



Mr Joe Fittell
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Department of Planning, Housing and Infrastructure

By email: joe.fittell@planning.nsw.gov.au

Dear Joe

Thank you for the opportunity for the National Parks and Wildlife Service (NPWS) of the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to provide advice on the Snowy Hydro Limited (SHL) Modification Report (MOD3 to Snowy 2.0 Main Works).

NPWS has the following outstanding issues and I request they be considered by SHL as part of the Response to Submissions process. We are happy to discuss any of the items further with you:

- Spoil (section 6.1 Surface water and spoil management) – generally states that spoil material will either be re-used for backfill of the adit tunnel, removed to the Tantangara permanent spoil emplacement (PSE) if potentially or actually containing naturally occurring asbestos (NOA), with all remaining spoil removed to the Rock Forest site. A single statement on page 38 notes that if the capacity of the Rock Forest site is less than the surplus spoil volume, any additional material will be placed at Tantangara PSE. NPWS acknowledges that the Tantangara PSE was the original emplacement location for this material under the Main Works approval, however notes spoil will now be required to be transported from Marica. NPWS requests clarification:
 - that the maximum amount of spoil possible will be placed at Rock Forest
 - of the likelihood of spoil (other than NOA) being transported to Tantangara PSE (noting varying volumes for the spoil generated at Marica are given in the MOD3 report – refer p37-38 with totals of 451,000m³, 605,100m³ and 424,000m³ unbulked), and
 - of the maximum spoil volumes to be (i) excavated in the various tunnel sections and (ii) permanently emplaced in the various locations (noting the varying volumes noted above on p37-38)
- Spoil (section 6.1 Surface water and spoil management) – NPWS requests confirmation that apart from spoil material re-used to backfill the adit tunnel and topsoil reused in rehabilitation works, no additional spoil will be permanently emplaced at Marica. This is in response to a sentence included on p24 *'The approved Rock Forest PSE will be utilised for spoil that cannot be reused at Marica for rehabilitation'*
- Spoil (section 6.1 Surface water and spoil management) – I note that any spoil potentially or actually containing NOA will be removed to the Tantangara PSE. NPWS acknowledges that Tantangara was the original emplacement location for this material under the Main Works approval, however queries whether it has been considered placing this material at the Rock Forest site?

- Groundwater (section 6.2 Groundwater) – I understand that DPHI (Planning) have engaged an external expert to review the geotechnical and groundwater aspects of the proposed works. I request that NPWS and DCCEWW's Biodiversity Conservation Division (BCD) be advised of the outcome of that assessment and receive a copy of any report generated. One of NPWS's prime considerations with respect to groundwater is to be confident there will be no detrimental impact on sensitive environmental receivers such as karst and terrestrial groundwater dependent ecosystems (GDE) (eg bogs and fens including string bogs) either during construction or the future operational period
- Groundwater (section 6.2 Groundwater) – clarify the monitoring locations relevant to the modification works (as outlined in section 6.2.2) with those shown on Figure 4.1 of Appendix C. Specifically, the naming conventions in the legend of Figure 4.1 are not consistent with the descriptors in section 6.2.2
- Transport (section 6.3 Transport) – the traffic impact assessment in section 6.3 addressed two spoil removal options, being all spoil to Rock Forest and all spoil to Tantangara. However, it also noted that Tantangara Road itself was closed at the time of the on-site inspection and was not accessed. NPWS requests an assessment of Tantangara Road be undertaken to assess both road suitability and environmental implications with respect to the potential increased heavy vehicle movements from NOA spoil and/or non-NOA surplus spoil that can't be placed at Rock Forest. Noting that the road will remain closed until 4 October 2024, so access prior to that date will require a request to be made to NPWS
- Transport (section 6.3 Transport) – I note that SHL has been in consultation with Traffic NSW (TfNSW) regarding the traffic impact assessment. NPWS will support any comments from TfNSW, particularly where it relates to the Snowy Mountains Highway and intersections with Tantangara Road, Link Road and Marica trail
- Removal of tunnel boring machine (TBM) infrastructure – confirmation is requested from Snowy Hydro that all components of the proposed fourth TBM will be removed from Kosciuszko National Park at the completion of construction works. NPWS expects that the existing Main Works planning condition (condition 9 Table 3 Rehabilitation Objectives – Kosciuszko National Park - Infrastructure) '*Decommission and remove infrastructure, unless NPWS agrees otherwise*' will apply to any works approved under this Modification.

I note that BCD will be making a submission to the Modification Report. NPWS supports that submission.

If you have any further questions about this issue, please contact Nicole Shotter, Manager Snowy 2.0 Team on 0419 400 550 or at nicole.shotter@environment.nsw.gov.au.

Yours sincerely



Anthony Evans
a/Director, Park Operations Projects
National Parks and Wildlife Service
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