

May 12, 2025

Dear Sir/Madam

Thank you for the opportunity to comment on rule 007 black line version. I commend you on how much public consultation you have offered. I have missed a lot of it because I was just not aware of the issues. I became aware when a wind industrial wind turbine facility was proposed in an area that my family has land in and that I live in. My family runs a cabin, and camping retreat on one section and industrial wind towers are not a desirable thing. I love the landscape and wild life. So, I am not a proponent of this industrial wind project. The project was named the Craig Lake project and then the Fleet north Wind project. Atco has currently paused the project.

I participated in the public consultation meeting organized by the proponent Atco. It was not well advertised so I took posters to nearby towns announcing it. The public section of the meeting was overwhelmingly against the project. This was the only public consultation. I will address the unreasonable nature of this later.

I organized a Wind opposition group and retained a lawyer I watched many AUC videos on YouTube and found them very informative. My background is in resource conservation, I worked for a nonprofit wetland conservation company for a number of years. I am not unfamiliar with being the proponent or the opponent of a project. In that time, the best theoretical guide to mitigation of projects were the steps of 1 Avoidance, 2 Minimization, And 3 Compensation. I believe government agents use these steps in a wetland mitigation. I will tender my remarks under the umbrella of this framework. I will also make comments about reasonableness.

Avoidance- Before selection the proponent should examine the site for the most important variable 'people'. In my experience, trying to deliver a land use program where you are unwanted is not wise. As a second step the proponent should be sensible and not place facilities close to residential. In examining elevations and locations of different industrial wind turbine projects in the county, it is easy to see that their priority is Wind. That means high places that are very visible. On the subject of pristine landscapes I have lived in this country for 75 years. What I love about it is the horizons. Industrial wind turbines just do not cut it. Especially when they mirage to miraculous Heights. I like it when the Neutral hills does that, but not wind turbines. One of the other things is quiet dark nights. The red blinking aviation lights ruin the nights.

Since the third step, Compensation, does not exist, this puts more emphasis on Avoidance. For an industrial wind project avoidance may mean finding another project location and more distance from turbines. I am assured set back distances will be covered at some point in the AUC deliberations of rule 007 or related discussions. Setback distances from homes must be very generous. perhaps 1600 m is adequate for a solar facility, but at least a 3200 m setback is necessary for an industrial wind tower.

Adequate setback distances will reduce the number of AUC hearings, had adequate setback distance been in place two of the YouTube videos I watched would never have happened.

Minimization -The Alberta Utilities Commission does this well If there are things that can alleviate conflict. These can be substantial, a requirement for low wind speed shut offs in wind turbines can reduce unsustainable migratory bat mortality. As you know, it is possible to turn off blinking red lights on wind turbines when airplanes are not in the area. These technologies should be incorporated on all new projects as up front minimization

I understand, that only the proponent can initiate a change in project design to AUC for retrofitting towers with this technology. I would hope the AUC would encourage such retrofitting in any matter within its power and mandate.

Compensation-As it is not available, it is incumbent in the Alberta Utilities Commission to lean heavily on the side of opponents to the project. There are always unintended negative impacts from any industrial project.

Reasonable

Ultimately, "reasonableness" in Canadian law serves as a guiding principle for both individuals and institutions, emphasizing the importance of fairness, proportionality, and community standards whether in a criminal or civil context.

I would like to address the reasonableness of industrial wind turbines being placed where people live with one public meeting and an AUC hearing. Municipal approval and a public process to decide on that approval is missing. Similar human artefacts are only found in cities. The placement of high buildings is very much a

concern of the municipal authorities. The minimum consultation on placement of such a high structure is unreasonable.

Almost all federal environmental regulations, as well as provincial are relaxed to assure the project will go through. When dealing with something as large as wind turbines, this is unreasonable!

Wind turbines in my county used to be one to 2 MW. They are now proposing 6 MW. Turbine power has increased at exponential rates, I realize tower height is not equivalent but it is high enough to start to kill a lot more migratory forest dwelling, bats. There are real consequences to being bigger especially for bats. Atco is documented in a AUC consultations as saying no one owns the space above the land. But in reality it is linked to land ownership. How high would you extend this ownership, into the universe? That would be unreasonable so where is the cut off? I do not see on my land title that I own the air above, the land I know I do not own it below. I believe we all collectively own the space as well as bats and birds. On the human side, aviation has rules on use Atco has no right to take it.

Size of turbines relative to all other human artefacts on the landscape is immense. While a small child could identify the scale as being out of place, regulations and legislation ignores the obvious. Wind turbines are visible to the entire population. They are not consulted, this is unreasonable.

The size of wind turbine is not business as usual and it is unreasonable to say it is. That size has a far-reaching consequence to human beings and their enjoyment of their property in a myriad of ways. Reasonable setback distances are one way to mitigate this. Another way to turn down projects.

Thank you for the opportunity to make comments.

Leslie Wetter

