

**From:** Robyn Charlton [<mailto:westlakewrens@gmail.com>]  
**Sent:** Tuesday, 2 December 2014 10:53 AM  
**To:** Colin Phillips  
**Subject:** Re: Submissions for the Northern Coal Logistics Project.

Hi Colin,

Thank you for that.

Could the Department please consider the following? I have already written to Commonwealth Department of the Environment...

*On behalf of LT Creek Sustainable Neighbourhood Group, I have some concerns in regarding the Flora and Fauna Assessment on the Northern Coal Logistics Project and the potential impact on the Large-eared Pied Bat (Chalinolobus dwyeri).*

*As you are aware the Large-eared Pied Bat is listed vulnerable on the EPBC Act 1999 and TSC Act 1995. Due to the lack of knowledge about Large-eared Pied Bat and its roosts, I am concerned about the adequacy of the mitigation measures in place for the Large-eared Pied Bat.*

*I refer you to page 39 of the Flora and Fauna Assessment to Bat Alley. Bat Alley (is a disused coal mine shaft) is known bat roost site, with a range of cave- dependent bat species known to use the shaft, this includes the Little Bentwing-bat and the Eastern Bentwing-bat. These two bats were recorded entering the shaft in 1998 with some individuals being possibly pregnant. It has been documented that in other locations that Bentwing bats are known to cohabit roosts with the Large-eared Pied Bat. I believe that the project may potentially affect the Large-eared Pied Bat.*

*The RPS ecological assessment undertook ultrasonic bat detection adjacent to the shaft; however this occurred in May, with night temperatures going down as low as eight Degrees Celsius. Ultrasonic surveys under these conditions are not adequate for any bat species, in particular adjacent to a potentially important bat roost. Eight harp traps nights are also inconsistent with the federal guidelines for bat surveys, which specify a minimum survey effort of 20 harp trap nights.*

*There is also the issue of the potential inadequacy of the 30 metre buffer (if the site is a roost for the Large-eared Pied Bat). The national Large-eared Pied Bat recovery plan states:*

*"Clearing or harvesting of vegetation in or around roosts has the potential to affect foraging resources through habitat loss and the fragmentation of the surrounding vegetation. This is likely to be particularly detrimental in the vicinity of maternity roosts where pregnant and lactating females require sufficient food resources to raise their young. The microclimate with roosts may also be altered through adjacent clearing and logging altering solar radiation levels and groundwater levels."*

It is my understanding that only one comprehensive study as been conducted on the Large-eared Pied Bat. There is not enough information on this species and more studies need to be done before any removal of habitat is commenced.

Regards

Robyn