

Submission Opposing “Jupiter Wind Farm Project” - Bushfire Risk

Summary

I object to the proposed Jupiter Wind Project (Jupiter) because it will create substantial disruption to the capacity to deal with bushfires and grassfires in the Mount Fairy area where I have a residence. The EIS has not put forward a credible analysis of bushfire and grassfire risk nor a reasonable plan for mitigation of the impacts, given the high level of fire risk in this area and recent experience with major damaging and dangerous fires. Information presented in the EIS relating to bushfire is misleading and wrong.

- The benign assurance of no risk is misleading - E.18 “There will be no WTGs or supporting infrastructure located within areas mapped as high or extreme bushfire hazard and with the implementation of the prescribed measures, the risk of bushfire can be effectively managed.” - The EIS shows WTGs located immediately adjacent to areas that it defines as high fire risk, and located in areas where a proper assessment would show that the current rating of low fire risk is misleading.
- The mapping of bushfire hazard has not been carried out by anyone with knowledge or recognised authority in assessing bushfire hazard. - Bushfire risk assessment is not among the services offered by ERM according to their website and a search of their website does not reveal any expertise in conducting fire assessments.
- No account is taken of grassfire risk in the EIS even though grassfires are stated to be included in the EIS definition of bushfire.
- The proponent has not consulted with recognised authorities in the area of fire risk, particularly including senior levels of the Rural Fire Service or relevant local brigades, and has no documented results of its reported consultations.
- A Fire Management and Emergency Response Plan is yet to be prepared and consequently the public cannot make any assessment of the effectiveness of such a plan. Public reports of such a plan for the nearby Capital Wind Farm in the context of the damaging Currandooley fire reveal that it is totally inadequate.
- The EIS admits that aerial fire suppression will not be possible increasing risks to firefighters, the community and the environment. Aerial suppression has been a key factor in controlling two recent major fires adjacent to Jupiter: Lower Boro 11 December 2016 (500ha) and Currandooley 17 January 2017 (3400ha).
- Accordingly the Jupiter proposal should be rejected or approval of Jupiter should be delayed until the assessment of fire risk is conducted properly, with correct objectives, scope, study area and in consultation with the correct authorities - If the study of fire

risk is not done then there is a strong likelihood Jupiter will add to the community risks faced from fire.

- In any event, all wind turbine towers that hinder aircraft to deal with bushfire or grassfire risk should be removed from the approved project.

I call for the following actions to avoid increasing the bushfire and grassfire risk to a community already demonstrably vulnerable from fire experience over recent years:

- deny approval for the Jupiter project in the light of increased potential threats from fire due lack of thorough assessment of fire risk
- if approval is not denied, then the current EIS should be rejected in the light of inadequate consideration of fire risk in an area at the high end of rural residential settlement
- if the current EIS is not rejected, then construction or operation of Jupiter should not be allowed until a thorough documented assessment of fire risk is undertaken including properly authorised public assessments by all relevant agencies, particularly including the NSW Rural Fire Service at senior level, and public consultation on the fire risk is conducted

Bushfire Assessment Objectives - ill-informed, faulty and misleading

- 16.25 - The objectives of the bushfire study indicate, admirably, that “no human life is lost or person injured” or that “infrastructure and property is not significantly damaged”
 - However, it is unclear what the word ‘significantly’ means in this context or what an acceptable level of damage to infrastructure or property might be. The standard should be the same for infrastructure and property as for people, that there should be no damage or injury arising from any bushfire or grassfire arising in the Jupiter area.
- 16.25 - The objectives of the bushfire study indicated further that they relate to “construction, operation and maintenance of the Project” - why has this limitation been placed in the EIS? - There is an implication that there may be other aspects of Jupiter that could cause injury, death or damage, apart from ‘construction, operation and maintenance’. - Indeed the siting of Jupiter in an area that has experienced damaging and dangerous fires demands that a) the project clearly states that it will not add ANY increased risk of fire, no matter from what aspect of Jupiter; b) that that Jupiter will not in ANY way diminish the capacity to deal with fires, whether arising from Jupiter or not; and c) that the relevant assessments be carried out as professionally as possible and in full consultation with relevant authorities.

Study Area and Existing Environment - excessively narrow, misleading description

- 16.26 - The EIS claims that it has been generous in assessing an area larger than the current project area - “defined as the extent of the Former Project Area (refer *Chapter 5*), plus a 1 km buffer” - However, such an assessment should be made on the basis a thorough understanding of threatened assets (including natural features and ecosystems) as well as based on a better understanding of fire behaviour (than is displayed in the current version of the EIS) - in difficult fire conditions the rate of spread of fires may well exceed a few kilometres per hour making the current definition of the study area (plus a ‘1km buffer’) meaningless - the Currandooley fire moved many kilometres during the day on Tuesday 17 January 2017, ultimately threatening properties in the Jupiter area.
- 16.27 - Misleading description - “The Project is set in a cleared landscape dominated by rolling hills where the majority of native vegetation has been partially or fully cleared for grazing and cropping activities.” - Figure 14.1 clearly shows that there are substantial areas of forest within and near the project area and that there are a number of wind turbines located within metres of forests - In addition the description of ‘rolling hills’ is misleading because this description ignores grassland and pasture that can pose a significant fire risk. - The use of the word ‘cleared’ is misleading in the context of a fire risk assessment because it implies a lack of fuel, which is not the case for natural or improved pasture.
- 16.27 - Misleading conclusion - “The low availability of fuels across the landscape combined with the dominance of cleared grazing land and numerous roads (which act as fire breaks) would reduce the likelihood of a severe or widespread fire and the PA is mapped as predominantly low bushfire hazard (refer to *Figure 16-3*).” - The area around Jupiter has suffered ‘severe and widespread fires’ in the last three years, in precisely the same combination of landscape and fuel. These fires have involved substantial use of firefighting resources, including air resources, in order to protect the community from damage, injury and death. - The presence of local roads did nothing to stop the Currandooley fire that originated from the location of the Capital Wind Farm.
- 16.27 - Important factor downplayed - “It is important to note that there are residential dwellings on rural properties scattered throughout the landscape that may be at risk from fire.” - This sentence correctly identifies the the risks that would be faced by the large number of residences in the Jupiter area from fire, but its importance is not reflected in the conclusion that there is a ‘predominantly low bushfire hazard’. - The focus of the EIS text on defending Jupiter FROM fire occurs despite the claim that

“The Bushfire Hazard and Risk Assessment (refer *Annex M*) identified assets that occur within and surrounding the PA”.

Assessment of Impacts - wrong priorities

- 16.27 - Text of the EIS emphasises the threat of fire to the wind turbine installations and does not consider the threat of fire to the community, infrastructure or natural environment - Detailed discussion of the “defendable space (fuel reduced zone) will be maintained around each of the substations and compounds” - that the Currandooley fire originated from the Capital Wind Farm site contradicts this benign perspective.

Fire Management and Emergency Response Plan - assessment is incomplete

- 16.28 - “A Fire Management and Emergency Response Plan will be prepared, in consultation with the local RFS, including an assessment of the existing road network and adequacy of the existing fire breaks.” - Why is such an important assessment being delayed until after submission of the EIS and potentially approval for Jupiter? - Who will be responsible for considering and approving such a plan once consideration of the EIS and the public consultation period is concluded? - There needs to be an opportunity for full public consultation of any such plan PRIOR to approval of Jupiter and its EIS.

Aerial fire suppression - inhibited

- 16.28 - The EIS admits that aerial fire suppression will not be possible - “While installation of WTGs may inhibit aerial suppression of fires over the wind farm itself, the alternative management practices as recommended will take advantage of some of the Project infrastructure and aim to improve the overall fire control capabilities.” - Aerial fire suppression is becoming increasingly important with the impressive array of air support options available to the NSW Rural Fire Service - on 12 and 13 December there was a bushfire and grassfire that occurred in the eastern part of the Jupiter Northern Precinct where fixed wing and helicopter air resources were used to bring the fire under control and avoid further risk to the community and the environment. These resources included the Southern Belle DC10 air tanker that was flying at low altitude. - Such low altitude air support would not have been possible in the confused and low visibility fire conditions had the Jupiter wind turbines been in place - Air support now provides an essential factor to contribute to firefighter and community safety as was demonstrated at the Currandooley Fire on 17 January 2017.

- 16.28 - The EIS admits that fires are possible to escape the Jupiter area to adjoining properties - "In the unlikely event that a fire did spread from the PA to surrounding properties, the WTGs would not limit aerial fire- fighting capabilities on other properties in the area surrounding the wind farm." - The comment that escape from the Jupiter area is 'unlikely' is totally misleading when fires spread quickly in difficult fire weather, as demonstrated by the Currandooley fire.
- 16.28 - The EIS admits that there is the potential for death, injuries and widespread damage from any fire that escapes the Jupiter area - "Assuming a fire 'escapes' the wind farm, there is a low to medium risk of fire (adversely) affecting surrounding life, property and environment. The highest risk rating scored was medium, being:
 - the possible chance of fatalities or major injuries to life within or surrounding the PA; and
 - the possible chance of widespread damage to infrastructure within or surrounding the Project."
- 16.28 - No mitigation measures are presented in the referenced section of the EIS - "It is these identified bushfire risks that require specific management and mitigation (treatment) measures as outlined in *Section 16.6.5*." - There is no section 16.6.5 in the EIS. - Mitigation measures are discussed in section 16.7.6
- E.16 - Fixed wing aviation excluded from the Jupiter area - "Whilst the Project may affect the fixed wing agricultural operations within the PA"
- P35 - Because the wind turbines pose such a hazard in smoky conditions, aircraft will be excluded from the Jupiter area and, presumably, a large safety buffer area around Jupiter - "Aircraft would therefore not fly within close proximity to the wind farm in smoky conditions and the turbines are not considered to pose any increased risk to aerial firefighting capabilities."

Stakeholder Engagement and Consultation

- E.10 - Community and Stakeholder Engagement "Key agencies consulted" - does not include the NSW Rural Fire Service
- P14 - "Consultation with the NSW Rural Fire Service former Palerang Local Government Area (Lake George office) was undertaken on Tuesday 6 January 2015."
 - no record of these consultations, who represented the RFS or their conclusions has been presented.

Bushfire Risk

- E.18 - Bushfire risk - ERM “risk of fire from wind farm developments is considered low”
 - what about reduced capacity to fight fires from lack of access by fixed wing aircraft?
 - Currandooley fire shows that very damaging fires can originate from wind farm areas.
- Current discussions of the cause of the Currandooley fire, which originated in the area of the Capital Wind Farm, have indicated that overhead power lines in the area contributed to ignition of that fire.

Grassfire Risk - misleading classification

- 16.29 - In Figure 16.6 - Bushfire Hazard Classes areas of grassland and pasture are shown as ‘low’ Bushfire Hazard Class - grassland is exactly where many fires of human origin start and where much of the damage from the Currandooley fire occurred.

Mitigation measures - lack of commitment

- 16.30 - EIS includes equivocal wording in respect of essential safe working procedures to protect against fire - “safe working procedures and emergency response procedures should be developed and strictly implemented for all work tasks”
 - When the EIS says that these procedures SHOULD be implemented, who will implement them and when will a full commitment be made? - The word SHOULD continues to be used in relation to other mitigation measures
- 16.31 - EIS admits that mitigation measures will not eliminate fire risk - “Despite the treatments that are put in place (above) some bushfire risk will remain” - “The emergency plan will be developed in conjunction with relevant stakeholders, including local fire services, adjoining property owners and employees” - Jupiter EIS, construction and operation should not be approved in the absence of a proper assessment of fire risk and full public consultation.

Annex N

- Annex N is shown as prepared by “Joanne Woodhouse, Senior Consultant, Ecology and Biodiversity” - a search of the background of Ms Woodhouse does not show any

expertise in relation to fire risk assessment or experience in relation to bushfires or grassfires

- Disclaimer - "This report has been prepared solely for use by, and is confidential to, the client and ERM accepts no responsibility for its use by other persons." - does that mean that ordinary citizens, DPE and the PAC are excluded from directly accessing or using this material? - Does this mean the consultant is deliberately writing material for the EIS in a way that makes it impossible for the community to understand and make informed decisions? It is possible that the consultants have been wrongly briefed about the role of the EIS.