

COMMENTS ON
APPLICATION OF BLUE STONE WIND, LLC
CASE 16-F-00559
FOR
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY

Comments submitted by: MARK McDONOUGH, 102 HANSON RD
Judy Rowe, 407 Oquaga Lake Road, Town of Sanford, Deposit, NY 13754
607-427-4755, judyrowe28@gmail.com 607-467-2064
markmcd2645@gmail.com

Re: CASE 16-F-00559

The Department of Energy has stated that "Wind turbines do make a noise when in operation." (www.energy.gov.za/NoiselevelsofwindfarmsFactSheet5) Turbine noise is a constraint especially in rural areas like the farm in Case 16-F-00559 where background noise levels can be very low, especially overnight. In fact the critical times are when wind speed is at its lowest, so the turbines can be heard more clearly. This occurs because the main noise sources: blade tips, trailing edge of the outer part of the blade, the gearbox, and generator are all elevated and therefore nothing screens the noise.

Since the Town of Sanford where the majority of the turbines are to be located has no Noise Ordinance or any specifically related to wind turbine noise, I request that the permitting authorities require the project to conform to noise level limits recommended by the World Health Organization or as suggested in the article from the Department of Energy about noise levels of wind farms (www.energy.gov.za/.../NoiselevelsofwindfarmsFactSheet5) "by applying and insisting on applicable international and local standards such as IEC 61400-11 and SANS 10103, laws and regulations..."

I also request that the Town Of Sanford or another entity to be determined by the permitting board establish a procedure for the submission in writing of noise complaints about turbines exceeding the standard noise limits and if deemed that the complaint is reasonable, the established entity can hire an acoustic engineer to be paid for by the wind farm's operator to determine whether the turbine is non-compliant. If non-compliant, the wind farm operator would be required to resolve the problem. Also, The established entity should be given the authority

to fine the wind farm operator \$1,000 per day until the problem is resolved. And if the problem is not resolved within 60 days, the entity would have the authority to decommission the turbine at the wind farm operator's expense. (Wind-watch.org/news/2019, article filed January 23, 2019, "New Rules Eyed to Address Wind Turbines' Noise, Shadow Flicker").

With the establishing of wind farm noise standards and an entity with the power to determine the validity of a noise complaint, initiate a noise investigation, and the authority to fine and decommission a turbine, I believe the residents of the area affected by the wind farm in Case 16-F-0559 would be protected.

Sincerely,

 MARK McDONOUGH

Added info on standards and measurement :

Turbine manufacturers may provide noise characteristics certificates based on measurements from independent test organizations to agreed standards. The internationally recognized standard that is typically referred to is the "Wind turbine generator system: Acoustic noise measurement techniques (IEC 61400 Part 11 of 2002)".

Standard techniques, taking into account standard noise propagation models, are used to calculate the expected noise levels at critical locations, which are usually the nearest dwellings. The results are then compared with the acceptable levels, which are often defined in national legislation. The internationally recognized standard for such calculations is 'Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation' (ISO 9613-2)