

ERM demonstrates itself to be the epitome of laziness and incompetence. Annex N to the EIS for the Jupiter wind farm appears to be a document that has been in the main, a cut and paste of the equivalent document for the Biala Wind farm.

As a result, this document bears little significance to this project area.

I refer to Annex N, Table 6.5 – “Detailed Bushfire Risk Assessment”, where the following is described: (My emphasis in Red, bold and underline)

**Risk: Loss of Life**

**Analysis of Risk:** Assuming that a fire escapes the development, there is a low to medium risk of fire (adversely) impacting on the surrounding life, property and environment. Residential assets in proximity to the Project are generally not vulnerable to bushfire due to their location in low hazard areas although the risk to life cannot be discounted.

These words appear verbatim in the Biala Fire Risk Assessment. Has ERM performed **ANY** analysis on the actual project area in question for **this** proposal? Any demonstration of diligence would have discovered the following fires that have occurred in the area in the last 6 years:

- Fire behind Branxton Park (Host property) allegedly caused by illegal campers/hunters, 2011
- Fire within Branxton Park (Host Property) allegedly caused by uncontained burn-off, 2011
- Fire, Sandhills Road to Mulloon (Project area) allegedly caused by Lightning strike 2013
- Fire within Branxton Park (Host property) allegedly caused by Lightning strike (Boxing Day 2015)

How can the project area possibly be dismissed as not vulnerable to fire given these four instances? If Branxton Park was a gazetted road, it would be subject to precautionary accident black-spot signage!

Since the EIS has been submitted, there have been two more major fires, both which impacted the project area and surrounds:

- Fire on Boro Road (encroached upon the project area) caused by an alleged discarded cigarette butt, and most recently,
- Fire ignited in Currandooley which burnt in excess of 3000 Hectares, threatened a large number of properties on the project boundary, and encroached onto several host properties. Incidentally, this fire allegedly ignited from within a wind farm itself.

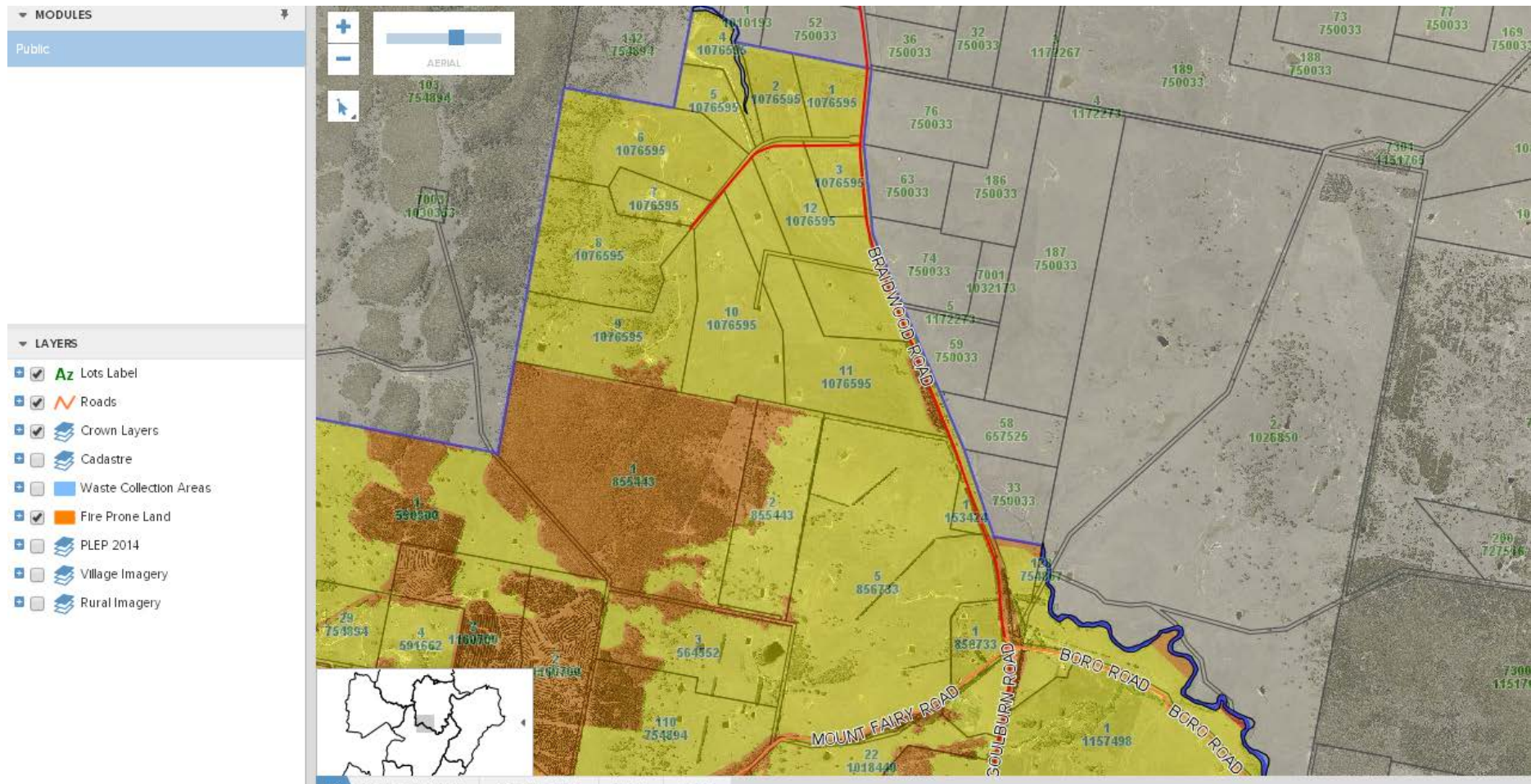
Six fires in the project area in 6 years. It is absurd that the surrounding area be deemed a low to medium fire risk. Does ISO 31000:2011 HB436 or SA/SNZ HB 89:2013 support such a conclusion? The adequate risk assessment for this area can only be assessed as HIGH at the very least.

The RFS have published a Community Resilience User Guide

([http://www.rfs.nsw.gov.au/\\_data/assets/pdf\\_file/0016/4417/User-Guide-BAL-Risk-Assessment.pdf](http://www.rfs.nsw.gov.au/_data/assets/pdf_file/0016/4417/User-Guide-BAL-Risk-Assessment.pdf)), in which they advise how to determine the bushfire risk of a property. In this document they advise that “To determine whether your property is identified as bush fire prone check council’s Bush Fire Prone Land Map”

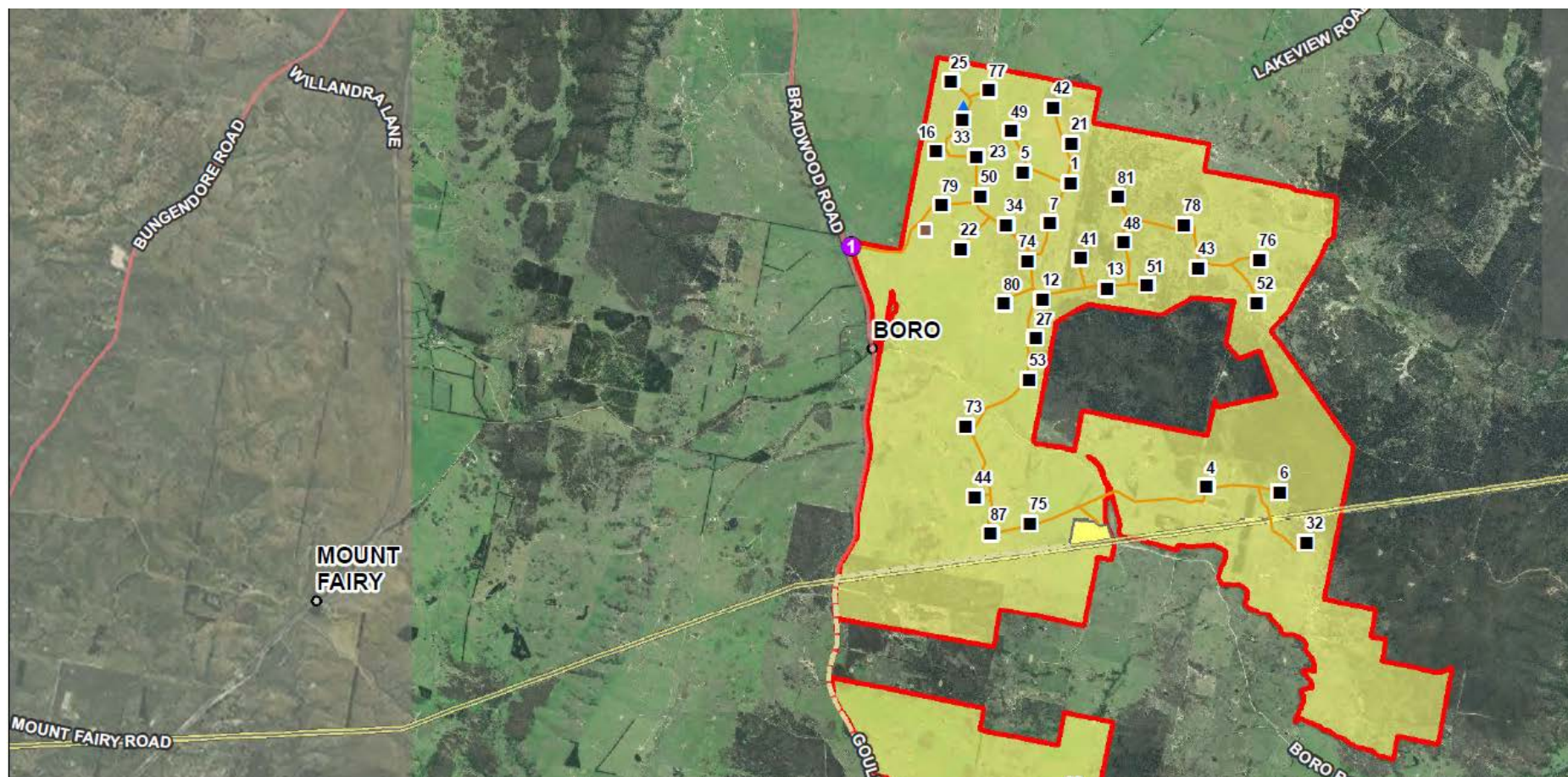
Fortuitously, Queanbeyan/Palerang Council offer this service on-line, although they only offer this within the boundary of their shire. Simple search results return the following:

## Northern Precinct:



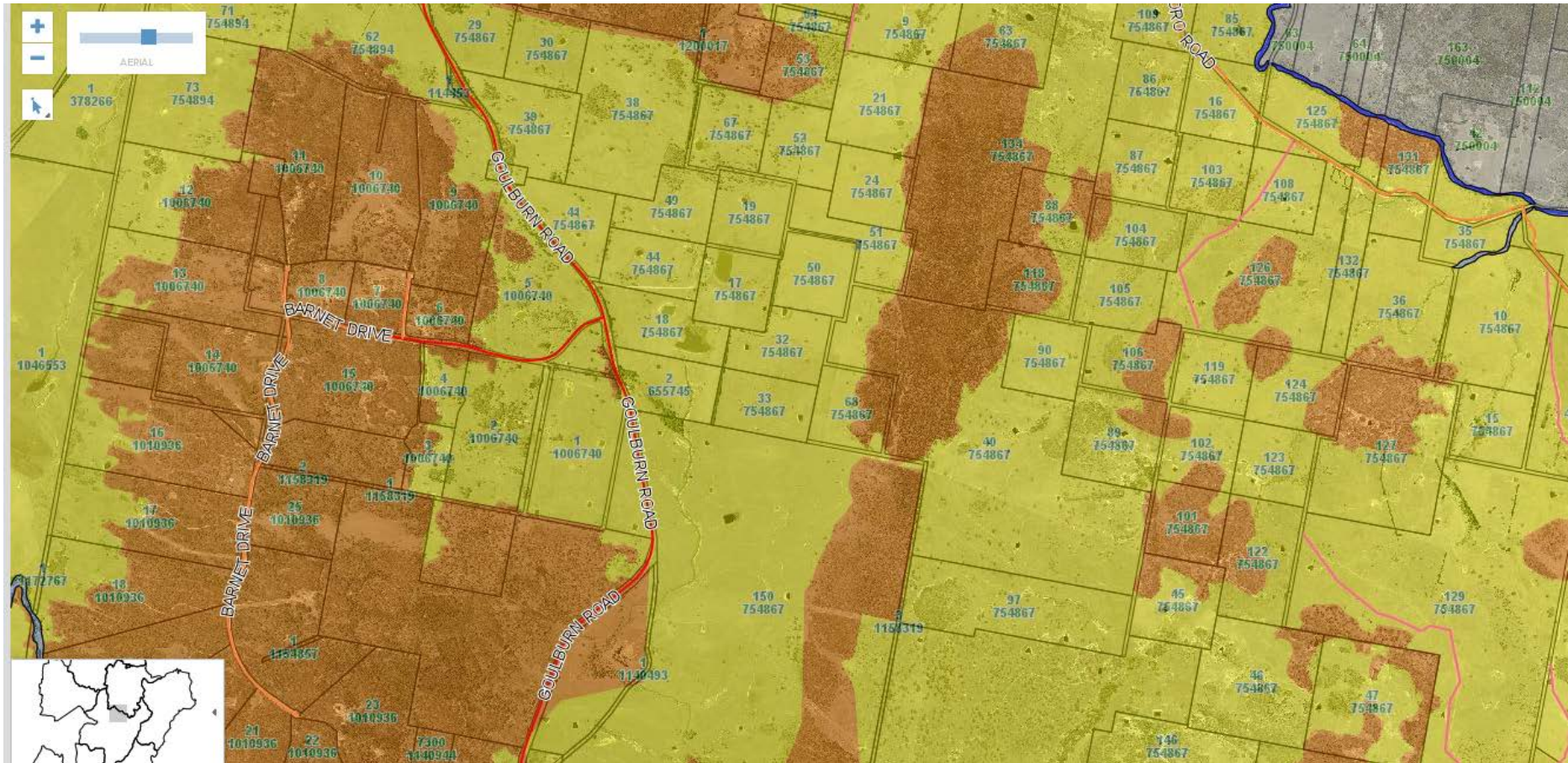
And the corresponding turbine locations: (Using mount Fairy Road and property 855443 as a reference)





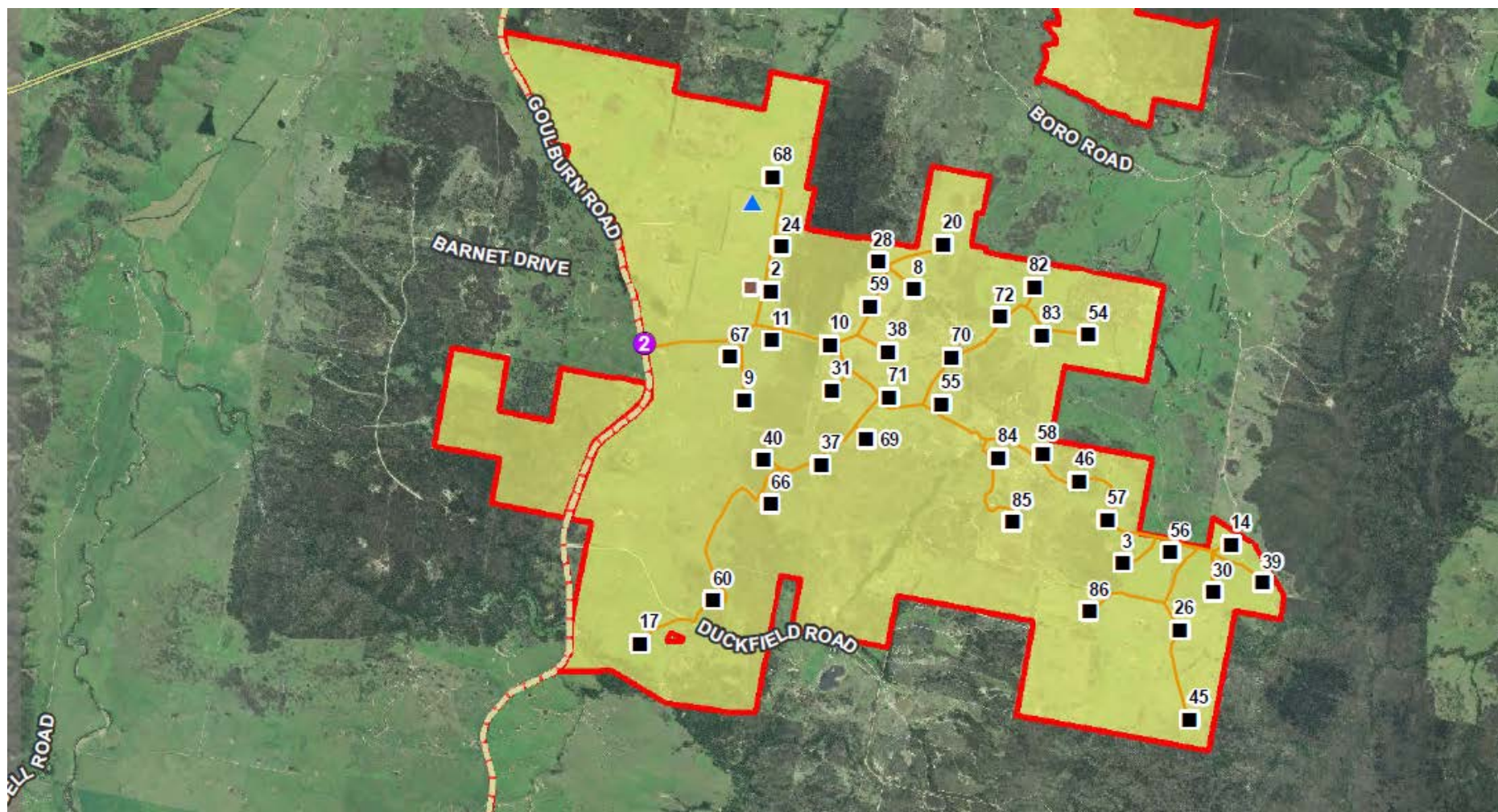


The Middle section



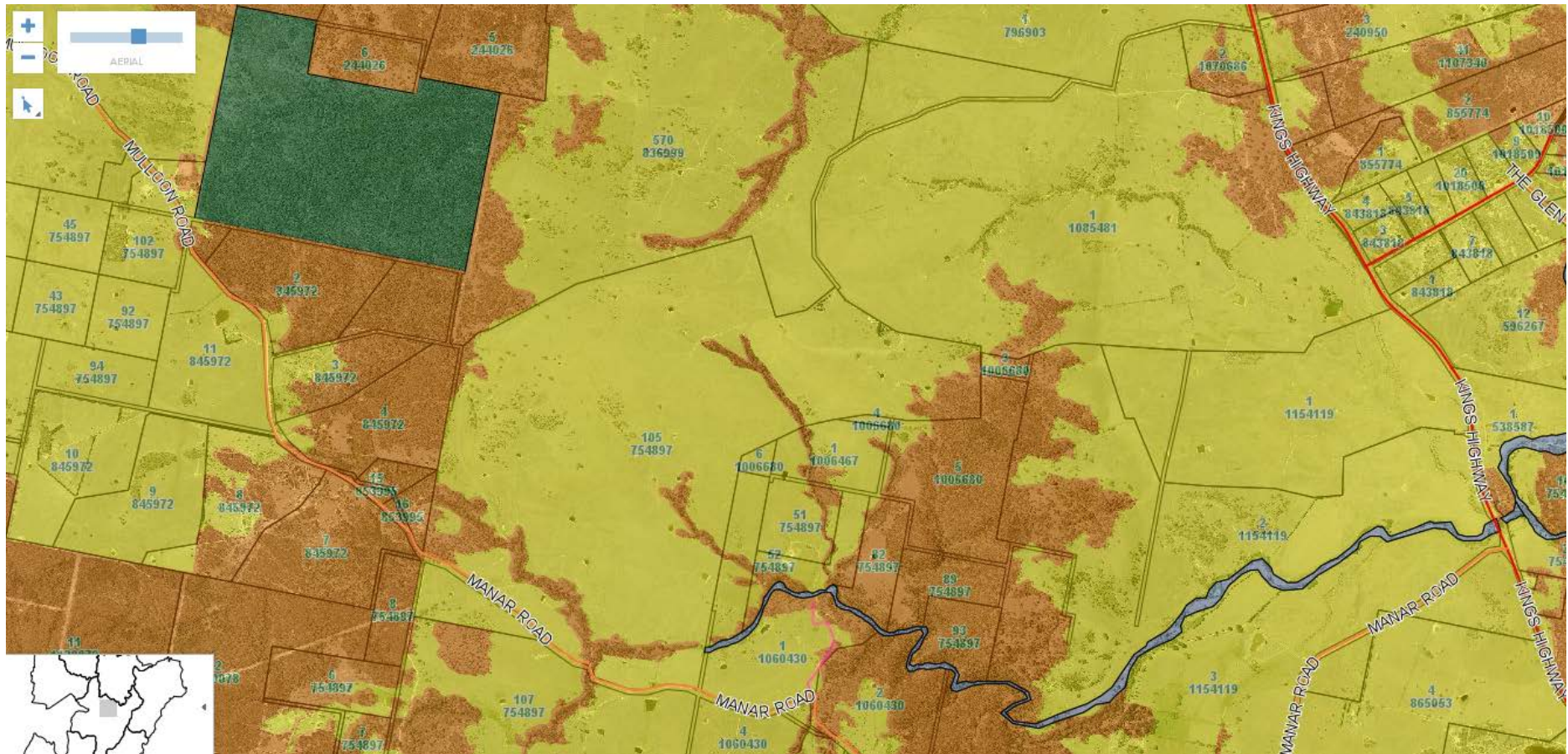
And the turbine locations (Using Barnet drive as a reference point)





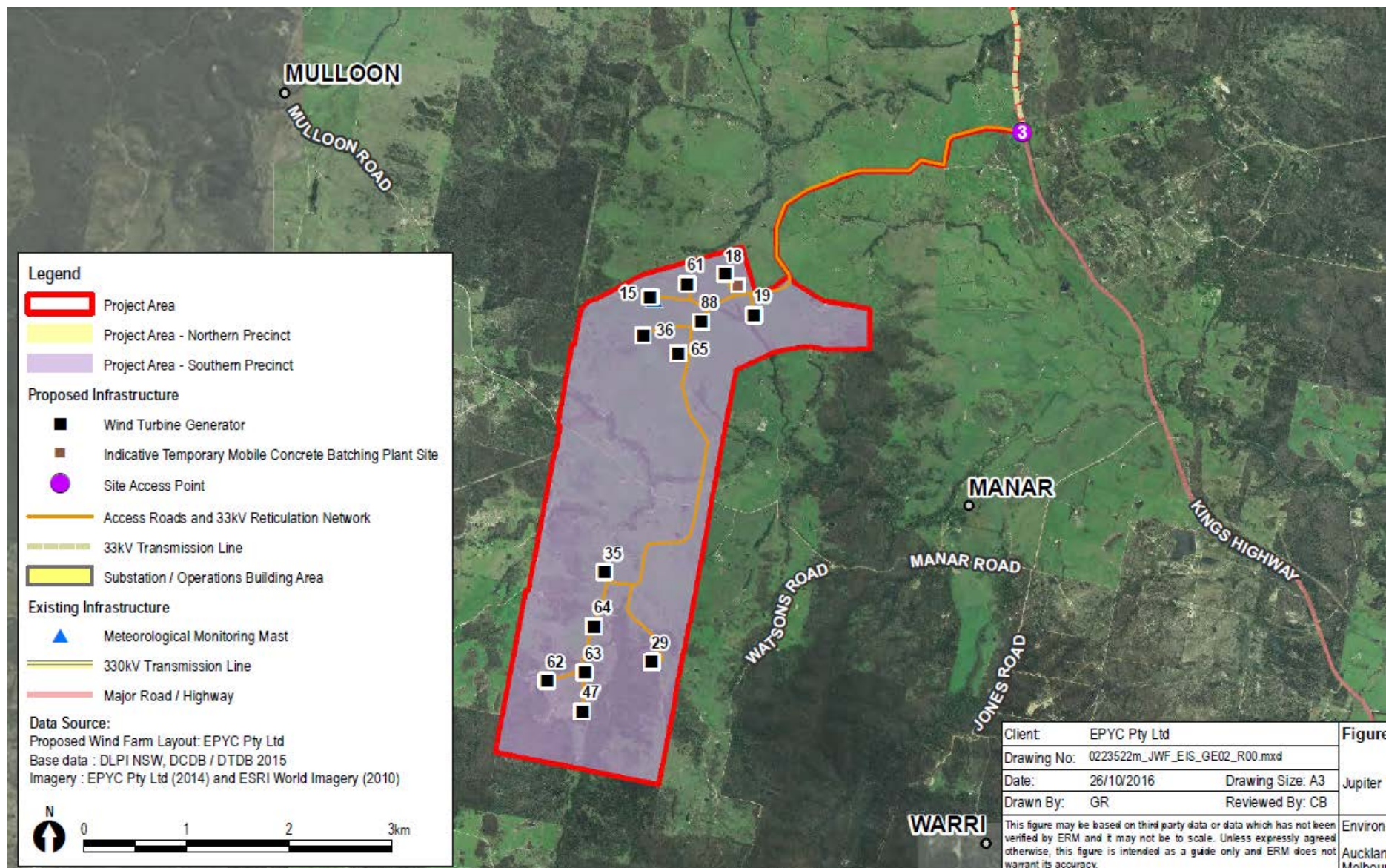


And finally the Southern section:



Using Manar Road as a reference, the turbine placement:





Not only are an incredibly high number of surrounding properties (within 4Km of a turbine) designated as a HIGH Bushfire risk, there are a number of proposed turbines to be **built within high risk areas themselves**.

Table 6.5 identified this risk as being a **risk to a loss of life**. In this context, how can it possibly be accepted that “Residential assets in proximity to the Project are generally not vulnerable to bushfire due to their location in low hazard areas”?.

## Aerial Fire Fighting

It is worth noting that 5 of the 6 fires mentioned above extensively used Aerial fire fighting to control them. Table 6.5 identifies that post-construction, all aircraft activity in the vicinity of the proposed area will be required to fly at a minimum of 500 feet above the highest wind turbine height. At this height, aerial bombing is rendered ineffective due to a reduction of accuracy and water dispersal during the fall. This will critically impact the ability of the RFS to use Aerial fire fighting in this High Bushfire Prone area. What provision will be made to compensate for the removal of this region’s primary fire attack strategy? Aerial bombing was the main reason only one property was lost to the Currandooley fire in January of this year. Without the ability to aerially attack fires, the entire project area will be at an elevated risk of fire attack, which, given its High Bushfire Prone rating will significantly increase the risk to life and property in the project area.

The Environmental and Planning Act 1979 contains the following provision

### **148B Offence--false or misleading information**

(1) A person must not provide information in connection with a planning matter that the person knows, or **ought reasonably to know**, is false or misleading in a material particular.

(2) The maximum penalty for an offence under section 125 arising under this section is a tier 3 maximum penalty.

If any semblance of astute research was conducted by the proponent it would have been revealed that the project area has an acute history of fire events, associated with a high prevalence of bushfire prone land. The proponent **ought** to have learned this, and would have, had they not cut and pasted from a previous unrelated and irrelevant document.

In my opinion, the assessment of the project area and its surrounds as a not being vulnerable to fire, given the prevalence of a history of recent fires within the project area in the last 6 years (6) and the conflicting assessment as made by the RFS and available via the Queanbeyan/Palerang council web site places this EIS chapter well beyond False or Misleading, and possibly exhibits negligence.

This EIS chapter has apparently been submitted with minimal if any research, which results in a lack of due care to the loss of life and/or property to fire. The resultant risk profile is high and the proposal must be denied in the name of public safety.