Objection to EPYC Pty Ltd - Jupiter Windfarm Project

Firefighting Impacts

I wish to submit my objection to the subject Project because of the proposed industrial windfarm's impact on firefighting efforts to contain/extinguish bushfires.

In Dec 2016, a bushfire erupted in the Boro district of the Southern Tablelands of NSW. The bushfire destroyed several hundred acres of bushland and farmland.

On 17 Jan 2017, a bushfire erupted on 'Currandooley', a property located east of Lake George and owned by a local wind turbine host. The landowner hosts 10 wind turbines of the Infigen owned Capital Wind Farm. This bushfire eventually destroyed a home, burnt out some 3,400 hectares, shed and farm equipment and killed several hundred sheep and cattle.

During both these events the RFS utilised the services of many helicopters and two fixed wing aircraft to disperse either water or fire retardant on the fire to bring the blazes under control and to eventually extinguish the fires.

The fixed wing aircraft were a converted DC10 named 'Southern Belle' a C130 Hercules named 'Thor'.

Both aircraft have capacity to approach fires from any required direction and descend to about 195 feet (60M) or lower to dump their payload in the required area. It is reported that some pilots descend to about 45M.

For the Boro and Currandooley fires, both the aircraft were able to deliver their payloads of water or retardant on both fires without hindrance or obstruction, providing invaluable assistance to the 'on the ground' firefighters.

The DC-10 aircraft is capable of dumping its payload in a line 91m wide by 1.6km long although the spread of retardant/water is determined by the 'on the ground' requirements and controlled by the pilot and the plane's computer. Nevertheless, tests have shown that the lower the flight path, the more even the density and distribution of retardant. Naturally, landforms and other obstructions as well as the prevailing wind direction and speed will impact on the direction the aircraft can approach the drop zone and how low the aircraft can descend to deliver an effective payload.

EPYC are proposing to build a windfarm in the general area of Tarago all the way down to the Kings Highway which encompasses the districts of Boro, Lower Boro, Barnet, Mount Fairy which coincidentally is the general vicinity of the Dec 16/Jan 17 bushfires.

My contention is that should the proposed windfarm go ahead with its 173M turbines, in dense concentration littering the landscape of these districts, as is planned, then aerial firefighting using Thor and/or Southern Belle will be drastically impeded. The wind turbines will impact the approaches, the payload dumping zones and the subsequent climb away of these aircraft.

The means available to the firefighters to manage bushfires in the areas of windfarms will be limited to using much smaller fixed wing aircraft and helicopters to deliver vastly smaller quantities of water/retardant. This will mean much longer missions for the firefighters and probably vastly more areas of destroyed land, property and animals.

In EPYC's EIS it is claimed that the NSW Fire authorities have stated that aerial fire-fighting does not play a major part in rural/bush firefighting but that ground forces do most of the work.

I suggest that the claim is erroneous. In both the bushfires mentioned above aerial services were called for and employed within just a few hours of the fires breaking out. Ground forces were unable to contain the fires in the prevailing conditions. Had it not been for aerial bombardment using large fixed wing aircraft and helicopters the fires would not have been contained in a relatively short period, to a point that allowed the ground forces to get 'on top' of the blazes. Indeed, the Currandooley bushfire would not have been arrested at the Goulburn-Braidwood road had it not been for large quantities of retardant being spread by large fixed wing aircraft. This effort then allowed the ground forces to contain the fire from burning further to the east of the road and possibly continue on for days leaving a path of destruction.

It is common practice for large fixed wing aircraft to be utilised in firefighting efforts.

EPYC approached the former Palerang Local Government Area (Lake George Office) Fire Control Centre for assessment and management recommendations. EPYC also declared consulting with the NSW Rural Fire Service (for Palarang Local Government Areas (Lake George Office)). For a State Significant Project such as this, which will have a significant impact on this Region, formal advice should have been sought from and provided by the NSW Rural Fire Service Head Office not local representatives whose qualifications are not known and may have provided their own personal views rather than views sanctioned by the NSW Head Office. EPYC, through their consultants ERM, has chosen to cherry-pick/shop for answers in their efforts to meet the EIS requirements. EPYC's and ERM's report should not be taken as factual, particularly when EPYC's consultants are notorious for cutting and pasting assertions from previous projects they've worked on.

I urge the Department to reject the DA for the Jupiter Industrial Windfarm because the numbers of wind turbines, the density of their placement and the height of the turbines will impede aerial firefighting efforts particularly where large fixed wing aircraft are to be utilised in the firefighting effort.

I strongly suggest that windfarms are not the answer to renewable energy and that the Department should not approve any further windfarm development in NSW including EPYC's Jupiter Industrial Windfarm Project.