



Uarbry Tongy Lane Alliance Inc.

11 May 2025

Independent Planning Commission

Re: Valley of the Winds

Dear Sir/Madam

We note the Department's response of 1 May with regards to the IPC's request on 17 April *"... can the Department please confirm that there will be no operational impacts of aerial firefighting arising?"*

Their response, notably, does not make a judgement on whether aerial firefighting will be impacted. Their conclusion, in fact, does not refer to aerial firefighting at all but states that the Recommended Conditions of Consent will make it *"unlikely to result in any significant aviation hazards or impacts to aerial activities"*.

The Department refers to the Applicant's aviation assessment which admits that aerial firefighting operations are conducted lower than 500 feet and in reduced visibility. It then puts the whole process of aerial firefighting under risk management to ensure safety can be maintained – i.e. the aerial organisation will have a position on operating near wind turbines and/or the pilot in charge will make a risk analysis at the time and their own decision. In his submission to the IPC, Grant Piper provided statements from two operators that have instructed their pilots to stay away from wind turbine project areas for safety reasons. In his presentation to the IPC, Grant Piper also provided a video of an aerial tanker flying at less than 200 feet putting out a nearby fire in 2024. As a professional pilot with over 6000 hours of flying time including as a military pilot flying a Hercules aircraft (which are also used in aerial firefighting), and operating at low level (both during his military service and in his civil operations), he has stated that an aviation risk assessment will undoubtedly mean that large airtankers will stay well clear of the turbines, thus negating their firefighting effectiveness. RFS and AFAC continue to ignore this reality and DPHI do not compel them to examine the subject with the appropriate due diligence.

The Department refers to the AFAC position paper which, based on the Waterloo wind project incident is :

- a) Outdated – it refers to turbines 150-165m high. Turbines in the applicant's proposal are 250m high.
- b) Not relevant (1) – the layout of the Waterloo wind project is a single row of turbines. The applicant's proposal is over 130 scattered wind turbines, adjacent to another wind project with 185 scattered wind turbines.
- c) Not relevant (2) – the terrain of the Waterloo wind project is on a single low lying ridge adjacent to flat grasslands. The applicant's proposed project is on multiple ridges and hills in a vast area, adjacent to more hills, ridges and valleys.

Once again, we refer to Grant Piper's submission where he outlines why the AFAC "study", based on an article in a pro-renewable publication, is not fit for purpose.

Chair

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