



PRESERVE HILLS OF GOLD

HILLS OF GOLD PRESERVATION INC.
87 JENKINS STREET NUNDELL NSW 2340

Director - Energy Assessments Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta. NSW 2124

Date: January 29th 2021

TO WHOM IT MAY CONCERN,

RE: HILLS OF GOLD WIND FARM APPLICATION NO. SSD 9679

Hills of Gold Preservation Inc attaches comments from Tamworth ecologist Phil Spark, North West Ecological Services as part of its objection to Hills of Gold Wind Farm.

Phil Spark is a farmer, ecologist and one of the state's leading environmentalists.

He has more than twenty years of experience conducting flora and fauna surveys across New South Wales. He has surveyed the majority of national parks and nature reserves of the region. He is familiar with threatened species and endangered ecological communities, and NSW and Commonwealth environmental protection and planning regulations.

In 2016 Phil Spark was made a Research Associate of The Australian Museum and in 2017 he received the Dunphy Award for most outstanding environmental effort by an individual.

Yours sincerely,

Megan Trousdale
Communications sub-committee chair

Comments on Appendix D Wind Farm Biodiversity Assessment Development Report (B DAR)

As a general comment the report demonstrates in many ways a lack of understanding of the flora and fauna of the region. Species that don't occur are considered like they do occur and those that do occur are not considered.

The report relies on fauna and flora surveys that were conducted during the worst of the drought when detectability for most species was at an all-time low. Those surveys done in Feb and March 2020 were marginally better, populations needed a lot more time to recover to become detectable. To have any credibility the surveys should be done again when populations have had a chance to recover and the seasonal conditions and timing will optimise results.

The survey guidelines for threatened species appear to have been ignored by conducting the surveys to meet project deadlines rather than when species were detectable. The frog surveys are a classic example of a token effort. Davies Tree Frog occurs widely in the area from Hanging Rock to the Head of the Peel, and the Booroolong Frog has been recorded in the Head of the Peel and Wombramurra Creek.

The bat surveys rewrite the distributions for numerous of the bats that were supposedly Anabat recorded. Many of those frequently recorded do not occur in the region *Chalinolobus picatus*, *Scotorepens greyii*, and *Ozimops lumsdenae* are classic examples of how badly the Anabat analysis was done. To have any credibility all the recordings should be re analysed by an expert who is familiar with the calls of the bats of the region.

Nocturnal playback was also conducted when the populations of the large owls were rock bottom, and the timing of the surveys between November and March was when owls are least responsive to playback.

There needs to be consideration of the potential impact of the turbines hitting birds and bats when they are aligned by a prevailing wind that results in them forming an overlapping tall barrier.

If clearing for a new road is proposed to convey the turbines to the top of the mountain, that impact must be included in the EIS assessment as many more species will be impacted.

The report contains numerous errors and false information regarding all aspects of the environmental assessment. I consider it goes beyond what is an acceptable standard for the government to accept for approval, and should be either rejected outright or the proponent asked to do it again.

4.3 Threatened Ecological Communities

Can't see any mention or consideration of the three other endangered ecological communities that occur in the region. The swampy sections on the basalt benches fit the upland wetland description.

Common Name	NSW status	Comm. status	Occurrence
Ben Halls Gap National Park Sphagnum Moss Cool Temperate Rainforest	E3		Known
Carex Sedgeland of the New England Tableland, Nandewar, Brigalow Belt South and NSW North Coast Bioregions	E3		Possibly
Upland Wetlands of the Drainage Divide of the New England Tableland Bioregion	E3	E	Likely

4.4 Groundwater dependent ecosystems

Fail to understand why ground water dependent ecosystems were considered on the ridge tops.

Table 20 list of Ecosystem Credit Species is hard to fathom why some are relevant and others that occur in the same habitat aren't. Species that don't occur like Gang Gang Cockatoo and Grey Crowned Babblers are considered relevant, whereas species that do occur like Little Lorikeet are not considered relevant.

The editing of the document leaves a lot to be desired, for example The Eastern Coast Freetail bat occurs twice in the same table under *Mormopterus norfolkensis* and again as *Micronomus norfolkensis*.

Typos are common throughout which makes the report hard to read, and reduces its credibility as a factual document further.

Table 21 Species Credit Species

Hard to comprehend why some species required targeted surveys that don't occur, and those that do occur didn't require targeted surveys. The Rufous Bettong is a classic example that does not occur.

Fail to see why vulnerable species that do occur like *Eucalyptus oresbia* didn't require a survey, but *Eucalyptus nicholii* that doesn't occur does require a survey.

The November 2020 Environmental Impact Statement

Can't see why the species considered in the EIS should be considerably less than those in the B DAR.

Has some confusing presentations like figure F9-3 Threatened Fauna Records Map that lists species and gives locations for common species like Australian Hobby, Black Kite, and Wedge-tail Eagle that are not threatened.

With regard to the area of clearing required, it must be pointed out that it was not coincidental that the landholder who stands to gain more than anyone else cleared the Turbine alignment before the wind farm proposal was made public. Some of that clearing was reported to the EPA hotline at the time when such clearing was illegal.