

Our ref: DOC19/866791

Your ref: MP05\_0117

Andrew Rode  
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Dear Mr Rode

**Subject: Moolarben Stage 1 Mod 15 – AG4 ancillary works**

Thank you for your e-mail dated 2 October 2019 to the Biodiversity and Conservation Division (BCD) of the Department inviting comments on the Environmental Impact Statement (EIS) for the Moolarben Stage 1 MOD 15 AG4 ancillary works.

BCD has reviewed the Biodiversity Development Assessment Report and the Aboriginal Cultural Heritage Assessment (ACHA) report supporting the EIS. BCD has no comments regarding the ACHA for the modification.

BCD's recommendations regarding biodiversity are provided in **Attachment A** and detailed comments are provided in **Attachment B**.

If you require any further information regarding this matter, please contact Liz Mazzer, Conservation Planning Officer, via [liz.mazzer@environment.nsw.gov.au](mailto:liz.mazzer@environment.nsw.gov.au) or (02) 6883 5325.

Yours sincerely



21 October 2019

**Steven Cox**  
**A/Director North West Branch**  
**Biodiversity and Conservation Division**

Enclosure:      Attachments A and B

## BCD's recommendations

### Moolarben Stage 1 Mod 15 – AG4 ancillary works – Biodiversity Development Assessment Report

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1. The accredited assessor should provide a certified, final version of the BDAR.
2. The proponent should justify the delineation of species polygons for glossy black-cockatoos and gang-gang cockatoos.
3. An assessment of hollow-bearing trees in PCT 281 for gang-gang cockatoos should be provided.
4. Mitigation and management measures should be included for all potential indirect impacts identified in table 26 of the BDAR.

## BCD's detailed comments

### Moolarben Stage 1 Mod 15 – AG4 ancillary works – Biodiversity Development Assessment Report

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#### Biodiversity

##### 1. The BDAR is a draft and has not been certified

The document tracking for the Biodiversity Development Assessment Report (BDAR) shows the document's status as draft. In addition, the BDAR has not been certified by the accredited assessor as required by clause 6.15 of the *Biodiversity Conservation Act 2016* (BC Act).

As stated in the BAM Accredited Assessor [Update Number 3](#) (6 August 2018), a BDAR must be final when submitted.

##### Recommendation 1

The accredited assessor should provide a certified, final version of the BDAR.

##### 2. The delineation of species polygons has not been justified

Glossy black-cockatoos and gang-gang cockatoos are dual ecosystem and species credit species. Species credits are generated when breeding habitat is present.

Species polygons in the BDAR for both species of cockatoos are based on 30 metre buffers around hollow-bearing trees within PCT 479. The use of 30 metre buffers around hollow-bearing trees has not been justified in the BDAR. BCD note that there is no buffer distance specified in the general notes of the Threatened Biodiversity Data Collection (TBDC) for these species.

In addition, gang-gang cockatoos are associated with PCT 281 in the TBDC, but there is no assessment of hollow-bearing trees (breeding habitat) in PCT 281 included in the BDAR.

##### Recommendation 2

The proponent should justify the delineation of species polygons for glossy black-cockatoos and gang-gang cockatoos.

##### Recommendation 3

An assessment of hollow-bearing trees in PCT 281 for gang-gang cockatoos should be provided.

##### 3. Further mitigation measures are required

Table 26 of the BDAR provides a risk assessment for potential indirect impacts such as vehicle strike and inadvertent impacts on adjacent habitat or vegetation. While table 27 provides some measures to mitigate and manage potential impacts, this does not directly address all impacts identified in table 26.

#### Recommendation 4

Mitigation and management measures should be included for all potential indirect impacts identified in table 26 of the BDAR.