

June 24, 2016

Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620 -2701

Re: Temporary Sound Level Standard

Dear Public Service Board members,

Please accept our following comments and proposals for implementing temporary sound-level standards in wind energy projects.

We are submitting our comments as neighbors of the Georgia Mountain Wind (GMW) project. We live 3800 feet from the nearest turbine. We are situated to the northeast of the project, downwind of the prevailing southwest winds in the summer, an open shot with nothing between us and the project, such as forest or topography. We are not considered “experts” in noise, but we can assure you that our experience with living next to this project for the last three years has made us more knowledgeable than most experts. We are making our comments and proposals based on that experience.

Unfortunately, the turbine noise is louder at night during the time that we are trying to sleep. This is because winds typically die down at dusk at our level, but may continue to blow up on the mountain. This combined with typical low ambient noise levels at night and the prevailing southwest winds blowing the noise in our direction is the “perfect storm” for noise at our home.

We have become very good at taking snapshot readings of the noise with our certified, calibrated sound meter. We understand that these readings must be taken without any background noise (artifacts), such as leaves rustling, birds, insects, dogs barking or vehicle traffic, along with a number of other background sounds. We are using our readings as a “boots on the ground” perspective. Honestly, it doesn’t take a rocket scientist to stand outside at 2 a.m. and take a snapshot reading to figure out why we can’t sleep. We do understand that the noise measurements are averaged over an hour according to the GMW CPG, and that becomes more complicated to measure, but we are discussing here our snapshot readings. (Although, Scott is an engineer, mentored by experts in the field of sound measurement and has done many hours of Leq measurements at ours and our neighbor’s homes).

That being said, it’s clear to us that the outside 45dBA Leq is not conducive to sleeping. It only takes a couple of minutes of the turbines running 35dBA to 45dBA for our sleep to be disrupted. In the winter time when our windows are closed, the deep rumbling sound of the turbines comes through our walls and windows. This not only disrupts our sleep, but prevents us from enjoying typical evening activities, such as watching television or reading in our living room. The rumbling is always present when the

turbines are operating at, or near full capacity. In the summer with our windows open, we most often hear the airplane noise, with humming and periodically an extra “whoomph”. We have measured this noise time after time, and it almost always falls within that 35-45dBA range.

For this reason we recommend inside noise levels limits of 30dBA (LAeq10min).

For outside levels, we have often sat on our south porch and measured the varying noise levels of the turbines and our ability or inability to relax and tune them out. 30dBA is a level at which we barely notice the noise, and it’s just a small presence in the background, easily forgotten. When the noise creeps above 35dBA, it becomes intolerable and dominates the space around us.

For this reason we recommend 35dBA (LAeq10min) for outside noise levels limits, measured at all property lines or 500-ft from the residence, whichever is closer.

Along with new, lower noise standards, monitoring is essential. As the Department of Public Service (DPS) and the Public Service Board (PSB) become more responsive to noise complaints, the work for neighbors has increased. Our recent icing complaint is a good example of how the burden of policing projects falls into the neighbor’s laps. We complained that the turbines were running iced and at high noise levels. The DPS recommended an investigation and the PSB ordered setting a schedule for an investigation. This investigation may end up including deadlines for briefs to be filed, reply briefs, and a technical hearing with testimony and witnesses. We are put in the awful position of acting as our own attorneys or hiring an attorney for several thousand dollars to see our complaint through to the end. We are forced to participate because the burden of proof is on us. This is all as a result of Georgia Mountain Wind running the turbines iced and subjecting us to hours of high noise levels. It’s as if we are being punished for complaining. If monitoring had been in place, the turbines would not have run at such high noise levels for so many hours.

For this reason we recommend continuous sound monitoring by a firm independent of the project owners and paid for by them. If the project is found to be out of compliance at any time, the project should be shut down until there is resolution. If there is an investigation into the non-compliance, the project owner should pay for an attorney of the complainant’s choice so that they may participate in the proceedings.

Wind turbine noise at high levels is well beyond “annoying”. Annoyance is a fly buzzing around your face and then disappearing seconds later. Wind turbine noise does not disappear and becomes a dominant force in your life.

As an example, last week we had several days of hot, sunny weather with low winds. The turbines turned slowly or not at all. We worked in our gardens, hayed our meadows, spent pleasant evenings on our porch, slept well with windows wide open and essentially forgot about the turbines on the mountain. All the things that one does when they live in a rural setting.

On Sunday, the high pressure to the west weakened and the winds returned; our “noise-cation” was over. Sleep loss creeps in, our energy levels ebb, and we begin again to live in a constant state of anger

over the noise invading our life. Outdoor activities such as working in the gardens becomes an effort of trying to ignore the constant nuances of the noise, the airplane sounds, humming, rumbling, whooshes and the cooling fans kicking on and off, driving us inside. The noise from the cooling fans is an unpleasant surprise that was never mentioned by GMW during the permitting process, sounding like a large truck whining up over the mountain when they kick on. Noise emitting from wind projects caused by equipment other than the turbines themselves must be considered in the noise evaluations. Shutting windows and turning our fans on high in an attempt to block the noise becomes routine. We look forward to the front moving on so that we can have another few days of peace.

In closing, we would like the PSB to consider carefully who is submitting comments and recommendations regarding this temporary sound standard. We have no financial interest in whether the noise standard is lowered or not. Our only concern is that neighbors of potential new projects are not subjected to the high noise levels that we are on a regular basis. The Morrisville public hearing during the PSB's sound investigation brought a number of family members and employees of wind companies who testified that wind turbine noise was not an issue for them. Most neglected to say that they lived miles away from any project. The Board approved a project that is within 3800 feet of our home and within 3400 feet of our neighbor's home. The noise and its impact on our quality of life is a function of distance. Please consider where someone lives and their financial interests in a project when they submit their comments.

Thank you for considering our comments in this matter.

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