

Summary of comments on the Draft Flora and Fauna Management Plan for the Golden Plains Wind Farm

5 April 2022

The Flora and Fauna Management Plan (FFMP) for the Golden Plains Wind Farm (the Project) was placed on public exhibition from 13 December 2021 to 7 January 2022. Members of the public were invited to provide feedback and comment on the FFMP.

In accordance with the conditions of the Project's approval under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (the EPBC Approval):

- A notice was published on the Project's website from 9 December 2021 to 7 January 2022;
- A notice was published in *The Age* newspaper on 13 December 2021;
- Printed copies of the FFMP were provided to the following places for public display:
 - the office of the Department of Environment, Land, Water and Planning at 8 Nicholson Street, East Melbourne
 - the office of the Department of Environment, Land, Water and Planning at 402 Mair Street, Ballarat
 - Golden Plains Shire Council - Bannockburn Customer Service Centre, 2 Pope Street, Bannockburn
 - Golden Plains Shire Council - Smythesdale Customer Service Centre, 19 Heales Street, Smythesdale
 - Bannockburn Library at 25/27 High Street, Bannockburn
 - State Library Victoria at 328 Swanston Street, Melbourne

A summary of the comments received and the proponent's response to those comments is provided in Table 1. The Response to Comments has been prepared in accordance with Condition 5 of the EPBC Approval. The Response to Comments does not detail statements or questions raised regarding other wind farms or the statutory processes of either the State or Commonwealth Government.

Table 1: Response to Comments

Submitter	Summary of content of Comments	Address of Comments
1 (Walton)	Identification and Protection of local flora and fauna and birdlife during construction.	<p>The FFMP includes measures to protect local flora and fauna during construction of the Project. These measures are detailed in Section 4 of the FFMP.</p> <p>The management and mitigations measures in the FFMP have been developed in consultation with the Department of Environment, Land, Water and Planning (DELWP). DELWP has endorsed the FFMP which now forms part of the Project's Planning Permit.</p>
	The vegetation removal proposed for wetland 52364 is in breach of Planning Permit Condition 1e. Map 127 of the FFMP proposes to intrude on the Plains Grassy Wetland.	Permit condition 1e requires that the boundary of the terminal station site does not intrude into the boundary of the Plains Grassy Wetland Ecological Vegetation Class (EVC). The terminal station site provides a setback distance of more than 80m from the boundary of the Plains Grassy Wetland vegetation class which is shown on 'Map 127' on page 176 of the FFMP. The terminal station site does not intrude into this EVC. Furthermore, in accordance with permit condition 1e, the boundary of the terminal station has been approved by DELWP Environment portfolio.
	The FFMP does not respond to the impacts of the quarry	The original quarry location considered as part of the EES has been abandoned and is not part of the FFMP. Any quarry associated with the Project will be subject to its own planning and environmental assessment and approval process.
	Native grasslands to be continually assessed and monitored to ensure no increase in works	Appropriate widths have been allocated for all project works corridors (refer to Section 2.3 of the FFMP). The management measures in section 6 of the FFMP require ongoing monitoring to ensure there is no additional impacts on native vegetation or fauna habitat.
	Impacts of further native grassland removal beyond what has been permitted.	<p>The planning permit and EPBC approval (EPBC 2017/7965) detail the extent of impact allowable by the Project. No additional impacts beyond the limits set out in the permit and EPBC approval are proposed.</p> <p>The FFMP includes measures to ensure works are contained within the approved work areas (refer to section 4.1.1), and outlines management measures and compliance indicators (refer to section 6) to ensure ongoing monitoring of impacts during construction.</p>
2 (Coad)	The 28.74ha and 49ha of high quality natural temperate grassland should not be removed as it cannot be mitigated.	The assessment of the environmental impact of the Project was undertaken via a comprehensive Environmental Effects Statement (EES) informing both the issue of the Planning Permit and the EPBC approval. These approvals allow for the removal of specific amounts of native vegetation including up to 28.74 hectares of Natural Temperate Grasslands of the Victorian Volcanic Plan (NTGVVP) (detailed in Condition 1c of the EPBC approval). It is

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	<p>Detailed survey work of grasslands in the south-eastern section of the wind farm</p> <p>Roadside vegetation removal should not occur</p> <p>Mitigation measures identified for the Golden Sun Moth (GSM) and the Stripped Legless Lizard (SLL) are unlikely to work.</p> <p>An independent team should undertake site specific surveys for GSM.</p> <p>Tracks and cable ripping should not be done in south-eastern section of wind farm so to not fragment populations of SLL</p> <p>Wetland 52364 or any other wetland should not be impacted on.</p>	<p>important to note that the project's planning permit allows for removal of up to 49.052 ha of native vegetation in total across all vegetation types, not 49 ha of NTGVVP.</p> <p>Detailed surveys of the entire Project works area have been undertaken and the results of these surveys inform the FFMP.</p> <p>Removal of roadside vegetation has been minimized and the remaining impacts have been accounted for in the Project's overall native vegetation impacts.</p> <p>Translocation of SLL to other, remote sites has been suspended and is not proposed by the FFMP. The FFMP proposes to relocate SLL a short distance (<100m) to adjacent suitable habitat outside the works area. Section 4.5.5 of the FFMP discusses salvage and relocation procedures.</p> <p>The FFMP does not propose the relocation of GSM.</p> <p>The surveys informing the FFMP were undertaken by suitably qualified persons as defined by the EPBC Approval. Each survey was undertaken in accordance with the guidelines relating to that type of survey.</p> <p>Access tracks will not fragment populations of SLL and SLL will be able to traverse access tracks to move between areas of habitat.</p> <p>The FFMP includes measures to mitigate impacts from trenching during construction while trenches are open. This is detailed in Section 4.5.3. Once covered, trenches be remediated and will not fragment populations of SLL.</p> <p>Impacts on wetlands and wetland vegetation have been minimized and approved in consultation with DELWP Environment portfolio. All residual impacts will be offset to the satisfaction of the Commonwealth Department of Agriculture, Water and the Environment (DAWE), and the project is required to implement a Brolga Monitoring and Compensation Plan to offset all impacts on Brolga.</p>
3 (Cumming)	<p>The FFMP is next to useless if it is any comparison to Dundonnell Wind Farm (DWF). DWF underestimated impacts.</p> <p>An independent assessment must be done prior to the start of works with post completion assessments to manage and mitigate.</p>	<p>The DWF and the DWF FFMP is not relevant to the GPWF project or the GPWF FFMP.</p> <p>The surveys informing the FFMP were undertaken by suitably qualified persons as defined by the EPBC Approval.</p> <p>Appropriate widths have been allocated for all project works corridors (refer to Section 2.3 of the FFMP).</p> <p>Ongoing monitoring and management actions are included in the FFMP in Sections 4 and 6 to ensure potential impacts are appropriately managed and mitigated.</p>

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	The surveys were technically performed at textbook times of year although these times were not appropriate due to unseasonal conditions. Surveys must be independently reviewed.	Each survey was undertaken by suitably qualified persons as defined by the EPBC Approval. All surveys were accordance with DELWP's and DAWE's Survey guidelines relating to each type of survey.
	The FFMP lists species on page 7 that were shown on desktop surveys that could not be found on site specific surveys. So have excluded them.	All of the species on page 7 of the FFMP are <i>likely to or have the potential to</i> occur at the Project site. Targeted surveys were undertaken to understand whether each species did in fact occur within the Project footprint. The majority of the species were not recorded within the Project footprint.
	Original quarry has been abandoned and not assessed in the FFMP	The original quarry location considered as part of the EES has been abandoned and is not part of the FFMP. Any quarry associated with the Project will be subject to its own planning and environmental assessment and approval process.
	The FFMP states only small areas of GSM habitat will be removed but the EPBC approval allows for 44ha	The FFMP states that small areas of GSM habitat will be removed for the Project. The aggregate of these small areas will be less than the limits set by the EPBC Approval.
	Salvage and relocation of GSM is unlikely to work. Salvage and relocation of SLL has previously failed and has been suspended in Victoria.	The FFMP does not propose the relocation of GSM. Translocation of SLL to other, remote sites has been suspended and is not proposed by the FFMP. The FFMP proposes to relocate SLL a short distance (<100m) to adjacent suitable habitat outside the impact zone. The proponent is not aware of any known issues with the efficacy of short-distance relocations.
	A 50 m buffer from works is too small for the Growling Grass Frog (GGF) and other aquatic species.	Per section 4.6 of the FFMP, no infrastructure will be placed within 100m of a confirmed Growling Grass Frog wetland. Additional mitigation measures will apply where works are within 50m of <u>any</u> waterway or wetland. These mitigation measures will apply to all waterways and wetlands, regardless of the waterway or wetland's potential to support GGF.
	The destruction of species and habitat should not be approved on the grounds that it will somehow be mitigated or offset.	The assessment of the environmental impact of the Project was undertaken via a comprehensive Environmental Effects Statement (EES) informing both the issue of the Planning Permit and the EPBC approval. These specific matters were assessed via the Project's EES and appropriate removal limits were approved by both the State and Commonwealth Governments.