

Mr Marcus Ray  
Deputy Secretary  
Planning and Assessment  
Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Ray

**Snowy 2.0 Transmission Connection (SSI 9717) Environmental Impact Assessment –  
Environment, Energy and Science Group Submission**

We write in reference to your Department's exhibition of the Environmental Impact Statement (EIS) for the Snowy 2.0 Transmission Connection project located primarily in Kosciuszko National Park (KNP), within the Snowy Valleys local government area. The National Parks and Wildlife Service (NPWS) and the Biodiversity and Conservation Division (BCD) of the Environment, Energy and Science Group have reviewed the EIS and supporting technical reports.

The Snowy 2.0 project, which includes the Transmission Connection project, was granted Critical State Significant Infrastructure status in March 2018, thereby making the Minister for Planning and Public Spaces the consent authority, notwithstanding the project's presence largely within KNP.

In November 2018, the NSW Parliament also amended the *Snowy Hydro Corporatisation Act 1997* to allow the granting of leases, licences and easements for the project. Under that legislation, these leases may only be granted once planning approval is in place. As you may be aware, NPWS is also in the process of amending the KNP Plan of Management to recognise Snowy 2.0 and thereby provide for the continued granting of leases, licences and easements.

We understand that TransGrid (TG) on behalf of Snowy Hydro Limited (SHL) and their consultants has consulted with NPWS, as the park management authority, and relevant areas of DPIE such as BCD.

We retain significant concerns regarding the assessment and treatment of impacts of the proposed works on the visual amenity, biodiversity and recreational values of a largely pristine landscape within KNP. In particular, we consider the analysis of the powerline options to be inadequate. More work needs to be done by Transgrid to show the relative viability of their preferred option, and to identify the comparative environmental impacts of alternate options.

Our detailed advice is provided in Attachments A, B and C. In summary the critical points of advice that require clarification and resolution prior to your final consideration of the proposal are:

- Impact to largely pristine area of national park – the current proposal of two nine kilometre 330 kV overhead transmission lines and 42 x 75 metre high towers will require clearing of approximately 100 hectares of largely undisturbed native vegetation in KNP (and 43 hectares in Bago State Forest). If this remains the preferred option, NPWS will discuss all options to reduce impacts, and compensate for any remaining unavoidable impacts (e.g. visual amenity) in addition to biodiversity impacts discussed below.

- Options analysis - gaps in the options analysis including comparison of all relevant parameters such as, clearing and construction disturbances, residual disturbance area, spoil volumes, visual amenity impacts and costs. The analysis should include all alternative options identified in the EIS and potentially those proposed during public submissions, with the aim of identifying those with the least environmental impact and cost effectiveness.
- Non-compliance with the Biodiversity Assessment Method (BAM) — the Biodiversity Development Assessment Report (BDAR) is incomplete and requires more work before project determination to meet the requirements of the BAM. Potential impacts to some threatened species, particularly Booroolong frog, are not adequately considered. Insufficient detail has been provided about measures to mitigate, monitor and manage potential impacts to have confidence that the calculated credit requirement will sufficiently offset residual impacts of the development.
- Biodiversity Offset Strategy - more detail and further analysis about how credits will be determined and how the credit obligation can be met within and outside KNP is required, in consultation with and to the satisfaction of NPWS and BCD.
- Potential post construction liability - if the project is approved the potential liability for NPWS in three post construction circumstances needs to be addressed: (i) rehabilitation does not meet completion criteria in agreed timeframe or is incapable of meeting the completion criteria; (ii) long term stability or contamination; and (iii) increased biosecurity risks (weeds, pests and pathogens) associated with new access tracks and easements in largely pristine areas of KNP.

Separate advice will be provided on the assessment of the Commonwealth MNES matters as an accredited project under the NSW Bilateral agreement. Provision of this advice is contingent on an appropriately detailed BDAR.

Similarly, surface water management and water quality issues are likely to be an ongoing concern. The Environment Protection Authority will respond on these matters.

We request that Conditions of Approval are prepared in consultation with NPWS and BCD to ensure that issues identified in this submission are adequately addressed

If you have any questions regarding this advice, please contact Graeme Enders, Director South West on 02 6229 7141 or [graeme.enders@environment.nsw.gov.au](mailto:graeme.enders@environment.nsw.gov.au) for any Biodiversity and Conservation related matters, and Nicole Shotter, Manager Snowy 2.0, NPWS on 02 6450 5535 or [nicole.shotter@environment.nsw.gov.au](mailto:nicole.shotter@environment.nsw.gov.au) for any other matters.

Yours sincerely



Atticus Fleming AM  
**Deputy Secretary**  
**National Parks and Wildlife Service**



Dean Knudson  
**Deputy Secretary**  
**Biodiversity Conservation and Science**

ATTACHMENT A – Assessment Summary for Snowy 2.0 Transmission Connection (SSI 9717)

ATTACHMENT B - Detailed BDAR review against BAM requirements (BCD)

ATTACHMENT C –Detailed comments – Flooding (BCD)