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November 7, 2011

**Delivered via Email**

WPD Canada  
2233 Argentinia Road, Suite 102  
Mississauga, Ontario  
L5N 2X7  
Attention - R. Surette - Manager, Communications  
Email: Kevin@wpd-canada.ca

Dear Mr. Surette,

**Re: WPD - White Pines Project – Prince Edward County, Ontario (the “Project”)  
Our File No.: 00487**

We are the solicitors for the Alliance to Protect Prince Edward County (“APPEC”). We are in receipt of your email correspondence dated October 18, 2011 to Inge and Caspar Radden and have been asked to respond on behalf of our client.

As you are aware, as part of the Renewable Energy Approval process WPD is required to fully and accurately describe any potential health effects of the Project. It appears your October 18, 2011 email communication does not fulfill this requirement.

At the request of our client we are providing the following information to assist your organization in fulfilling its responsibilities to fully and accurately describe any negative effects on health and safety.

We note that your October 18, 2011 email selectively cites an article authored by Drs. Christopher Ollson and Loren Knopper entitled “*Health effects and wind turbines: A review of the literature.*” (Knopper and Ollson, 2011). Your email states:

Their report, published in the scientific journal Environmental Health, states that “To date, no peer reviewed articles demonstrate a direct causal link between people living in

proximity to modern wind turbines, the noise they emit and resulting physiological health effects.”

Our client wishes to advise WPD that evidence and expert testimony provided during a 2011 Ontario Environmental Review Tribunal (“ERT”) confirmed wind turbines can harm human health. The July 18, 2011 ERT Decision states:

This case has successfully shown that the debate should not be simplified to one about whether wind turbines can cause harm to humans. The evidence presented to the Tribunal demonstrates that they can, if facilities are placed too close to residents. The debate has now evolved to one of degree.<sup>1</sup>

Evidence and expert testimony provided during the ERT confirmed negative human health effects of wind turbine exposure can be expected to be created via “indirect” pathways.

Your October 18, 2011 email also appears to reference the Chief Medical Officer of Health of Ontario (the “CMOH”) report “*The Potential Health Impact of Wind Turbines*.” Under oath the lead author of that report, Dr. Gloria Rachamin, explicitly acknowledged the report looked *only* at direct links to human health.<sup>2</sup>

Based in part on the shortcomings of the CMOH’s report, the ERT Decision expressed concern “...about the Director’s apparent lack of consideration of indirect health effects and the need for further work on the MOE’s practice of precaution...”<sup>3</sup>

In fact, Knopper and Ollson (2011) does appear to acknowledge health effects from wind turbine exposure can occur via the indirect pathway stating “...self reported health effects of people living near wind turbines are more likely attributed to physical manifestation from an annoyed state...”<sup>4</sup>

During the ERT hearings:

- Expert witnesses for both the Respondents (Ministry of Environment, Suncor Energy Services Inc.) and the Appellants provided evidence and/or testimony which acknowledged wind turbines in Ontario “will” cause annoyance, which is expected to result in stress related health impacts in some individuals.
- Dr. Ollson provided evidence stating “What is clear is that some people living near wind turbines experience annoyance due to wind turbines. Swishing, whistling, resounding and pulsating/throbbing were the sound characteristics that were most highly correlated

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<sup>1</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122. Retrieved from <http://www.ert.gov.on.ca/english/decisions/index.htm>

<sup>2</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122. Transcript of Dr. G. Rachamin, Mar, 4, 2011

<sup>3</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122. Retrieved from <http://www.ert.gov.on.ca/english/decisions/index.htm>

<sup>4</sup> Knopper and Ollson: Health effects and wind turbines: A review of the literature. Environmental Health 2011 10:78

with annoyance by wind turbine noise among respondents who noticed the noise outside their dwellings. Some people are also disturbed in their sleep by wind turbines.”<sup>5</sup>

- Dr. Ollson provided evidence that wind turbine induced annoyance and sleep disturbance occur at sound pressure levels above and below 40 dBA.<sup>6</sup>
- Expert witnesses for both the Respondents and the Appellants provided evidence and/or testimony which acknowledged annoyance, stress and sleep disturbance to be adverse health effects.
- Dr. Ollson testified under oath that “annoyance is a health effect.”<sup>7</sup>
- Expert witnesses for both the Respondents and the Appellants provided evidence and/or testimony which acknowledged there will be some people who will evaluate themselves as annoyed or disturbed by wind turbine noise.
- In reference to people who subjectively evaluated themselves as disturbed by noise Dr. Ollson provided evidence which stated “Regardless of whether the perceived impacts by affected individuals are physiological or psychological in nature, they are a serious matter and are considered as adverse health effects.”<sup>8,9</sup> Under oath Dr. Ollson reaffirmed these statements in his testimony.<sup>10</sup>
- Dr. Ollson provided evidence suggesting some individuals may require clinical treatment stating “...health effects from annoyance can be mitigated though behavioural and cognitive behavioural interventions.”<sup>11</sup>

Your October 18, 2011 email also states:

Our project will follow the new guidelines put in place by the Ministry of the Environment regarding sound levels and minimum distances for wind projects in Ontario. The key consideration is the sound level. The requirements, supported by information from the Ontario Chief Medical Officer of Health, Health Canada and The World Health Organization (WHO) Europe and upheld by the courts, ensure a project must be sited a minimum distance of 550 metres from non-participating receptors (residences) provided a cumulative sound level of 40 dBA is not exceeded.

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<sup>5</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Witness Statement of Dr. Christopher Ollson, January 17, 2011

<sup>6</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Witness Statement of Dr. Christopher Ollson, January 17, 2011

<sup>7</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011

<sup>8</sup> Jacques Whitford Stantec Limited, Byran Wind Project Environmental Review Report, Prepared for SkyPower Corp., August 25, 2009, Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122 Exhibit 74 p. 7-68

<sup>9</sup> Stantec Consulting Ltd., Ostrander Point Wind Energy Design and Operations Report, Prepared for: Gilead Power Corporation, September 2010, Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122 Exhibit 75 p. 5.18

<sup>10</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011

<sup>11</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Witness Statement of Dr. Christopher Ollson, January 17, 2011

As you may or may not be aware, Ontario wind turbine noise guidelines permit,<sup>12</sup> and projects are being approved for,<sup>13</sup> noise levels of up to 51 dBA.

In addition, during the ERT hearings expert witnesses, including the lead author of the Chief Medical Officer of Health 2010 report, testified that the WHO 40 dBA noise limit was not designed based on research related to wind turbine noise but rather road, rail and aircraft noise.<sup>14</sup> <sup>15</sup> <sup>16</sup> <sup>17</sup> <sup>18</sup>

Conversely, of the 26 ERT witnesses that testified, Dr. Ollson was the only one to express the opinion that the WHO Night Noise Guidelines for Europe, 2009 (WHO, 2009) did not exclude consideration of wind turbines noise.<sup>19</sup>

A review and search of WHO (2009) revealed no evidence which supports the position that the WHO 2009 Night Noise Guidelines considered wind turbine noise. For example, the word “wind” only appears once in WHO (2009) and not in the context of wind turbines.<sup>20</sup> <sup>21</sup>

Furthermore, Dr. Ollson’s witness statement identified 13 leading peer reviewed articles on wind turbines. None of these articles are referenced in WHO (2009).<sup>22</sup>

During the ERT hearings, expert witnesses for both the Respondents and the Appellants provided evidence and/or testimony, including evidence from peer-reviewed published journals,<sup>23</sup> which acknowledged wind turbine sound is perceived to be more annoying than transportation noise or industrial noise at comparable sound pressure levels.

Furthermore the Ministry of Environment commissioned and submitted into evidence a report prepared by HGC Engineering. Referring to existing Ontario wind turbine regulations and noise guidelines the report states:

The audible sound from wind turbines, at the levels experienced at typical receptor distances in Ontario, is nonetheless expected to result in a nontrivial percentage of

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<sup>12</sup> Noise Guidelines for Wind Farms, Interpretation for Applying MOE NPC Publications to Wind Power Generation Facilities, Ministry of the Environment, October 2008

<sup>13</sup> Renewable Energy Approval Number 7988-8AVKM5 Issue Date: November 10 2010,

<sup>14</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Transcript of Dr. G. Rachamin, Mar, 4, 2011,

<sup>15</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Transcript of Dr. D. Shepherd, Feb, 9, 2011,

<sup>16</sup> Erickson v. Director, Ministry of the Environment, Environmental Case Nos. 10-121 and 10-122, Transcript of Dr. Christopher Hanning, Feb, 11, 2011

<sup>17</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. R. McMurtry, Feb, 16, 2011,

<sup>18</sup> Erickson v. Director, Ministry of the Environment, Case Nos. 10-121 and 10-122, Transcript of Dr. W. Colby, Mar, 29, 2011,

<sup>19</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Supplementary Witness Statement of Christopher A. Ollson, March 8, 2011

<sup>20</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011, p. 109 l. 6 to l. 14

<sup>21</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011, p. 112 l. 2 to l. 5

<sup>22</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011, p. 109, l. 6 to p. 113, l. 15

<sup>23</sup> Pedersen, E., Bakker, R., Bouma, J., & van den Berg, F. (2009), Response to noise from modern wind farms in the Netherlands, Journal of the Acoustical Society of America, 126, 634-643.

persons being highly annoyed. As with sounds from many sources, research has shown that annoyance associated with sound from wind turbines can be expected to contribute to stress related health impacts in some persons.<sup>24</sup>

A 2009 American Wind Energy Association and Canadian Wind Energy Association sponsored panel review (Colby et al., 2009) acknowledges wind turbine sound may cause annoyance which may result in sleep disturbance and stress. The report attributes reported wind turbine symptoms (sleep disturbance, headache, tinnitus, ear pressure, dizziness, vertigo, nausea, visual blurring, tachycardia, irritability, problems with concentration and memory, and panic attack episodes associated with sensations of internal pulsation or quivering when awake or asleep) to be the “well known stress effects of exposure to noise.”<sup>25</sup>

Other ERT expert witnesses confirmed these findings. For example Dr. Geoff Leventhall, ERT witness for Suncor Energy Services Inc., agreed with the above symptoms and provided evidence that he was “...happy to accept these symptoms, as they have been known to me for many years as the symptoms of extreme psychological stress from environmental noise, particularly low frequency noise.”<sup>26</sup> Dr. Geoff Leventhall further stated the above symptoms are “...effects of annoyance by noise—a stress effect.”<sup>27</sup>

During the ERT Dr. Geoff Leventhall also testified that some people *will be* annoyed by the sound of wind turbines at sound pressure levels permitted in Ontario wind turbine projects. (emphasis added)<sup>28</sup>

In reference to Colby et al., (2009) the President of the Canadian Wind Energy Association stated: “The study does acknowledge that wind turbines can be annoying, the sound of wind turbines can be annoying for some individuals and that may cause them to feel some stress etcetera.”<sup>29</sup>

During the ERT hearings witnesses for both the Respondents and/or the Appellants provided evidence and/or testimony which indicate plausible causes of wind turbine health effects include: amplitude modulation and/or audible low frequency sound and/or infrasound and/or tonality

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<sup>24</sup> Howe Gastmeier Chapnik Limited. (2010, December). Low frequency noise and infrasound associated with wind turbine generator systems: A literature review (Final draft, Rfp No. Oss-078696). Mississauga, Ontario, Canada: Ministry of the Environment. Ontario Ministry of Environment Disclosure Document # 34 - Erickson v. Director, Ministry of the Environment (10-121 and 10-122)

<sup>25</sup> Colby, W. D., Dobie, R., Leventhall, G., Lipscomb, D. M., McCunney, R. J., Seilo, M. T., & Søndergaard, B. (2009, December). Wind turbine sound and health effects: An expert panel review. Washington, DC: American Wind Energy Association and Canadian Wind Energy Association. [p. 4-3, 4-9, 4-10, 5-3] Ontario Ministry of Environment Disclosure Document # 23 - Erickson v. Director, Ministry of the Environment (10-121 and 10-122)

<sup>26</sup> Dr. Leventhall, (2009), “Wind Turbine Syndrome, an Appraisal,” Erickson v. Director, Ministry of the Environment (10-121 and 10-122) Exhibit 55 submitted by Suncor Energy Services Inc.

<sup>27</sup> Dr. Leventhall, (2009), “Wind Turbine Syndrome, an Appraisal,” Erickson v. Director, Ministry of the Environment (10-121 and 10-122) Exhibit 55 submitted by Suncor Energy Services Inc.

<sup>28</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. G. Leventhall, Mar, 11, 2011

<sup>29</sup> Hornung, R. (2010, March 4). Interview on Business News Network (Video). Retrieved from <http://watch.bnn.ca/clip272347>

and/or lack of nighttime abatement and/or shadow flicker and/or visual impact and/or economic impacts.<sup>30, 31, 32, 33, 34, 35</sup>

The reference list contained in Knopper and Ollson (2011) is also incomplete. For example Knopper and Ollson (2011) cites a number of literature reviews but does not appear to reference Colby et al. (2009) which, as noted above, acknowledges wind turbines may cause annoyance, stress and sleep disturbance which may have other consequences (see above for the “well known stress effects of exposure to noise”).<sup>36</sup> Dr. Christopher Ollson and/or his Stantec staff have previously cited and relied on this American and Canadian Wind Energy association sponsored panel review in other productions.<sup>37</sup>

Furthermore Knopper and Ollson (2011) appears to have omitted the published proceedings from the Fourth International Meeting on Wind Turbine Noise from April 12-14, 2011. The Wind Turbine Noise (2011) post-conference report states:

The main effect of daytime wind turbine noise is annoyance. The night time effect is sleep disturbance. These may lead to stress related illness in some people. Work is required in understanding why low levels of wind turbine noise may produce affects which are greater than might be expected from their levels.”<sup>38</sup>

Since the summer of 2011, at least ten further relevant articles have been published in peer reviewed journals which are not included in the reference list of Knopper and Ollson (2011).<sup>39, 40, 41, 42, 43, 44, 45</sup>

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<sup>30</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. G. Rachamin, Mar, 4, 2011

<sup>31</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Dr. Colby’s presentation to Nova Scotia Department of Energy on March 4, 2010, Exhibit 90, p.9 p. 18 and p. 29

<sup>32</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. K. Mundt, Mar, 22, 2011

<sup>33</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Transcript of Dr. C. Ollson, Mar, 22, 2011

<sup>34</sup> Howe Gastmeier Chapnik Limited. (2010, December). Low frequency noise and infrasound associated with wind turbine generator systems: A literature review (Final draft, Rfp No. Oss-078696). Mississauga, Ontario, Canada: Ministry of the Environment. Ontario Ministry of Environment Disclosure Document # 34 - Erickson v. Director, Ministry of the Environment (10-121 and 10-122)

<sup>35</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Witness Statement of Dr. R. McMurtry, January 16, 2011

<sup>36</sup> Colby, W. D., Dobie, R., Leventhall, G., Lipscomb, D. M., McCunney, R. J., Seilo, M. T., & Søndergaard, B. (2009, December). Wind turbine sound and health effects: An expert panel review. Washington, DC: American Wind Energy Association and Canadian Wind Energy Association. [p. 4-3, 4-9, 4-10, 5-3] Ontario Ministry of Environment Disclosure Document # 23 - Erickson v. Director, Ministry of the Environment (10-121 and 10-122)

<sup>37</sup> Stantec Consulting Ltd., Ostrander Point Wind Energy Design and Operations Report, Prepared for: Gilead Power Corporation, September 2010

<sup>38</sup> Wind Turbine Noise. (2011). Post conference report. Retrieved from [http://www.confweb.org/wtn2011/index.php?option=com\\_content&view=article&id=70:report&catid=35:information](http://www.confweb.org/wtn2011/index.php?option=com_content&view=article&id=70:report&catid=35:information)

<sup>39</sup> McMurtry, RY, Toward a Case Definition of Adverse Health Effects in the Environs of Industrial Wind Turbines: Facilitating a Clinical Diagnosis, Bulletin of Science Technology & Society 2011 31: 316, DOI: 10.1177/0270467611415075, <http://bst.sagepub.com/content/31/4/316>

For example recent peer reviewed articles document some individuals living in the environs of wind turbines report reduced quality of life.<sup>46, 47</sup> An October 2011 Noise & Health article describes the results of a peer reviewed study. The study found “... residents living within 2 km of a turbine installation reporting lower overall quality of life, physical quality of life, and environmental quality of life. Those exposed to turbine noise also reported significantly lower sleep quality ...”<sup>48</sup>

Peer reviewed findings that wind turbines in the vicinity can lower quality of life of individuals is supported by a Canadian Wind Energy Association media release. The October 14, 2011 media release acknowledges wind turbines in the vicinity can cause annoyance for some individuals. The media release acknowledges annoyance can have “a significant impact on an individual's quality of life”. The media release further advises affected individuals that “it is important” they obtain the services of medical professionals (i.e. consult their doctor).<sup>49</sup>

The conclusion of Knopper and Ollson (2011) acknowledges the existence of “trade-offs” between “mental and social well-being” of some individuals exposed to wind turbines “against the larger demand for energy and its source.”<sup>50</sup>

Knopper and Ollson (2011) also cite The World Health Organization definition of health stating “Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.”<sup>51</sup>

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<sup>40</sup> Salt, AN, and Kaltenbach, JA, (2011) Infrasound From Wind Turbines Could Affect Humans, Bulletin of Science Technology & Society 2011 31: 296, DOI: 10.1177/0270467611412555, <http://bst.sagepub.com/content/31/4/296>

<sup>41</sup> Shain, M, (2011), Public Health Ethics, Legitimacy, and the Challenges of Industrial Wind Turbines: The Case of Ontario, Canada, Bulletin of Science Technology & Society, 2011 31: 256, DOI: 10.1177/0270467611412552, <http://bst.sagepub.com/content/31/4/346>

<sup>42</sup> Bronzaft, AL, (2011) The Noise From Wind Turbines: Potential Adverse Impacts on Children's Well-Being, Bulletin of Science Technology & Society 2011 31: 256, DOI: 10.1177/0270467611412548, <http://bst.sagepub.com/content/31/4/291>

<sup>43</sup> Harrison, JP, (2011), Wind Turbine Noise, Bulletin of Science Technology & Society 2011 31: 256, DOI: 10.1177/0270467611412549, <http://bst.sagepub.com/content/31/4/256>

<sup>44</sup> Phillips, CV, (2011), Properly Interpreting the Epidemiologic Evidence About the Health Effects of Industrial Wind Turbines on Nearby Residents, Bulletin of Science Technology & Society 2011 31: 303, DOI: 10.1177/0270467611412554, <http://bst.sagepub.com/content/31/4/303>

<sup>45</sup> Thorne, B, (2011), The Problems With "Noise Numbers" for Wind Farm Noise Assessment, Bulletin of Science Technology & Society 2011 31: 262, DOI: 10.1177/0270467611412557, <http://bst.sagepub.com/content/31/4/262>

<sup>46</sup> Krogh, CME, (2011), Industrial Wind Turbine Development and Loss of Social Justice? Bulletin of Science Technology & Society 2011 31: 321, DOI: 10.1177/0270467611412550, <http://bst.sagepub.com/content/31/4/321>

<sup>47</sup> Krogh, CME, Gillis, L, Kouwen, N, and Aramini, J, (2011), WindVOiCe, a Self-Reporting Survey: Adverse Health Effects, Industrial Wind Turbines, and the Need for Vigilance Monitoring, Bulletin of Science Technology & Society 2011 31: 334, DOI: 10.1177/0270467611412551, <http://bst.sagepub.com/content/31/4/334>

<sup>48</sup> Shepherd D, McBride D, Welch D, Dirks KN, Hill EM. Evaluating the impact of wind turbine noise on health-related quality of life. *Noise Health* 2011;13:333-9.

<sup>49</sup> The Canadian Wind Energy Association, October 14, 2011, The Canadian Wind Energy Association responds to October 14, 2011 statement by Wind Concerns Ontario, Retrieved from [http://www.canwea.ca/media/release/release\\_e.php?newsId=133](http://www.canwea.ca/media/release/release_e.php?newsId=133)

<sup>50</sup> Knopper and Ollson: Health effects and wind turbines: A review of the literature. *Environmental Health* 2011 10:78

The Canadian federal, provincial, and territorial governments and health officials have accepted WHO's definition of health.<sup>52</sup> Dr. Ollson himself provided evidence during the ERT hearings where stated he is completely in support of the WHO definition of health.<sup>53</sup>

The WHO also states: "Mental health is as important as physical health to the overall well-being of individuals, societies and countries."<sup>54</sup> Health Canada specifically states: "Mental health is as important as physical health. In fact, the two are intertwined. Our mental health directly affects our physical health and vice versa."<sup>55</sup>

In summary "mental and social well-being" falls within the definition of health recognized by the WHO, Canadian jurisdictions, public health authorities and Dr. Ollson. Consequently Knopper and Ollson (2011) appears to acknowledge that the health of some individuals will be traded off as a result of wind turbine projects.

In closing, now that you and WPD are in possession of this information, as part of your organization's responsibility to fully and accurately describe health issues related to the Project, or any other project(s) in Ontario, we trust that the foregoing information will be provided whenever you are communicating with members of the public or regulatory authorities on health matters during the Renewable Energy Approval(s) process. In our respectful view, amongst other things, WPD's failure to include such information could be viewed as negligent misrepresentation and be actionable. In addition, a failure to disclose such information may provide grounds for a landowner to void any agreement purportedly reached with WPD.

Should you have any questions or require additional information please advise.

Yours very truly,

**ERIC K. GILLESPIE**  
**PROFESSIONAL CORPORATION**

**Eric K. Gillespie**  
EKG/am

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<sup>51</sup> Knopper and Ollson: Health effects and wind turbines: A review of the literature. Environmental Health 2011 10:78

<sup>52</sup> Health Canada. (2004). Canadian handbook on health impact assessment: Vol.1. The basics. A report of the Federal/Provincial/Territorial Committee on Environmental and Occupational Health. Retrieved from <http://www.who.int/hia/tools/toolkit/whohia063/en/index.html>

<sup>53</sup> Erickson v. Director, Ministry of the Environment, Environmental Decision Case Nos. 10-121 and 10-122, Supplementary Witness Statement of Christopher A. Ollson, March 8, 2011

<sup>54</sup> World Health Organization, The World Health Report: 2001: Mental Health: New Understanding, New Hope,

<sup>55</sup> Health Canada (May 2006), It's Your Health Mental Health - Mental Illness