

I object to the development of the Jupiter Wind Farm on the grounds that:

1. The Project Area (PA) is located in a totally unsuitable and inappropriate area.

The Environmental Impact Statement describes the Project Area as -

- 'extensively cleared farm land and hill formations' (E3 Volume 1) and (para 4.4 Volume 1);
- 'farm land within the PA is predominantly used for commercial grazing with isolated lots used for personal cropping. The hill formations consist of both cleared and light density tree coverage (E3 Volume 1) and (para 4.4 Volume 1);
- 'the land within the PA is primarily used for agricultural grazing and consists of both native and improved pasture with remnants of native woodlands. (E6 Volume 1) and (para 9.2 Volume 1)
- 'the majority of the PA consists of large and predominantly cleared agricultural lots that are used primarily for commercial grazing. (para 2.6.5 Volume 1)
- 'the portion of the PA located within the former Palerang LGA is zoned '*RU1 - Primary Production*' under the Palerang Local Environment Plan 2014; while that portion located within the Goulburn Mulwaree LGA is zoned '*RU1 - Primary Production*' and '*E3 - Environmental Management*' under the Goulburn-Mulwaree Local Environment Plan 2009. (para 4.5.1. Volume 1)

From these descriptions, the proponents give the impression that the project area is a vacant landscape and is solely farm land.

This description of the PA is totally false and misleading and the photograph of the PA at Figure E.1 is totally false and misleading.

Both the authors of the EIS, Environmental Resource Management Pty Ltd, and EPYC Pty Ltd, fail to understand or accept that the PA is located within a highly populated area consisting of rural lifestyle properties and some larger properties. In fact, there are by my calculation, **288 residences** identified in Figure 4.4 and Figure 4.5 within 5 kilometres of a wind turbine. Considerably more than the 13 residences in the Southern Precinct and 50 residences in the Northern Precinct identified in the EIS (para 4.3.1 Volume 1).

Of the 288 residences within 5kms of a wind turbine, 98 are located in the Southern Precinct and 260 in the Northern Precinct. Hardly what one could call extensively cleared farm land used for agricultural grazing and some cropping. Hardly what can be described as a vacant landscape.

The EIS has also gone to great lengths to describe the properties within the PA as 'RU1 - Primary Production' and *Figure 4.11 Minimum Lot Sizes of Surrounding Rural Lands in Proximity to Canberra*, depicts and only depicts properties within the PA as 40 to <80 ha. One could conclude from Figure 4.11 that there are no properties within the PA that are less than 40 hectares. This is not only false and misleading, it is total fiction.

There are numerous properties within the PA that are less than 40 hectares. For example, along Mulloon Road in the Southern Precinct and along Barnet Road in the Northern Precinct. Hardly what can in reality be described as extensively cleared farm land used for commercial grazing and some cropping.

At least the proponents had the grace to state that 'it is considered that there is some potential for future residential dwellings to be approved within and in close proximity to the PA'. (para 4.5.9. Volume 1).

This EIS should be rejected on the grounds of gross misrepresentation of the project area. The description is false and misleading. It is biased, unbalanced and uses slight of hand.

2. The EIS is based on presumption and supposition.

In para 5.4.1 under Micro-Siting WTGs, it is stated that 'approval is sought for a micro-siting allowance that will authorise the final positioning of up to 88 WTGs and associated infrastructure, upon detailed design, within a radius of 100m of indicative WTG locations documented in the EIS'.

EPYC Pty Ltd have no idea what WTG model is to be used for the Project (para 5.4.2). EPYC Pty Ltd have no idea how high the WTGs will be. EPYC Pty Ltd have no idea of how many WTGs will be built. And now, the proponents are asking for a 100m micro-siting allowance. Which means, that if approval is granted, any or all the WTGs could be located up to 200m (up to 100m radius means in any direction) from the current plan as designated in Figures 4.4 and 4.5. EPYC Pty Ltd have no idea where the WTGs will be located.

Any data provided under this EIS is therefore based on supposition, not fact. All visual assessments, including the photo montages, are based on supposition, not fact. All noise monitoring data is based on supposition, not fact.

All impacts of the WTGs on the 288 residences within the PA are based on supposition, not fact.

The foundation of a wind farm development is the WTGs. With any other industrial development, the proponents would have to submit detailed designs down to the last nut and bolt. Yet EPYC Pty Ltd cannot design with any certainty, accuracy or detail, exactly where the WTGs will be located.

It is a fiction. How can anyone make an assessment of fiction? There are no guarantees. Not a single one.

I object to approval being given for a Micro-Siting Allowance. EPYC Pty Ltd must provide accurate locations of all the WTGs before any assessment can be made.

3. Environmental Risk Ratings

According to Table 8.5 the Environmental Risk Ratings as stated are -

Biodiversity	High
Noise and Vibration	High
Landscape and Visual	Very High

And in 9.2.2 "Field investigations identified two threatened ecological communities, two species of threatened flora, nine threatened bird species and one threatened bat species'.

One threatened species is more than sufficient to reject this EIS.

Yet the proponents state that 'The conclusion of the legislated impact assessment processes was the project would not significantly impact on the majority of threatened matters' (para 9.3.4).

A bold statement to make, even if 'the Glossy Black-cockatoo was considered as likely to be significantly impacted, as a result of the potential for exclusion from areas of high quality foraging habitat, if the species was to avoid areas habitats immediately surrounding WTGs' and 'removal of

1.63 ha of the EPBC community White Box-Yellow Box-Blakely's Red Gum Woodland may be considered a significant impact' (para 9.3.4 Volume 1).

And just how is EPYC Pty Ltd going to deal with these high biodiversity impacts?

"The full offset requirement will be determined following detailed project design'. (para 9.1.2. Volume 1). Environmental impacts solved.

We are living in the land of Oz, not the Wizard of Oz.

Conclusion

There is no basis on which this EIS can be approved.

The proponents have written an EIS based on false and misleading information, admit to high and very high environmental risk ratings and have no accurate or detailed design for the WTGs. With no accurate and detailed design for the WTGs any assessments including visual, noise and even biodiversity are based on fiction, not fact.

On what grounds could this EIS possibly be approved?

Pam Handyside