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22 June 2016

Department of Planning

RE: Ungula Wind Farm Environmental Impact Statement (EIS)

To Whom it may concern,

Wellington Valley Wiradjuri Aboriginal Corporation (WWWAC) would like to thank you for your invitation to provide a response for This Aboriginal Cultural Heritage issue relevant to obligations to protect our Heritage within our Traditional Lands. Wellington Valley Wiradjuri represent the fourteen traditional families with identified apical ancestry pre European occupation with our known Traditional Lands. We know our culture, country and continue with our association with our traditional lands (Ngurangbang).

WWWAC object to any other non-traditional aboriginal organizations or people taking part in site surveys, consultation and assessments within our defined Traditional Lands. These non-traditional people and groups are outsiders under Traditional Lore and have no right to advise on or to be present during consultation or site visits as they do not possess the specific traditional knowledge in relation to these lands or sites. These participants may be indigenous and may live locally within the region however, this still does not give them the right to disregard Traditional Lore and values.

WWWAC notes that the Corporation CEO is a member of the Ungula Wind Farm Community Consultation Committee (CCC), and has actively updated community and other Aboriginal Registered Parties, Individuals and groups around the developments and changes of this project.

Wellington Valley Wiradjuri Aboriginal Corporation is generally supportive of any efforts to provide facilities and business for the community at large within our Traditional Lands, provided Proponents have consulted with WWWWAC and negotiated an agreed outcome in relation to our cultural, heritage and environmental concerns. WWWWAC notes that the Corporation CEO is a member of the Ungula Wind Farm Community Consultation Committee (CCC), and has actively updated community and other Aboriginal Registered Parties, Individuals and groups around the developments and changes of this project.

Wellington Valley Wiradjuri Aboriginal Corporation (WWWAC) have through consultation with other Traditional Elders and Traditional Community with cultural knowledge have the following comments and or recommendations:

Appendix G Framework for Biodiversity Assessment and Appendix H Assessments of Significance

- It is noted that within both of the above named documents that the **wedge-tailed eagle** (*Aquila audax*) and **red-tailed black cockatoo** (*Calyptorhynchus banksii*) were not mentioned. The

omission of these two species is of concern. Traditionally these two avian species have cultural significance to us as a Tradition people especially within this local area.

- Aboriginal Cultural Heritage Field Officers from WVVAC and other Registered Aboriginal Parties (RAP's) during pedestrian field surveys of the project on numerous occasions identified a pair of the wedge-tailed eagle (*Aquila audax*) and at least one other individual bird. We have concerns around the wind turbines and bird strike in relation to this species which is already in low numbers throughout our region. It is not clear as to if this species was included or not in the modelling for Appendix I Collision of Risk Model.
- Aboriginal Cultural Heritage Field Officers from WVVAC and other Registered Aboriginal Parties (RAP's) during pedestrian field surveys of the project on numerous occasions identified a small singular flock of red-tailed black cockatoo (*Calyptorhynchus banksii*) and noted several areas of habitat in which they frequented, as various aged feathers were also found on the ground in these areas. We have concerns around the wind turbines and bird strike in relation to this species which is already in very low numbers throughout our region. It is not clear as to if this species was included or not in the modelling for Appendix I Collision of Risk Model.

Appendix J Heritage (ACHA)

- Aboriginal Community put a higher value on our cultural and artefact sites which is in stark opposition to the scientific value which is recorded as Low for the majority of artefact sites in the EIS. The reason for this is that it is our heritage, our ancestral links and projects such as this keep destroying them and we have less and less physical traditional sites and it is a significant loss to our heritage with the damage to or collection at each AHIMS registered site. Anthropologically these sites tell our ancestors story across the landscape and the loss of physical sites to show future generations is becoming dangerously high within this Traditional Clan area.
- Section 9 Recommendations, page 191 - *"The study area does not warrant further archaeological investigation such as subsurface test excavation"*. Those consulted are concerned around the recommendation that no additional testing will be conducted, as where access roads will cross drainage lines where artefacts may have been located within 20m needs to have at least 2 test pits each side of the water source tested to ensure that there is no archaeological deposit that may be destroyed and confirm that the site use was limited to a confined area.

Appendix K Heritage (ACHA Addendum)

- Sub-surface testing is required in the significant sites as listed if they are going to be impacted in any way.
- Twelve Mile Road, page 61 – *"There were no areas of high potential on this section of the survey, although surface artefacts were recorded in three locations. It is recommended that, if possible, these areas be avoided, however, if disturbance is not avoidable a community collection should take place prior to any works being undertaken"*. WVVAC do not entirely agree with this as there is one area on an elevated landform near the creek 55H 692708 6400470 where multiple artefacts were located on the surface with potential for sub-surface deposit. This area due to its proximity to water is identified by Field officers as a sensitive landform and if any roadworks are to be conducted in the vicinity of this creek and landform test pitting will be required.

General comments and recommendations relating to the combined Heritage Assessments

- Where an Aboriginal Cultural Heritage site can be avoided, that is the optimal outcome, even if changing the project design by 5m to avoid impacts and loss.
- If this project is approved, there needs to be conditions set where the Proponent or Developer changes proposed infrastructure layouts such as roads, powerline routes or turbine locations as



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CWP Crudine Ridge Wind Farm has done. That the site be completely salvaged and where indicated with reasoning by field officers on the site, sub-surface testing be conducted to establish if any archaeological deposit is present. As at Crudine ridge Wind Farm, this has not occurred and has caused cultural sites to be partially collected and site integrity has been lost.

- All workers who enter the site must undertake and pass Aboriginal Cultural Heritage Induction Training presented by the combined Registered Aboriginal Parties for this project, this is to avoid another incident where a site is destroyed as with the Bodangora Wind Farm incident.

Appendix R Landscape Visual Assessment (LVIA) and Appendix R LVIA (Appendix A-D), (Appendix E) and (Appendix F-I).

- Feedback from various people consulted and some general community remarks is that it's going to ruin the landscape and there are concerns as it if the turbines will be seen from on Lake Burrendong, and from the Reflections Holiday Parks, Burrendong and Cudgegong River.
- There are general concerns that the visuals of wind turbines from Burrendong may deter visitors.

WWWAC **conditionally support** to this Wind Farm project, however there are issues relating to outcomes in relation to our Traditional Owner Community cultural, heritage and environmental concerns that need to be satisfied.

WWWAC look forward to further participating in the above project, sharing our knowledge of county and to ensure our Heritage is protected. We trust our response meets your requirements. Please contact WWWAC Directors should you require our assistance to address any Aboriginal issues to support your future plans.

Regards,

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