



DOC21/957939

Dominic Crinnion  
Specialist Planning Officer  
Energy & Resource Assessments  
Department of Planning Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Dominic

**Subject:** Snowy 2.0 Main Works (SSI 9687) – Modification 1 – Main Access Tunnel to Marica Services Connection

National Parks and Wildlife Service (NPWS) and Biodiversity Conservation Section (BCS) have reviewed the modification application. NPWS and BCS are supportive of the application and the resulting reduction in impacts to the environment in Kosciuszko National Park. However, there are two critical, and linked, issues that remain outstanding that need to be addressed in the application.

Firstly, the application does not address the implication on emergency egress/access to or from Lobs Hole with the construction of Marica West Trail no longer being considered. Secondly, the application does not address Snowy 2.0 Main Works Infrastructure Approval (Main Works Approval) Schedule 3 condition 44, which places restrictions on the use of Lobs Hole Ravine Road North. The use of this road will need to be reviewed as it will now be the only other primary access/egress route to the Lobs Hole site.

The below points provide further detail on these two issues:

- The Main Works Approval Schedule 3 condition 61, required that an Emergency Management Plan be prepared to the satisfaction of the NPWS. During the development of the Exploratory and Main Works Emergency Management Plans, Snowy Hydro Limited (SHL) and their contractor identified that once constructed, Marica West Trail would be identified as a primary access/egress route during emergency events.

The implications of this modification on the ability of emergency services to access Lobs Hole if Ravine Road South becomes impassable, has not been addressed and requires resolution prior to final consideration of the application.

- The Main Works Approval Schedule 3 condition 44, restricts the use of Lobs Hole Ravine Road North to:
  - *access to and from the site during emergencies*
  - *light vehicle at all other times with*
    - *a maximum of 120 vehicle movements allowed a day (60 each way): and*
    - *an annual average maximum of 60 vehicle movements allowed a day (30 each way).*

NPWS is of the understanding that this condition of approval was based on Lobs Hole Ravine Road North being only a secondary access/egress route until the construction of Marica West Trail was completed.



- Additionally, an upgrade of Lobs Hole Ravine Road North was approved under Snowy 2.0 Exploratory Works Modification 2 with the condition that safety improvement works were to be completed prior to the use of the road. A recent inspection (16 September 2021) of the road by NPWS and NSW Rural Fire Service with SHL, identified that the works outlined in Exploratory Works Infrastructure Approval condition 40A are not complete to the extent required by the approval, or to the satisfaction of NPWS. At the time of this inspection it was noted that in the roads' current format, it is unsuitable for heavy fire trucks to use if emergency assistance is required at Lobs Hole, and Ravine Road is impassable.

NPWS recommends that the proponent consults with all emergency services that may be called upon to assist the project in Lobs Hole as to the appropriateness of Lobs Hole Ravine Road North in the instance that Ravine Road is impassable. If it is identified that Lobs Hole Ravine Road North does not meet the appropriate standard, then the proponent should be required to provide a detailed response for consideration as to what road works are required.

Finally, a review of the Main Works Emergency Management Plan is required to address the concerns raised above as soon as possible if the application is approved. NPWS and BCS also request that in accordance with Schedule 4 condition 4 of the Main Works Approval, all relevant management plans be reviewed, in particular the Biodiversity Management and associated monitoring plans.

If you have any questions regarding this advice, please contact Nicole Shotter, Manager Snowy 2.0, NPWS on 02 6450 5535.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mick Pettitt'.

**Mick Pettitt**  
**Director Southern Ranges Branch, Park Operations Inland**  
**National Parks and Wildlife Service**  
**Department of Planning, Industry and Environment**

5/11/2021

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