

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

Acronym	Definition
BAM	Biodiversity Assessment Method (2017)
BC Act	Biodiversity Conservation Act 2016
BCD	Biodiversity and Conservation Division
BDAR	Biodiversity Development Assessment Report
CoA	Condition of Approval (if approved)
EEC	Endangered Ecological Community
FCNSW	Forestry Corporation of NSW
KNP	Kosciuszko National Park
EIS	Snowy 2.0 Transmission Connection Environmental Impact Statement (February 2021)
EPBC Act	Commonwealth Environmental Protection and Biodiversity Conservation Act 1999
MW	Snowy 2.0 Main Works Project (SSI 9687)
NPWS	National Parks and Wildlife Service
PCT	Plant Community Type
RTS	Response to Submission
SEAR	Secretaries Environmental Assessment Requirements
SF	State Forest
SHL	Snowy Hydro Limited
TARP	Trigger Action Response Plan
TEC	Threatened Ecological Community
TG	TransGrid

Key Issues

1.	<i>General Requirements</i>	<p>Issues:</p> <ol style="list-style-type: none"> 1) Table 4.1 identifies that Section 138 of the Roads Act is not required for the section of Elliott Way managed by Snowy Valleys Councils. However, it does not address the section of Elliott Way managed by NPWS 2) EIS identifies various construction and environmental management plans 3) Section 5.7 of the EIS (Ongoing design process) identifies that “<i>construction methods and how the project would be constructed may also vary subject to design refinements and selection of the construction contractor. These details would be resolved as the</i>
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		<p><i>design of the project progresses. As a result, the final design may vary from the design described in this EIS"</i></p> <p>4) EIS page 185, identifies that exclusion zones will need to be established on Talbingo Reservoir during wire stringing activities. However, there is no detail as to the extent of the exclusion zone or project staging and access sites to Talbingo Reservoir to carry out these activities.</p> <p>Recommended action/conditions of approval (numbers directly link to Issues identified above – this is consistent throughout the table):</p> <p>1) Clarification is provided as to the requirements of the project to work on or over Elliott Way in Kosciuszko National Park</p> <p>2) CoA that all construction and environmental management plans that are required for works conducted in KNP be to the satisfaction of NPWS and the Planning Secretary</p> <p>3) CoA requires that NPWS be consulted on any design for permanent infrastructure in KNP</p> <p>4) Clarification is provided on the location and extent of any disturbance area required for construction within KNP not already identified in the EIS. If the project requires areas outside the identified disturbance area, that this is done in consultation with NPWS and a full assessment of impacts conducted.</p>
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2.	Biodiversity	<p>Issues:</p> <p>1) The BDAR does not meet the minimum requirements of the BAM. Details and recommendations for further work or COAs are in Attachment B.</p> <p>There are 5 key issues:</p> <ul style="list-style-type: none"> a. <i>Misleading and confusing terminology</i> – there is ambiguity and potential for post-approval misinterpretation of the project description, assessment of indirect impacts, the project footprint, and what is being included in the offset obligation into the future. b. <i>Booroolong Frog</i> – residual biodiversity risk to Booroolong frog needs to be quantified and account for proximity of the impacts to breeding habitat, and location of the project on steep terrain above headwaters and mapped habitat. c. <i>Impact mitigation, monitoring and adaptive management</i> – there is not enough detail about mitigation measures, monitoring of threatened species and adaptive management to give certainty that the impacts have been adequately assessed, and that there will be effective impact mitigation after project approval. There are non-binding terms used throughout the proposed mitigation measures. d. <i>Biodiversity Offset Strategy</i> – this is incomplete. More work is needed before project determination. e. <i>BAM assessment</i> – this is incomplete. <i>Caladenia montana</i> needs to be included and there are BAM non-compliance issues (Attachment B, Issues 14–29)
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		<p>2) Section 5.4.6.4 (vegetation) of the EIS identifies “<i>removal of timber off-site and stockpiling at a suitable location for potential re-use as building material or firewood</i>”</p> <p>3) Weed, pest and pathogen control in KNP – see proposed CoA’s below.</p> <p>4) Monitoring of impacts to threatened species – see proposed CoA’s below.</p> <p>Recommended actions/conditions of approval:</p> <p>1) That a revised BDAR is provided for BCD consideration before project determination addressing identified issues in Attachment B, and including as a minimum:</p> <ul style="list-style-type: none"> a) consistent terminology as defined by the BAM b) clarification of project activities and what is being offset c) consolidated list and map of threatened species recorded from the study area boundary d) realistic identification of indirect and prescribed impacts (BAM s9.3) and assessment of all threatened species, not just species credit species (BAM s6.4.1.15) e) additional impact assessment and species polygon for Booroolong frog, including areas that of likely overland stormwater flows, overlap between construction envelope and the 50 m habitat buffer. f) mitigation measures and associated adaptive monitoring (according to BAM s9.3.1.2, s9.3.2 and 9.3.3.1a,b,e,g,h,i) with details of threatened species adaptive monitoring to determine if measures are being implemented as planned, response of the threatened entity is as expected, provide triggers for ameliorative action if the controls are ineffective or the impact is not as predicted, and include a program to evaluate and publicly report on the outcomes g) details of stringent controls for mitigating indirect impacts of runoff and sediment mobilisation from the disturbance footprint during construction and operation, until site stabilisation completion criteria are met. h) assessment, mitigation and adaptive management strategy for uncertain impacts of bird and bat collision (BAM s9.4.1.2, s9.4.2), including within PCT 729 i) re-calculation of any residual impacts to native vegetation (beyond that which has already been offset and any impacts that have not been successfully mitigated). <p>2) CoA that no material is removed from KNP and any excess materials (vegetation and/or soil) be used on site in rehabilitation for this and the Snowy 2.0 Project, unless otherwise approved by NPWS and the Planning Secretary</p> <p>3)</p> <ul style="list-style-type: none"> a) CoA requiring control of all weeds, pests and pathogens identified within the project area, not just for new weed outbreaks as indicated in mitigation measure B5. Control must be for not only the construction phase but also the operational and decommissioning phase of the project
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		<ul style="list-style-type: none"> b) CoA that the Biodiversity Management Plan clearly identifies a methodology for the disposal of weeds removed during clearing of sites as indicated in mitigation measure B5 c) CoA that the Biodiversity Management Plan clearly identifies the location and timing for implementation of washdown bays identified in mitigation measure B5 <p>4) CoA that monitoring of threatened species during the operation of the transmission line outlined in mitigation measure B7 also provide for Trigger Action Response Plans. With required actions if levels of impact as agreed with BCD and NPWS are triggered as a result of the operation of the project</p>
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3.	Heritage	<p>Issues:</p> <ul style="list-style-type: none"> 1) Management of Aboriginal and non-Aboriginal Heritage values <p>Recommended action/conditions of approval:</p> <ul style="list-style-type: none"> 1) CoA that management of Aboriginal and non-Aboriginal heritage and mitigation measures are as a minimum consistent with the Snowy 2.0 Main Works CoA and Heritage Management Plan requirements.
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4.	Land	<p>Issues:</p> <ul style="list-style-type: none"> 1) Clearing methodology within KNP 2) Rehabilitation carried out within KNP 3) Reports commissioned by the project that provide information relating to KNP 4) Spoil management <p>Recommended conditions of approval:</p> <ul style="list-style-type: none"> 1) CoA requiring that all clearing methodology within KNP be outlined in the CEMP to the satisfaction of NPWS 2) <ul style="list-style-type: none"> a) CoA that rehabilitation and decommissioning be to the satisfaction of NPWS within KNP b) CoA that all rehabilitation requirements are as per those issued for the Snowy 2.0 Main Works and that the Rehabilitation Management Plan be completed to the satisfaction of the Planning Secretary prior to commencement of construction to ensure progressive rehabilitation of the site c) CoA acknowledges through a requirement of the Rehabilitation Management Plan that rehabilitation will take significantly longer than the two months indicated in Figure 5.3 of the EIS; and that the plan must include a long-term plan for rehabilitation of the disturbance area d) CoA that the Rehabilitation Management Plan require that stabilisation use only native vegetation relevant to the local plant communities 3)
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		<ul style="list-style-type: none"> a) CoA that all reports commissioned by the proponent that address how the project may or will impact KNP are provided to NPWS within 21 days of being received by the proponent b) CoA that NPWS be provided with all contaminated land reports within 21 days of being received by the proponent c) CoA that any new geodiversity sites are notified to NPWS within 24 hours and the proponent is to undertake detailed field mapping and photographic recording prior to recommencing works. Any plan to continue works that may impact the site are to be to the satisfaction of NPWS and the Planning Secretary <p>4) CoA that the management of spoil aligns with the Snowy 2.0 Main Works.</p>
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5.	Transport	<p>Issues:</p> <ul style="list-style-type: none"> 1) Section 5.2.3 of the EIS (access tracks and roads) briefly described the detail to which access tracks will be constructed 2) Section 5.2.3 of the EIS indicates that the waterway crossing of Sheep Station Creek will either be a small bridge or large culvert 3) Road dilapidation reports, routine road maintenance and post construction repairs will cross over with other projects. This project will be using transport routes in conjunction with Snowy 2.0 and other major reconstruction projects in the area (Selwyn and Cabramurra rebuild) 4) The level of use by heavy and light vehicles between the west and east areas of the project via Elliott Way in KNP is unclear and the Road Safety Audit excluded this section of road <p>Recommended action/conditions of approval:</p> <ul style="list-style-type: none"> 1) CoA that requires all new access to be designed and constructed with long term operational considerations included to the satisfaction of NPWS 2) CoA that the crossing of Sheep Station Creek be via a bridge which is fitted with a permanent gate to ensure managed access to Sheep Station Ridge post construction 3) CoA that requires the Transport Management Plan be developed to the satisfaction of NPWS for NPWS managed roads <ul style="list-style-type: none"> a) CoA that the Transport Management Plan includes clear lines of responsibility for monitoring and repairing NPWS roads used by all the major projects in the area b) CoA that the Transport Management Plan addresses the cumulative impacts of the project on the road network and consults with NPWS, Snowy Hydro Limited, TfNSW, Snowy Valleys Council, Selwyn Resort and communities to implement scheduling that minimises the major project impacts on the road network. The TMP must be reviewed every six months to allow for adaptive management and resolution of issues, if occurring, in a timely manner
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		<ul style="list-style-type: none"> c) CoA that the NPWS is consulted during the development of traffic control plans that address the use of Elliott Way in KNP d) CoA that the Transport Management Plan require that no project related vehicles park or queue on or adjacent to the public road network e) CoA requires buses be used to transport personnel to site to minimise additional light vehicles on the road network f) That the Transport Management Plan require any road closures be scheduled to avoid weekends, public and school holidays and peak tourism events g) That any road improvements required for the project are identified and considered within this assessment and are not dealt with under different approval instruments as identified on page 138 of the EIS <p>4) Clarification is provided on the amount of project traffic that will use the Elliot Way between the east and west areas. If this section of roadway is to be used by all vehicles a road safety audit and risk assessment must be produced for review by NPWS to confirm the suitability or otherwise of the route for project light and heavy vehicles. Appendix D page 10 also incorrectly states that Elliott Way is a B-double route which is incorrect east of the KNP boundary.</p>
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6.	Amenity	<p>Issues:</p> <ul style="list-style-type: none"> 1) NPWS disagree with the statements in the Landscape Visual Impact Assessment (LVIA). The impact from the significantly larger transmission lines (compared to existing KNP transmission lines) in the area is greater than stated - as shown in the various photomontages 2) NPWS disagree with the assumption in the EIS p.159 that regenerating vegetation after the Dunns Road fire would provide screening for the project infrastructure 3) NPWS disagree with the assumptions in the EIS p.143 and p.149 that Lobs Hole Road and Mines Trail will experience low visitor numbers upon reopening to the public <p>Recommended action/conditions of approval:</p> <ul style="list-style-type: none"> 1) That the assumptions and statements made throughout the LVIA are reassessed and a comparison provided for all design and route options 2) That a reassessment of the LVIA be carried out considering that the proposed forty two 75m high towers far exceed the height of the existing vegetation in the area and that the 120 to 140 m easement introduces large tracks of clearing not previously seen to this extent in KNP 3) That a re-assessment of the LVIA be carried out taking into account that the upgrades to the Lobs Hole Ravine Road (to a two lane sealed road) and upgrades to recreational facilities at Lobs Hole by the Snowy 2.0 project, will likely see significant increases in visitor access and numbers throughout the year, post Snowy 2.0 construction.
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7.	Hazards	<p>Issues:</p> <ol style="list-style-type: none"> 1) Bushfire management in KNP 2) Flooding: The qualitative flood risk assessment requires more work to meet BCD requirements for flooding assessment. Specific comments on the Hydrology assessment and EIS Section 7.4 are included in Attachment C <p>Recommended action/conditions of approval:</p> <ol style="list-style-type: none"> 1) <ol style="list-style-type: none"> a) CoA require that a Bushfire Management plan be developed in consultation with the Snowy Valleys Bush Fire Management Committee and to the satisfaction of NPWS and FCNSW b) CoA that aircraft navigation markers be placed on all spans that could cause a conflict with aircraft operating in the area for firefighting and park management 2) COA require that quantitative flood modelling and assessments must be completed during the detailed design phase for infrastructure that will be located in floodplain areas with the aim of reducing flood impacts to acceptable levels of risk. The assessment must be completed prior to any development, and to the satisfaction of BCD.
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