

## **Attachment B: Specific comments on EIS (Main volume 1A – Chapter 10 – Biodiversity)**

Page	Comment
10-6	A survey effort of 117 days is not sufficient given the high number of impacted threatened species.
10-6	In Table 10-1 the exact survey periods for a number of activities is vague. For example, were the habitat surveys that occurred in November 2011 for a period of 1 day or 30 days?
10-6	Table 10-1. Reporting on field methods should report whether the surveys were species targeted or simply incidental to other surveys. Where a single survey effort was collecting data on a large number of species it is likely that the data is less reliable.
10-8	Typographical error - “to be removal”. The large number of typographical errors of this kind highlight that the EIS has not been adequately reviewed prior to finalisation.
10-9	Details of the impacts caused by ancillary facilities should be a part of the assessed EIS, rather than considered separately.
10-12	Population estimates- a poor level of detail has been provided here on belt transects. What was the minimum, maximum and average lengths of transects.
10-14	No details provided on what a site survey involved.
10-15	Survey periods of 5-20 minutes could be considered too short. Is there reputable evidence that supports the methodology (including survey periods)? If this is documented somewhere else in the EIS it should be cross referenced.
10-16	Lack of detail on survey effort for the endangered Bush Stone-curlew.
10-20	Typographical errors- “habitat, In addition, to call playback surveys and spotlighting were undertaken”. Highlights a lack of attention to detail throughout the EIS.
10-149	Good analysis provided for <i>Angophora robur</i> , however similar data and analysis is lacking for many other species. Data should be presented in a consistent manner across species.
10-152	Why does the observation of a circling Eastern Grass Owl not make this a ‘confirmed’ species?
10-153	Page 10-18 refers to data collected on the endangered Coastal Emu population, however the EIS does not report on this data to give an indication of distribution or abundance of the species. What portion of the population will be impacted by the proposal?
10-166	Details are provided for impact on Weeping Paperbark population at New Italy, however no indication is given to the broader significance of these impacts on the species as a whole. If this is further explained later in the EIS or Working Papers, this information should be cross referenced.
10-167	Slender screw fern. The information provided here suggests that the impacts to this species are very significant. Such a high impact on this species should be further avoided. The EIS does not provide evidence to support the assertion that “it is likely that there are other locations of <i>Lindsaea incisa</i> in adjacent areas of habitat not surveyed which would reduce the proportion of the population being impacted”. Without such evidence this claim is a speculation and should not be used to base a decision that will affect the future viability of this species.
10-167	Removal of two entire sub-populations of <i>Maundia triglochinos</i> is likely to represent a significantly large impact that should be

	avoided. There seems to be little regard to this fact in this section.
10-168	Green leaved rose walnut – the statement made against this species is unclear. The impact includes removing 6 of 8 known individuals and intersecting the population. The significance of this impact at a broader scale needs to be explained, including whether not the loss of this population is significant.
10-172	EIS does not provide evidence to support the assertion that the condition of the area “accounts for the limited distribution of the Black-chinned Honeyeater and Brown Treecreeper”.
10-172	Does not provide detail on potential impacts to the endangered Bush Stone-curlew.
10-172	Inadequate assessment of the proportion of the potential habitat for the critically endangered Double-Eyed Fig-Parrot.
10-174	Inadequate data provided on the proportion of the Coastal Emu population that is impacted by the proposal.
10-175	Report states that the “Brush-tailed Phascogale is tolerant of modified and fragmented habitats”. The fragmentation created by a major highway is not akin to the current fragmentation that is provided as evidence for this assertion.
10-176	Report states that the Rufous Bettong “is tolerant of modified and fragmented habitats”. The fragmentation created by a major highway is not akin to the current fragmentation that is provided as evidence for this assertion.
10-176	NSW Wildlife Atlas confirms known locations of Spotted-tailed Quoll, including roadkill within the project area. Given low densities across large ranges for this species it is possible that populations do occur, and if so they should be considered significant populations given the current limit of known distribution.
10-202	Data should be provided for the likely biodiversity impact of alternative routes, particularly for Section 3. The high impacts on threatened species for the proposed routing suggests that biodiversity was given very limited consideration.
10-203	Unclear what “three successive monitoring periods” is. Over what period of time? Given the long-term nature of impacts to the environment, and the RMS’s responsibility to manage the highway in perpetuity, monitoring of mitigation measures should be required on an ongoing basis for as long as the highway is in operation.
10-217 (10-208 – 10-211)	There is insufficient evidence (Table 10-30) that Emus will use any of the proposed crossing structures. Given this uncertainty, Section 3 should include land bridge overpasses to facilitate the movement of Emus. Land bridges have the highest success rate and should be considered as the first option.
10-221	Baseline monitoring of the Emu movement should be provided prior to approval as this data should inform routing and mitigation measures.
10-221	The proposed use of introduced species such as soybeans, oats and rye to attract emus to crossing zones may have unintended ecological consequences on other species.
10-231	Mitigation measure B64 – The review of project boundary, and the success of this as a mitigation measure, should be included in the EIS and not subsequent to approval.
10-231	Mitigation measure B66 – The proposed project will create a high level of fragmentation. Those ecological communities that are isolated by the construction of the project should be offset in the same way that directly impacted sections are.