



DOC18/946298  
SSD 6697 MOD 1

Ms Natasha Homsey  
Environmental Assessment Officer  
Department of Planning and Environment  
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Dear Natasha

### **Modification Application for Crudine Ridge Wind Farm**

Thank you for your invitation for the Office of Environment Heritage (OEH) to comment on the proposal to modify the Crudine Ridge Wind Farm project.

OEH understands that the modification involves:

- A reduction in the number of turbines from 77 to 37; and
- A revised road upgrade design for Aarons Pass Road.

OEH notes that the reduction of the number of turbines will align the Development Consent (SSD 6697) with the EPBC Act Approval (EPBC 2011/6206), and that the 37 approved turbines will be constructed within the micro-siting restrictions of SSD 6697.

OEH further notes that Aarons Pass Road was not the initial preferred route to the site. It is understood Aarons Pass Road became the preferred route following submissions from the Mid Western Regional Council and community members. OEH has not had the opportunity to assess the biodiversity and Aboriginal heritage values of any alternate routes in comparison to the proposed Aarons Pass Road route. We are therefore unable to comment on the potential merits of other routes to further avoid or minimise biodiversity impacts.

The revised design for Aarons Pass Road will require the clearing of 6.59 ha of native vegetation. As the existing approval allows for the clearing of 1.54 ha along Aarons Pass Road the revised design will require an additional 5.05 ha of clearing. OEH is satisfied that the biodiversity development assessment report (BDAR) has adequately assessed the biodiversity impacts of the modification as required by the Biodiversity Assessment Method (BAM).

OEH notes that the existing offset commitments for the development will not be reduced in response to the reduced total area of clearing resulting from fewer turbines. The increase in clearing along Aarons Pass Road will however be offset in accordance with the NSW Biodiversity Offsets Scheme and the BAM resulting in an additional offset liability.

The original Crudine Ridge wind farm project has an approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC approval number 2011/6206). This approval does not address the additional impacts of this modification on affected species and communities listed under the EPBC Act. Of particular concern are *Acacia meiantha* and *Pomaderris reperta* which are not

included in the current EPBC Act approval. OEH recommends that the need for an EPBC referral for the modification be discussed with the Commonwealth Department of the Environment and Energy.

The BDAR indicates that any individual *Acacia meiantha* and *Pomaderris reperta* that are required to be removed will be translocated using measures to be developed in the Biodiversity Management Plan (BMP). As *A. meiantha* is a clonal species, it is unlikely that the direct translocation of plants would be successful although several propagation techniques may result in the establishment of plants that can ultimately be planted on site. It is recommended that cuttings, seed collection and protection in-situ be used rather than direct translocation. OEH should be consulted during the development of the BMP to establish the most appropriate methods maintain these species.

In addition, OEH advises that identification of *Pomaderris* species is difficult. If not already done, voucher specimens of *Pomaderris* on the site need to be sent to a state or regional herbarium for formal identification. If this has already been done, please provide OEH with a copy of the determination. OEH is particularly interested in this population as it was not previously known. OEH will initiate further investigations into this population including considering actions to secure it in situ.

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering on 02 6883 5335 or [david.geering@environment.nsw.gov.au](mailto:david.geering@environment.nsw.gov.au).

Yours sincerely



**PETER CHRISTIE**  
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