

14th June 2011

Mr Neville Osborne
Manager – Energy Infrastructure Projects
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Mr Osborne

**RE: Exhibition of Environmental Assessment for White Rock Wind Farm
(Application Reference MP 10_0160)**



Thank you for providing the Border Rivers-Gwydir Catchment Management Authority (CMA) with the opportunity to comment on the Exhibition of Environmental Assessment for White Rock Wind Farm.

In our previous correspondence on this matter (29th September 2010, our reference A452758) we suggested that any clearing of native vegetation (including groundcover) associated with the development should include appropriate offsets or mitigating management actions to 'improve or maintain' environmental outcomes.

While the information provided indicated that the original plan has been modified to minimise environmental impacts, the development does not include appropriate offsets or mitigating management actions to 'improve or maintain' environmental outcomes associated with clearing native vegetation.

In addition, there are a number of comments made in Appendix 3 – Ecology Assessment that are of concern to the Border Rivers – Gwydir CMA, specifically:

- page i – 'The relatively small area of vegetation that would be removed for the wind farm in relation to much larger amount available in the immediate area resulted in a finding of no significant impact on EECs or threatened flora species listed under the TSC Act.'
- Page 44 – 'Direct and complete clearing will need to occur for the access roads, turbine footprints, cabling and other related infrastructure. This is estimated to result in the removal of 4.9 ha of the Ribbon Gum EEC.'
- Page 75 – 'Given that the majority of this EEC (93%) will be not be impacted upon by the proposal and larger intact stands occur immediately adjacent along the steeper slopes, it is considered highly unlikely this EEC will be significantly impacted upon by the proposal.'

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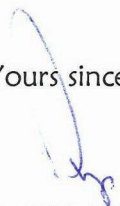
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The Border Rivers – Gwydir CMA considers any clearing of Endangered Ecological Communities to have a significant environmental impact. We again suggest that any clearing of native vegetation (including groundcover) associated with the development should include appropriate offsets or mitigating management actions to 'improve or maintain' environmental outcomes.

The NSW Government's Biodiversity Banking and Offset Scheme (BioBanking) is an appropriate mechanism for providing necessary offsets associated with the development's impact on native vegetation. BioBanking enables 'biodiversity credits' to be generated by landowners who commit to enhance and protect biodiversity values on their land through a BioBanking agreement. Credits can be used to counterbalance (or offset) the impacts on biodiversity values that are likely to occur as a result of development.

Should you have any queries or require additional information, please don't hesitate to contact Mr Geoff Rayson, Program Manager based in Inverell on (02) 6728 8024.

Yours sincerely,



Paul Hutchings
General Manager