

IPC Submission - SSD 9679 Hills of Gold Wind Farm (HOGWF) OBJECTION

I'm an owner of a property on Morrisons Gap Road, identified as NAD 24 and I object to the Independent Planning Commission (IPC) issuing consent for this proposed wind energy development.

I do not agree with the conclusion drawn by the Department of Planning & Environment (DPE) that this project is in the public interest.

Broadly, the remaining unresolved issues are:

- Traffic & Transport
- Decommissioning
- Bushfire
- Biodiversity
- Socio economic
- Visual

The Applicant's 2018 Scoping report proposed 97 wind turbines.

The Department's 2023 Assessment report and Determination recommends 47 wind turbines.

A **48.5%** reduction in the number of turbines from the original 97 clearly demonstrates the prospective and opportunistic approach the Applicant has taken when seeking an approval.

It is precisely this opportunistic approach the Australian Energy Infrastructure Commissioner (AEIC) Andrew Dyer criticises as unjust and detrimental to the advancement of renewable energy in Australia.

The recent independent review undertaken by Andrew Dyer (*Community Engagement Review Dec 2023*) has made 9 recommendations, of which the Minister for Climate Change & Energy Hon Chris Bowen (*2/2/24 Press release*) has stated his Government agrees in principle to implementing.

I highly recommend the Commissioners refer to the Dyer Review to help provide guidance and additional context for the unsuitability of the site for the proposed HOGWF. Dyer highlights the importance of considered and appropriate siting of wind farms to avoid protracted assessment times and community aggravation.

The Applicant and Department tout the ongoing changes throughout the assessment process have been "refinement" and design brilliance to deliver a better project.

I beg to differ. The protracted assessment process of the HOGWF is evidence in itself that this project is the result of poor site selection, and the "refinement" has been essential to the desperate attempt to achieve statutory compliance.

Traffic and Transport

The confusion that exists regarding the transport route from Nundle to the site of the proposed HOGWF can only be described as comical.

The local community, Tamworth Regional Council, the Department, even the Applicant all have conflicting and different understanding of something that should be simple.

The Applicant has stated the site access from Crawney Road is the **only** route suitable for delivering turbine blades. All other OSOM vehicles except for the turbine hub OSOM vehicles are proposed to use this route.

Therefore, the Crawney Road **must** be suitably upgraded to facilitate the delivery of the turbine components, or the project cannot be built. Crawney Road upgrade is therefore an **essential** and **unavoidable** impact.

The Applicant has also proposed to use the Hanging Rock/ Barry Road/ Morrisons Gap Road for turbine hub OSOM vehicles, heavy vehicles including B doubles and light vehicles to access the northern end of the site.

ALL of these vehicles **could** access the site via Crawney Road.

Restricting site access to Crawney Road **only** would directly benefit the local community by:

- Removing 15km of local road from construction traffic impacts.
- Removes road noise and amenity impacts to Sheba Dams camping ground, as well as traffic interaction with Hanging Rock road walkers and vehicle movements around the entrance to Sheba Dams camping ground.
- Removes 15km of Tamworth Regional Council road network exposed to Heavy vehicle damage.
- Removes interaction of construction traffic with School Bus service and logging trucks.
- Removes delays, inconvenience and interaction with Hanging Rock residents and tourists.
- Maintains the existing quiet amenity to the residents who front the 15km of the Hanging Rock route.
- Avoids the **permanent** alteration of the scenic values to Morrisons Gap Road and maintains the existing native roadside vegetation.

The Applicant and Department justify the two site access routes as being required to spread the load of traffic numbers during the construction period.

I challenge this justification is not supported with robust evidence as to why two heavy vehicle access routes are required to the HOGWF site from Nundle.

The proposed Crawney Access is apparently fit for OSOM vehicles. This access should also therefore be able to accommodate **all Heavy Vehicles**.

The main host landholder has in excess of 4000 Ha available for the Applicant to ensure Heavy vehicles leave the site in a forward direction. The local road network and neighbouring residents should not

have to endure unnecessary additional traffic and amenity impacts because it is more convenient for onsite constructability.

Consent condition **B35(c)(ix)** states “*details of the employee shuttle bus service (if proposed)*” implies the use of construction worker shuttle buses is optional.

The use of Worker shuttle bus travel at the construction of the Maules Creek Coal Mine in 2013/2014 was mandatory, except in exceptional circumstances. This specific condition was imposed on the mining company to remove unnecessary light vehicle traffic from the local road network and is very effective. All construction and operational mine traffic, including OSOM vehicles were permitted to only use a single access point to limit use of local road infrastructure as much as possible. If the Planning and Assessment Commission thought it appropriate in 2012 to restrict access to a large mine development, the precedent is set to apply to all projects with high impacts to local roads.

Consent condition **B35(c)(ix)** should have “(if proposed)” removed and a condition to state “*the Applicant **shall** use shuttle bus services or group travel to minimise the use of Light Vehicle movements*”.

Consent condition **B30** should be amended to state site access is restricted to:

“The Applicant must ensure that all OSOM and heavy vehicles associated with the development access to and from the site is via New England Highway, Lindsays Gap Road, Nundle Road, Crosby Street, Oakenville Street, Innes Street bypass, Jenkins Street and Crawney Road.”

“Light vehicle and emergency response vehicles only are permitted to use Old Hanging Rock Road, Barry Road and Morrisons Gap Road.”

The prudent use of shuttle buses and b-doubles would limit traffic volumes to a minimum on Jenkins Street and Crawney Road. The Applicant should also be proactive and offer “**impact agreements**” to residents along this route to compensate for the impacts they will suffer.

Restricting access to a single access point would limit disruption to the local road network to an absolute minimum and avoid **permanent** and irreversible impacts to Hanging Rock, Barry, and Morrisons Gap Roads.

Decommissioning & Rehabilitation

Condition B49 states the desired objectives the applicant must achieve at the end of the decommissioning & rehabilitation process. Whilst the overall objectives of condition B49 satisfy current Government policy, demonstration of how these objectives are to be achieved remains unclear and is of significant concern to the local community.

I note the Applicant has stated to the IPC Commissioners at the Nundle Public Hearing (02/02/2024) ENGIE has a strong commitment and track record demonstrated by their current rehabilitation to the old Hazelwood Coal Generator site, therefore the public should be reassured when the decommissioning phase arises ENGIE will meet the B49 Condition.

ENGIE's commitment may well be genuine however, given that the operational life of the proposed wind farm exceeds 30 years it is entirely reasonable to expect the ownership of the generation assets could change hands any number of times during the operational phase.

Any future owner may not necessarily have the experience, commitment, or financial resources that ENGIE espouses, thereby potentially becoming problematic for the host landholders or the NSW taxpayer, as they could be left paying for the decommissioning in the event of any future ownership failure.

To address this issue, a condition of consent "***requiring the applicant or future owner to demonstrate to the planning secretary suitable funding for decommissioning is available for the life of the project***" should be imposed.

Exactly how proof of funding is achieved is at the discretion of the applicant/ future owners.

For guidance, perhaps the IPC can consider the proposed SSD-10315 Bowmans Creek Wind Farm proposal to set up a Decommissioning Fund. In this case, the applicant deposits funds to an independent third party, beginning at commencement of construction with the aim to reach 100% of Decommissioning and Rehabilitation costs after 10yrs.

The added condition of consent would give certainty to the NSW Taxpayer, local community and host landholders that the future decommissioning liabilities are fully funded and the objectives of condition B49 are likely to be fulfilled.

Bushfire consent inconsistencies and additional concerns.

The Departments recommended conditions of consent are inconsistent and do not reflect the commitments the Applicant has made in the EIS. The NSW RFS issued approval based on the commitments made in Appendix K. The conditions of consent should reflect the RFS consent.

(Extract from Amendment Report Appendix K Bushfire Assessment)

“6.6 Water Storage

*Water supply should be designed to provide filling points for fire tanker units near the wind farm entrance and at the O&M Compounds. **A minimum combined storage of 50,000 litres is recommended for the site, based on refilling an approximate of six tanker units (4,000 litres) twice each. Noting that the final requirement will be confirmed by NSW RFS prior to the commencement of construction. The large dam on Nycooma (31° 37.781'S 151° 8.476'E) was used as a water supply for both vehicles and aircraft during the 2019/2020 bushfire season. As the wind farm development aims to increase the accessibility of the ridgeline to fire fighters and improve strategic fire advantages that already exist, access to water will be maintained such that existing water resources will remain available at all times to support firefighting activities. The requirement for any additional open water supplies (i.e large dams) to be provided along the ridgeline will be confirmed in consultation with NSW RFS. A preliminary figure showing Fire Control Advantages as outlined within the Ben Halls Gap National Park Fire Management Strategy (2005) is provided in Figure 6.1 as a basis for ongoing discussions. It is important that the locations of these additional water supply points (if required) are carefully considered as they require a catchment area to ensure they remain full during the summer months yet they also need to be near the top of the hill rather than in a valley because it takes a lot of power to lift. Extremely hot conditions also exacerbate the lifting difficulty for aircraft. Helicopters also require an obstacle-free area on approach and departure from a water point. This varies with wind direction and has been considered in the aviation report.”***

Conditions of Consent **B44(b) (ii)** states **20,000 litres water supply.**

This should be increased to **50,000 litres** as per Appendix K.

Additionally, as per **Appendix K**, *“the large dam on Nycooma (31° 37.781'S 151° 8.476'E) is to be maintained for ridgeline aerial water supply.” This must be an added condition to safeguard retention, as this was one of the only reliable ridgeline water points during dry periods available for firefighting.”*

I ask the Commissioners to consider the advice (NSW BCD & NPWS 20/1/23 Agency response to EIS) given to the Applicant of the nearby SSD-10471 Winterbourne Wind Farm regarding offsetting turbine locations to a **minimum of 600m from a National Park Boundary**. This offset distance allows fixed wing aircraft to operate to suppress bushfires as they require a minimum of 500m separation distance from a turbine to operate. The setback also enables helicopters working space for firefighting, pest management and search and rescue operations to the National Park. The setback also assists avoidance of impacts to avifauna from blade strike and barotrauma.

The **600m** setback also comfortably enables a 400m exclusion zone to be designated around a turbine in the event of a turbine fire. Recently in SA, at the Clements Gap Wind Farm, burning debris was

thrown into the air during the fire event, quickly spreading to the surrounding landscape. A 400m exclusion area around the burning turbine was required to protect the firefighters from falling debris. (source: <https://www.abc.net.au/news/2024-02-07/pacific-blue-clements-gap-wind-farm-turbine-fire/103438850>)

This recent fire event clearly demonstrates the proposed 130m/ 200m offset to the BHGMR is inadequate to protect the flora and fauna of the reserve from fire and falling debris in a relatively rare, but high consequence event.

The ABC footage of the Clements Gap Wind Farm fire demonstrates how fortunate they were to have fire crews on site after 15 mins, favourable weather conditions and relatively clear open terrain/ grassland to contain the grassfire. A distinct contrast to the steep, mountainous and forested areas that surround the HOGWF.

Whilst I appreciate the NSW RFS assessment team consider the current HOGWF turbine layout satisfactory to enable aerial suppression in fire events, this desktop review has instilled little confidence the local area will not be subject to reduced aerial suppression capability.

The local RFS people who drive the red truck and hold the firehose suggest the BHGMR and surrounding area will now be subject to reduced aerial suppression availability due to turbine placement on the ridgeline.

The conditions of consent should be amended to stipulate a **minimum 600m** offset from a wind turbine base to the surveyed boundary of BHGMR and CNP reserves.

Biodiversity Impacts

From the moment the Hills of Gold Wind Farm (HOGWF) was proposed, myself and many others in our community and afar have had serious concerns relating to the unavoidable or “residual” Biodiversity impacts, particularly to bird and bat species.

I acknowledge the Department, BCS Team, NPWS and other Governmental agencies have consulted with the Applicant extensively regarding this issue, however that should not automatically infer these concerns have been adequately addressed.

The Applicant and Department are placing heavy reliance on the use of the NSW Biodiversity Offset scheme. Whilst this project may be technically compliant, will compliance provide **meaningful** and **effective** mitigation to biodiversity impacts? When a simple GOOGLE search for “NSW Biodiversity System failure” returns dozens of news articles, independent reviews, and academic papers damning of the effectiveness of the NSW Offsetting Scheme, how can the community have any **confidence** this project is meeting the objectives of the EP&A Act and is in the Public Interest?

I ask the Commissioners to consider the research of Professor William Rees from the University of British Columbia Canada, the originator of the term “Ecological Footprint” and an expert in sustainable socio-economic development.

Rees' work is the foundation for global planning principles that are generically termed Ecologically Sustainable Development or ESD, which has made its way into the NSW Planning System as a “matter of consideration” in development assessment. Professor Rees' helps provide context for humans' impact on the biophysical world.

A simple exercise Rees often asks people to consider is this. At the dawn of modern civilization, approximately 10,000 years ago the world's terrestrial mammal biomass consisted of 1% humans and 99% wild animals.

In 2016, wild mammals made up just 1.5% of terrestrial biomass, humans 32%, cattle 45% and 21.5% other domesticated animals. The totality of biomass has also increased substantially in this period. The above statistics directly suggest human development and encroachment into the natural world is destroying it.

I strongly urge the Commissioners to take 20 mins and watch Professor Rees 2019 presentation titled “Storm Approaching! Overshoot, the Energy Conundrum and Climate Change [Storm Approaching! Overshoot, the Energy Conundrum and Climate Change - Bill Rees](#) (Source: <https://www.youtube.com/watch?v=EwBXFmXwFSk>)

The takeaway from Professor Rees' presentation is the notion of “**Overshoot**”. Overshoot is a term Rees uses to describe how human development and encroachment into our natural biophysical world is detrimental to humans' very existence. Whilst it may be a noble pursuit to address climate change, of far greater importance is addressing “Overshoot.”

I therefore put it to the Commissioners that it is an absurd notion that the proposed HOGWF is in the Public Interest as the objectives of the EP&A Act. have not been met.

Specifically, the following objectives in section 1.3 of the Act have not been met;

a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,

(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,

Australia is a world leader in allowing our native species to become extinct or endangered. Human development and encroachment into native habitat is one of the leading causes for this sad and troubling fact.

One does not have to search far to establish there is robust academic study confirming our native species decline is directly correlated with habitat destruction/ fragmentation and species dislocation.

Decades of development which is broadly compliant with State and Federal Biodiversity legislation has failed to halt our native species decline, numerous academic and parliamentary reviews and audits confirm the system has failed to deliver the intended outcomes.

The Applicant's EIS documents and Department's Assessment report have claimed the surrounding 28,000 - 30,000ha of NSW State Forests and Nature Reserves in the broader landscape will support any residual biodiversity loss to the adjoining Ben Halls Gap Nature Reserve (BHGNR) and Crawney Pass National Park (CPNP).

Little weight should be given to this misleading claim. Of the 30,000 ha of surrounding reserves just 2,000ha or approximately 6.5% is high integrity native vegetation, protected in Nature Reserves with the balance either exotic plantation timber or land that is designated for native timber harvesting and therefore not secured in perpetuity for biodiversity conservation.

The Applicant is requesting the consent authority grant permission to effectively undertake a science experiment on our native species that reside in the BHGNR, CPNP and surrounding landscape. If our native flora and fauna cannot be safe in a dedicated National or State reserve, then where? Unfortunately, avifauna are not cognizant of human defined boundary lines and setback/ buffer zones to be observed for their survival and wellbeing.

I acknowledge condition **A10(d)** limits blade tip clearance to a minimum of 130m from any BHGNR boundary. However, I disagree this is adequate separation.

The Department appears to be inconsistent when providing applicants with guidance regarding the minimum setback distances to turbine siting.

I refer the Commissioners to advice given by Biodiversity and Conservation Division (20/01/23) to the Applicant of SSD - 10471 (Winterbourne Wind Farm) in response to their exhibited EIS.

Advisory point **31** stated *“No turbines are to be located within at least 500m of the National Park boundary.”*

The principal control measure proposed to address bird and bat strike is the implementation of a Bird and Bat Adaptation Management Plan (BBAMP).

The only technical evidence the Applicant has publicly exhibited to demonstrate exactly how the proposed BBAMP will operate is nominating the use of “Smart Curtailment” and “Technology”. These are nothing more than buzzwords.

The applicant has failed to publicly cite robust evidence to support their claim turbine curtailment to manage bird and bat strikes is both feasible and effective in the Australian environment. The Applicant and Department are assuming the European curtailment experience will be effective in an Australian context, despite vastly different environments and species. Have we not learnt anything from 230 years of European ideological imposition?

I ask the Commissioners to perform a simple thought experiment. How is the Applicant going to reliably locate the carcasses of microbats, (*for reference, think mouse*) in the surrounding area of at least 18 moderate collision risk turbines?

With a sniffer dog the Applicant may say.

How often? We will conduct searches as necessary.

What does that mean?

Unless targeted surveys are conducted daily, over a meaningful period of time (several years), the effectiveness of a curtailment regime is nothing more than a token gesture.

What we do know, from carcass surveys conducted at operational wind farms in VIC and TAS, is that the actual fatality rates of birds and bats are significantly higher than predicted at the project assessment stage. What are these jurisdictions doing about the fatalities? Ongoing monitoring and more monitoring of excess deaths!

The Applicant has had 6 years to provide peer reviewed Australian studies into the effectiveness of turbine curtailment for the avoidance of bird and bat deaths and yet we remain in the dark.

Curtailment regimes in Australia are yet to be proven to work; how on earth can the Department conclude the objectives of section 1.3(a)(b)(e) of the EP&A Act will be met with unproven mitigation strategies.

I therefore ask the Commissioners to refuse consent to the HOGWF.

Socio Economic

It is sad to see the stress and anguish that some Nundle business owners have had to endure over the last six years while they await to see if years of hard work building a sustainable business is going to be taken away from them.

It is sad the Department refers to these hard-working people as numbers. Just numbers on a spreadsheet you can add or subtract for the greater good or public interest.

The Applicant's own Socio-Economic report by SGS acknowledges existing businesses may close due to the proposed wind farm, yet the Applicant and Department fail to acknowledge this fact or proactively offer a solution.

The Socio-Economic Impact Assessment (SEIA) carried out by SGS on behalf of the Applicant for the EIS estimates the following number of jobs for the operational phase of the project.

"...the operational phase would be likely towards the lower estimate of **25** jobs. Of which 10-20% would be in Nundle, 30-40% in the surrounding LGAs and the balance in the rest of NSW."

The Applicant has repeatedly reinforced that the benefits to the community will come from the local job opportunities. SGS estimates that there will be **2.5 jobs locally**. The report also mentions there is a possible decline in tourism activity because of the development. The jobs lost due to the decline in tourism activity will cancel out the jobs on offer from the proposal.

The Department Assessment Report has overestimated there will be **28** operational jobs.

For comparison, the recently approved SSD-10315 Bowmans Creek Wind Farm Assessment Report stated for a 335 MW project there would be **15** operational jobs. Who's telling fibs?

Why the disparity in the operational workforce numbers for a similar sized project?

Why have the Applicant and Department not provided the public or Commissioners with a basic cost comparison per MW installed between other wind farms. There is now a plethora of similar sized projects to draw comparison to, yet this simple guidance has not been forthcoming. How can the NSW electricity consumer have any confidence the proposed HOGWF will provide cost competitive power with its peers and not pass on unnecessary additional cost to the end user or displace more worthy renewable projects from accessing the transmission network?

The project fails to meet the objectives of the EP&A Act, it is not promoting social or economic welfare of the community. The promise of new people moving to the area because of this project is misleading and presumptuous.

Visual Impacts

Much time, money and resources have been allocated in an attempt to conceal the obvious. 64 or 47, **230** metre high industrial structures perched on a prominent ridgeline will not dominate the landscape! I make the above comments with some sarcasm and scepticism, just to clarify.

The Department's Assessment Report and resultant Conditions of Consent appear to be supported by opinions of the Applicant's visual consultants findings.

I remind the Commissioners; the Applicant has directly engaged the visual consultant who has arrived at a favourable evaluation for the Applicant.

How can the Department favour the opinion of a consultant who is not at arm's length to the Applicant over the opinion of the **Independent** Visual Expert engaged by the Department?

I support the finding of the Independent Visual Expert regarding the wider landscape assessment of the impacts to the ridgeline:

"4.1.7...The effect of the turbine array on the extended ridgeline of the Great Dividing Range which is as a Key Landscape Feature within the broader landscape will partially industrialise the character of LCU 05 'Forested Mountain Ranges'. The resultant change of character to a combination of Natural Appearing and Wind Energy Character is significant. This proposed change will be critical to the ongoing community perception of the value of the surrounding Landscape. The effect of this significant change of character should be carefully considered in the evaluation of the overall Project suitability and determination of Development Consent".

The Department's dismissal of the above statement is a complete insult to those of us who will have to endure the daily presence of these alien structures imposed on our personal and public amenity.

The reports provided by the Applicant that the Department appears to have given greater weight to downplay, trivialise and ridicule the legitimate concerns of impacted parties.

"NIMBY's" & "KNOCKERS" have the right to maintain their amenity as much as anyone else, I therefore request the Commissioners refuse consent to SSD-9679 due to unacceptable visual impacts.

Please see photo 1 following which shows 2019/2020 bushfire impacted trees, approximately 3 km away from our property. After 4 years, clear distant views are still possible. Therefore I object to the Applicant proposing to use existing vegetation as mitigation screening for high visual impacts to non-associated receivers without an **"Impact Agreement"** in place. Please refer to attachment IPC Nundle Public Meeting Submission 1/2/2023 for further information. Photo 2 is showing the result of storm damage. Existing Vegetation is NOT a permanent or a reliable mitigation method in bushfire / storm prone land.



Photo 1 – 02.02.2023



Photo 2 – 12/2020

Conditions of Consent amendments and additions

In the event the commissioners are inclined to approve SSD-9679 could consideration please be given to the following conditions of consent amendments:

Visual Impact Mitigation

B1. Amend to: *“for the operational life of the project”*

Construction Hours

B5 (b) Amend to: *“no time on Saturdays.”*

Blasting

B11 Amend to: *“no Blasting on Saturdays”*

Waste

B47 Construction waste to be disposed of at a registered waste facility that can accept commercial quantities of waste. (TRC Nundle depot is NOT suitable)

Additional conditions of consent

To assist in healing the division in our community and provide some form of certainty to our future, I ask the Commissioners to consider a condition to ensure this project, if approved, will lapse if not acted upon by the Applicant in a reasonable timeframe;

“The consent approval shall lapse 5 years from the date of determination if works are not commenced.”

The request by the Applicant to “re-baseline our biodiversity credit obligations” (Applicant and IPC meeting 15/1/24) should be **refused**.

The Department indicated due to the illegal and legal “agricultural” clearing that was undertaken within the development corridor, it is to be assumed this land remains subject to biodiversity credit obligations.

As the public was not provided clear information regarding any biodiversity set-aside areas, or extent of the clearing, any request to reduce credit obligations should be refused.

I ask the Commissioners to take note of Mr Fabian Norrie’s 2018 YOUTUBE video he submitted to the IPC.

At approximately the 5 minute interval it shows how vegetated the ridgetops and western slopes used to be before the “agricultural, noxious weed control and mosaic thinning” clearing commenced.

The current “agricultural” landscape of the ridgetop and slopes that the Commissioners recently visited, have over the last decade been highly modified from the high integrity native vegetation it once was.

Rewarding the Applicant and host landholder with a consent approval will be seen as endorsement illegal land clearing is ok, therefore refusal of consent is the only just option.

Conclusion

Whilst it has been frustrating dedicating more personal time to refuting the unsubstantiated claims by the Applicant and Department, the process has given me a sense of great pride at the quality of submissions to the IPC refuting the embellished and flawed propositions put to us.

After further reflection on the suitability of the site for industrialisation, I give thought to the meaning of the word "Nundle". It is thought to be derived from "NUNDUL", the local Aboriginal word for mouth.

How compatible are 230 metre high, alien monuments inserted into the "mouth" of "NUNDUL" with First Nations Mythology?

How compatible are these industrial insertions into the "mouth" of the Peel River?

How compatible is excavating large craters and ramming concrete and rock into the "mouth"?

They are not compatible, these monuments are a permanent mutilation of the "mouth."

Ms Sally Edwards, a speaker on Day 2 of the Nundle IPC Public Meeting spoke very eloquently as to how the Applicant "tactically" chose naming the project "Hills of Gold" in an attempt to gain community acceptance and familiarity.

I agree with Ms Edwards, the Applicant has attempted to "freeload" off the name "Hills of Gold " to gain acceptance, however ironically the name is almost fitting. 170 years later, just as they did in the 1800's, the gold diggers have returned to town to exploit the landscape and disrupt communities for new gold. Wind.

I ask the IPC Commissioners to refuse consent to the SSD - 9679 project.