



DOC22/108283

Alex Wang
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Department of Planning and Environment
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Dear Alex,

Re: Project EnergyConnect (NSW - Eastern Section) (SSI- 9172452)
Notice of Exhibition

The NSW National Parks and Wildlife Service (NPWS) appreciates the opportunity to review the Environmental Impact Statement (EIS) and accompanying documents and provide comment in relation to potential impacts to the Yanga State Conservation Area (SCA) which is part of NPWS estate.

In response to the submission of the EIS a few matters are raised which are outlined in **Attachment 1** to this letter. The detailed response in Attachment 1 also includes recommendations on environmental matters as well as advice on further consultation and notification with NPWS.

NPWS note that the exact location of the transmission towers and access roads in Yanga SCA is not identified in the EIS. NPWS should be provided the opportunity to review this information once the planning and design stages finalise the locations within Yanga SCA.

Please contact me on 02 6450 5669 or at Rebecca.owen@environment.nsw.gov.au if you have any queries about this consent.

Yours sincerely

REBECCA OWEN
A/Senior Project Officer
COMMERCIAL PROJECTS AND UTILITIES
VISITOR ENGAGEMENT AND REVENUE BRANCH
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15/2/2022

Appendix 1: Comments and recommendations for Project EnergyConnect (NSW - Eastern Section) EIS

Project Design Refinement

Comment:

Page xliii: *Some aspects of the proposal design would continue to be refined as part of the finalisation of the design. Aspects of the proposal that may be subject to further refinement include:*

- *the final transmission line component locations, including the specific location, height and type of transmission line structures, location of some access tracks and confirmation of the required vegetation clearance and disturbance areas after design refinement.*
- *final locations and layouts of the main construction compound and accommodation camp sites - including selection of the final site where location options have been provided at Balranald and Lockhart.*
- *water supply points and other ancillary construction facilities.*
- *construction method and staging.*

Recommendations:

- The actual site location of towers, infrastructure and access roads within the Yanga State Conservation Area (YSCA) has yet to be identified. Micro siting and local knowledge of the YSCA will assist in minimising the impacts to the conservation area. Finalisation of the proposal design (location) and construction methods for YSCA should involve NPWS consultation, review and endorsement including the CEMP subplans that would include minimising impacts to values identified in the NPW or BC acts (biodiversity, heritage etc) on Yanga SCA.
- Material and equipment storage areas should be off the YSCA where possible or restricted to previously disturbed areas or areas proposed to be disturbed if within the conservation area.
- Ancillary construction facilities such as water supply points and construction compounds should be located outside of the YSCA.

Threatened Species

Comment:

- The EIS does not appear to address the newly discovered Green Hood Orchid *Pterostylis pedina*, and its habitat, on YSCA.

Recommendation:

- That site surveys for this species are conducted during an appropriate time for the species to determine absence or presence. Works should then be planned to avoid areas which contain this threatened species.

PAD Investigations

Comment:

- Page xliii: *adjustment of some proposed tower locations and relocation of proposed new access tracks to avoid areas of Potential Archaeological Deposits (PADs) or other ecological identified constraints where practicable.*

Recommendations:

- The results from the PAD investigations in Yanga SCA (CRA submitted to NPWS, currently being reviewed) must be considered when determining the proposed tower

locations and proposed new access tracks in Yanga SCA. NPWS note that despite the intent to avoid areas of PADS over 40 PADS are still going to be impacted or potentially impacted.

- That archaeological investigation methodology that accords with the requirements of the Code of Practice for Archaeological Investigation is applied.
- That all planning and design of works to come is done in consultation with the Aboriginal peoples and the advice received regarding the management of Aboriginal objects is strictly adhered to.

Access

Comment:

- Page 172: *Requirements to access and conduct activity within Yanga State Conservation Area and proposed route alignment.*

Recommendation:

- NPWS requires at least 2 days notification prior to access within YSCA and at least 2 weeks prior to works commencing. Reason: To ensure there are no operational conflicts or current incidents/issues.

Easement

Comment:

- Page 7: *The proposal may also require the following approval under other NSW legislation: granting of an easement to Transgrid for a transmission line for areas of land reserved under the National Parks and Wildlife Act 1974 (NP&W Act) (Page 7).*

Recommendation:

- Continued and early engagement with NPWS area and the NPWS licencing teams regarding a new easement.

Visual Impact

Comment:

- Visual impacts for YSCA has not been addressed.

Recommendation:

- That visual impact for YSCA is considered.

Clarification sought on options considered

Comment:

- Was an option that did not impact on Yanga SCA considered (Section 3). A thorough options summary has been provided however it is not clear if YSCA could have been avoided all together with a minor realignment in the area.

Other recommended conditions usually applied to works on NP estate:

- Dewatering activities on park should be done in consultation with NPWS (Page liv)
- Weed control is required prior to entering SCA, especially if vehicles or machinery are coming from areas/properties with known weeds. Protocols are to accord with the 'Arrive Clean, Leave Clean – Guidelines to help prevent the spread of invasive plant diseases and weeds threatening our native plants, animals and ecosystems' (Australian Government 2015)

- Works must not be undertaken in wet weather if the proposed track surfaces and sites are going to be damaged by access, vehicles, equipment or works.
- Prior to commencing vegetation clearing, the applicant must clearly mark the areas approved for clearing via stakes or other suitable markers.
- Any felled timber or vegetation must be dispersed throughout the adjacent environment to aid stabilisation of bare soils, enhance fauna habitat, and reduce fire risk.
- All waste must be removed from site daily or must be contained daily. Adequate toilet facilities must be provided so human waste is not left onsite.
- A rehabilitation plan should be prepared for review and endorsement by the local NPWS area. Rehabilitation must commence as soon as possible in Yanga SCA.
- That relevant project coordinator contact, including an Environmental Supervisor and other key project contacts, are provided to NPWS to assist in communication and incident management.
- That an Incident Management Plan is prepared for the YSCA and provided to NPWS prior to works commencing.
- Firefighting conditions are usually applied to all works on NP estate. Model conditions include:
 - The applicant must ensure that firefighting equipment, including a bulldozer with a dedicated operator wearing approved PPE, is provided on site during periods of declared very high fire danger. The dozer must comply with provisions of the NSW Rural Fire Service heavy plant register and be on that register.
 - The applicant must ensure that at least 500 litres of freshwater are provided on site at all times. Dedicated pumps must be positioned next to each water supply to service fire appliances or extinguish small fires that may start at the site. Workers at the sites must be able to operate these pumps to extinguish fires or transfer water into firefighting appliances.
 - Firefighting foams or gels are not to be used in firefighting operations in landscapes below 10 metres above mean sea level or within 50 metres of the edge of a creek, swamp or freshwater lake.
 - Machinery which may result in sparking or ignition must not be operated during a Park Fire Ban or a declared Total Fire Ban for the zone which includes Yanga SCA.
 - The applicant must store fuel and other similar flammable materials, such as gas cylinders and paint, in appropriate fire-resistant storage containers.