Report on the Received Proposals within the Framework of Transboundary Consultations for the Strategic Environmental Impact Assessment of the "Lode" Wind Park Local Plan in Lode Parish, Valmiera Municipality

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
1. Ministry of Climate, Republic of Estonia 25.10.2024, Nr.6-3/24/4013-9	On 23 August 2024, Latvia notified Estonia in accordance with Article 10 of the Protocol on Strategic Environmental Assessment (SEA) to the Convention on Environmental Impact Assessment in a Transboundary Contect (Espoo Convention) regarding the planning document "The Local Plan of the Wind Farm "Lode"" and its SEA. The notification included translations (Estonian and English) of the environmental report of the local plan. The Ministry of Climate of Estonia organised a public display of the aforementioned documentation. The documents were shared with numerous authorities and non-govermental organisations. The notice of the public consultation procedure was published in the official publication Ametlikud Teadaanded. The public display took place from 27 September to 18 October 2024. Statements were received from the Ministry of Regional Affairs and Agriculture, Estonian Agriculture and Food Board, Estonian Health Board, Estonian Environmental Board, and Mulgi Municipality Government (the statements are enclosed in Annexes 1–4). Hereby, the Ministry of Climate informs that Estonia intends to participate in the SEA procedure regarding the planning document "The Local Plan of the Wind Farm "Lode"". Having reviewed the documents submitted by Latvia, the Ministry of Climate presents the following comments: 1. The quality of the English and Estonian translations of the environmental report is insufficient. Consequently, it is difficult to understand which species were studied and analysed in this report (adding the species names in Latin would also be advisable). Due to insufficient quality of the translations, it is not possible to provide a comprehensive assessment of the population of endangered species. As the environmental report relies on the environmental	1. The Environmental Report, prepared as part of the Strategic Environmental Impact Assessment (SEIA) procedure, was originally written in Latvian and is primarily intended for use within the Latvian legal system. The document has been machine-translated into English and Estonian, which may have led to some inaccuracies in terminology. Nevertheless, the SEIA is designed to be reviewed alongside the

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	impact assessment (EIA) report, a more comprehensive assessment of the potential environmental impact can be made after reviewing the EIA report.	Environmental Impact Assessment (EIA), a more detailed document that has been translated with greater accuracy. We hope that the translation is of sufficient quality to convey the document's content and key aspects effectively. Please note that the Environmental Report is intended for a broad audience rather than specialists in the field. As a result, Latin species names are not included in the original report (in Latvian). Environmental institutions in the Republic of Latvia, when providing feedback on the report, did not express a need to include such information. All expert evaluations concerning species are appended as annexes to the local plan (in Latvian) and do include Latin species names. Since these expert opinions were obtained during the environmental impact assessment process, a detailed description of species, including their Latin names, can be found in the Environmental Impact Assessment Report. A thorough evaluation of endangered species populations is also provided in the Environmental Impact Assessment Report, which has been submitted for cross-border assessment.
	2. The environmental report does not clarify whether the establishment of a 200-meter buffer zone[1] from landscape elements important to bats (woodland edges, tree lines, hedgerow networks, wetlands, waterbodies, watercourses) has been considered. Establishing a buffer zone to protect bats would be advisable.	2. Section 6.5.1 of the Environmental Report provides an assessment of the potential impact on bats. The section was prepared using the expert opinion of mammal – bat (Chiroptera) specialist, which was developed as part of the environmental impact assessment process. The Environmental Report mentions that the local plan solutions provide for equipping the wind power

[1] https://www.eurobats.org/sites/default/files/documents/publications/publication_series/pubseries_no6_english.pdf

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
		station with a technological solution that ensures the cessation of operation or non-starting of the wind turbines during periods and under conditions specified in the Environmental Impact Assessment report "Construction of the Lode Wind Park in Lode and Ipiķi Parishes, Valmiera Municipality." A requirement is included to ensure bat monitoring during the first and second years after the wind park begins operation and, if necessary, to review the operational restrictions of the wind turbines based on the results of the monitoring. The expert opinion does not include requirements for the establishment of a 200-meter buffer zone around areas important for bats. However, there is no doubt that all potential impact mitigation measures will be implemented.
	3. The environmental report states that the first section of the wind turbine mast will be painted dark, with a gradual transition from dark to light to mitigate impacts on birds, and the blades will be painted light (white) in order to reduce the visual impact on people. To prevent collisions with birds, it is advisable to make the turbine blades more visible, for example, by painting one of the blades black.	3. The Environmental Report outlines the proposals included in the local plan, which were prepared in accordance with the landscape expert's recommendations – the first section of the wind turbine mast, up to 20 meters in height, will be painted in dark colors matching the surrounding tones (green or brown) with a gradual transition from dark to light. The expert also indicated that the wind turbine blades should be painted in light (white) colors. This painting proposal has also been included in the local plan.
	4. According to the environmental report, the cumulative impact of all the wind farms planned in the area is significant – however, if all projects implemented mitigation measures, it is possible to reduce those environmental impacts. It is important to note that it cannot be assumed that all projects will follow the same mitigation measures,	4. The cumulative and summarized impacts are outlined in the Environmental Report (Section 7.2) and the Environmental Impact Assessment Report. The potential cumulative impact on the landscape and the cumulative impact in the context of bird protection have been analyzed. Regarding the landscape, it is concluded that, based on the current

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	as no such agreement between developers in Estonia and Latvia exists.	situation and visibility zone distances, the cumulative impact between the "Lode" park and the two "Saarde" parks in Estonia could result in visual overload, as there is an overlap in the good visibility zones. However, since the "Lode" wind farm already has a low visual impact on the surrounding area at a distance of 6 km according to the visual impact map, the overlap of visibility zones should not be considered significant. The Environmental Report indicates that cumulative impacts may arise in the context of bird protection, particularly when multiple wind farms are constructed in a specific region. According to the developers of the EIA Report, a comprehensive assessment of cumulative impacts on bird protection is not currently feasible. It can be definitively stated that such impacts will occur, considering at least the number of planned wind farms in the Valmiera and Limbaži municipalities, as well as in the border area of the Mulgi district in Estonia. Given the above, it is expected that the construction of the planned wind farms in the region will cumulatively have a negative impact on bird populations, which could be significant. Unfortunately, it is practically impossible to quantitatively assess the extent of the impacts currently. It must be agreed that there is no agreement between the wind farm developers on the Latvian and Estonian sides regarding the joint implementation of potential cumulative impact mitigation measures. We can only point out that such an agreement should exist or at

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
		least mutual discussions should take place. Both parties must work together on this matter.
	<u>Summary of received comments and proposals (written by the Ministry of Climate)</u> The Ministry of Regional Affairs and Agriculture noted that the proposed activity may have a transboundary impact (for example, visual and cumulative). The Ministry of Regional Affairs and Agriculture also provided comments on the environmental report: • The SEA must address the functioning of the green network across the border.	Comments on the Ministry of Regional Affairs and Agriculture's remarks regarding the Environmental Report: • Chapter 10 of the Environmental Report ("Assessment of Potential Significant Transboundary Impacts of the Planning Document") addresses the functioning of the green network across the border. The chapter provides an overview of residential areas in Estonia, natural values, ornithofauna, and a landscape assessment. It also includes information on the potential noise impact and shadow flicker effect of the planned "Lode" wind park. It is considered that, to the extent possible, information about the green network on the Estonian side and potential impacts has been provided.
	• The visual assessment must also cover the two densely populated areas and a village center in Mulgi Municipality.	• Chapter 10.1.4 of the Environmental Report, "Landscape," incorporates information from the expert opinion of landscape architect Heiki Kalberg, titled "Impact of the 'Lode' Wind Park on the Landscape in the Mulgi Municipality Area (Estonia)." This opinion was prepared within the framework of the environmental impact assessment and is fully available in the annex to the EIA report. The expert's opinion provides a detailed inventory of landscape values and an assessment of potential impacts. While evaluating the overall

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	• The noise regulations and standards in force in Estonia must also be taken into account to ensure that the noise levels at residences in Estonia are not exceeded.	impact of the planned activity, the expert concludes that it is insignificant, although the surrounding landscape will undeniably change, particularly in areas closer to the planned wind park. • The proposal has been considered. Within the framework of the Environmental Impact Assessment (EIA), the potential noise impact on residential areas in Estonia was evaluated in accordance with local regulations. The results of the environmental noise calculations indicate that the planned activities can be implemented while complying with both Latvian and Estonian regulatory requirements for noise management. However, it is expected that, if the loudest permissible turbines are installed, the noise levels in four residential areas closest to the planned wind park will exceed the World Health Organization's recommended threshold values for noise generated by wind turbines. Although there is currently no basis for imposing mandatory measures to mitigate or prevent the impacts, it is recommended to consider noise emissions during the selection process of wind turbine models to reduce the operational impacts of the planned wind park. If there are no justified reasons for selecting louder turbines, it is advisable to choose and install turbines with the lowest possible noise emission levels. Selecting quieter turbines will help to achieve or approximate noise levels in the nearest residential areas that align with the World Health Organization's

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
		recommended noise thresholds for wind turbines.
	• The local plan and the SEA should also be introduced to Estonian residents.	• The proposal has been supported. The local plan and the Environmental Report have been presented to Estonian residents. An online public discussion meeting has been organized.
	• The Estonian translation of the environmental report requires correction, especially regarding the terminology.	• As mentioned earlier, the Estonian translation is a result of machine translation. It may contain certain terminological inaccuracies, but overall, we hope it provides an understanding of the planned activities, local plan solutions, and proposed impact mitigation measures.
	Estonian Agriculture and Food Board stated that the SEA must consider the land improvement construction works located in Estonia – Penuja (code 6115320010006/001) and Purgali (code 6115360010028/001) – and their artificial recipients extending into Latvian territory. These land improvement systems drain a total of 50 hectares of agricultural land and 178,7 hectares of forest land. Therefore, it is important to ensure that the drainage of water and/or the reconstruction of these land improvement systems within the proposed wind farm area is managed in such a way that it does not worsen the conditions in the necessary artificial recipients for the functioning of the land improvement systems on the Estonian side and the recipient bodies on the Latvian side. Additionally, it is necessary to ensure the possibility of maintenance work on the artificial recipients of the land improvement systems on the Estonian side during the operation of the wind farm. In further stages of the project, it is important to provide a clear description of how the drainage ditches serving the artificial recipients of the land	The proposal has been evaluated and approved. As part of the preparation of the Environmental Impact Assessment Report and the Environmental Review, the land improvement systems on the Estonian side and the potential impacts on them have been analyzed. In any case, the construction of the wind farm cannot have a negative impact on the land improvement systems in either Latvia or Estonia. If land improvement reconstruction works are required, they must be carried out in accordance with the regulations to eliminate any potential negative impact on the surrounding areas.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	improvement systems on the Estonian side will be maintained after the construction of the wind farm.	
	Estonian Health Board stated that is important for Estonia to participate in the SEA procedure, based on the following remarks: •The environmental report reveals that if the noisiest of the proposed wind turbines is constructed, the noise level in the four residential areas closest to the wind farm will exceed the limits recommended by the World Health Organization (WHO). It is unclear what exact noise levels will these turbines reach and whether they will also exceed the noise standards in force in Estonia.	Estonian institutions and local inhabitants are provided with opportunities to participate in the Strategic Environmental Assessment (SEA) process. Within the framework of the Environmental Impact Assessment (EIA), the potential noise impact on residential areas in Estonia was evaluated in accordance with local regulations. The results of the environmental noise calculations indicate that the planned activities can be implemented while complying with both Latvian and Estonian regulatory requirements for noise management. However, it is expected that, if the loudest permissible turbines are installed, the noise levels in four residential areas closest to the planned wind park will exceed the World Health Organization's recommended threshold values for noise generated by wind turbines. Although there is currently no basis for imposing mandatory measures to mitigate or prevent the impacts, it is recommended to consider noise emissions during the selection process of wind turbine models to reduce the operational impacts of the planned wind park. If there are no justified reasons for selecting louder turbines, it is advisable to choose and install turbines with the lowest possible noise emission levels. Selecting quieter turbines will help to achieve or approximate noise levels in the nearest residential areas that align with the World Health Organization's recommended noise thresholds for wind turbines.
	•According to the environmental report, the flickering effect (shadow flicker) of the proposed wind farm may affect residential	The appropriate solutions are included in the Local Plan and mentioned in the Environmental Report. As

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	areas within 1,5 to 2 km. All possible solutions to avoid and/or mitigate the flickering effect should be considered.	part of the Environmental Impact Assessment, calculations were made, revealing that the flickering effect caused by the wind farm could lead to disturbances exceeding the recommended threshold values in the residential areas near the planned site, regardless of the chosen wind turbine model. The only technical solution that can reduce the duration of the flickering effect is the cessation of operation of the turbines causing the flickering during periods when such disturbance may occur in the residential areas. Relevant requirements are included in the Local Plan's Land Use and Building Regulations, applying to new residential buildings to be constructed after the wind farm starts operations.
	Estonian Environmental Board noted that Estonia should participate in the SEA procedure, as the participation in the EIA for the same project has already been confirmed. Estonian Environmental Board explained that since the EIA report of the "Lode" wind farm project has not been shared with them yet[2], it is not possible to provide comprehensive feedback regarding possible transboundary environmental impact. However, Estonian Environmental Board pointed out that even though the lesser spotted eagle (Clanga pomarina) was studied in the EIA (according to the environmental report), an overview of the scope of the studies was not provided in the environmental report. There are several habitats of the lesser spotted eagle in the border area of Estonia, including the Laatre lesser spotted eagle nesting site within a 2 km radius of 1–3 proposed wind turbines, that the wind farm may negatively impact. Additionally, habitats of other species such as the northern goshawk (Accipiter gentilis) and the black stork (Ciconia nigra) can also be found in the area. Furthermore, the	As part of the preparation of the Environmental Impact Report, the ornithologist expert, while searching for lesser spotted eagles (*Clanga pomarina*) and inventorying the adjacent forest plots, also surveyed the territory of the Republic of Estonia, approximately 3 km from the planned wind turbines. Of the two lesser spotted eagle nests identified in Estonia, the closest wind turbine will be located no closer than 1200 meters. During the survey, the expert also identified a honey buzzard (*Pernis apivorus*) nest in the Republic of Estonia. The expert noted that the potential impact would be significantly reduced by implementing appropriate mitigation measures. It is not specified which areas mentioned in the letter have not been addressed in the environmental report.

[2] The letter from Estonian Environmental Board was sent before the public display of the EIA in Estonia.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	environmental report does not address all the impacts and issues mentioned in the Ministry of Climate's letter number 6-3/23/4047-13 "Answer to the notification regarding the project "Wind farm „Lode" in the Municipalities of Lode and Ipiki, Valmiera district Municipality"[3]. Mulgi Municipality Government stated that it is important for Estonia to participate in the SEA procedure of the "Lode" wind farm project and that a public hearing/meeting is necessary, as the project might have an impact on local residents. Public hearing/meeting The notification sent on 23 August 2024 also included a request to inform Latvia whether Estonia considers the organisation of a public hearing/meeting for the SEA of „Lode" wind farm project and the environmental report necessary. Hereby, considering the received proposals, the Ministry of Climate informs that organising a public hearing/meeting is necessary. The Ministry of Climate believes that as the SEA of the "Lode" wind farm project is performed in parallel with the EIA of the project, it is sufficient to organise a joint online meeting for both the SEA and EIA. Since the local communities in the border areas of Estonia are among the interested parties in the discussion, it is important that the public hearing/meeting takes place either in Estonian or that a translator is involved for simultaneous translation into Estonian.	A joined online public hearing of both Environmental Impact Assessment (EIA) and Strategic Environmental Impact Assessment (SEIA) was held on October 19, 2024 as suggested by institutions. Both institutions and local communities were represented in aforementioned meeting.
2. Põllumajandus- ja Toiduametile 18.10.2024 Nr.6.1-7/7210-1	Kliimaministeerium saatis 25.09.2024 Põllumajandus- ja Toiduametile (edaspidi PTA) kirja nr 6-3/4013-2 arvamuse avaldamiseks Läti „Lode" tuulepargi projekti kohaliku tasandi planeeringu KSH algatamise keskkonnaaruandele. PTA on tutvunud edastatud materjalidega. Algatatud planeeringu eesmärk on valida tuulepargi kui olulise ruumilise mõjuga objekti ja selle toimimiseks vajaliku taristu (tuulikute	The development planning and construction of the "Lode" wind farm have thoroughly assessed the hydrogeological situation in both Latvia and Estonia, considering the existing drainage systems and potential impacts. The Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) have

[3] The letter was sent to Latvia on 10 October 2023.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	ehitusplatsid sh ehitusplatse teenindav kuivendusvõrk, juurdepääsuteed, elektriühendused liitumispunktidega) püstitamiseks sobivaimad asukohad planeeringualal (asukoha eelvaliku koostamine) ning seejärel koostada detailne planeeringulahendus. PTA huvi on seotud Eestisse jääva kahe maaparandusehitise (Penuja MS kood 6115320010006/001 ja Purgali MS kood 6115360010028/001) ja nende eesvoolude suubumisega Läti riigi aladele. Nimetatud maaparandussüsteemid kuivendavad kokku 50 ha põllumaad ja 178,7 ha metsamaad. Seetõttu on oluline planeerimisel arvestada, et kavandatud tuulepargi maa-alal lahendatakse kuivendusvee ärajuhtimine ja/või sealsete maaparandussüsteemide ümberehitustööd selliselt, et see ei muudaks Eesti pool olevate maaparandussüsteemide toimimiseks vajalikes eesvooludes ja Läti pool asuvates suublateks olevates kraavides tingimusi halvemaks. Lisaks peame vajalikuks veenduda võimaluses teha hoiutöid Eesti pool asuvatel maaparandussüsteemi eesvooludel tuuleparkide ekspluatatsiooni ajal. Leiame, et „Lode" tuulepargi projekti edasistes detailsemates etappides tuleb anda selge kirjeldus, kuidas on tagatud pärast tuulepargi ehitust nende kuivenduskraavide toimimisvõime, mis teenindavad Eesti pool asuvate maaparandussüsteemide eesvoolusid. Analoogselt Eestis läbi viidavate tuuleparkide ja nende toimimiseks vajalike taristu kavandamise eriplaneeringute ja keskkonnamõju strateegilise hindamise protsessides, on oluliseks peetud rõhutada igas menetletavas etapis maaparandusega arvestamise aspekte1. Planeerimise etappidesse antav sisend võimaldab ja kohustab juba detailse lahenduse või ka eriplaneeringu tasemel sellega arvestada. Seetõttu on oluline, et sellele pööratakse tuulepargi	comprehensively analyzed the potential risks and effects on the existing drainage systems. It will be ensured that any construction of the wind farm will be carried out in full compliance with the applicable regulations governing the management of drainage systems and water drainage. The construction process will incorporate all necessary measures to ensure that the reclamation of the drainage systems is conducted in a manner that meets regulatory standards and does not adversely affect the drainage regime or water exchange capacities of the surrounding areas. The construction and operation of the wind farm will not have an adverse impact on the existing drainage systems in either Latvia or Estonia. Furthermore, provisions will be made to facilitate the necessary maintenance of the drainage systems in Estonia during the operational phase of the wind farm. In this regard, we consider any additional suggestions for further measures unnecessary, as all risks related to the drainage systems have already been addressed in the planning process and will be appropriately managed during construction. All required actions will be implemented in accordance with relevant regulatory requirements.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	planeerimisel tähelepanu ka Läti pool asuvatele maaparandussüsteemidele mõeldes. Võttes kokku eelneva leiame, et PTA kaasatus „Lode" tuulepargi projekti kohaliku tasandi planeeringu KSH menetluses on rohkem põhjendatud, kui KMH protsessis. KMH protsessis hinnatavate keskkonnaaspektide sisu on teise suundumusega, mis ei ole otseselt suunatud planeerimise ja ehituslike lahenduste leidmisele. Samas puudub meil arusaamine, kui palju on Läti osapool kohustatud Eestiga jagama tuulepargi detailset projektlahendust, mis analoogselt Eestiga, ei pruugi KSH protsessis selguda.	
3. Keskkonnaamet, 18.10.2024 Nr 6-3/24/19870-3	Läti on piiriülese keskkonnamõju hindamise konventsiooni (Espoo konventsiooni) keskkonnamõju strateegilise hindamise (KSH) protokolli alusel teavitanud Eestit „Lode" tuulepargi projekti kohaliku tasandi planeeringu KSH algatamisest. Olete palunud Keskkonnaameti põhjendatud arvamust selle kohta, kas Eesti peaks osalema selle KSH menetluses. Kirjas märgite, et „Lode" tuulepargi projekti raames on muuhulgas algatatud keskkonnamõju hindamine (KMH), mis toimub KSH-ga paralleelselt. Kliimaministeerium on Lätit teavitanud[4] Eesti soovist osaleda „Lode" tuulepargi projekti piiriüleses KMH menetluses. Vastavalt Läti teavituses toodud selgitustele on menetlustel erinev eesmärk (KSH raames käsitletakse muuhulgas piirkonna ruumilise arengu planeerimisega seotud asjaolusid), mistõttu on põhjendatud KMH ja KSH paralleelne läbiviimine. Arendaja Utilitas Wind Ltd kavandab rajada ligi 1150 ha suuruse pindalaga tuulepargi,	Informative note.

[4] Kliimaministeeriumi 10.10.2023 kiri nr 6-3/23/4047-13.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	mille täpne tuulikute arv, võimsus ning paiknemine selguvad KMH menetluse käigus. Kavandatava tegevuse asukohaks on Lode ja Ipiki vallad Valmiera piirkonna haldusüksuses.	
	Keskkonnaamet on seisukohal, et Eesti osalemine „Lode" tuulepargi projekti kohaliku tasandi planeeringu KSH menetluses on vajalik. Kuna Eesti osaleb „Lode" tuulepargi projekti piiriüleses KMH menetluses, on põhjendatud osaleda ka sama tuulepargi kohaliku tasandi planeeringu KSH protsessis.	A joined online public hearing of both Environmental Impact Assessment (EIA) and Strategic Environmental Impact Assessment (SEIA) was held on October 19, 2024 as suggested by institutions. Both institutions and local communities were represented in aforementioned meeting.
	Ühtlasi olete palunud märkusi ja ettepanekuid Läti edastatud keskkonnaaruande kohta, mis on koostatud tuulepargi „Lode" kohaliku tasandi planeeringule. Aruande ptk 10 kohaselt keskkonnaaruande koostamise raames on välja toodud olulisemad võimalikud piiriülesed mõjud Eestile – elamute ehitus, kaitstavad loodusväärtused, ornitofauna, maastiku kvaliteet, müra ja hinnatakse virvendusefekte. Aruande kokkuvõttes on kirjutatud, et planeerimisdokumendis kavandatud maakasutuse meetmete puhul ei prognoosita olulist piiriülest mõju. Aruande ptk-s 5 on öeldud, et planeerimisprotsessiga samaaegselt viiakse läbi KMH. Kohaliku tasandi planeeringuga nähakse ette ainult territooriumi kasutamine, mis on vajalik tuulepargi arendamiseks. Olulist mõju keskkonnale hinnatakse KMH protsessis.	Informative note.
	Märgime, et keskkonnaaruandes on esitatud üksnes „Lode" tuulepargi KMH kokkuvõte. Keskkonnaametile teadaolevalt „Lode" tuulepargi projekti piiriülese KMH aruanne ei ole veel Eestile tutvumiseks ja ettepanekuteks laekunud, samuti ei ole	As indicated in this letter, it is understood that the institution initially received the environmental report, and only later had the opportunity to review the Environmental Impact Assessment (EIA) report. The EIA report includes a detailed evaluation by

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	kättesaadav keskkonnaaruandes viidatud kohaliku tasandi planeeringu seletuskirja lisas 3 olev uuring. Seetõttu Eestil ei ole terviklikku infot selle tuulepargi piiriüleste keskkonnamõjude ja uuringute tulemuste kohta. Keskkonnaaruande jooniselt 11 nähtub, et tuulikud on kavandatud vahetult Eesti riigipiiri äärde. Eesti poolel on mitmed väike-konnakotka elupaigad. Keskkonnaaruande alapeatüki 10.1.3 kohaselt on KMH raames väike-konnakotkast uuritud, kuid esitatud aruanne ei anna täpset ülevaadet uuringute mahust. Laatre väike-konnakotka pesapaigast (KLO9124845) 2 km raadiusesse on kavandatud 1-3 tuulikut, mis võivad avaldada konnakotkale eeldatavalt olulist negatiivset mõju. Lisaks esineb piirkonnas ka teisi liike (nt kanakull, must-toonekurg). Seetõttu on väga oluline saada põhjalik „Lode" tuulepargi keskkonnamõju hinnang Eestile. Keskkonnaaruandest ei ole leida ka kõiki Keskkonnaameti 28.09.2023 kirjas nr 6-3/23/18313-2 nimetatud mõjusid-teemasid, mis on omakorda ära nimetatud Kliimaministeeriumi 10.10.2023 kirjas nr 6-3/23/4047-13. Seetõttu saab Keskkonnaamet esitada ettepanekud keskkonnaaruande kohta piiriülese KMH aruande saamise järel.	ornithological experts and an assessment of potential impacts on bird fauna. According to the information available to us, the institution was later provided with the opportunity to familiarize itself with both the EIA report and the expert opinion on birds. The potential environmental effects and mitigation measures have been thoroughly evaluated and considered. We trust that the information provided in the EIA report, as well as the expert's conclusions, has clarified any concerns. As part of the preparation of the Environmental Impact Report, the ornithologist expert, while searching for lesser spotted eagles (Clanga pomarina) and inventorying the adjacent forest plots, also surveyed the territory of the Republic of Estonia, approximately 3 km from the planned wind turbines. Of the two lesser spotted eagle nests identified in Estonia, the closest wind turbine will be located no closer than 1200 meters. During the survey, the expert also identified a honey buzzard (*Pernis apivorus*) nest in the Republic of Estonia. The expert noted that the potential impact would be significantly reduced by implementing appropriate mitigation measures.
4. Terviseamet, 17.10.2024 Nr 9.3-4/23/5842-2	Tutvusime teie poolt edastatud Läti "Lode" tuulepargi projekti piiriülese strateegilise keskkonnamõju hindamise dokumentidega. Keskkonnaaruande kokkuvõttest selgub, et juhul kui rajatakse hinnatud elekrijaamadest mürarikkaim, siis neljas tuulepargile kõige lähemal asuvas elamuehituse piirkonnas on müra tase kõrgem kui Maailma Terviseorganisatsiooni poolt soovitatud piirväärtused. Samal ajal ei ole selge, mis tasemeteni need	Within the framework of the Environmental Impact Assessment (EIA), the potential noise impact on residential areas in Estonia was evaluated in accordance with local regulations. The results of the environmental noise calculations indicate that the planned activities can be implemented while complying with both Latvian and Estonian regulatory requirements for noise management. However, it is expected that, if the loudest permissible turbines are installed, the noise levels in four residential areas

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	ulatuvad ning kas ületatakse samuti Eestis kehtivaid müranorme. Samuti planeeritav tuulepark võib osutada mõju 1,5 – 2 km lähedal asuvatele elamualadele virvendusefekti näol. Leevendusmeetmena on pakutud tuulikute seiskamaist perioodidel, millal virvendusefekt on maksimaalne. Leiame, et tuleks ette näha kõiki võimalikke alternatiivseid lahendusi virvendusefekti vältimiseks või leevendamiseks.	closest to the planned wind park will exceed the World Health Organization's recommended threshold values for noise generated by wind turbines. Although there is currently no basis for imposing mandatory measures to mitigate or prevent the impacts, it is recommended to consider noise emissions during the selection process of wind turbine models to reduce the operational impacts of the planned wind park. If there are no justified reasons for selecting louder turbines, it is advisable to choose and install turbines with the lowest possible noise emission levels. Selecting quieter turbines will help to achieve or approximate noise levels in the nearest residential areas that align with the World Health Organization's recommended noise thresholds for wind turbines. The appropriate solutions are included in the Local Plan and mentioned in the Environmental Report. As part of the Environmental Impact Assessment, calculations were made, revealing that the flickering effect caused by the wind farm could lead to disturbances exceeding the recommended threshold values in the residential areas near the planned site, regardless of the chosen wind turbine model. The only technical solution that can reduce the duration of the flickering effect is the cessation of operation of the turbines causing the flickering during periods when such disturbance may occur in the residential areas. Relevant requirements are included in the Local Plan's Land Use and Building Regulations, applying to new residential buildings to be constructed after the wind farm starts operations.

Institution / Date, Number	*Proposals on the Local Plan Environmental Report and Assessment of Transboundary Impacts*	*Comment by the Developer of the Strategic Environmental Impact Assessment ("METRUM" LLC)*
	Sellest lähtuvalt peame vajalikuks Eestil osaleda nii KMH kui ka kohaliku tasandi planeeringu KSH menetluses.	A joined online public hearing of both Environmental Impact Assessment (EIA) and Strategic Environmental Impact Assessment (SEIA) was held on October 19, 2024 as suggested by institutions. Both institutions and local communities were represented in aforementioned meeting.
5. MULGI VALLAVALITSUS, 14.10.2024 Nr 7-6/2024-110-1	Anname teda, et Mulgi Vallavalitsus peab oluliseks, et Eesti osaleb „Lode" tuulepargi projekti kohalikuku tasandi planeeringu KSH ja paraleelselt toimuva KMH menetluses. Planeeritud Lode tuulepargi tuulikud jäävad Mulgi valla piiri läedusse ja mõjutavada otselt meie valla elanikke. Seetõttu peame vajalikuks Lode tuulepargi KSH menetluses avaliku arutelu korraldamist.	The Estonian environmental protection authorities, as well as the Mulgi Municipality administration and residents, were provided with the opportunity to review the Environmental Report and participate in the public consultation, including the possibility of attending the meeting remotely.
6. Regionaal- ja Põllumajandus-ministeeriumit, 18.10.2024 Nr 6.2-15/4195-1	Kliimaministeerium teavitas 25.09.2024 kirjaga nr 6-3/24/4013-2 Regionaal- ja Põllumajandusministeeriumit Läti „Lode" tuulepargi projekti kohaliku tasandi planeeringu keskkonnamõju strateegilise hindamise (KSH) algatamisest. Ligi 1150 ha suuruse pindalaga Lode tuulepark asub Valmiera piirkonnas ja on ümbritsetud 3 küljest Mulgi vallaga. Antud tuulepargi projekti raames on algatatud ka keskkonnamõju hindamine, mis toimub KSHga paralleelselt. Kliimaministeerium on Lätit teavitanud Eesti soovist osaleda antud KSHga paralleelselt toimuva KMH menetluses. Tutvunud esitatud materjalidega on Regionaal- ja Põllumajandusministeerium arvamusel, et kavandatava tegevusega võib kaasneda piiriülene mõju, eelkõige kavandatud või juba rajatud tuuleparkide koosmõju ja visuaalne mõju ning seetõttu on Eesti osalemine vajalik. Lisatud keskkonnaaruande kohta märgime järgmist: • KSHs tuleb käsitleda rohevõrgustiku toimimist üle piiri;	Informative note. • Chapter 10 of the Environmental Report ("Assessment of Potential Significant Transboundary Impacts of the Planning Document") addresses the functioning of the

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		green network across the border. The chapter provides an overview of residential areas in Estonia, natural values, ornithofauna, and a landscape assessment. It also includes information on the potential noise impact and shadow flicker effect of the planned "Lode" wind park. It is considered that, to the extent possible, information about the green network on the Estonian side and potential impacts has been provided.
	• Arvestades, et Mulgi valla kaks tiheasustusala ja üks külakeskus asuvad lähedal, peab visuaalne hinnang käsitlema ka neid alasid;	• Chapter 10.1.4 of the Environmental Report, "Landscape," incorporates information from the expert opinion of landscape architect Heiki Kalberg, titled "Impact of the 'Lode' Wind Park on the Landscape in the Mulgi Municipality Area (Estonia)." This opinion was prepared within the framework of the environmental impact assessment and is fully available in the annex to the EIA report. The expert's opinion provides a detailed inventory of landscape values and an assessment of potential impacts. While evaluating the overall impact of the planned activity, the expert concludes that it is insignificant, although the surrounding landscape will undeniably change, particularly in areas closer to the planned wind park.
	• Arvestama peab ka Eestis kehtivaid müranorme, sh et Eestis asuvate elamute juures ei toimuks müranormide ületamist;	• Within the framework of the Environmental Impact Assessment (EIA), the potential noise impact on residential areas in Estonia was evaluated in accordance with local regulations. The results of the environmental noise calculations indicate that the planned

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		activities can be implemented while complying with both Latvian and Estonian regulatory requirements for noise management. However, it is expected that, if the loudest permissible turbines are installed, the noise levels in four residential areas closest to the planned wind park will exceed the World Health Organization's recommended threshold values for noise generated by wind turbines. Although there is currently no basis for imposing mandatory measures to mitigate or prevent the impacts, it is recommended to consider noise emissions during the selection process of wind turbine models to reduce the operational impacts of the planned wind park. If there are no justified reasons for selecting louder turbines, it is advisable to choose and install turbines with the lowest possible noise emission levels. Selecting quieter turbines will help to achieve or approximate noise levels in the nearest residential areas that align with the World Health Organization's recommended noise thresholds for wind turbines.
	• Planeeringut ja KSHd tuleb tutvustada ka Eesti lähimates asulates;	• The opportunity to review the documents was provided to the residents of Estonian municipalities, local government specialists, and representatives of environmental institutions.
	• Enne eestikeelsete materjalide avalikustamist vajab materjal keelelist korrektuuri, eelkõige mõistete osas	• The Environmental Report, prepared as part of the Strategic Environmental Impact Assessment (SEIA) procedure, was originally

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	(nt Viljandi rajooni territoriaalplaneering vs Viljandimaa maakonnaplaneering).	written in Latvian and is primarily intended for use within the Latvian legal system. The document has been machine-translated into English and Estonian, which may have resulted in some inaccuracies in terminology. However, the SEIA is meant to be studied in conjunction with the Environmental Impact Assessment (EIA), a more detailed document that has been translated with greater precision.

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THE DOCUMENT IS SIGNED WITH A SECURE ELECTRONIC SIGNATURE AND CONTAINS A TIMESTAMP