Modification 2 Application

Walla Walla Solar Farm

March 2022

Project Number: 21-200

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Acronyms and abbreviations

ACHA	Aboriginal Cultural Heritage Assessment
ACHCRP	Aboriginal cultural heritage consultation requirements for proponents 2010
BC Act	*Biodiversity Conservation Act 2016* (NSW)
BDAR	Biodiversity Development Assessment Report
CO_2e	Carbon dioxide - equivalents
Development Site	The area of land that is subject to the Project
Development Footprint	The area of land that would be directly impacted by the Project including infrastructure, access roads, perimeter fence and vegetation screens
DPE	Department of Planning and Environment (NSW) (Formerly the Department of Planning, Industry and Environment)
EIS	Environmental impact statement
EPC	Engineering Procurement and Construction
EP&A Act	*Environmental Planning and Assessment Act 1979* (NSW)
ha	Hectares
km	kilometres
m	metres
LALC	Local Aboriginal Land Council
LMP	Landscape Management Plan
MW	Megawatt
$MW_{(ac)}$	Megawatt alternating current
$MW_{(dc)}$	Megawatt direct current
O&M	Operations and Maintenance
PAD	Potential Archaeological Deposit
PPA	Power Purchase Agreement
PV	Photovoltaic
Project	The approved solar farm including the construction, operation and decommissioning of a 300 $MW_{(ac)}$ ground-mounted photovoltaic (PV) solar farm and associated infrastructure
Proponent	Walla Walla Solar Farm Pty Ltd, as established by FRV. FRV is a global renewable energy solutions provider and leading solar developer.
Proposal	The proposed modifications to the approved Project
SSD	State Significant Development
Subject Land	Any and all lots to be directly impacted, in whole or part, by the Project

TMP	Traffic Management Plan

1. Introduction

1.1 Approved Project

The Walla Walla Solar Farm is located off Benambra Road, approximately 2.6 km west of Olympic Highway in the Greater Hume Local Government Area (LGA) as shown in Figure 1-1.

The Development Consent for the Walla Walla Solar Farm was approved by the Independent Planning Commission of NSW (IPC) on 27 November 2020 (Application Number: SSD 9874) under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (NSW).

During detailed design, Walla Walla Solar Farm Pty Ltd identified aspects of the consented project that required amendment. A modification application, number SSD-9874-Mod-1, was approved by the NSW Department of Planning and Environment (DPE) on 3 March 2022.

The amendments included an increase in the maximum height of solar modules, an increase in the maximum height of substation transmission poles, an amendment to the construction transport route, and a minor variation to the timeline of vegetation plantings.

The current existing consent permits the construction, operation and decommissioning of a 300 $MW_{(ac)}$ ground-mounted photovoltaic (PV) solar farm and associated infrastructure.

Key development and infrastructure components include:

- Approximately 650,000 solar arrays mounted on single axis tracking systems.
- Approximately 76 modular inverter units.
- New TransGrid substation and connection point comprising transformers, associated switchgear, control and protection equipment.
- 33 kV/330 kV transformer and protection.
- Internal access tracks, operations and maintenance (O&M) building, parking and perimeter fencing.
- Vegetative screening and setbacks.

The approved project layout is shown in Figure 1-2.

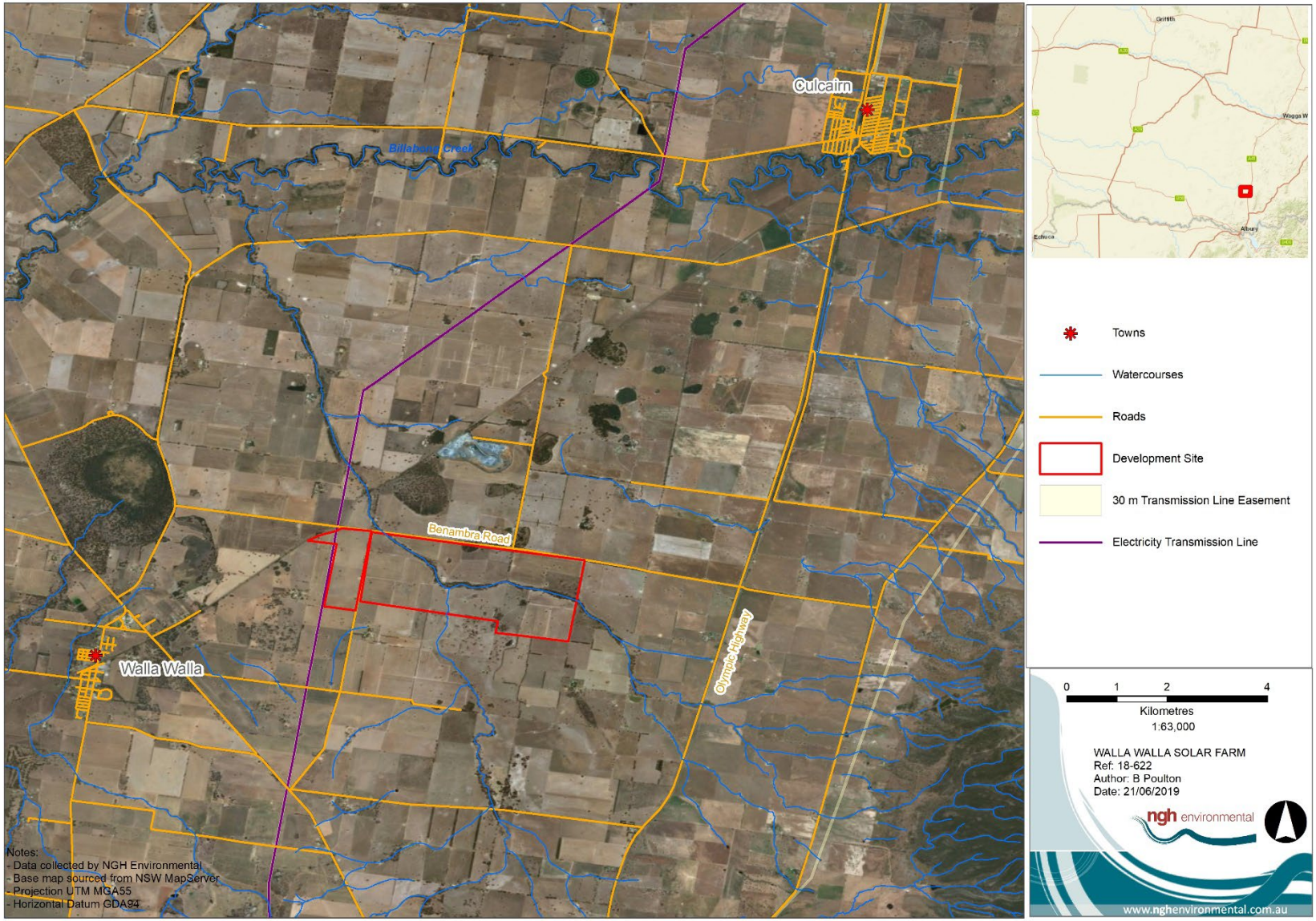


Figure 1-1 Location of the Walla Walla Solar Farm

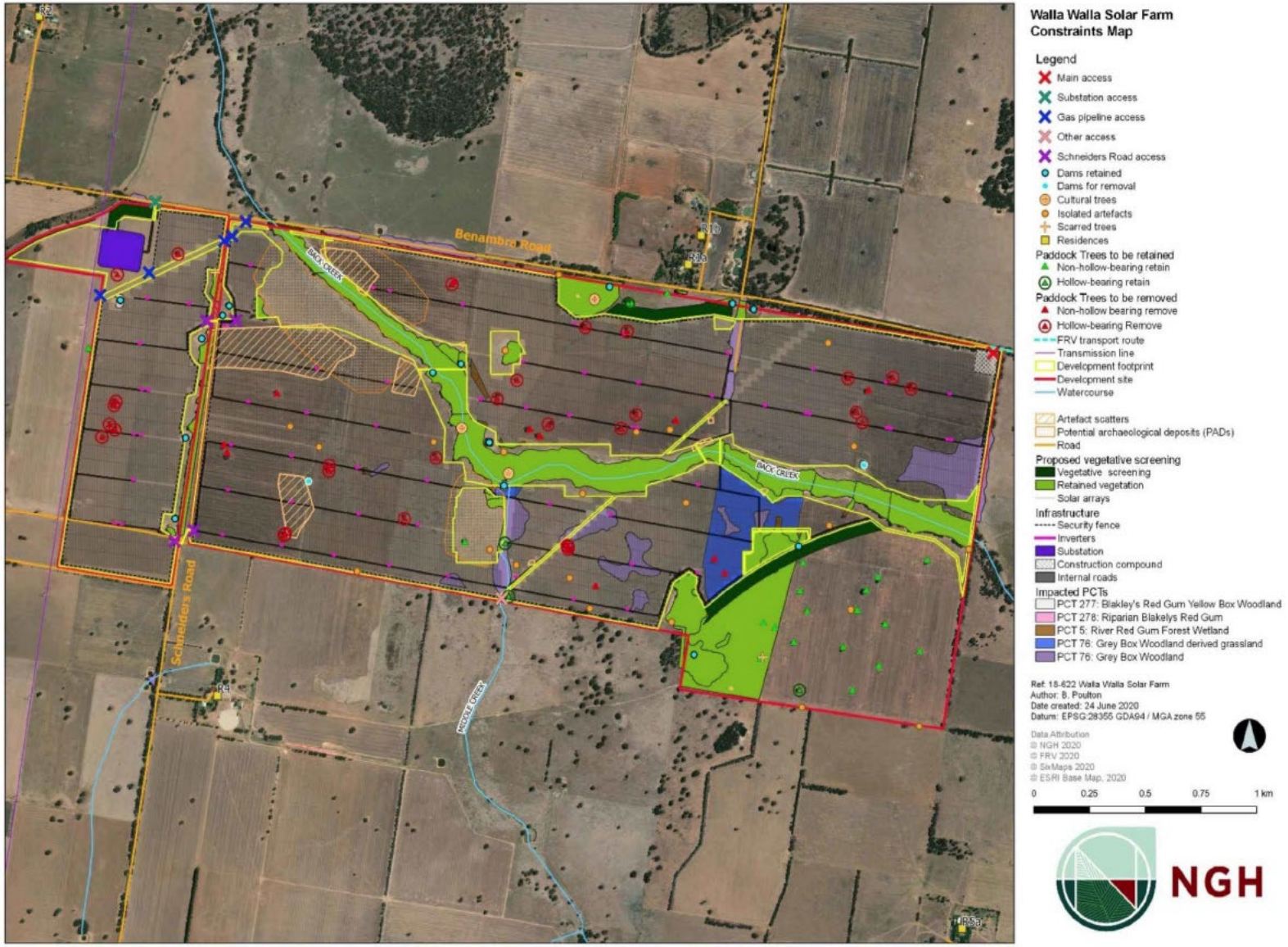


Figure 1-2 Approved project layout

1.2 The Proponent

Walla Walla Solar Farm Pty Ltd is a wholly owned subsidiary of FRV Services Australia Pty Ltd (FRV). FRV is a global renewable energy solutions provider and leading solar developer. With a strong presence in Australia, FRV has a portfolio of successful solar projects currently operating and under development across the country. FRV's most recent solar farm, the Sebastopol Solar Farm in New South Wales (NSW), completed construction and began its commissioning phase in December 2021.

FRV aims to be at the forefront of the global energy transition to renewables, while setting the highest standards of quality, community engagement, technical innovation and commitment to service delivery, from planning to operations of assets for single and portfolios of customers, suppliers and investors.

In NSW, two of FRVs solar farm developments have a Power Purchase Agreement (PPA) with Snowy Hydro, Goonumbla Solar Farm and Sebastopol Solar Farm.

FRV pioneered Australia's first ever utility-scale solar farm in the Australian Capital Territory (ACT) (Royalla Solar Farm) and as a global operator of renewable assets FRV has a clear strategy to manage its projects through design, construction and the full operational lifecycle. Numerous other projects are under development and consideration by FRV.

FRV acquired the development rights to the Walla Walla Solar Farm in July 2019. From this time, FRV have been engaging with local stakeholders and working to accommodate concerns where possible. As a result, FRV implemented significant design changes to the proposal in developing the approved project.

2. Proposed Modification

2.1 Modification Overview

This report has been prepared to support an application to modify Development Consent SSD 9874. It includes:

- Legislative context for the Modification Application. Section 3
- Details of the consultation undertaken in relation to the proposed modification Section 4
- Modification details Section 5
- Assessment of potential additional impacts Section 6

This report has been prepared by NGH Pty Ltd (NGH) on behalf of the proponent, Walla Walla Solar Farm Pty Ltd.

To provide consistency for stakeholders this modification application report has maintained the format of the previous Modification Application 1.

In December 2021 *State significant development guidelines – preparing a modification report; Appendix E to the state significant development guidelines* (Modification Guidelines) were released by the Department for Planning, Industry and the Environment (now DPE). The following Table 2-1 provides a summary of how the Modification Guidelines' requirements have been met in this report.

Table 2-1 SSD Modification Guidelines consistency

Modification Guidelines report requirements	This Report
Introduction	Section 1.
Strategic context	As per original EIS and Project objectives as summarised in Appendix A.1
Description of the modifications	Introduced and summarised in Section 2.2 Detailed in Section 5 for assessment
Statutory context	Section 3
Community engagement	Section 4
Assessment of impacts	Section 6
Justification of the modified project	Section 2.3

2.2 Summary of Changes Proposed

A summary of the proposed amendments (the Modification) are:

- Construction of an additional vehicle crossing over Back Creek to accommodate heavy vehicles.
- Revised Project Biodiversity Development Assessment Report (BDAR) with a revised credit liability.
- An increase in the solar array and development footprint, of approximately 15.4 ha, within the existing project boundary.
- An increase in the peak daily heavy vehicle numbers accessing the site from 45 to 110 (NB: There would be no increase in traffic accessing the substation access).

The additional development footprint area will be used to increase the solar array with the following infrastructure:

  - An additional approximately 50,000 PV solar arrays mounted on single axis tracking systems (a total of approximately 700,000 panels).
  - No increase to the approved number of modular inverter units.
  - Associated internal reticulation, access and ancillary infrastructure.

All other solar farm infrastructure proposed remains as described in the current Development Consent.

The maximum output of the project would remain at 300MW$_{(ac)}$, however the modification would increase output during 'shoulder' periods, as outlined in section 2.3

No other changes to the existing conditions is sought, and the proposed changes do not require any additional assessment beyond what was assessed in the original EIS.

The modification, if approved, would extend the construction timeframes by a maximum of two weeks.

There would be no change to the project site boundaries, and all proposed changes occur within the existing land parcels associated with the project.

2.3 Justification

Further detail on justification and benefits for each proposed change is provided in Table 2-2.

Table 2-2 Summary of changes, justification and benefits

Change	Justification	Benefits
Increase in solar array and increased renewable energy production.	The Proponent has signed an agreement with TransGrid which would limit output from the project at 300$MW_{(ac)}$ throughout its project lifetime. Whilst output is capped at 300$MW_{(ac)}$ the project would, at times, produce less electricity than 300$MW_{(ac)}$ – for example, during cloudy weather, during winter months and during morning and evening periods. Whilst there would be no increase to the project's maximum capacity, the modification would result in an increase to the peak $MW_{(dc)}$ installation capacity of the project. This would result in the project reaching its nameplate capacity of 300$MW_{(ac)}$ for longer periods of time, such as early mornings and late afternoons during peak energy demand when solar irradiation is typically low, and an increase in the overall renewable energy supplied to the grid and consumers. The modification would, therefore, improve the reliability of the electrical grid by providing additional energy at times when solar energy generation is typically lower.	Community • additional benefit to the community and the state by providing greater stability and reliability to the grid. • an increase in renewable power generation and supply of renewable energy to the people of NSW whilst avoiding impacts on neighbours or other sites for equivalent energy generation. Environment • additional displacement of CO_2e per year emissions.

Change	Justification	Benefits
Updated assessment of impacts to threatened species	The original BDAR included an assessment of some threatened species that were 'assumed to be present' on the site, as biodiversity surveys could not be taken at the correct time of year in order to confirm their existence on site. Seasonal surveys have been undertaken and the BDAR has been updated in accordance with the revised layout, and in accordance with the seasonal biodiversity surveys for threatened species which had potential to occur within the site.	Community • confirmation of avoidance of threatened species. • reduction in credit liabilities. Environment. • demonstrated avoidance of impacts to threatened species • accurate offsets for impacted biodiversity.
Optimised Internal Heavy Vehicle Access Path – additional creek crossing	The modification proposes an additional crossing over Back Creek, which would result in additional clearing of native vegetation along Back Creek. Whilst the Development Application originally proposed only one crossing over Back Creek, as shown in Figure 5-1, during detailed design it has become apparent that this would not be sufficient for the quantity of vehicles and materials to be used during the construction period. In order to permit construction vehicles to travel throughout the site, the internal layout must be optimised in order to: • provide a practical and effective direct route. • minimise heavy vehicles utilising existing creek bed causeways. • improve all weather access. • minimise impact on the project infrastructure.	Community • avoid increased use of unsealed public road and ensure road safety. • minimise noise and dust impacts to neighbouring receivers. Environment • Avoid potential impacts to watercourses from existing approved and proposed increased traffic with an upgraded alternative crossing.

Change	Justification	Benefits
Increased traffic movements	Following engagement of an Engineering Procurement and Construction (EPC) contractor, the detailed design and construction planning has established that a greater number of vehicle movements is required for the existing approved solar farm development to be constructed within the proposed timeframes. The EPC contractor has indicated that up to 80 heavy vehicles would be required during peak construction periods. Since the lodgement of Modification 1, Transgrid has also updated its projections for heavy vehicle requirements, advising it requires up to 30 heavy vehicles per day during the substation's peak construction period. This may result in peak traffic volumes of up to 110 heavy vehicles per day. The increased rate of traffic movements allows construction to be completed in an optimised overall construction duration due to enabling sufficient delivery of resources in peak periods and avoidance of delays.	Community • Optimised construction period and avoidance of construction delays and associated noise and traffic impacts.

2.4 Alternatives Considered

A number of alternatives were considered to the proposed modification, particularly in relation to the increased number of vehicles entering the site, both as a result of FRV's construction activities and those required by TransGrid:

- **Use of Benambra Road and the substation Access**

  Since the Modification Application was lodged, Transgrid has updated its advice to the Proponent, advising it would require an allowance of up to 30 heavy vehicles per day to the substation during the substation's peak construction period.

  The proponent considered the use of the unsealed section of Benambra Road and the dedicated Substation Access for the additional substation traffic, however considered that this was not a suitable outcome as it would increase amenity impacts such as transport noise and dust on local receivers.

- **Sealing of Benambra Road**

  The proponent considered sealing Benambra Road to permit additional heavy vehicle traffic to access the site. This option was considered, as it would address concerns raised by local community members regarding dust and road safety.

  This option was ultimately deemed unfeasible due to both time and financial commitments required in order to undertake road sealing works, which would have resulted in considerable delays to the project's construction period.

  Sealing of Benambra Road would likely have resulted in additional biodiversity impacts, as it was possible that the road would have required widening.

- **The 'Do Nothing' approach**

  The proponent considered maintaining a limit of ten heavy vehicles per day to access the substation area via Benambra Road, in accordance with the consolidated conditions of consent. TransGrid advised that this was not feasible, for the following reasons:

  - During the peak construction period, the project would generate up to ten heavy vehicle movements per day for basic activities alone, such as waste removal.
  - When concrete slabbing is being poured for the substation, the works must be completed in a continuous fashion, and cannot be broken down over several days. It is estimated that over 10 concrete mixers would be required daily during this phase of construction.
  - Materials would be trucked in locally during civil works. On those days, a single truck would make multiple journeys to the site. Limiting vehicles to ten per day would prevent the optimised use of available resources.
  - Limiting vehicles to ten per day would significantly increase the length of the substation's construction period, increasing impacts on the community and neighbouring receivers.

3. Statutory Context

3.1 NSW Approval

The Development Consent was approved by the Independent Planning Commission of NSW on the 27th November, 2020 (Application Number: SSD 9874) under Section 4.38 of the *Planning and Environment Act 1979*. The Development Consent was modified by the NSW Department of Planning and Environment (DPE) in March 2022.

3.2 Consistency with Existing Approval

A review of the modifications against the conditions of consent was undertaken to determine:

- Whether the changes proposed would be substantive changes to the Project's nature or description.
- Whether the changes proposed would have a material change to predicted environmental impacts.
- Whether the changes proposed would impact on the ability to meet any Development Consent.

The review (refer Appendix A) concluded that:

- The changes proposed would not substantively change the Project. The Project would still involve the construction, operation and decommissioning of a 300 $MW_{(ac)}$ ground-mounted photovoltaic (PV) solar farm and associated infrastructure. Whilst the development footprint would increase, the modification would not alter the project footprint or distance to receivers. The Project remains 'substantially the same development' and would enable the project to meet the Project objectives, as stated in the EIS (NGH Pty Ltd 2019). In particular the increased efficiency and capacity would increase the ability of the Project to:
    - Provide a clean and renewable energy source to assist in reducing Greenhouse Gas emissions.
    - Assist the NSW and Australian Governments to meet Australia's renewable energy targets and other energy and carbon mitigation goals.
- Three environmental aspects were identified for closer investigation, to ascertain if material impacts would result:
    - Aboriginal cultural heritage.
    - Biodiversity.
    - Transport and traffic.
- The proposed modification would result in minimal impacts, which can be largely managed and mitigated as outlined in Section 6 and Appendix A.2.

3.3 Modification Application

Following discussions with DPE, the proponent considers that the modification should be assessed by the Department under section 4.55(1A) of the EP&A Act.

Under Section 4.55 of the EP&A Act, an SSD Development Consent can be modified where the:

> "*development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted*".

In determining an application for a modification under section 4.55 of the EP&A Act, the consent authority must consider such matters referred to in section 4.40 (4.15) as are relevant to the development. These matters include the likely impacts of the proposed amendments to the Development Consent, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

Modifications are allowed that are 'substantially the same development'. Section 1(A) and Section 2 of Clause 4.55 differ regarding whether the proposed modification is of minimal environmental impact or not.

As per Section 6 and Appendix A the proposed changes within this Modification Application would not substantially change the project and would involve minimal environmental impact and, as such, be appropriately assessed under Section 4.55(1A) of the EP&A Act.

There would be no amenity impact on sensitive receivers, and the additional areas of solar array would not be visible from nearby residences.

The additional impacts to traffic, heritage and biodiversity as a result of the proposed modification would not result in significant impacts and have been avoided or minimised as far as practical.

It is noted that heritage impacts in particular were considered acceptable by the Registered Aboriginal Parties (RAPs). The proposal would not impact on any artefacts of cultural or scientific significance, as determined in the attached Aboriginal Cultural Heritage Assessment (ACHA, refer Appendix B.2).

Additional biodiversity impacts are minimal, with an additional 0.137 ha of native vegetation impacted as a result of the additional crossing over Back Creek, which would be offset in accordance with the *NSW Biodiversity Offset Scheme* as per the Revised BDAR provided in Appendix B.1.

Whilst the modification proposes an increase to the number of heavy vehicles entering the site, the additional traffic would not impact any sensitive receiver, and traffic impacts would be temporary in nature. Benambra Road is not an arterial road, or primary access route for local road users.

In the context of the approved Project impacts the additional impacts from the proposed modification are considered minimal for the purposes of Section 4.55 of the EP&A Act.

4. Community and Stakeholder Engagement

The Proponent has undertaken the following additional consultation as part of the Modification assessment:

- Consulting with uninvolved neighbouring landowners.
- Consulting with Council.
- Consulting with the broader community, via the Proponent's email database of interested parties, to advise on the modification and seek any feedback or comments.

4.1 Neighbour and Community Consultation

FRV has incorporated consultation of the proposed Modification as part of its ongoing engagement with neighbours and the broader community.

4.1.1 Adjacent neighbours

Three adjacent neighbours (R1, R2 and R5) were provided with detailed updates on proposed Modifications and invited to provide feedback.

It should be noted that all of the proposed changes are entirely within the site and would have minimal impact to neighbours.

No other neighbours would have views to the project. As restrictions arising from public health orders surrounding COVID-19 prevented face to face consultation, the proponent consulted with neighbours online.

Whilst neighbours did not raise concern with issues specific to the modification, concern regarding a potential Heat Island Effect and its impact on livestock was raised by one neighbour.

FRV will continue to engage with these neighbours throughout the Modification assessment process.

4.1.2 Wider Community

An email update was also produced and sent to subscribers on the Walla Walla Solar Farm email database. Similarly, recipients were invited to contact FRV to request further information on the Modifications or review Modification plans and reports on the DPE Major Projects website. The Project website was also updated.

FRV did not receive any additional comments or concerns from members of the community.

4.2 Greater Hume Shire Council

The proponent consulted with Council's Director of Environment & Planning, and Council's Head of Engineering during February and March 2022 regarding the proposed modification.

Council did not raise any concern with the proposed modification, but expressed its preference for FRV to seal Benambra Road, as it saw this as providing greater community benefit. Council provided additional detail regarding its preliminary road design for Benambra Road.

4.3 Aboriginal Groups

The Aboriginal Cultural Heritage consultation process is detailed in Section 6.1.1 and in Appendix B.2.

The RAPs for the original ACHA were re-consulted on the proposed modifications, the additional test excavation assessment approach and the amended ACHA findings.

RAPs re-consulted include:

- Albury and District Local Aboriginal Land Council (LALC).
- Bundyi Cultural Knowledge Group.
- Yalmambirra.

All RAPs were invited to participate in the test excavations with Albury and District LALC and Bundyi Cultural Knowledge Group assisting the fieldwork.

The RAPs feedback on the amended ACHA is included in the ACHA provided in Appendix B.2.

5. Modification details

5.1 Layout Changes

FRV proposes to increase the approved solar array area of 390 ha by an additional 15.4 ha (~ 4% increase). The additional footprint would be entirely contained within the approved project site boundary, in areas that had previously been avoided due to uncertainty of potential Aboriginal cultural heritage impacts.

Two Potential Archaeological Deposits (PADs) previously identified in the ACHA (NGH 2019) for the Project EIS were originally avoided by the approved development footprint of the Walla Walla Solar Farm project, as time constraints prevented a full archaeological assessment of their potential cultural significance.

In addition to increases in the solar array area, FRV proposes to install an additional creek crossing over Back Creek to cater for an increase in heavy vehicle movements within the site during construction. One vehicular creek crossing has already been approved, however it has become apparent that the location of the creek crossing is not suitable to permit transport of heavy vehicles within the site. The approved and proposed vehicle crossings would both be designed and constructed in accordance with the *Guidelines for Controlled Activities on Waterfront Land* (NRAR, 2018).

The proposed amendment to the Project Development Footprint and increased solar array is shown in Figure 5-1.

The additional development footprint area is approximately 15.7 ha and will be used to increase the solar array with the following infrastructure:

- An additional approximately 50,000 PV solar arrays mounted on single axis tracking systems.
- No additional modular inverter units.
- Associated internal reticulation, access and ancillary infrastructure.
- Additional upgraded creek crossing.

Proposed development of PAD1 would not result in any additional impacts on native vegetation, as the land has previously been cleared for agriculture. Development of PAD2 would result in the removal of one paddock tree.

Minimal impacts to native vegetation are anticipated from upgrading the creek crossing due to the ability to align to avoid trees and align over existing groundcover pasture grass species. However a conservative allowance for a footprint of up to 0.219 ha is proposed to reflect widening for impacts for the construction of a new crossing over Back Creek.

All other solar farm infrastructure proposed remains as described in the current Development Consent. No change to the project boundary, other infrastructure or construction facilities is required.

As outlined in Chapter 2.3, the Project's maximum capacity would remain at 300 $MW_{(ac)}$. The increased area of solar array would provide greater energy reliability though diurnal shoulder periods.

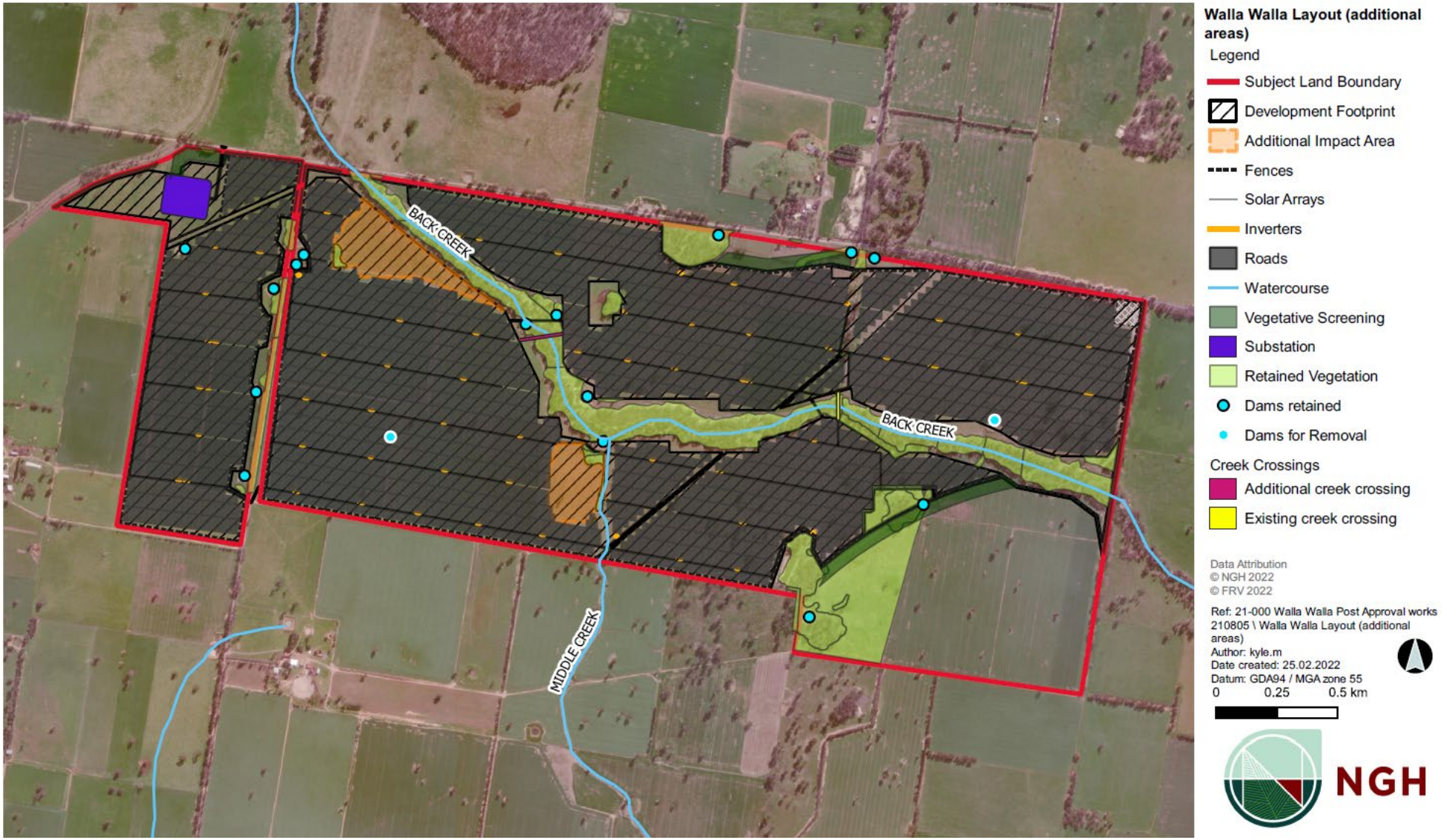


Figure 5-1 Proposed Modification

5.2 Biodiversity Development Assessment Report Amendment

The original BDAR included an assessment of three threatened species that were 'assumed to be present' on the site, as time constraints prevented biodiversity surveys from being undertaken at the appropriate time. These species were:

- Southern Myotis (*Myotis macropus*).
- Little Eagle (*Hieraatus morphnoides*).
- Pine Donkey Orchid (*Diurnus tricolor*).

The Project timeline has provided the opportunity to undertake additional seasonal surveys for these three threatened species previously assumed present.

In addition, the proposed additional creek crossing for internal access tracks has the potential to impact on remnant vegetation within the site. In a worst case scenario, based on a 12m wide corridor, the crossing would result in the removal of up to:

- 0.137 ha of PCT 5 – River Red Gum Forest (wetland).

Development of PAD 2 would also result in the removal of an additional paddock tree.

With the exception of the single paddock tree, there would be no impact to native vegetation by development of the additional 15.4 ha of solar array, which predominantly occurs on Category 1 cleared agricultural land. Stands of native vegetation contained within the PAD areas would be retained.

In light of the above changes, the previously approved BDAR has been revised to:

- Incorporate seasonal surveys for threatened species.
- Assess impacts to proposed increases to the development footprint.
- Update credit calculations.

The revised BDAR is provided in Appendix B.1.

A summary of the revised credit liability and change from the approved Project is summarised in Table 5-1 for vegetation communities and in Table 5-2 for species credit species.

Table 5-1 Revised credit liability – vegetation communities

Vegetation community	PCT ID	Credits required	Credit change to approved project
River Red Gum herbaceous grassy very tall open forest wetland	5	30	+2
Western Grey Box tall grassy woodland	76	298	NA
Blakeley's Red Gum – Yellow Box grassy tall woodland	277	13	NA
Riparian Blakely's Red Gum – box – shrub – sedge – grass tall open forest	278	3	+1

Table 5-2 Revised credit liability – species credit species

Species Credit Species	Credits Required	Credit change to approved project
Squirrel Glider (*Petaurus norfolcensis*)	184	+2
Little Eagle (*Hieraatus morphnoides)*	0	-135
Southern Myotis (Myotis macropus)	100	+3
Pine Donkey Orchard (*Diurus tricolor)*	0	-77

5.3 Increase to Numbers of Heavy Vehicles

The existing consent allows for up to 45 heavy vehicle movements per day during peak construction periods.

Following detailed construction planning, and interactions between peak construction periods for the substation area (Stage 1) and the remaining solar farm site (Stage 2), it has been established that the project would require an increase in the peak number of heavy vehicles per day travelling to and from the site.

This modification proposes to increase the maximum number of heavy vehicles to 110 vehicles per day, consisting of:

- a maximum of 80 heavy vehicles per day associated with construction of the remaining solar farm site.
- a maximum of 30 heavy vehicles per day associated with construction of the substation, made up of:
    - 10 heavy vehicles using the dedicated substation access, in accordance with the existing consent.
    - 20 heavy vehicles using the main site access, and internal roads to reach the substation area, following construction of the internal road network.

6. Environmental Assessment

A range of environmental risks were investigated within the EIS (and where relevant, with the Submissions Report and Amendment Report) for the approved Project.

All environmental risks investigated within the EIS prepared for the approved project were reviewed (refer Appendix A), with three considered relevant to the modification as reproduced in Table 6-1.

Biodiversity and Aboriginal cultural heritage impacts were investigated in greater detail, with specialist reports included in Appendix B and summarised in the following subsection 6.1. Visual and traffic impacts were considered potentially of concern but were found to be adequately addressed by existing mitigation measures.

Table 6-1 Summary of environmental risks of potential concern

Environmental risk (EIS Section)	Relevance to modified project	Impact
Biodiversity	Additional solar arrays will result in a minor increase in impact on native vegetation and the habitat of threatened species. Avoidance of previously assumed present threatened species has been confirmed. No additional mitigation measures are required	Minimal impact
Aboriginal cultural heritage	Additional solar arrays will increase impact on known and unknown Aboriginal cultural heritage due to impacts on previously identified PADs. Additional mitigation measures are required as outlined in Section 6.1.1.	Minimal impact
Traffic and transport	It is proposed to increase the peak daily heavy vehicle movements from 45 to 110 for peak construction periods. All additional vehicles will use the Main Access and Benambra Road, which has adequate capacity. It is important to note that there are no receivers along the proposed transport route for the additional vehicles, and there would be no amenity impacts to any local receivers. Some potential for cumulative impacts with unlikely timing of peak construction coinciding with peak construction period of nearby solar farm.	Minimal impact

6.1 Impacts requiring additional assessment

6.1.1 Aboriginal Cultural Heritage

An Addendum ACHA (Appendix B.2) has been prepared to assess the impacts of the proposed Project modification on Aboriginal cultural heritage.

Whilst there would be no change to the project's site boundary, the modification would increase the project's development footprint by 15.7 ha. This increase would impact previously avoided areas of

Walla Walla PAD 1, Walla Walla PAD 2 and the site Walla Walla SF IF 20. The location of the impacted Aboriginal sites within the development footprint are shown in Figure 6-1.

In order to ascertain the significance of Walla Walla PAD 1 and Walla Walla PAD 2, further archaeological assessment has been undertaken including a subsurface testing programme of Walla Walla PAD 1 and Walla Walla PAD 2 areas. The Addendum ACHA documents the outcome of the subsurface testing programme, assesses potential impacts to cultural heritage values, documents consultation with the registered Aboriginal parties and provides management strategies to mitigate any potential impacts within the proposed modification.

The Addendum ACHA is intended to be read in conjunction with the original Walla Walla Solar Farm ACHA (NGH 2018).

Consultation

Consultation with Aboriginal stakeholders has been undertaken in accordance with clause 80C of the National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010 and updated clause 60 of the National Parks and Wildlife Amendment Regulation 2019, following the consultation steps outlined in the Guidelines for Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (ACHCRP) guide provided by OEH.

All consultation undertaken for the original Walla Walla Solar Farm ACHA is outlined and documented in the original report. Consultation about the additional modification which will result in impact to Walla Walla PAD 1 and Walla Walla PAD 2 has been a continuation of this process in accordance with provisions of acceptability outlined by OEH and in line with the ACHCRP.

Potential Impacts

The current and previous archaeological investigations of the Project area identified the presence of Aboriginal archaeological sites. The archaeological testing program identified subsurface artefacts within both PAD 1 and PAD 2, with the site PAD 2 containing a higher density of artefacts.

With the proposed modification it would not be possible to avoid PAD 1 and PAD 2 within the development footprint. The proposed level of disturbance would be total, with both sites facing ground disturbances, such as piling, trenching and construction of access roads. These impacts are not avoidable, nor can they be mitigated.

Archaeological investigations found that PAD 1 and PAD 2 presented a low-density concentration of surface artefacts that have been assessed to hold a low scientific value. Based on the assessment of the sites and in consideration of discussions with the Aboriginal representatives during the fieldwork, it is not considered necessary to prevent all development of the proposal area, or for total avoidance of the Aboriginal heritage sites identified within the Addendum ACHA.

A potential cultural hearth was also observed during test excavations within PAD 1. No cultural or artefactual material was found in association with this hearth, however RAPs advised that the potential hearth may have had local cultural significance as a cultural/signal fire. Whilst a 2m exclusion zone was recommended, FRV has committed to a 5 m exclusion zone around the hearth site, which would not be impacted by the modification.

A surface artefact that would previously have been avoided, Walla Walla SF IF 20, would now be impacted by the development. This artefact was identified as having low cultural and scientific significance.

The additional creek crossing is within the vicinity of a known cultural tree (Walla Walla SF 496602). However, the crossing will be sited to maintain a minimum 10m buffer and is unlikely to have an impact. As per existing mitigation measures the cultural tree would be demarcated prior to any works being commencing on the site, to avoid any accidental damage to the tree.

Additional Mitigation Measures

The following mitigation measures have been adopted following results of the archaeological survey and following consultation with the registered Aboriginal parties, taking into consideration previous heritage assessments and relevant legislation.

These commitments are in addition to commitments already made by the Proponent, and in addition to the requirements of the conditions of consent, which represent implementation of all recommendations from the ACHA.

1. FRV has committed to incorporating into the Aboriginal Heritage Management Plan the employment of a local RAP as a “Heritage Consultant” during high impact excavation works in the vicinity of PAD 2.
2. Prior to construction, subsurface (archaeological) salvage will be undertaken at the location of PAD 2. Salvage will occur in two open pit areas of between 2m x 2m – 3m x 3m around the centre of the PAD (where the highest density of artefacts was recorded), as outlined in Figure 7-1 of the Addendum ACHA as reproduced in Figure 6-3 below.
3. The works within the PAD 1 will avoid the area containing the potential hearth with a 5 m buffer, as outlined in Figure 7-1 of the Addendum ACHA as reproduced in Figure 6-2 below.

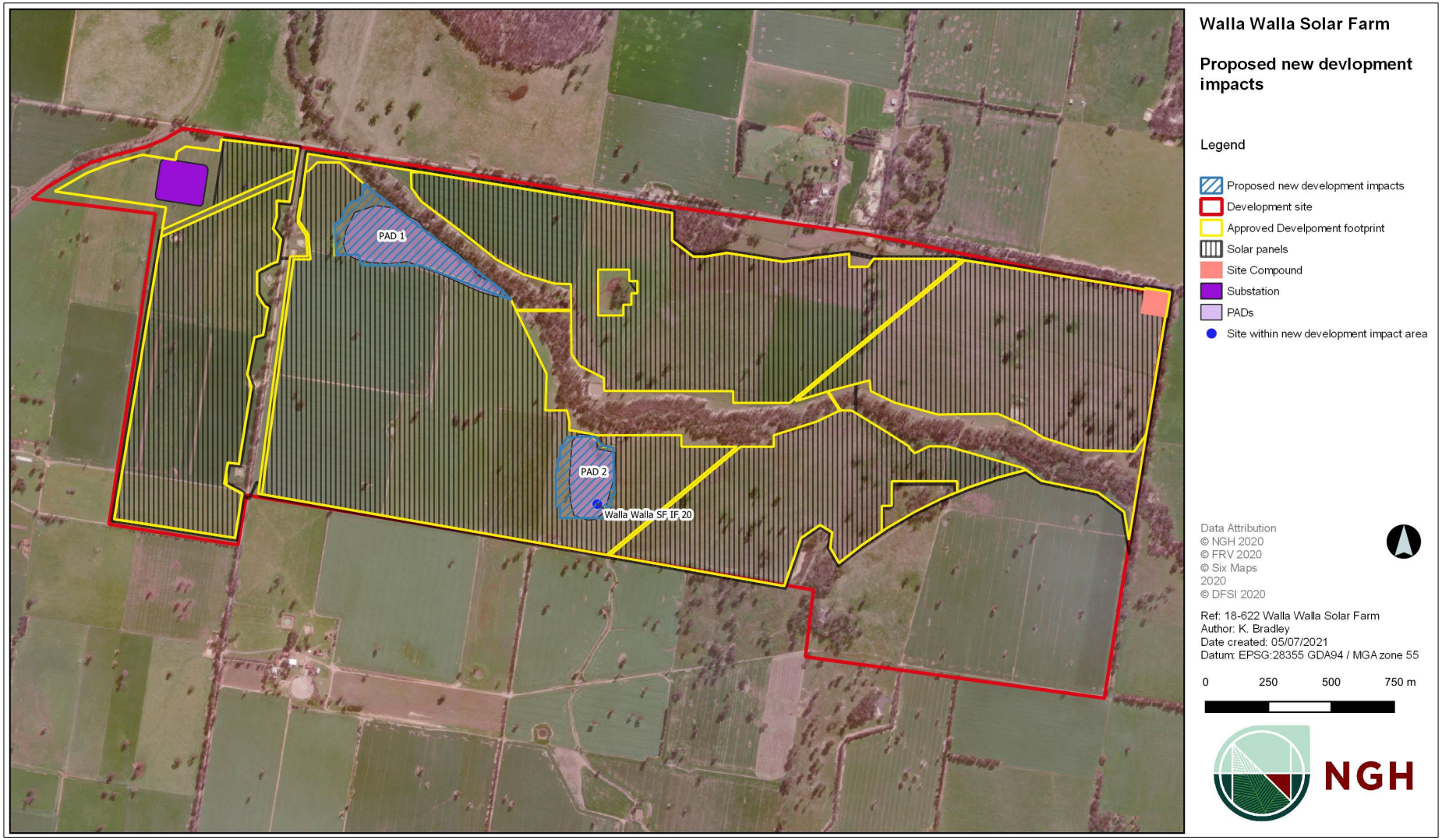


Figure 6-1. Proposed new Aboriginal cultural heritage impacts and investigation areas within the Walla Walla Solar Farm

Figure 6-2. Recommended mitigation measures, PAD1.

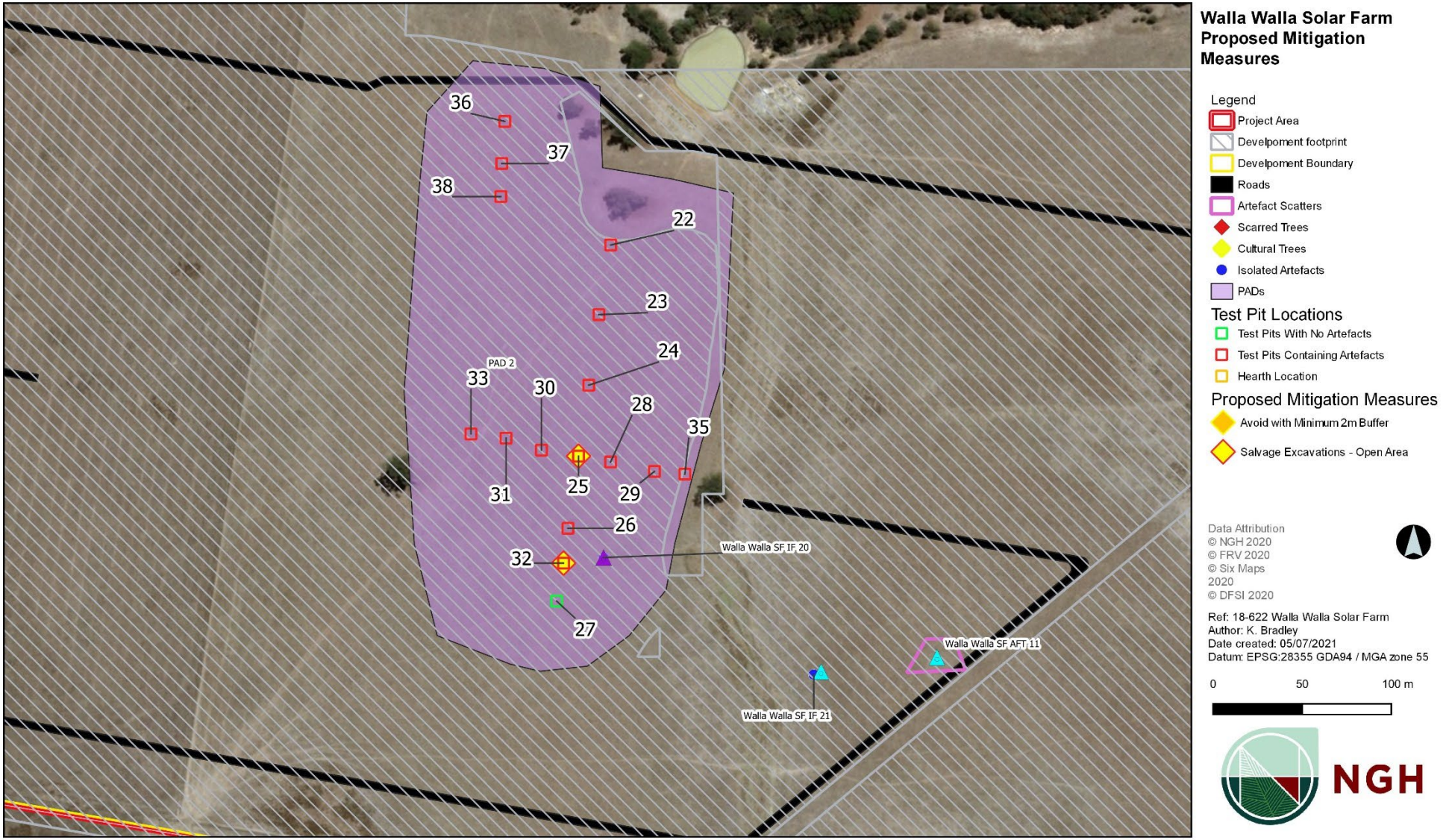


Figure 6-3. Recommended mitigation measures, PAD2.

6.1.2 Biodiversity

The revised BDAR (Appendix B.1) has been prepared incorporating an assessment of new impacts.

Potential Impacts

The modification proposes the development of a total additional area of 16.6 ha within the Project Site. The final Project layout in relation to vegetation communities is shown in Figure 6-4. This additional area has largely avoided native vegetation zones within the site. One scattered tree will require removal.

Of the total additional area, 15.4 ha of cleared agricultural land would be used for the development of an additional area of solar array within the site.

The additional watercourse crossing is estimated to have an impact area of 0.219 ha based on a conservative corridor width of 12m, which includes additional clearing of 0.137 ha of native vegetation.

Plant community types

Whilst the project has been designed to avoid biodiversity impacts where possible, the provision of an additional watercourse crossing has the potential to result in the clearance of an additional 0.137 ha of PCT 5 River Red Gum Forest within Back Creek.

No additional impacts to zones of native vegetation would occur from the updated solar array layout. 15.4 ha of non-native grassland, currently used for grazing would be impacted. This area has been assessed as Category 1 – Exempt Land under a land category Assessment undertaken in the BDAR (NGH, 2020). This non-native vegetation does not generate ecosystem credits.

Scattered Trees

One additional scattered tree would be removed within the development footprint. This tree is a Grey Box (*Eucalyptus acrocarpa*) over Category 1 -Exempt Land (NGH, 2020). This tree is classed as Class 3 Scattered and has no hollows.

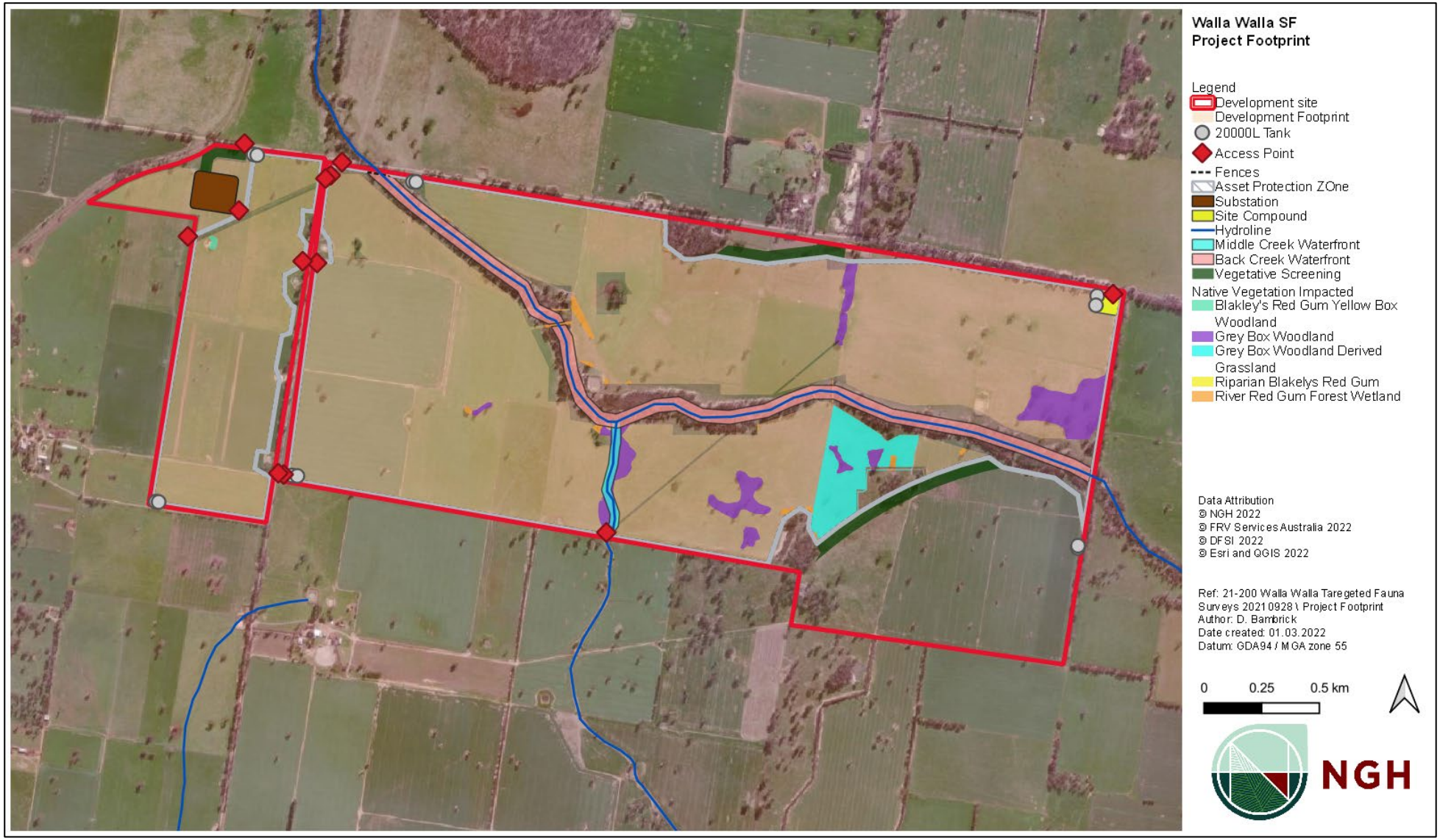


Figure 6-4 Final project footprint in relation to vegetation

6.1.3 Traffic and Transport

The existing consent allows for up to 45 heavy vehicle movements per day during peak construction periods (as per Schedule 3.2(a)), with 10 of these heavy vehicles permitted to use the substation access via the unsealed section of Benambra Road (as per Schedule 3.6(b)).

Following detailed construction planning, including optimising of construction timelines to minimise the duration of construction, the Proponent has established that the project would require an increase in the peak number of heavy vehicles per day travelling to and from the site.

This modification proposes to increase the maximum number of heavy vehicles to 110 vehicles per day, consisting of:

- a maximum of 80 heavy vehicles per day associated with construction of the remaining solar farm site.
- a maximum of 30 heavy vehicles per day associated with construction of the substation.

It should be noted that whilst up to 30 heavy vehicles per day would be required for construction of the substation, only 10 of those vehicles would use the dedicated substation access, in accordance with the terms of the existing approval. The remaining 20 vehicles would access the substation area via the Main Site Access, cross Schneiders Road, and access the substation from within the site.

Whilst it is understood that the modification represents a substantial increase to the approved heavy vehicle limits, it should be noted that the additional vehicles would not impact any nearby receiver and would not involve extensive use of local roads.

The proposed heavy vehicle limits are similar to other approved local projects of a similar size to the Walla Walla Solar Farm, such as the Culcairn Solar Farm.

Potential Impacts

Peak vehicle numbers would only occur during a relatively short period of time. For example, the peak construction period for the substation area would occur at the commencement of construction (during civil works and concreting), which would occur during the first 4 – 6 weeks.

In development of the remaining solar farm site, there would be a small peak in heavy vehicle numbers during the first few weeks of construction whilst material was transported to site for the construction of internal access roads.

As the substation works (Stage 1) would likely commence several months before the remainder of the site (Stage 2), it is unlikely that these two periods would overlap. As such, it is unlikely that the development would produce 110 heavy vehicle movements per day, however the Proponent has adopted a conservative approach in estimating vehicle numbers required for the early stages of development.

Amenity Impacts on Nearby Receivers

All additional heavy vehicles would use the approved access route and gain access to the site via the Primary Site Access. There would be no increase to the approved number of vehicles (10 per day) that are able to use the dedicated Substation Access.

There are no residences located along Benambra Road, between the Olympic Highway and the Primary Site Access, which would exclude additional amenity impacts on neighbouring receivers.

Cumulative Impacts

All additional heavy vehicle traffic proposed as part of this modification would utilise the unsealed section of Benambra Road, and the Primary Site Access. This route is also currently used by heavy vehicles associated with the Boral Quarry. The route would also be used by the Culcairn Solar Farm, if constructed.

Existing traffic on Benambra Road currently includes an average of 134 vehicles (including 33 heavy vehicles) per day.

In the unlikely event that both the Culcairn Solar Farm and Walla Walla Solar Farm were constructed concurrently, and had overlap with their respective peak construction periods, the cumulative traffic movements across both projects would be an additional 210 heavy vehicles per day, and 350 light vehicles per day.

It should be noted that the scenario of peak construction of both projects would likely not occur, due to the following reasons:

- The Walla Walla Solar Farm is at an advanced stage of development in comparison to the Culcairn Solar Farm, which would likely commence construction much later.
- The peak construction period for Walla Walla would only occur for a period of one to two weeks, during civil works for the substation.
- The Proponent has committed to implementation of a shuttle bus service from nearby centres for construction staff, which would significantly reduce the number of light vehicles coming to the site.

Despite the above factors, it should be noted that Benambra Road has sufficient capacity, 600 vehicles per hour (OntoIt 2019), to accommodate the number of vehicles associated with both projects, in the unlikely event that they were constructed concurrently.

The Proponent would also highlight that Benambra Road has no residences between Olympic Highway and the Primary Site Access, and is not an arterial or primary access route between the township of Walla Walla and the Olympic Highway.

Impacts on Road Users

As demonstrated in the original traffic impact assessment (Ontoit 2019), this section of Benambra Road has capacity for these vehicle movements. Additionally, there are no sensitive receptors along this stretch of road.

The Traffic Management Plan will ensure the additional heavy vehicle movements in peak periods will be managed in a way to minimise impacts to existing road users during construction including quarry trucks utilising this section of road.

The additional vehicles utilising Benambra Road would create minor additional noise impacts through changed construction traffic noise location, duration and extent. Construction vehicles would only travel between the hours listed in the traffic management plan (to be drafted) and would be subject to existing traffic control measures for the approved project such as speed limits to minimise unnecessary noise and traffic controls to maintain site access safety during peak traffic scenarios. Benambra Road is currently an operational road, and there are no sensitive receptors along this section of road, and as such any noise impacts would not be considered beyond the current operational conditions of the road.

No additional traffic mitigation measures are required as a result of the proposed Modification.

6.2 Minimal Impacts

The additional impacts to traffic, heritage and biodiversity as a result of the proposed modification have been assessed to avoid significant impacts and have been minimised as far as practical. Heritage impacts in particular have been found to be acceptable to RAPs. The minimised biodiversity impacts can be offset and traffic impacts are temporary and within the capacity of the existing facilities.

In the context of the approved Project impacts the additional impacts from the proposed modification are considered minimal for the purposes of Section 4.55 of the EP&A Act.

Appendix A Review of proposed modification against the development consent

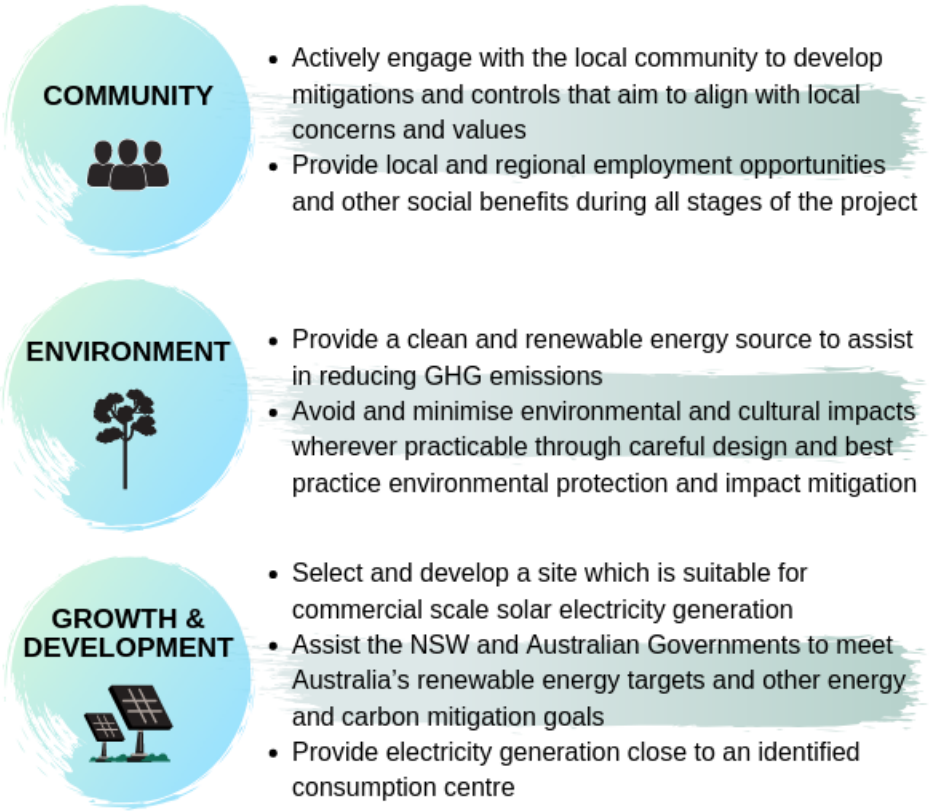
A.1 Nature of the development

The proposed amendments are:

- A revised Project Biodiversity Development Assessment Report (BDAR) with a revised credit liability.
- An increase in the development footprint, of approximately 15.7 ha, within the existing project boundary associated with the additional arrays and the additional creek crossing.
- Increase in peak daily heavy vehicle movements.

All other solar farm infrastructure proposed remains as described in the Development Consent. The project size remains the same at 300 $MW_{(ac)}$. No changes to the project boundary or peripheral development footprint are required.

The project remains 'substantially the same development' and will enable the project to meet the following project objectives as stated in the EIS (NGH Pty Ltd 2019):



A.2 Consideration of Environmental Impacts

The following risks were investigated within the EIS and Modification 1 (and where relevant, with associated Submissions Reports and EIS Amendment Report), completed for the approved project. Four of these are considered relevant to the modification and are discussed further in the Modification Application in Section 6. The assessment of biodiversity and Aboriginal cultural heritage impacts are supported by specialist studies in Appendix B.

Table A-1 EIS impacts investigated and relevance to modification

Environmental risk (EIS Section)	Relevance to modified project	Impact
Visual (6.2)	The additional solar arrays are infill within the existing development footprint, representing an increase of 4% to the approved array area. Neighbouring receivers would not have sightlines to the additional development areas for the array and creek crossing, and the modification would not alter visual impact levels for receptors.	Minimal impact
Land use (6.3)	The proposed modifications do not relate to additional land use considerations to those previously assessed and as such there would be no change to impacts. Managed grazing would still be maintained within the site, in coordination with the landowners. No additional mitigation measures are required.	No additional impact
Socioeconomic and community (6.4)	The proposed modifications do not relate to socioeconomic or community and as such there would be no change to impacts. Some additional community and NSW power consumers' benefits relating to increased renewable energy generation. No additional mitigation measures are required.	No additional impact
Noise and vibration (6.5)	There would be no change to the type of machinery or equipment used on site during construction. Development of the additional areas within the development footprint may slightly extend the duration of construction by approximately 2-3 weeks and may result in additional materials delivery. Due to the location and low proportional increase, the increase in impacts are minimal and consistent with the impacts previously assessed, including the indicative construction duration considered in the EIS. There would be no change to the project's noise levels previously assessed. Noise during construction and operation would remain within permissible levels. No additional mitigation measures are required.	Minimal impact
Traffic, transport and road safety (6.6)	As discussed in Section 6.1.2 peak daily heavy vehicle movements will be increased. All affected roads would continue to operate above a satisfactory level. No additional mitigation measures are required.	Minimal impact
Water use, quality (surface and groundwater) and hydrology (6.7)	The proposed additional creek crossing and arrays would be constructed to the same design requirements and construction management measures as the approved crossing and arrays, and would not change water use, quality or hydrology characteristics or impacts to those already assessed. No additional mitigation measures are required.	No additional impact
Biodiversity (6.8)	The proposed solar array modifications avoid disturbance to any retained zones of native vegetation. One non-hollow bearing	Minimal

Environmental risk (EIS Section)	Relevance to modified project	Impact
	scattered tree will be removed. The additional creek crossing will impact on native vegetation and require additional offsets in accordance with existing mitigation measures. No additional mitigation measures are required.	impact
Aboriginal heritage (6.9)	The proposed modifications will have further impacts on Aboriginal heritage. The archaeological sites within the proposed additional areas have presented a low-density concentration of surface artefacts that have been assessed to hold a low scientific value. Based on the assessment of the sites and in consideration of discussions with the Aboriginal representatives during the fieldwork, it is not considered necessary to prevent all development of the Project site, or for total avoidance of the Aboriginal heritage sites identified within the Addendum ACHA. As per Section 6.1.1 and Appendix B.2 additional mitigation measures have been established to mitigate and minimise impacts.	Minimal impact
Climate and air quality (7.1)	Due to additional construction a slight increase in minor dust generation is possible, however, existing dust mitigation measures would be applied as per existing environmental conditions. No additional mitigation measures are required.	Minimal impact
Historic heritage (7.2)	The proposed modifications do not relate to Historic heritage and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Soil (7.3)	Due to additional construction an increase in soil disturbance is anticipated, however, existing mitigation measures would be applied as per existing environmental conditions. No additional mitigation measures are required.	Minimal impact
Hazards (7.4)	The proposed modifications do not relate to fire or EMF hazards and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Resource and waste generation (7.5)	The increased array will increase materials required and waste generated, however, existing mitigation measures would be applied as per existing environmental conditions. No additional mitigation measures are required.	Minimal impact
Cumulative Impacts (7.6)	The proposed modifications may result in cumulative traffic impacts from the unlikely scenario where the Projects peak construction period coincides with the peak construction of the approved Culcairn Solar Farm. As per Section 6.1.3 existing traffic management mitigation measures would be applied with the impacts considered minimal. No additional mitigation measures are required.	Minimal impact

A.3 Consideration of relevant Consent Conditions

With reference to the conditions of consent for the project, March 2022, the following areas are identified for further consideration.

- The consented peak daily heavy vehicle movements requires amendment, to reflect the potential for peak daily vehicle movements to increase to 110 per day.
- Biodiversity offset credit values require modification to reflect the impacts on biodiversity from the additional creek crossing and the additional removal of a scattered tree.
- The Aboriginal heritage items listed for avoidance and salvage requires modification to reflect the impacts from the increased solar array area.

Relevant conditions are evaluated below for their ability to impact on satisfying the existing Development Consent conditions.

Table A-2 Relevant development consent conditions

Condition	Current wording	Proposed update to condition
Condition 2, Schedule 3	TRANSPORT Over-Dimensional and Heavy Vehicle Restrictions 2. The Applicant must ensure that the: (a) development does not generate more than: • 45 heavy vehicle movements a day during construction, upgrading and decommissioning;	Up to 110 heavy vehicle movements per day accessing the Main Access may be required.
Condition 15, Schedule 3	BIODIVERSITY OFFSETS Prior to commencing construction, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below, unless the Planning Secretary determines otherwise in consultation with BCD. The retirement of these credits must be carried out in accordance with the *NSW Biodiversity Offsets Scheme* and can be achieved by:	Credit requirements for PCT 5 have increased by two (2) credits due to the additional creek crossing and to changes in credit ratios within the current BAMC Credit requirements for PCT 278 have increased by one (1) credit due to the removal of a scattered tree for the increased solar arrays. Threatened species credits have reduced for the Little Eagle and Pine Donkey Orchid following seasonal surveys confirming their absence. Species credits species credits have been modified to due to

<table>
<tr><th>Condition</th><th>Current wording</th><th>Proposed update to condition</th></tr>
<tr><td></td><td>
a) Acquiring or retiring ‘biodiversity credits’ within the meaning of the Biodiversity Conservation Act 2016;
b) Making payments into an offset fund that has been developed by the NSW Government; or
c) Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.
<table>
<tr><th>Vegetation Community</th><th>PCT ID</th><th>Credits Required</th></tr>
<tr><td>River Red Gum herbaceous grassy very tall open forest wetland</td><td>5</td><td>28</td></tr>
<tr><td>Western Grey Box tall grassy woodland</td><td>76</td><td>298</td></tr>
<tr><td>Blakeley’s Red Gum – Yellow Box grassy tall woodland</td><td>277</td><td>13</td></tr>
<tr><td>Riparian Blakely’s Red Gum – box – shrub – sedge – grass tall open forest</td><td>278</td><td>2</td></tr>
</table>
<table>
<tr><th>Species Credit Species</th><th>Credits Required</th></tr>
<tr><td>Squirrel Glider (Petaurus norfolcensis)</td><td>182</td></tr>
<tr><td>Little Eagle (Hieraatus morphnoides)</td><td>135</td></tr>
<tr><td>Southern Myotis (Myotis macropus)</td><td>97</td></tr>
<tr><td>Pine Donkey Orchid (Diurus tricolor)</td><td>77</td></tr>
</table>
</td><td>
changed credit ratios in the current BAMC.
A revised credit liability is summarised as follows.
<table>
<tr><th>Vegetation Community</th><th>PCT ID</th><th>Credits Required</th></tr>
<tr><td>River Red Gum herbaceous grassy very tall open forest wetland</td><td>5</td><td>30</td></tr>
<tr><td>Western Grey Box tall grassy woodland</td><td>76</td><td>298</td></tr>
<tr><td>Blakeley’s Red Gum – Yellow Box grassy tall woodland</td><td>277</td><td>13</td></tr>
<tr><td>Riparian Blakely’s Red Gum – box – shrub – sedge – grass tall open forest</td><td>278</td><td>3</td></tr>
</table>
<table>
<tr><th>Species Credit Species</th><th>Credits Required</th></tr>
<tr><td>Squirrel Glider (Petaurus norfolcensis)</td><td>184</td></tr>
<tr><td>Southern Myotis (Myotis macropus)</td><td>100</td></tr>
</table>
</td></tr>
<tr><td>Appendix 6</td><td>ABORIGINAL HERITAGE ITEMS</td><td>Table 1, Table 2 and the Appendix 6 figure requires modification to reflect the impact to Aboriginal heritage items in the modified development footprint.</td></tr>
</table>

Condition	Current wording	Proposed update to condition

Table 1: *Aboriginal heritage items – avoid impacts*

Item name	Item Name
Walla Walla SF AFT 6	Walla Walla SF IF 20
Walla Walla SF AFT 7	Walla Solar Farm 495495
Walla Walla SF IF 1	Walla Solar Farm 497946
Walla Walla SF IF 4	Walla Solar Farm 496602
Walla Walla SF IF 7	Walla Solar Farm 497199
Walla Walla SF IF 9	Walla Solar Farm 496812
Walla Walla SF IF 13	Walla Walla PAD 1
Walla Walla SF IF 14	Walla Walla PAD 2
Walla Walla SF IF 15	

* Refer to the Figure in this Appendix to identify items

Table 2: *Aboriginal heritage items – salvage*

Item name	Item Name
Walla Walla SF AFT 1	Walla Walla SF IF 6
Walla Walla SF AFT 2	Walla Walla SF IF 8
Walla Walla SF AFT 3	Walla Walla SF IF 10
Walla Walla SF AFT 4	Walla Walla SF IF 11
Walla Walla SF AFT 5	Walla Walla SF IF 12
Walla Walla SF AFT 8	Walla Walla SF IF 16
Walla Walla SF AFT 9	Walla Walla SF IF 17
Walla Walla SF AFT 10	Walla Walla SF IF 18
Walla Walla SF AFT 11	Walla Walla SF IF 19
Walla Walla SF IF 2	Walla Walla SF IF 21
Walla Walla SF IF 3	Walla Walla SF IF 22
Walla Walla SF IF 5	Walla Walla SF IF 23

* Only items located within the development footprint are to be salvaged (refer to the Figure in this Appendix to identify items)

Table 1. Aboriginal heritage items – avoid impacts

Item Name	Item Name
Walla Walla SF AFT 6	Walla Walla SF IF 15
Walla Walla SF AFT 7	Walla Walla Solar Farm 495495
Walla Walla SF IF 1	Walla Walla Solar Farm 497946
Walla Walla SF IF 4	Walla Walla Solar Farm 496602
Walla Walla SF IF 7	Walla Walla Solar Farm 497199
Walla Walla SF IF 9	Walla Walla Solar Farm 496812
Walla Walla SF IF 13	Walla Walla SF Cultural Hearth (TP12)
Walla Walla SF IF 14	

Table 2. Aboriginal heritage items – surface salvage

Item Name	Item Name
Walla Walla SF AFT 1	Walla Walla SF IF 8
Walla Walla SF AFT 2	Walla Walla SF IF 10
Walla Walla SF AFT 3	Walla Walla SF IF 11
Walla Walla SF AFT 4	Walla Walla SF IF 12
Walla Walla SF AFT 5	Walla Walla SF IF 16
Walla Walla SF AFT 8	Walla Walla SF IF 17
Walla Walla SF AFT 9	Walla Walla SF IF 18
Walla Walla SF AFT 10	Walla Walla SF IF 19
Walla Walla SF AFT 11	Walla Walla SF IF 20
Walla Walla SF IF 2	Walla Walla SF IF 21
Walla Walla SF IF 3	Walla Walla SF IF 22
Walla Walla SF IF 5	Walla Walla SF IF 23
Walla Walla SF IF 6	

<table>
<tr><th>Condition</th><th>Current wording</th><th>Proposed update to condition</th></tr>
<tr><td></td><td></td><td>Table 3. Aboriginal heritage items – subsurface salvage
<table><tr><th>Item Name</th><th>Item Name</th></tr><tr><td>Walla Walla PAD 2</td><td></td></tr></table>Figure 7-1 and Figure 7-2 from the ACHA to be utilised for Appendix 6.</td></tr>
</table>

Appendix B Specialist Reports

B.1 Revised BDAR

B.2 Addendum ACHA