



**Catchment Management
Authority**
Border Rivers-Gwydir

"We work to help people in our communities look
after their land for future generations."

"We strive for balanced production and
conservation within resilient landscapes."

Our Ref: A756348/BRG00915

Your Ref: 09_0093

29 February 2011



PCU031262

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 Sapphire Wind Farm
(Application Reference MP 09_0093)**

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

I am satisfied that the Environmental Assessment addresses the main issues of concern for the Border Rivers – Gwydir CMA. I also commend the proponent on their Statement of Commitments which addresses both construction and operational environmental management issues.

Specific comments on Native Vegetation, Indigenous Cultural Heritage and Soil and Landform are included below.

Native Vegetation

The Border Rivers – Gwydir CMA is responsible for the administration of the *Native Vegetation Act 2003*. This proposed development is excluded from this legislation via Part 3a of the *Environmental Planning & Assessment Act 1979*. However, we are encouraged to see that the environmental assessment has considered the Native Vegetation Act's 'improve or maintain' objective regarding the utilisation of appropriate offsets for native vegetation and threatened species via mechanisms such as the BioBanking scheme.

We would strongly suggest that any replanting, rehabilitation or landscape planting to be undertaken on the project uses locally endemic native species. This could be undertaken using a local provenance seed bank of vegetation communities in the area.

Soil and Landforms

Chapter 8 of the Sapphire Wind Farm Environmental Assessment refers to the lack of published soil landscape mapping (pg. 246). We would like to draw your attention to the existence of more recent

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information available from 2010. The more recent soils survey was the "Reconnaissance Soil Landscape Mapping for the Border Rivers Gwydir Catchments". It is available from the Border Rivers Gwydir CMA.

We recommend that the proponent obtain this information as it is much more comprehensive in its content to the 1977 reference. In particular, the soil landscape information provides detailed information on limitations of the soil and suitability for certain land use. To obtain information on this mapping, please contact Mark Blair, Catchment Officer based in Inverell on (02) 6728 8048.

Indigenous Cultural Heritage

In our previous correspondence to Adrian Maddocks, Development Manager in September 2009, we indicated ways in which Wind Prospect CWP Pty Ltd could consider Indigenous Cultural Heritage as stated:

"I would also request that Wind Prospect CWP Pty Ltd consider if an Indigenous Cultural Heritage (ICH) archeological survey needs to be initiated at the proposed site to ascertain if there are any cultural heritage concerns which may affect the project."

The Border Rivers-Gwydir CMA acknowledges the importance of Indigenous Cultural Heritage within our catchment and we commend the completion of a Heritage Assessment. For the purposes of this assessment, the proponent has likely fulfilled the requirements of legislation. It is unfortunate, however, that representatives of the relevant Local Aboriginal Land Council (LALC) (Glen Innes LALC or Anaiwan LALC) were not included in the survey. The people listed as participating in the survey are more representative of Ashford LALC area, which is outside the survey area.

It is recommended that for future site surveys or training for personnel on procedures relating to cultural heritage, local representatives of either Anaiwan or Glen Innes LALC's are involved. Should you require additional information or assistance contacting relevant representatives, please do not hesitate to contact Harry White (Catchment Officer Aboriginal Support) on 02 6728 8047.

Catchment Action Plan

The Border Rivers – Gwydir CMA is currently upgrading its current Catchment Action Plan (CAP). This will be implemented from early 2013. Our current CAP, which was listed along with other policies in the Environmental Assessment, identifies the current state of natural resources, threats to condition and provides strategies for their management. For information on the upgrade of our CAP, refer to our website, www.brg.cma.nsw.gov.au and follow the links.

Should you have any queries or require additional information, please don't hesitate to contact Amanda Bigelow, Program Manager based in Inverell on (02) 6728 8022.

Yours sincerely,



Paul Hutchings
General Manager