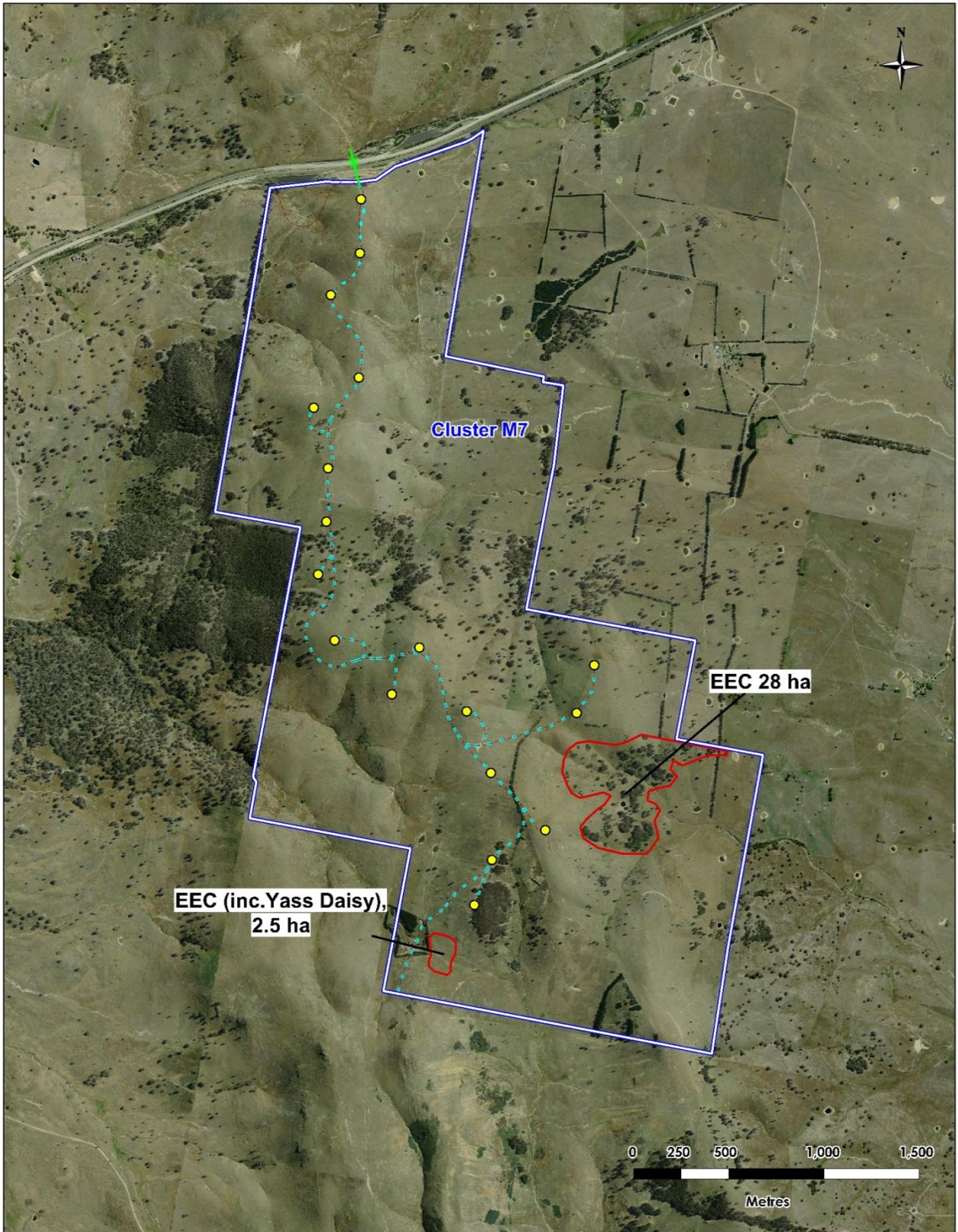








Conroys Gap Wind Farm Stage 2 (EPBC 2013/6989)

The exhibition of the Preliminary Documentation (Additional Information report) for a period of 20 business days resulted in the submission of one set of comments. A summary of the comments and how they have been addressed is provided in the table below.

	Comment summary	Response
1.	<p>Epuron has inappropriately claimed approximately 4 hectares of my property as a "Proposed Offset" area without permission, agreement or lease (refer pp 101 EEC Offset Area 9.0 ha);</p>	<p>The inclusion of the 9 ha offset area outside the project boundary on the map on page 101 was an error. There are other suitable areas within the project boundaries that could be used for biodiversity offset areas. Refer to revised map of potential offset areas attached.</p> <p>A final offset package will be prepared in consultation with relevant government agencies and affected land owners. The purpose of the offset discussion in the exhibited report is to show that land that is suitable for offsets is available within the project boundaries. The aim was to demonstrate offsets are feasible and not to lock in final offset areas. The report states:</p> <p><i>A site has yet to be identified, but there is ample land of suitable type within the project boundaries to demonstrate that offsets are achievable for EPBC affected species.</i></p>
2.	<p>Golden Sun Moth Distribution. Epuron state that:</p> <p><i>"Golden Sun Moth populations were not known within or nearby the project site when the original assessments were undertaken.</i></p> <p>1997 a simple search of http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=25234 will verify this.</p>	<p>As the species has been detected onsite, additional surveys to inform an appropriate offset for the species are proposed. The strategy proposed for this species is about minimising impact on areas verified as providing habitat for this species and offsetting impacts that cannot be avoided. Lack of verified onsite records earlier in the project assessment has not influenced the ability of the project to manage impacts on this species.</p>
3.	<p>Swift Parrot Surveys</p> <p>Surveys inadequate in late March</p>	<p>Even though flora and fauna surveys are carried out over a number of seasons and include a number of targeted methods to increase the likelihood of detecting threatened species, the results cannot be exclusively relied upon to assess and manage flora and fauna impacts. Wind farm sites are very large and many threatened species are cryptic or rare. Therefore, the biodiversity assessment approach includes strategies to deal with these factors. The assessment is precautionary and informed by risk assessment, specific to the impacts that the wind farm is anticipated to have on 'affected species'.</p> <p>In the case of the Swift Parrot, the wind farm cannot impact breeding (which does not occur on the mainland) but may affect foraging and migration. Even though it was not detected in the survey onsite, the exhibited report states that:</p> <p><i>Potential foraging habitat for this species is present at the proposed site and it is possible that this species occurs there during its winter migration.</i></p>

	Comment summary	Response
		<p>It is therefore assessed further, considering it could occur and be affected by the wind farm, as an 'affected' species. Independent modelling for this species has concluded a 99% turbine blade avoidance rate for this species and therefore is considered a low collision risk. Hence, the fact that surveys did not identify this species onsite has not limited the assessment of impact on this species.</p>
4.	<p>Superb Parrot</p> <p>Again they conducted their field surveys over the 26th to 28th March; when the peak period of activity of this species in the Bowning area is from October to January as grass seeds ripen. I declare that the species is both common and relatively abundant in the Bowning area in spring and early summer.</p>	<p>In the case of the Superb Parrot, surveys onsite and in the locality have demonstrated the species is relatively abundant at certain times of year. It is treated as an 'affected' species in the exhibited document and subject to detailed assessment.</p> <p>The assessment details that clearing may remove breeding habitat (hollow bearing trees) and the wind farm may affect foraging and migration through blade strike and clearing of vegetation.</p> <p>Repeated surveys in the local area have identified the species is more common in lower lying parts of the landscape and therefore at less risk of collision with turbines than species that forage at higher elevation. Clearing impacts would be managed to minimise impacts on this species and offset impacts that cannot be avoided.</p>
5.	<p>Cattle Egret <i>Ardea ibis</i></p> <p>In a previous submission to the EPBC I stated that the: <i>"Cattle Egrets have been observed as a seasonal visitor by the author on the Tannoch Brae property on Graces Flat Road, within 1.5 kilometres of the proposed turbines. This property is to the east of the development site and the Murrumbidgee River, flights from Tannoch Brae to the Murrumbidgee River would require crossing the development."</i> At the time of writing the above I had not retained any photographic or diary records of my observations; however Cattle Egrets (Listed migratory -CAMBA as <i>Ardeola ibis</i>, JAMBA as <i>Bubulcus ibis</i>) returned to the Graces Flat area on the 13th April 2014 and at the time of writing remain in-residence.</p>	<p>Although it was not recorded in surveys, the Cattle Egret is considered a relatively common species in suitable habitat. Wetlands, prime habitat for this species, would not be affected by the wind farm however, the wind farm may affect migration. For the broader Yass Valley Wind Farm site, the exhibited report states:</p> <p><i>The Cattle Egret usually inhabits lowland areas, away from ridge tops. When migrating it is likely that this species would follow riparian corridors or fly at a height well above the blade of a turbine.</i></p> <p><i>Considering its range and abundance, this species has not been considered to be affected by the proposal.</i></p> <p>In conclusion, it must be acknowledged that the presence of a species does not imply that impacts will be significant for the local population of that species. Impact strategies are developed based on risk of impact and are not limited to species known to occur but rather are centred on those least able to withstand further loss.</p>



LEGEND		PROJECT		TITLE		
	Project boundary		Proposed overhead reticulation	Proposed Offset Areas		
	Proposed offset areas		Proposed underground reticulation			
	Proposed wind turbine			SCALE	DATE	DRAWN
	Proposed access track			1:25,000 at A4	08/08/14	VR

Potential Offset Areas