



Anthony Ko
Senior Environmental Assessment Officer
Resource and Energy Assessments, Planning Services
Department of Planning Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Via email: anthony.ko@planning.nsw.gov.au

Dear Mr Ko

RE: Snowy 2.0 Exploratory Works Modification 1 (SSI 9208 – MOD 1)

I refer to your email dated 25 June 2019 seeking comment for Modification 1 to the Snowy 2.0 Exploratory Works located in the Lobs Hole area in Kosciuszko National Park, within the Snowy Valleys local government area. Biodiversity and Conservation (B&C) Division and the National Parks and Wildlife Service (NPWS) have reviewed the exhibited Modification and supporting technical reports.

I understand Snowy Hydro Limited and their consultants have consulted extensively with the NPWS, as the park management authority, and relevant areas of B&C.

A significant concern discussed with representatives of Snowy Hydro Limited during the initial Exploratory Works assessment was the impact on geodiversity values. NPWS strongly recommends that damage to the boulder/stream screes and fossil beds in the upgrade of Lobs Hole/Ravine Road continue to be avoided as part of these Modification works.

Another key issue is that the removal of the 91 trees along Lobs Hole Road has not been included in the offset calculations for the modification.

The B&C/NPWS assessment summary is included in **Attachment A**. This assessment is consistent with previous advice provided on the EIS for the Exploratory Works dated 20 August 2018.

The Modification as proposed will require all existing management plans to be updated to reflect the new works.

If you have any questions regarding this matter, please contact Glenn Stroud on (02) 6947 7000 in relation to park management issues, or Allison Treweek on (02) 6229 7082.

Yours sincerely

12/07/2019

Mike Saxon
Director South East Branch
Biodiversity and Conservation Division
Department of Planning, Industry and Environment

ATTACHMENT A – Assessment Summary for Snowy 2.0 Exploratory Works Modification 1 (SSI 9208 MOD 1)

ATTACHMENT A Assessment Summary for Snowy 2.0 Exploratory Works Modification 1 (SSI 9208 MOD 1)

Key Issues

1	Geotechnical Investigations	<ul style="list-style-type: none"> • The description of works (Volume 1 - 3.2.3) identifies that access tracks 1km long and only 4m wide will be required to access all drill pads. It is unlikely that this width will be suitable along those sections of tracks with very steep side slopes such as the access tracks to BH7201 & 7212. • The description of plant and equipment (Volume 1 – 3.2.11) introduces the use of helicopters for remote drilling operations. The modification identifies that all drilling will be accessed by vehicle. <p>Recommended action:</p> <ul style="list-style-type: none"> • Clarification is provided on the road width along all sections of the tracks to establish access to BH7201 & 7212, and the level of impact is quantified for any sections greater than 4m wide. • Clarification is provided on how remote drilling operations will be accessed and the use of helicopters. The impact of any changes that lead to increased clearing is to be quantified.
2	Groundwater monitoring and access	<ul style="list-style-type: none"> • The detail identified in Figure 3.6 does not clearly indicate the distinction between vehicle and pedestrian access to sites. Some access identified on the map is not currently used or has been closed and rehabilitated. • Section 3.2.9 identifies that, “<i>Snowy Hydro proposes to retain the option of installing monitoring equipment in any of the boreholes for ongoing groundwater monitoring purposes. This may occur sometime in the future following the decommissioning activities.</i>” <p>Recommended action/conditions of approval:</p> <ul style="list-style-type: none"> • Clarification on the detail in Figure 3.6 is provided with clear documentation of the requirements for use and maintenance of access tracks in KNP. The impact of any clearing of vegetation along rehabilitated tracks is to be to be quantified. • A set time frame for all activities and continuing access to the works is to be provided. • All rehabilitation is to be incorporated into the Exploratory Work Rehabilitation Plan (yet to be developed) as per Condition of Approval 58.
3	Construction of sub station	<ul style="list-style-type: none"> • The description of works (Volume 1 page 3) identifies that 33kv feeder connection between the substation and the exploratory works construction power network will be either be via overhead line or underground cable.

		<ul style="list-style-type: none"> The visual assessment (Volume 1 Section 6.5.5) states that visual impact assessment for the substation will not be done until the Main Works application. <p>Recommended actions/conditions of approval:</p> <ul style="list-style-type: none"> All feeder power to construction facilities are to be provided via underground cables. A visual impacts assessment is to be completed and assessed for the substation as part of this application. The current NPWS and Transgrid agreement, "<i>Procedures for the undertaking of Inspection, Maintenance and Emergency Works on Transgrid Network Assets and Associated Infrastructure 2014</i>" is to be referenced for all operational requirements of Transgrid facilities in KNP.
4	Changes to project boundary.	<ul style="list-style-type: none"> Changes to the project boundary do not include all access tracks, laydown areas and communication sites identified in the modification. An assessment of impacts has been carried out for road widening at the fossil beds. However, no assessment has been made for similar widening at the streams/boulder scree. <p>Recommended actions/conditions of approval:</p> <ul style="list-style-type: none"> Changes to the EIS boundary are to incorporate all areas identified in the modification. All works are to be incorporated and conducted as per the Exploratory Works Environmental Management Strategy and associated plans. All rehabilitation is to be incorporated into the Exploratory Work Rehabilitation Plan (yet to be developed) as per Condition of Approval 58. An independent significance, impact and geotechnical engineering assessment is to be undertaken of the proposed works at the stream/boulder scree. The mitigation measures identified in the RTS Volume 2 Table 3.2 relating to "no retaining wall" is a condition of approval. No impacts beyond those already approved are to occur to the stream/boulder scree and/or site of the Devonian strata fossil beds on Lower Lobs Hole Ravine Road.
5	Road Access and Transport	<ul style="list-style-type: none"> Condition 46 of Schedule 3 of SSI 9208 Determination dated 7/2/19 requires preparation of a Traffic Management Plan The revised peak hour traffic movements in Table 6.7 indicate a significant increase in traffic movements. While Section 6.4.3 and 8.3.2, "indicates that current conditions of approval relating to traffic are adequate" and "no additional impacts will be experienced by recreational users". The modification does not address current concerns being expressed by the proponent in relation to the current use and status of Link Road, particularly relating to public interaction

		<p>and snow and ice impacts. NPWS snow clearing and ice treatment operations have limited capacity and budget to meet additional demand placed on it by this Modification</p> <p>Recommended action:</p> <ul style="list-style-type: none"> Additional mitigation measures be developed and incorporated into the Traffic Management Plan to address impacts experienced during normal and adverse weather and traffic conditions on KNP roads.
6	Heritage	<ul style="list-style-type: none"> The Aboriginal and Historic Heritage assessment as outlined in Section 6.2 and shown in Figures 6.3 – 6.6 does not include work associated with BH7201 & 7212 and associated access tracks or geophysical surveys. Please note a separate response is to be provided by the Heritage Division of DPC in regard to Heritage Council responsibilities. <p>Recommended action:</p> <ul style="list-style-type: none"> Clarification on the assessment undertaken for activity around Talbingo Reservoir associated with BH7201 & 7212 is to be provided.
7	Other matters	<p>Noise and Vibration</p> <ul style="list-style-type: none"> The noise and vibration assessment relies on the Exploratory Works EIS. The EIS did not consider works in the Marica area or take into account the impact on adjacent NPWS camp grounds. <p>Recommended action:</p> <ul style="list-style-type: none"> An assessment is made of possible impacts (noise, vibration) upon Bullocks Hill Camp Ground in KNP.
8	Bushfire Risk and Hazard	<ul style="list-style-type: none"> Condition 54 of Schedule 3 of SSI 9208 Determination dated 7/2/19 requires preparation of an Emergency Management Plan addressing bushfire risks Current bushfire and emergency plans do not address new operational areas, changed landscape and bushfire behaviour. Of particular note, Marica drill sites which only have one access/egress. <p>Recommended action:</p> <ul style="list-style-type: none"> Current Bushfire and Emergency Management Plans are to be revised to incorporate the additional operational areas as per Condition of Approval 54.
9	Biodiversity	<ul style="list-style-type: none"> B&C have reviewed the BDAR to support the modification. The credit calculation has been adjusted to account for areas where the clearing has been reduced. However the calculation is based on a

		<p>4m wide road width. Does not appear to account for any cut and fill required on steep slopes. (See Key Issue 1).</p> <p>Recommended action:</p> <ul style="list-style-type: none"> The road widths and laydown areas in steep areas are to be reconsidered and if it is necessary to widen the roads in sections, then the offsetting requirements are to be recalculated.
10	<i>Smoky Mouse</i>	<ul style="list-style-type: none"> There will be an increase in impact within the Marica area on the Smoky mouse. There is no detail in the Biodiversity Management plan on how the vehicle speed limit will be maintained in the Smoky mouse habitat. <p>Recommended actions:</p> <ul style="list-style-type: none"> The draft Biodiversity Management Plan is to include extending the existing monitoring program for Smoky Mouse to the Marica area in consultation with B&C Division. Detail on how the speed limit will be maintained and enforced in the Smoky mouse habitat is to be provided. The BMP is to include monitoring and recording any fauna road deaths and detail on the adaptive response to any deaths.
11	<i>Dangerous tree removal</i>	<ul style="list-style-type: none"> The BDAR and offset calculations do not include the 91 trees being cleared on Lobs Hole Road. Some of these trees are large and hollow bearing. <p>Recommended actions:</p> <ul style="list-style-type: none"> The offset calculation and the credit liability is to be adjusted to include the 91 trees. The financial amount payable in Condition 7 is to be adjusted accordingly. The offset strategy is to detail how the loss of hollow bearing trees will be offset on park. Clarification on the surveys for arboreal fauna and hollow dependent birds is to be provided including whether the 91 trees were assessed during the appropriate time for breeding habitat. Mapping and location of the 91 trees would assist in determining if the trees were surveyed. Where feasible, the impact of the removal of hollow bearing trees is to be mitigated by cutting out the section(s) of each removed tree with the large hollows and remounting them on suitable trees.
12	<i>Aboriginal Cultural Heritage</i>	<ul style="list-style-type: none"> Conditions 11, 12, 13 and 14 of Schedule 3 of SSI 9208 Determination dated 7/2/19 are relevant to the modification. Table 6.4 (page 70) and Figure 6.3 (page 77) indicates that additional impacts will also occur to Aboriginal objects in RSU29. This is not discussed under section 6.2.3.ii (page 69). The commitment to update the current Aboriginal Heritage Management Plan under section 8.3.1.i (page 113) is noted.

		<p>Recommended actions:</p> <ul style="list-style-type: none">• For completeness - section 6.2.3.ii is to be updated to include discussion of impacts to RSU29.• All operational maps and plans are to be reviewed and updated to ensure the new boundaries of works are consistent with the proposed modification changes, especially those areas where impacts to Aboriginal cultural heritage values are reduced. All older versions of operational maps and plans are to be removed from circulation to ensure there are no inadvertent impacts to Aboriginal cultural heritage values.
--	--	---