



Vides pārraudzības valsts birojs
Environment State Bureau of the Republic of Latvia

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Regarding the notification of the proposed wind farm

Environment State Bureau (hereinafter – the Bureau), acting as a competent authority on environmental impact assessment (hereinafter – EIA) in Latvia, confirms receipt of the notification that was sent about the proposed wind farm near the border of the Republic of Latvia (hereinafter – The Project). The Project is planned in Židikai Ward, Bataičiai and Palūše Villages (on the south west side of Pikeliai), approximately 04 km and 0,8 km from the border of the Republic of Latvia.

We have examined documents for the screening for EIA, including the summary in English and The Project submission by UAB “*Ekosistema*”. According to the notification 2 additional wind turbines (height of structures up to 230 m) are planned in the area close to a previously planned wind park consisting of 7 wind turbines (planned, but not built yet). Nevertheless – from the submission by UAB “*Ekosistema*”, in particular – the Annex 6, we conclude, that there are not only 9 wind turbines under the evaluation within The Project (7 previously planned and 2 additional), but there are 5 more wind turbines indicated in the noise calculation maps. Therefore we conclude that the wind farm might be even bigger – consisting of 14 installations in total. Some of these wind turbines might be even closer to the border of the Republic of Latvia than the installations of the notification.

From publicly available information we also conclude, that there is another proposed activity of similar nature in the vicinity of The Project site – a wind farm in Židikai Ward, Juodeikeliu and Grieže Villages (http://gamta.lt/files/PAV_atranka_VVP_Mazeikiu_r.06.11%20-%20viesinimui.pdf) consisting of 9 wind turbines. These wind turbines are planned relatively close to The Project site, on the south east side of Pikeliai. To some extent the possible impacts on environment, in particular – on landscape as well as bird and bat mortality risk from collisions with wind turbines, can be cumulative. Since the summary in English is very concentrated and does not reflect findings in this field (total and cumulative impacts with other projects), we remain cautious that there might be some additional routes for a more profound impact screening.

During the consultation phase of The Project we received comments and opinions regarding the possible impacts on the environment from Environmental Service, Nature Conservation Agency and Saldus County (the bordering municipality). Attention was driven to the fact that the nearest

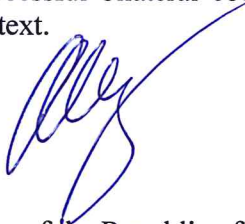
pecially protected nature territory of European significance (Natura 2000) – “*Nigrandes meži*” (site code LV0531000; site type: B) is approximately 2 km from the planned wind farm. Taking into account the distance and the site type – Nature Conservation Agency is of the opinion that there might be no significant negative impacts. More concerns about negative impacts were expressed by Environmental Service (impact on bats) and the local municipality, in particular – the impact on the landscape, the flickering effect and low frequency noise, as well as impact on the aviation.

According to The Project submission by UAB “*Ekosistema*”, no increased noise levels (above 45 dB(A)) are expected in the territory of Latvia and the flickering effect in the territory of Latvia is assessed as not exceeding international recommendations. Still we draw your attention to the Annex 7 and Annex 8 of The Project submission by UAB “*Ekosistema*” and express our concern about the flickering prognosis. Based on the experience we conclude that the flickering effect of a wind turbine with total heights above 200m (if evaluated as a worst case scenario) can exceed recommended 30 hours per year in a distance up to 1 km. If evaluated as a real case scenario (as mentioned in Annex 7 and Annex 8 of The Project submission by UAB “*Ekosistema*”) – results can be different, but it must be taken in account that for the real case scenario also the recommended values are much lower (8 hours not 30 hours per year)¹. We have assessed the publicly available information regarding residential territories and have found out that the nearest dwellings in the territory of the Republic of Latvia are further than 1 km from The Project site. Nevertheless this might indicate that there are some additional aspects for further assessment.

Concluding the aforementioned, Latvia remains cautious regarding The Project, especially the possible cumulative effects on the environment. Therefore we intend to participate in the EIA process if EIA will be applied.

We are looking forward to our successful bilateral cooperation in the field of environmental assessment in the transboundary context.

Sincerely yours,



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¹ <https://www.slideshare.net/ErikKoppen/wtn-2017-international-legislation-and-regulations-for-wind-turbine-shadow-flicker-impact>.