



Office of Environment & Heritage

Date: 27 October 2014
Your reference: SSD 5581
Our reference: DOC14/250986
Contact: David Geering
(02) 6883 5335

Colin Phillips
Planning Officer
Department of Planning and Infrastructure
GPO Box 39
Sydney, NSW 2011

Dear Mr Phillips

RE: Airly Mine Extension (SSD 5581)

The Office of Environment Heritage (OEH) has reviewed the exhibited Environmental Impact Statement (EIS) for the Airly Mine Extension, and provides the following comments for consideration by the Department of Planning and Environment.

The OEH has previously responded, on 16th May 2014, to an earlier draft of the EIS and raised several concerns including the status of derived native grassland being impacted by the Reject Emplacement Area. These concerns have been addressed in the final version of the EIS. It has been confirmed that Grassy Box Gum Woodland Endangered Ecological Community (EEC) is present within the Reject Emplacement Area but the condition of this, and other derived native grassland types present, do not warrant an offset.

OEH's major concern regarding this development is the potential for impact on the natural features of Mugii Murum-Ban State Conservation Area. OEH accepts that the proposed mining methods and mine design should result in "negligible subsidence impact" over the majority of the mining lease. OEH notes that greater subsidence impacts may occur above the old oil shale workings.

OEH also notes that impacts cannot be entirely ruled out and that some rock fall is predicted. OEH has particular concerns regarding the vulnerability of the Genowlan Pea and unknown vulnerability of the Genowlan Point *Allocasuarina nana* Heathland EEC, and thus the importance of monitoring and associated Trigger Action Response Plans.

The EIS stresses the importance of developing a monitoring system that minimises the impact on the environment, an important consideration for OEH. Section 8 of the Subsidence Predictions and Impact Assessment emphasises the value of the installation of stress and deformation monitoring instrumentation in the underground pillars providing data in respect to the stability of these pillars. The use of conventional subsidence monitoring lines over the first series of extraction panels beneath Mount Airly is expected to demonstrate the accuracy of less intrusive remote monitoring, which "would eliminate the reliance upon conventional subsidence survey lines" in more environmentally sensitive areas. OEH recommends that the DPE considers applying a condition of consent to ensure that minimal impact monitoring systems are employed within Mugii Murum-Ban SCA to minimise impact to the environment.

If you have any questions regarding this matter further please contact David Geering on 02 68835335.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Ardill', written in a cursive style.

SONYA ARDILL
Senior Team Leader Planning
North West Region