

Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
Attention: Director- Resource and Energy Assessments

21 August 2019

Dear Mr Betts,

Exhibition of Modification Application for Snowy 2.0 Exploratory Works (SSI 9208 MOD 1)

The National Parks Association of NSW (NPA) made a submission on the modification application for the Snowy 2.0 exploratory works dated 1 July 2019. NPA was subsequently invited to a meeting on 25 July 2019 to discuss the application with Mr David Kitto, Ms Nicole Brewer and Mr Andrew Ko of the Department of Planning, Industry and Environment. We are very appreciative of the offer to meet and particularly the invitation to provide further comments on the modification application. Those comments are provided below.

Issue 1. Consultation

NPA's earlier submission emphasised the scale of potential impacts and the large amount of supporting information provided by the applicant. In that context we requested that the Department extend the submission period to enable community stakeholders sufficient time to prepare comments on the application. We also noted the limited consultation that Snowy Hydro had undertaken and recommended that they consult with a broader range of stakeholders about the proposed modification.

Issue 2. Revised project cost and timing

The modification will result in changes to the cost and timing of the Exploratory Works. It is recommended that these changes be disclosed in the application, in particular the construction of the new substation and its connection to the camp and work sites.

Issue 3. Additional accommodation

The modification will require accommodation for an additional 70 workers but does not specify where they will be housed and if this requires additional facilities at Lob's Hole.

Issue 4. Location of Power Station

The modification proposed moving the underground power station one kilometre to the west. There is no explanation of the reasons for this change beyond a reference to 'design development'. It is unclear what 'feasible alternatives' were considered (as required by the EP&A Regulations) and whether this change has additional environmental or functional implications for the project. In a recent meeting with NPA, Snowy Hydro indicated that the new location would involve substantial surface structures, which don't appear to be described or assessed in the modification application.

It is recommended that the application address the implications for the change of location. For example, declines in pumping efficiency due to the longer distance to Tantangara or a greater visual impact from the higher surge tank.

Issue 5. Environmental offset

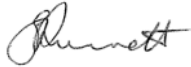
The modification does not specify the recompense of environmental offsets.

Issue 6. Roadworks

NPA considers that the additional roadworks described in the application reinforces the inappropriateness of the incremental approach to the public release of information about the total environmental impact of the project. It is recommended that the application should address whether the road and bridge works for the modified Exploratory Works will be extended even further when and if the Main Works proceed, and if so to what total extent.

I can be contacted at garyd@npansw.org.au or on 9299 0000.

Yours sincerely,



Gary Dunnett
Executive Officer
National Parks Association of NSW