

- The week before the EIS submissions closed UPC/AC rented a shop front in Coolah to display posters on the Valley of The Winds. These posters fell down or curled up within 2 days. The shopfront is attended once a week so it was some days before UPC/AC were even aware of their defunct display. This is indicative of the consultation that UPC/AC have conducted prior to the EIS.
- Below just a few examples of errors in the EIS:
  - Dwellings missing from the non-associated dwellings listings
  - ALA less than 1 nm to the wind farm boundary not mentioned by UPC/AC
  - Dwelling listed as associated when definitely not associated
  - Maps indicating the footprint of the project has been reduced to minimise the cumulative impact of the Tilt's Liverpool Range Wind farm and UPC/AC Valley of the Winds wind farm – completely imagined by UPC/AC. The supposed Eastern Girragulang Cluster never existed
  - No mention of obstacle lighting on wind turbines when every CASA submission on Wind Farms insists on obstacle lighting
- Our workplace is outside, we are accustomed to hearing bird and animal noises not crackling noise from transmission lines nor infrasound and audible sound from wind turbines. The sound pollution in our homes and our workplaces will be not only environmentally destructive to the local fauna but cause significant mental health issues to those landholders who cannot escape the noise.
- Biosecurity risks include animal diseases, plant diseases, feral pests and weeds might be introduced and spread during construction and operation (of both wind farm and transmission line infrastructure) via vehicle, machinery and personnel movements.
- Substation/Wind Farm/Transmission line development will require overmass and oversize routes, the development of these routes through agricultural land will be environmentally damaging.
- Sealed roads in the area are in very poor condition following the prolonged wet conditions, heavy vehicle, oversize vehicles and overmass vehicles will further erode road surfaces. Sealed roads in the area are currently not fit for purpose for the existing traffic let alone wind farm construction vehicles, transmission line construction vehicles and substation construction vehicles.
- Unsealed roads are currently not in a fit state for all but light 4WD vehicles.
- Risk of bushfire is greater than it has ever been, the body of fuel in the Wind Farm and Transmission line construction area is greater than that prior to the Sir Ivan Fire. Even in

current damp, cool conditions there is potential for a significant grass fire as there is a large amount of dry grass.

- Increased vehicle and personnel activity brings more fire risk, many don't understand that simply driving a vehicle in the right conditions can be incendiary.
- In the event of a bushfire what resources do the Wind Farm and Transmission line construction and operation teams bring (other than water tanks)? Or is UPC/AC going to solely rely on the volunteer bush fire brigades that operate in the area.
- Is UPC/AC willing to take full responsibility for all adverse outcomes that will result from the loss of local bush fire management resources? For example:
  - The Turee ALA accommodates the 802 air tractor. This ALA is used by district farmers and listed on the RFS pre incident database because of its ready access to 200,000 litres of water.

Turee ALA could be disabled by transmission lines and neighbouring wind turbines.

Such is the nature of the Valley of the Winds EIS that this ALA is not even mentioned, despite it being located adjacent to the wind farm boundary.

- Turee Dam – used in the Sir Ivan fire to reload helicopters. This dam is the largest in the area. Transmission line infrastructure, substation infrastructure and nearby 250-metre-high wind turbines could disable this bush fire management resource.

Please provide us with confirmation that UPC/AC will take full responsibility for the loss of these bush fire management resources and are aware of the potential outcome of loss of life and loss of property that may arise from disabling these resources.

- Regarding the electric and magnetic fields surrounding the electrical infrastructure (particularly the substation) please specify the exact mitigation and management measures.
- Regarding the radio frequency interference known to arise from transmission infrastructure are you willing to take full responsibility for the adverse outcomes that will result from:
  - the inability for farmers to use UHF for communication,
  - interference of the current minimal mobile service in much of the area that at present allows for sporadic SMS only,
  - interference of drone functionality, particularly when increasingly low-cost drones are used by farmers to reduce occupational risk and injuries (refer Workcover NSW)
  - interference of GPS navigation systems on farming equipment to reduce chemical overuse and reduce soil compaction
- The construction of the wind farm and the transmission lines will generate waste; the local refuse collection points are not equipped to handle the current amounts of waste generated by the community. Given there are no collection points for those living outside the local towns waste is currently transported by landowners direct to the refuse collection centre during restricted opening times. It is often deemed unacceptable to deliver more than one

waste bin at a time despite many landowners not delivering weekly and delivering waste from multiple houses. Yet magically the local refuse collection centres will be able to cope with more than 400 people required for the construction of the windfarm, the number required for the construction of the transmission line is at this stage unknown.

- Please quantify the water usage required during the construction of the wind farm and exactly which local water sources are to be used. Water is often in short supply, while this is not the situation at present, we know that dry seasons follow wet ones.
- Cumulative impact of explosion of population during construction of wind farm, transmission line and substation.
  - Coolah has 1 Doctor, there are times when Coolah has no Doctor. At present it takes weeks to get a GP appointment. What happens to the ability for locals to get a GP appointment when 400 plus construction workers arrive? Construction workers will undoubtedly require GP services.
  - Coolah has 1 tyre and vehicle mechanical service. What happens to the ability for locals to access this service when 400 plus construction works require tyre or vehicle repairs?
  - Increased traffic during construction will make it difficult for trucks to access landholders for the collection of livestock and grain and timely delivery to processors.
  - Loss of biodiversity and environmental destruction and NO this will not be offset by purchasing biodiversity credits NOR making a payment to the Biodiversity Conservation Fund NOR establishing biodiversity stewardship sites on lands with like to like biodiversity values to those impacted by the wind farm, transmission line and substation. The area has endangered and protected fauna it is beyond comprehension that purchasing biodiversity credits, making a payment to the biodiversity conservation fund or establishing biodiversity stewardship sites elsewhere will in anyway mitigate the death of endangered and protected fauna and the destruction of the environment.
  - Biodiversity credits won't save the following or stop their habitat displacement:
    - Owls
    - Swift Parrot
    - Superb Parrot
    - Black Falcon
    - Wedge tail eagles – Turee alone has 3 pairs of Wedge tail Eagles in the Croppy Creek valley alone, they will likely be destroyed by impact with wind turbines or be driven out by the sound pollution and destruction of their environment.
    - Microbats
- Studies indicate that Electric and Magnetic Field exposure generally changes bird behaviour, reproductive success, plus growth and development.

- There has been no independent study of the biodiversity impact of the area neighbouring the wind farm.
- UPC/AC EIS indicates that there is generally decreasing bird/bat strike rate per year- is this because all the birds and bats have either left the environment or died because of blade strike?
- The Girragulang Cluster is almost all CEEC (Figure 18, page 41) and UPC/AC note on page 169 of the biodiversity appendix that avoidance of high value vegetation such as CEECs was considered a priority. Is UPC/AC genuinely attempting to reduce the overall footprint of the Project? Or is this another imagined mitigation?
- Wind turbines will be an aircraft hazard it is noted that CASA have recommended the following in regard to the other nearby windfarms:

CASA consider that wind farms are hazardous to aviation safety, and they recommend that wind turbines have obstacle lighting; medium intensity red obstacle lighting. CASA do not consider the visual impact of obstacle lighting on neighbours or local wildlife. CASA state that international standards require 2000 candela lighting intensity. If the lighting fails, it should fail in the “on” condition until it can be rectified.
- No visibility study undertaken along any area of Tongy Lane and Turee Creek valley which stands to be substantially affected
- UPC/AC state there will be 137 km of internal roads, 6 metres wide excluding drainage. Farm tracks are less than 3 metres wide. Environmental impact?
- The cumulative impact of the Tilt Liverpool Range Wind farm and the UPC/AC Valley of the winds wind farm is 370 plus 250-metre-high wind turbines in our small community. In the Turee and Croppy Creek Valley we will see 300 of these. How many Wedge Tail Eagles will stay in the valley? How many will be destroyed in the Turbines? Paying money to the conservation foundation does not save the local Wedge Tail Eagles
- How can the noise from Girragulang Rd Substation be calculated when the specific location of this substation is not known?
- DPE SSD guidelines state EIS documents should be prepared to a high standard. The number of errors in this document indicate that UPC/AC have not followed this guideline

### 5.3 High standard

The EIS must be prepared to a high standard, having regard to the Department's *State Significant Development Guidelines – Preparing an Environmental Impact Statement* (see Appendix B), and should:

- be as succinct as possible and easy to understand
  - reflect community views
  - contain a technically robust assessment of the impacts of the project
  - provide a justification and evaluation of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.
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- How is DPE able to carry out high level checks of SSD applications when the department appears overwhelmed with developers' applications for Renewable Energy Projects?
  - People who live in rural areas highly value the natural environment. They place huge importance on visual amenity, they choose to live and work in the "paddock", visual amenity is vital to their sense of wellbeing. We see the building of hundreds of 250-metre-high wind turbines, substations and transmission lines required Gigantic towers as a transformational deterioration to our environment. Farmers wellbeing, livelihoods, mental health and values of farms will be changed forever. Farmers are accustomed to working in drought, flood and fire, they have never before had their right to farm so emphatically challenged by well-funded developers seeking to build hundreds of industrial structures. No matter the cost to agriculture, protected and vulnerable wildlife, the environment, historical heritage and aboriginal heritage.