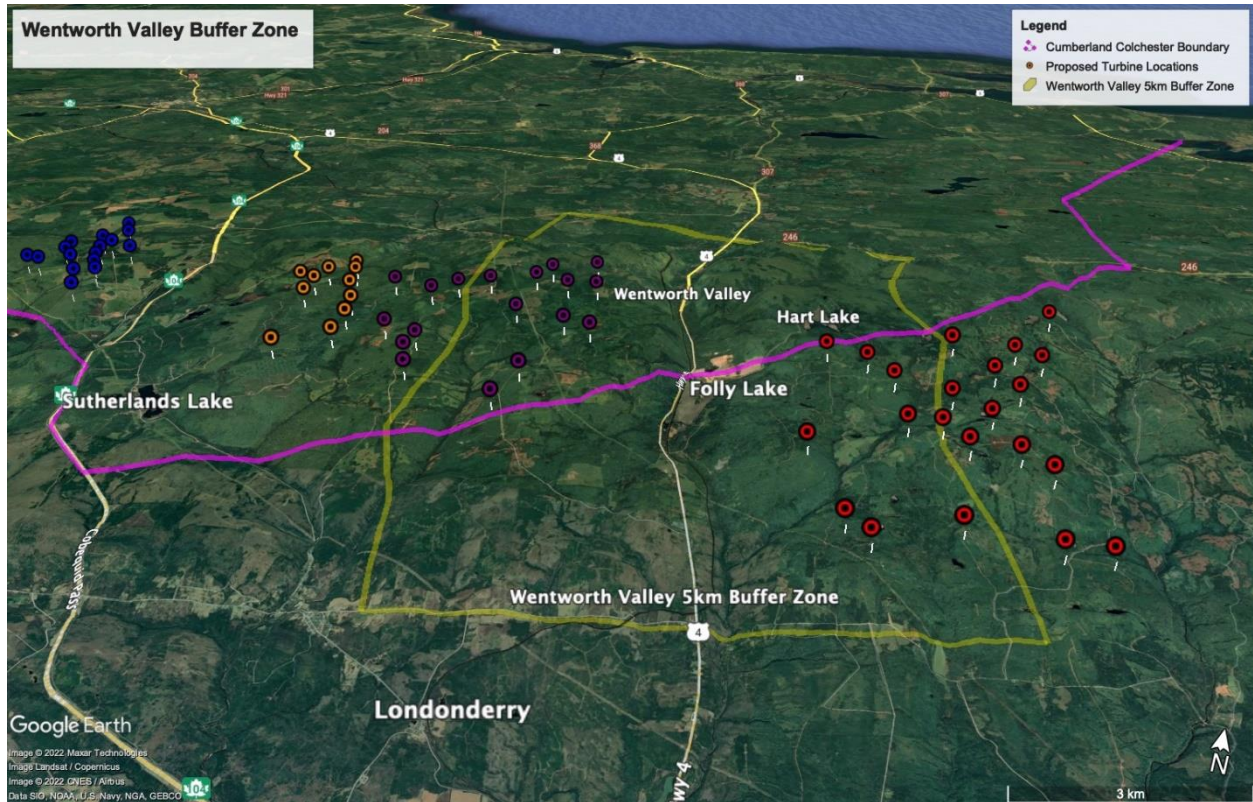
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Adding Wentworth to Restricted Overlay

Wentworth needs a Restricted Overlay of approximately 5km east and west of Hwy 4. See this Map Link of what a 5 KM Buffer Zone looks like:



We must also take into account the topography of this buffer zone- slope and topography can greatly effect the symmetry of the buffer zone- visual impact analysis of receptor locations must be performed to determine the ideal boundaries for the restricted overlay.

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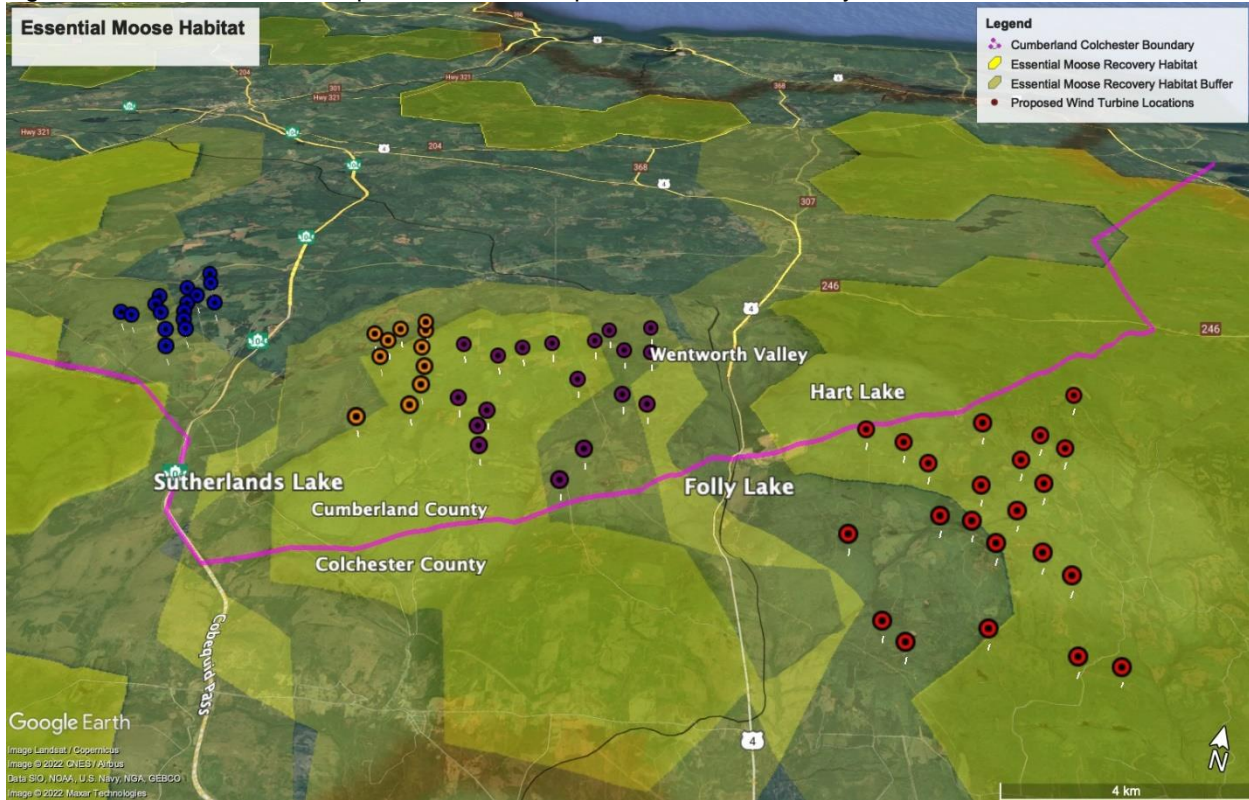
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Respectfully,

Protect Wentworth Valley

Heather Allen-Johnson

Dr. Joanna Zed

Gregor Wilson

Catherine Johnston

Audrey Conroy

Nancy Frame

Leslie Dykeman

www.protectwentworthvalley.com

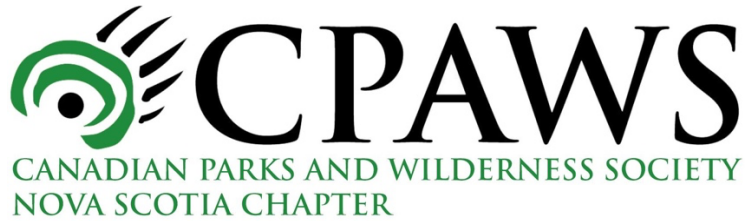
From: Chris Miller <cmiller@cpaws.org>
Sent: May 5, 2022 8:40 PM
To: Planning
Subject: "Wind"; CPAWS Nova Scotia public review submission
Attachments: CPAWSNS letter_Cumberland Municipality_May5,2022.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern

Please find attached a written submission from the Nova Scotia Chapter of the Canadian Parks and Wilderness Society (CPAWS-NS) for the public engagement process currently underway for the proposed "Restricted Overlay" at Wentworth. We are a non-government organization with expertise in identifying and protecting ecologically significant lands.

Thank you,
Chris Miller



Canadian Parks and Wilderness Society
Nova Scotia Chapter
P.O. Box 51086 Rockingham Ridge
Halifax, NS
B3M 4R8
cmiller@cpaws.org

May 5, 2022

Re: Public consultation

My name is Chris Miller. I'm the Executive Director of the Nova Scotia Chapter of the Canadian Parks and Wilderness Society (CPAWS-NS). We are a science based, non-government organization that works specifically to identify ecologically-significant areas in Nova Scotia and to recommend these places to government for legal, regulatory, or policy protection. We maintain professional expertise in locating High Conservation Value Forests (HCVFs) and conducting on-the-ground field research to determine conservation significance. I have a Ph.D. in ecology and over 20 years experience identifying protected areas.

CPAWS-NS notes that the Municipality of Cumberland is considering applying a "Restricted Overlay" to the general area of the Wentworth Valley, using existing policies within the Municipal Planning Strategy. A public engagement is currently underway, which includes "draft recommendations for review and comments from Council, stakeholders, and the general public". The documents prepared for that public review identify Policy 4-53 as being directly relevant for establishing the "Restricted Overlay" area. Policy 4-53 states:

*"Policy 4-53: Council shall, through the Land Use By-law, establish a Wind Turbine Restricted Overlay that identifies inappropriate areas for small- and large-scale wind turbines and includes lands such as, but not limited to, drinking water supplies, bird conservation areas, important cultural areas, historic sites, and **ecologically significant lands.**" (Bold emphasis added)*

The question of whether the Wentworth area is considered to contain “ecologically significant lands” appears to be an important consideration in Council’s decision on how to proceed. This speaks directly to the CPAWS-NS area of expertise, so we are pleased to be provide input for this public review process.

The Wentworth area absolutely contains ecologically significant lands. This determination comes not from any one particular conservation value, but rather from the combination of overlapping features of ecological significance that occur at this location. This includes large intact forests, headwater areas, species-at-risk habitat, connectivity values, landscape representation, and a rich diversity of ecosystem types, including old-growth hardwood forests, wetland habitats, rivers, floodplains, and steep ravines. It is due to the presence of these overlapping values that various levels of government and conservation organizations have invested considerable time and resources to apply conservation measures to the Wentworth area.

The background document prepared for the current public consultation seems to suggest that the ecological significance of the Wentworth area is due solely to the presence of “core habitat” for the endangered mainland moose and, if protection measures are put in place for the Wentworth area that such measures would also necessarily have to be put in place for much more extensive areas of the Municipality of Cumberland because of the core habitat. That is not the case. The ecological significance of the Wentworth area comes from the presence of numerous overlapping ecological values, which includes the core habitat for the endangered mainland moose, but other values as well. Professional conservation biologists and planners can assist the Municipality of Cumberland in the identification, and spatial delineation, of ecologically significant lands that fall under Policy 4-53.

In 2009, CPAWS-NS recommended to the Nova Scotia government that public lands in the Wentworth Valley be considered for a protected wilderness area designation using the *Wilderness Areas Protection Act*. Our recommendation also advised the provincial government to purchase lands at this location to expand the protected area and provide better ecological integrity for the overall conservation zone. In 2013, the Nova Scotia government included the Wentworth Valley in the final version of the *Nova Scotia Our Parks and Protected Areas Plan*, which resulted in legal protection for Wentworth Valley being implemented in 2018 (<https://novascotia.ca/news/release/?id=20181126002>). The Nova Scotia government determined that this area maintained ecological-significance sufficient for designation as a protected wilderness area, citing the presence of the following features:

“Mature to older hardwood and mixed forest blankets highlands and deep ravines. Sugar maple, yellow birch and red spruce are mixed with white ash, hemlock, red maple, white spruce, ironwood and other species. Scattered throughout are fast flowing brooks, waterfalls, a few lakes, ponds, wetlands, and vernal pools. The forest condition and extended seasonal snow cover provide quality habitat for the endangered mainland moose. This is also part of the headwaters of the Wallace River, which supports an

*Atlantic salmon run.” (Nova Scotia Environment and Climate Change website:
https://www.novascotia.ca/nse/protectedareas/wa_wentworthvalley.asp)*

Following the legal protection of these lands in 2018, the Nova Scotia government has taken several important steps to expand protection to include adjacent and nearby lands, recognizing that other lands in the Wentworth area maintain High Conservation Value as well. In 2021, the Nova Scotia government announced that it would expand the protected area boundary of Wentworth Valley Wilderness Area and subsequently initiated a public consultation for several properties. Additionally, the Nova Scotia government has increased the provincial protected areas target and is currently in the process of selecting additional public lands for legal protection. This review is provincial in scope, so will include public lands within the Wentworth area as well.

In conclusion, the Wentworth area includes “ecologically significant lands”, which is consistent with Policy 4-53 for a “Restricted Overlay” to protect these conservation values. CPAWS-NS recommends that the Municipality of Cumberland proceed with this designation. We note that the public consultation currently underway does not appear to include an actual map showing the spatial delineation of the “Restricted Overlay” in the Wentworth area. It is important that this area capture the full spatial extent of the ecologically significant lands and High Conservation Value Forests in the Wentworth area. CPAWS-NS is conducting fieldwork in this area and we would be pleased to help the Municipality of Cumberland determine the appropriate boundary for the “Restricted Overlay”.

Thank you for the opportunity to provide comment during this public review period.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Miller', is positioned above the typed name.

Chris Miller, Ph.D.
Executive Director
CPAWS-Nova Scotia