renewable power ventures

26th May 2006

Mr Chris Wilson
A/Executive Director
Office of Sustainable Development Assessments and Approvals
NSW Department of Planning
23-33 Bridge St
Sydney NSW 2000

Reference: A. Dept of Planning Letter of 9 May 06, request for Submissions Report re Proposed Capital Wind Farm (PA No. 05_0179).

Dear Sir,

As requested in Ref A, the following report is Renewable Power Ventures (RPV) response to issues raised in the Canberra Ornithologists Group (COG) submission to the Department of Planning. This submission states that the COG only considered Appendix F1 in preparing their submission. They also failed to read the associated appendices to this report or Appendix F2 or Appendix F3. This is unfortunate, as they would have discovered answers to many of the issues raised in their submission.

Databases. The submission states incorrectly that the Flora and Fauna Study only relied upon the NSW Wildlife Atlas Database. The study also utilized data collected from local landowners, correspondence from the Dept of Environment and Conservation, national databases, the URS Woodlawn Wind Farm EIS and 'A Planning Framework for Natural Ecosystems of the Act and NSW Southern Tablelands' (Falding 2002). A full list of references is available at the rear of Appendix F1 and F2. Written requests were also made to, and acknowledged by, the Canberra Ornithologists Group committee in April 2005 for them to provide lists of bird species, collected during two bird surveys in the area. Whilst the COG did not provide the requested information, a local landowner who was instrumental in facilitating and conducting the surveys undertaken by the COG, was able to supply bird lists for the study. This list is provided in Appendix 7 of the flora and fauna report and it was referenced in Section 4.2 of the report.

Site Surveys. The submission disregards the third period of time spent on site as described in Appendix F2. Further, COG has not viewed any of the tables or maps within Appendix F1 which would have answered their concerns.

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Survey Methods. Survey methods are fully described in Appendix F1, Para 4. The bird surveys were conducted as targeted surveys of woodland birds, birds of prey, waterfowl, and other flock birds, to ensure the greatest likelihood of identifying the various species when they are most likely to be active. The surveys were not 'general site walk throughs only' as suggested in the submission. The COG would have found the information on the conduct of the surveys had they read the appendices to the study (which are repeatedly referred to in the main body). Appendix 4 of the study has the bird survey sheets, including the time, date, site, birds observed, altitude, etc… A full list of all birds from all sources researched is included in Appendix 3, including those birds located in areas subsequently abandoned by the project, e.g. Kalbilli. Appendix 6 provides photos of the project area. Appendix 7 provides a list of bird species in the Taylors Creek area, provided by a project landowner who is also the local birdwatcher who facilitated the COG bird surveys in the area.

Raptors. Raptors were subject to targeted surveys from appropriate locations and their location, behaviour and height noted. The comments made in the submission take no account of the fact that the Wedge-tailed Eagle and Brown Falcon are present across the continent. Their behaviour is well understood and these species have been interacting with wind farms for many years, with very little to no impact.

Glossy Black Cockatoo. The Glossy Black Cockatoo was identified in the Kalbilli area. As is made clear on several different occasions in the EA, this area of the project (in excess of 10km from the nearest turbine) has been abandoned and forms no part of the final project area. Nor is the habitat that the Glossy Black Cockatoo is known to frequent, present at the wind farm site.

Waterbirds. Species lists are provided in the Appendices that the COG did not read. Use of the URS report is appropriate due the proximity of the Woodlawn Wind farm. Conclusions as to the likely path of these birds are drawn from extensive experience and professional skill. As stated in the study and in Chapter 7 of the EA, the issue only becomes apparent when there is surface water in both lakes. This is a rare occurrence and likely to become increasingly rare into the future. The flora and fauna studies were carried out over three periods in two springs. During the second spring (2005), Lake George held its highest volume of water (5% capacity) for at least the preceding eight years and any time since.

Research conducted by the CSIRO for the NSW Greenhouse Office has identified a trend in reduced rainfall since 1950. Average temperatures are also increasing. As Lake George is an evaporation basin, the level of water is a function of the balance between rainfall and evaporation. With less rainfall and higher temperatures, the incidence of both lakes holding water will continue to decline.

Further, as the birds use the low ground to the north of Groses Hill (partially to avoid predation by birds of prey on exposed ridges) they will not be impacted by the wind farm.

Conclusions. Many of the species identified in the project area are present at other wind farm sites in Australia, where they have largely coexisted with turbines for several years. Experience from other wind farm sites is an extremely important consideration. Australian wind farms have very little impact on birds because important lessons learnt from overseas and within Australia have been adopted when designing new Australian wind farms. These include the fact that wind turbine lattice work towers pose an increased threat to birds (by encouraging nesting), as do wind farms sited in key migration choke points (Altamont Pass, USA). By siting and designing wind farms with these and other considerations in mind, the risk to birds is minimized. Obviously, it is still prudent to conduct post construction monitoring and RPV has already committed to do this.

The conclusions drawn in the flora and fauna study are based on on-site observations, observations from other local surveys and various national and state databases. The flora and fauna studies were conducted in accordance with accepted procedures by professional and qualified ecologists to a high standard and in full compliance with the requirements of the DEC. RPV would like to reiterate that it is important for parties to read the entire EA, rather than selected excerpts.

Fundamentally, RPV proposes to build this wind farm in an area with an extremely altered environment, which has been in environmental decline for many decades. The construction of the wind farm will lead to improved environmental outcomes through the protection of important habitat that is otherwise not related to the project, the rehabilitation of several heavily degraded areas, providing landowners with the opportunity to reduce stocking levels to a more sustainable level (as is there stated desire) and reduce the greenhouse intensity of the NSW economy. The climate change resulting from anthropogenic greenhouse emissions is the most significant threat to the remnant native flora and fauna that remains in this area and this development will provide a positive contribution towards reducing the impact of that climate change.

Yours sincerely,

David Griffin
CEO

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