



Councillors & Mr Peter Smith
Cooma Monaro Shire Council
COOMA NSW 2630

email: Councillors@cooma.nsw.gov.au peter.smith@cooma.nsw.gov.au

Dear Councillors & Mr Smith

Re: Proposed Fixed Wireless Facility 149 Peak View Road, Numeralla NSW 2630

I write on behalf of Wildcare, a wildlife rehabilitation and advocacy group with over 250 members that has actively supported the conservation of the nationally significant population of koalas located to the east of the Monaro Highway. We strongly object to the proposed tower at 149 Peak View Road, Numeralla NSW, this location is in core koala habitat. Koalas have been sighted crossing roads and on properties in this vicinity.

Our members work closely with wildlife rescue groups LAOKO & NARG to ensure that these koalas are rescued and rehabilitated whenever they are in need. Wildcare members have volunteered large amounts of time participating in koala survey work. Tissue samples that our members have provided from koalas in rehabilitation or from road kills, has contributed to the genetic work of Sydney University. This work has shown that this koala population is genetically unique. Genetic diversity is important to the long term survival of koalas, koalas are listed as threatened with extinction under both NSW and Federal legislation.

Our concern is for the proposal's impact on the koalas that are known to range in the Numeralla area. We are very concerned that the process followed to date, has failed to identify that koalas live in this vicinity. The Cooma Monaro Shire Council knows that koalas live in the Numeralla area and is in the process of developing a Comprehensive Koala Plan of Management for this population.

It is disturbing that the "Statement of Environmental Effects" prepared on behalf of NBN Co Limited by Visionstream in December 2014, fails to identify koalas in the vicinity of the tower. Page 23 of this document, section "(l) The likelihood of impacting on threatened species and communities should be identified in consultation with relevant state or local government authorities and disturbance to identified species and communities avoided wherever possible" The response in this section fails to identify any threatened species. The koala is a threatened species and a phone call to either NPWS (the relevant state government authority) or the Cooma Monaro Shire Council (the relevant local government authority) would have quickly identified koalas in the Numeralla area. It appears that little or no effort has been made to identify threatened species, this is a significant failure.

On page 32 of the "Statement of Environmental Effects" prepared on behalf of NBN Co Limited by Visionstream in December 2014, Section 7.4 Flora and Fauna, in the response to this section there is the following statement "There are no

known items of Flora and Fauna significance located in the vicinity of the proposal site." Clearly there has been a significant failure to even identify species in the vicinity of the proposal site.

We ask that Cooma Monaro Shire rejects the current Statement of Environmental Effects document due to the significant failure to identify koalas in the vicinity of the proposal site.

At a community meeting at Numeralla Hall on Monday 19/01/2014, concern was raised by community members in relation to the impact on people from the electromagnetic emissions of the tower and the impact on koalas in the area. It was discussed at the meeting that the Rural Fire Service is looking into building a tower on the top of Numeralla Mountain to improve radio communications. At a recent Koala Committee meeting, NPWS staff talked about building a tower to improve radio communications. A map at the meeting clearly showed that Numeralla Mountain at a high of 1263 metres provides advantages in being able to service a much larger area than the proposal site at 149 Peak View Road.

On page 20 of the "Statement of Environmental Effects" prepared on behalf of NBN Co Limited by Visionstream in December 2014, The NSW Telecommunications Facilities Guideline including Broadband 2010, Principle 2: "Telecommunications Facilities should be co-located wherever possible." The response to this section states that there are currently no existing telecommunication facilities in the vicinity. This is true, but as both the Rural Fire Service and the NPWS are looking into improving telecommunications in the area, we believe a co-located site on the top of Numeralla Mountain should be investigated. Construction costs could be shared and there would only be one site, one area of impact. As I understand it, the proposed NBN tower site at 149 Peak View Road, would be unsuitable for both the Rural Fire Service and NPWS as its much lower elevation and the higher mountains around the site, would significantly restrict communications from a tower at 149 Peak View Road.

Regardless of the site, as a minimum, there should be intensive koala surveys conducted over a 1km radius to properly determine impact and mitigations required at the site. There should also be compensation payable for each tree removed, to enable future strategic replanting of koala preferred feed trees.

Yours sincerely

Signed: ... *James Fitzgerald*

James Fitzgerald

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