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(Family Farm impacted by Humelink at 1064 Yaven Creek Rd, Darlow NSW 2729)

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Director - Energy Assessments,
Development Assessment,
Department of Planning and Environment,
4 Parramatta Square,
12 Darcy Street,
Parramatta NSW 2150

Friday October 6th 2023

Dear Sir/Madam,

**SUBMISSION IN RESPONSE TO THE ENVIRONMENTAL IMPACT STATEMENT OF THE
HUMELINK PROJECT - APPLICATION NO SSI-36656827**

I hereby submit this response to the HumeLink Environmental Impact Statement report.

I object to the HumeLink proposal on a number of grounds, as follows, as a concerned community member, daughter of impacted landholder, and Rural Fire Service Volunteer:

Our family farm is impacted by HumeLink, for a length of 1.23km. This is a 3rd Generation worked farm, with 4th generation prospects for the future. Our property has been lovingly worked by my family since being acquired by my Grandfather as a returned Soldier Settler, and we continue his legacy with plans long into the future. We have an operational Hereford and Poll Hereford Stud cattle, and commercial cattle business. Glenellerslie (our property name) is home to us, and not just refined to the dwellings that reside on the property, but the entire property it is our workplace, our home, our amenity and the embodiment of who we are and our belonging.

I have been on Transgrid's Community Consultative Group since its inception (October 2021), and on the Steering Committee for Transgrid's commissioned Undergrounding Feasibility Study. I have much to say about this in regards to consultation, and lack thereof, as well as misrepresentation around undergrounding and the Undergrounding study that is referred to within the EIS but not endorsed by the community and independent underground experts, that sat on this for 13 long months.

The following assertions and objections have been made in direct connection to Transgrid's Environmental Impact Statement:

- The EIS presents first time discussion of Tumut REZ, there has been no consultation in regards to this and I believe Snowy Valleys Council could attest to this. The community has asked Transgrid representatives time and time again in Community Consultative Group Meetings as to the purpose of Humelink, and have questioned what other renewables may connect in. Transgrid has never provided any indication or name of projects other than Snowy 2.0. The '*candidate renewable energy zones*' that Transgrid has indicated on the map, have no substation connectors or infrastructure included in this EIS for tapping in along the line, so how do they form part of the EIS for Humelink when there is no infrastructure planned to connect these to Humelink. In actual fact in AEMO documentation, Tumut REZ for instance has been flagged for interconnection to the existing

330kv infrastructure. Transgrid has publicly stated both in the Media and within the NSW Parliamentary Inquiry (August 2023) that Orana REZ and Hunter REZ will tap into Humelink, apart from geographical location making this impossible, this has again been proven false as there is no mention of this in the EIS.

- This EIS does not reflect the Primary Purpose of Humelink, Snowy 2.0, there is relatively no reference to Snowy 2.0, but for the last 3 years, it has been drilled as Humelink's main and only objective.
- Transgrid states that the project will deliver \$491 Million in net benefits to consumers, how has this been determined? Originally, Humelink had a net benefit of \$39 million only, now the capital cost of Humelink has increased to nearly \$5 billion, it would no doubt now have a net cost to consumers. The RIT-T needs to be applied to Humelink immediately and honestly, being that Snowy 2.0 will be the only project to come online and into Humelink. Transgrid also states that *'According to the 2022 Integrated System Plan, the project is estimated to contribute about \$1.3 billion in net market benefits'* However, in the event of a fire, or severe weather events, due to exposure the assets will become damaged, where is this factored in? The amount of money that Transgrid's network would have cost consumers during the Black Summer Fires (exposed in Transgrid's report 'Overview of 2019-20 Bushfire Damage to Transgrid's Network - Cost pass through application 13 November 2020, https://www.aer.gov.au/system/files/A.2_%202019-20%20%20Bushfire%20Damage%20to%20TransGrid%20Network_%20FINAL_PUBLIC_Redacted.pdf), would be astounding, for damage and loss of network, and the costs of this passed through to consumers, please request Transgrid to provide the community with the total cost of damage to the network in 2019/20 fire . Based on this itself, to have a resilient network and grid we should not have be adding in more overhead transmission to be exposed to climatic events and be at the mercy of potential damage when it can be placed underground to safeguard and protect the infrastructure, and not cost consumers further.
- There has been independent reports that have been commissioned by Transgrid that fail to get a mention in this EIS though they are important to include due to the determinations and recommendations that have been uncovered within them. In particular the RED HAT REVIEW carried out on only Tumut and Bannaby parts of the route, but the content needs to be included in the EIS, particularly the recommendation to put the transmission underground in Bushfire Prone Areas. Please ask Brendan Nelson from Macroplan to provide the Red Hat Review in it's entirety for the purpose of review for the EIS. This has only been provided to the community by Brendan as a summary as outlined in the CCG Presentation September 2022, the community were never provided with the complete report. <https://www.transgrid.com.au/media/yyspafzk/humelink-ccg-presentation-sep-2022-snowy-valley.pdf>
- Transgrid state the following engagement objectives; - *'listen to feedback, understand community views, and consider these can deliver a better project'* (They have failed to listen and respond to community input and feedback, and ascertain a better project, social licence only comes with Undergrounding, as it is the only option that considers community objections, and Transgrid have misrepresented the facts on undergrounding to date) - *'build on Transgrid's positive reputation and social licence to operate'* (You can not build upon an unstable, cracked, broken foundation. Transgrid are so poorly respected in the regions, they are unable to stay in certain locations due to community anger, and mistrust, and have absolutely zero social licence in the regions impacted and surrounds.)

- Further on Consultation, the Community Consultative Groups (CCG), do not serve as their name suggests, consultation should go both ways, but does not. As a member of the CCG since its inception, I joined in hope that this would provide a platform for us and our communities to be heard, the only purpose I have observed of these meetings is a tick-a-box exercise for Transgrid to push ahead with their overhead agenda. These meetings have a presentation style approach, Transgrid doing all the presenting, and telling the community what they are doing with no consideration for people, the communities impacted and the environment. There is failure to listen, failure to respond to communities to better the project as is the requirements of consultation, and therefore Transgrid has failed in its requirement to consult.
- Transgrid have failed to present the facts to the public, it seems that in fact they have hidden much from the community, and in some cases have gone to great lengths to hide the 'reality'. Very much a case of 'if we don't show them, don't tell them, opposition will come when it is too late'. This EIS whilst it has uncovered information we have not heard before, it also attempts to mask the impacts and reality. Some relevant examples:
 - Transgrid has only ever discussed a 70m wide easement (originally 80m), however this EIS brings to light that in some areas easements of 110-130 metres wide will be required.
 - The community have questioned time and time again the height of the towers, originally documentation and materials stated 50-70m, but when pushed after a Transgrid employee stated they could be 85 m tall, they outed a new size bracket of 60-80 m but not ruling out taller based on the topography.
 - When asked in a recent CCG meeting about the maximum height of 76m establishment in this EIS, Transgrid stated that figure was '*for the purpose of the EIS only*', and they would not assure the community that they wouldn't be taller due to the topography. In Tasmania 92m has been suggested as maximum height, how can Transgrid provide a maximum for the purpose of EIS but not the ACTUAL size, this is evidence of Transgrid hiding information from the Public and in fact not providing the 'reality' in this EIS.
- Transgrid has construction timetabled for Q3 2024, with the growth of opposition to this project, and no social licence to do so, they will not meet these targets. Transgrid has heard from the community that we are accepting of the alternative to underground Humelink, on the same hand they have said to us that they are advocating for undergrounding, but in the same breath as misrepresenting facts and misleading the government to put undergrounding to bed. Undergrounding will not be put to bed, especially in light of October 9 when information was exposed by Independent Experts Amplitude Consultants on the cost of delivering Humelink underground being only 1.5 times the cost of Transgrid's overhead price of \$ 4.89 billion. A \$7.3 billion dollar investment with all the social, environmental and economic benefits and further still the significant savings on lifetime operational costs and maintenance of undergrounding Humelink, making undergrounding the best option on cost for the long term, and considerate of and valuing the externalities.
- Transgrid's information on Environmental Impacts is incomplete due to not having the social licence to acquire access. They state that '*where information is lacking or uncertain, a conservative approach has been adapted assuming presence of threatened fauna and flora or adopting predictive models*'. Where is the map that shows every property that has had

no access demands put on Transgrid, and proof that they have logged ALL presence. Using the word 'conservative' suggests that they are only providing at a 'minimum'.

- In reference to Transgrid's potential impacts, they state '*where feasible and reasonable, the project has aimed to avoid and minimise impacts. Where impacts are unavoidable, mitigation measures have been identified to reduce the likelihood, magnitude and consequences of any residual impacts.*' I object to this statement, Transgrid has not aimed to avoid or minimise the impacts in any case. I particularly would like to identify the Bushfire risk, the obstruction risk and impeding safe fire fighting efforts to control and fight fires in the vicinity of Humelink overhead, the only mitigation that is certainly a most reasonable ask is to underground Humelink as a HVDC alternative. It is negligent to put people, communities, homes, properties, livestock and assets of regional Australia at greater risk in the next fire event, when the risk is already so high, and even higher in bushfire prone areas. Our property is located a few mere kilometres from the Dunn's Road Fire ignition point, we are ever so aware of the risk, and the arcing behaviour of High Voltage transmission lines (330kv) in a fire event, we should not be exposing volunteer firefighters and risking their lives putting Humelink overhead. During the NSW Parliamentary Inquiry, we heard from firefighters on the fire ground, stating that Dunn's Road could have been controlled, but the existing 330kV impeded this as they had to wait for it to pass the structures and lines, and by that point it was too late, it was uncontrollable. Firefighters also provided evidence that the existing 330kV lines have been responsible for starting fires, and contributing to fires. We can not afford to have obstruction, dangerous infrastructure placed in the way of controlling fires, and presenting a dangerous threat to human life.
- Transgrid states that '*clearance of 670.21 hectares of native vegetation during construction*', I do not believe that this includes the native vegetation removed from private agricultural land, in particular from Wondalga to Wagga, this is a major oversight, and grossly underestimated by Transgrid, what other native vegetation clearance has been missed in this calculation? Our property is located along this part of the route, and as per an independent ecological assessment that we have commissioned ourselves, Ecology Consulting identified the impacted area as '*Critically Endangered Ecological Community, commonly known as Box Gum Woodland, White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Commonwealth EPBC Act)*'. And stated further, '*it's crucial to recognise that the study area constitutes part of the unaffected remnants from past bushfires in New South Wales... data sourced from the NSW Fire Extent and Severity Mapping indicates that the proposed easement area has remained relatively untouched by significant bushfires... while the surrounding regions have been affected. This distinctive status highlights the study area's value as a precious remnant, providing vital habitats for local species.*' It is concerning that this native vegetation, critically endangered, is not included in Transgrid's figures, for native vegetation removal. Our impacts would be only one example of many hundreds across the 360 km route, where biodiversity is not 'accounted for' on private, agricultural land. Please provide more accurate information on the 'reality' of native vegetation clearance across the scope and length of the project, Transgrid's figure proves to be inaccurate in this EIS.
- Transgrid makes reference to impacts '*if inappropriately managed*', this can not be a risk, it gives no confidence of assurances to landholders, communities, environmentalists, and Government. I object to a project that can not assure it's management to NOT cause adverse effects and impacts to ecology, property, and biosecurity.

- Biodiversity Offsets are estimated to be around \$1 billion, yet this Environmental Impact Statement fails to acknowledge biodiversity impacts across the route by not considering 'ALL' native vegetation clearance along the 360 km route, and without access to ALL properties can not be properly calculated for their Biodiversity value. Hence I object to a project that does not account for ALL Biodiversity and fails to deliver an EIS that accurately accounts for the environmental impact.
- It is of great concern that Transgrid states on Operational Impacts for the longevity of Humelink's lifetime, '*changed bushfire risk to surrounding vegetation and EMF exposure to native fauna.*' A HVDC alternative underground system would provide no exposure to EMF and would have no bushfire risk associated with it, safe and sound underground. This also raises the question of EMF exposure to humans and livestock, as well as bushfire risk to homes and property surrounding Humelink. When Transgrid have been asked about EMF exposure in CCG meetings, they have suggested that there is no exposure risk, and that there are no studies to suggest that there is such, yet here is a statement that clearly states there is EMF exposure to native fauna. Transgrid has failed to provide the community with assurances around EMF exposure, with a 'there is nothing to see here' attitude. The community deserves to know the reality, the community has even provided Transgrid with case studies from overseas, and received no acceptance, commentary or response to these.
- Transgrid states that there are '*90 Aboriginal Heritage sites and potential archaeological deposits within Humelink's footprint*'. It is alarming that when these sites fall within the easement of Humelink, in the next fire event they will be lost to us all, due to the inability to fight fires in and around Humelink overhead. It is in our best interests to protect these important Aboriginal sites and artefacts by placing Humelink Underground, so that we can protect these critical deposits, rather than decimate them by industrialising them and exposing them to further bushfire risk and damage. Undergrounding could ensure that these areas are avoided and every chance given for them to be retained for the future.
- The EIS states in regards to Non - Aboriginal Heritage sites, that '*Indirect visual impact is expected to have a negligible impact on the heritage significance of these places*'. Is it right that Transgrid determine this, they have no standing with the community to be trusted to make such 'determinations' on places of significance. Industrialising places of heritage and significance to us as Australians, is criminal, visibility classifications within the EIS are not indicative of 'reality', we are making a grave mistake to have the proponent complete an EIS with such bias.
- What Transgrid has failed to include in the EIS is the Generational Heritage of those families impacted. Examples; Soldier Settlement Blocks of Ellerslie Station, Landcare Projects by family members and communities, Property infrastructure built by early farmers and family members, private cemeteries, all imposed and changed forever, with significant relevance to families, communities and those that live there. Legacy and heritage of generations disturbed and impacted without consideration as they are not 'listed'.
- Transgrid states that '*there are 9 dwellings within the project footprint with only one dwelling likely to require demolition or relocation*'. When a statement is made in this EIS about the changed exposure to EMF for native fauna, and here we have people's homes within the 70m easement. What about the impacts of EMF on people, or the fact that those homes will have no chance to be saved in the next fire event. Undergrounding would ensure that there are no homes impacted negatively within a 15 m easement, that would work more effectively to divert to avoid them.

- As someone who has been brought up in agriculture, on the land, Transgrid are making very harmful, unqualified statements on permanent agricultural impacts. At the most recent CCG meeting, it was asked of Transgrid as to whether they have any person within their team with an Agricultural Degree or expertise. The Director Mr Jeremy Roberts, the team responsible for the EIS and other Transgrid employees were unable to provide a response to such a simple question. From the following statement it is obvious that the Agricultural impacts were not with consultation from an expert in the field, and also highlights Transgrid's inability to hear our experienced community of Farmers, who have put forward their concerns, and have not been listened to, our attempts to be considered and heard as a farming community have been ignored. Please seek to review this statement *'Restrictions on: aerial agricultural operations, grain loading/unloading, drone use, maintenance of fruit trees, crop spraying. Overall the impact of the project on agricultural production would be minimal due to the small area affected relative to total size of agricultural enterprises.'* Aerial agricultural operations that we conduct on our property are for fertilising and spraying our steep country, we use helicopter as a safer option than by ground, it is an important part of our operation in pasture improvements and being unable to continue to carry out this operation due to safety concerns for the helicopter pilot is devastating and a major impact on our operation moving forward. Not being able to use modern farming practices on that part of our property, such as drones, limits us from bringing our property into the new technological era, which is not a minimal impact, it is a large impact, and an enduring one. We have asked Transgrid about the impact of EMF exposure on our livestock and unborn foetus of our pregnant heifers, and have never gained a response that suggest that EMF exposure is problematic, but when this EIS points out the existence of EMF radiation exposure on native fauna, Transgrid have failed to give us this crucial information. There is no difference to the exposure of EMF to native fauna, and our livestock, we can not afford for our Stud cattle and commercial herd to be adversely impacted by Humelink overhead, it is of high importance to our production and breeding to have healthy cattle with optimal figures to succeed in our industry. Humelink has a massive impact on day-to-day operations for all farm operators who will have to travel under and conduct farming activities under these lines, with the ever present overhead structures and obstructional towers which present risk to them when using machinery over 4.3 m. Importantly, 4.3 m is not the same determination that Victorian farmers have be stipulated, 3 m is the guideline being used there, why is this not the same standard across the country? With the lowest set of lines being only 12 m for the ground, and sagging nature of overhead lines, I question the 4.3 clearance.
- This EIS states *'Direct adverse residual impacts would largely at a local level in cases where permanent land adjustments are required. These impacts would be managed through landowner agreements'*. Yet, there need not be these permanent scars, adjustments to land, carving out hills to put in towers, and crane pads. The rural landscape should be treasured, respected and preserved for future generations, not destroyed by archaic towers and wires representative of the past. Underground HVDC is NOW, and is a socially conscious, ethical, safer, more environmentally geared, sustainable and I would have thought more Australian, in the hope that we leave no one at the detriment of an archaic overhead option.
- Economic Benefits for Regional Communities, only ever suggests benefits during the construction period, local employment opportunities, and workers spending money in towns, it seems the expectation of Transgrid and Government to imply that Regional people are supposed to look forward to and be grateful for this benefit?! There is no benefit to Regional Communities, only destruction to our communities, and the burden we will bear long into the future can not be weighted or negated by a short term so-called 'benefit'.

Economic benefits go wider than short term employment opportunities, short term spending, and short term financial gains to attempt to cover up the economic impacts to tourism in our regions, economic impacts on agriculture, economic impacts on individual landholders, economic impacts on our places of heritage, economic impacts on the environment and economic impacts long into the future where bushfires can not be controlled around this overhead infrastructure causing widespread damage. And even so, when Transgrid is looking to build camps, and have all resources located on the camp, this is an absolute farce, they will come, they will destroy and build dangerous infrastructure, and then they will move on, and our communities are left to carry all the burden into the future. When it does not have to be this way with a HVDC underground solution. Please provide us with costs estimated for Economic impacts on ALL externality impacts, not only limited to short term impacts during construction but over the lifetime. (Tourism, agriculture, heritage, social, environment, and bushfire damage).

- On Social Impacts, again it is absolutely disrespectful to communities impacted by Humelink to suggest that there are *'positive social benefits that have been rated as 'high' or above'*, all of which are again short term construction related like the economic suggestions, and to list that *'increased tourism from temporary workers and their visitors'* all in the cause to destroy our beautiful rural landscapes and negatively impact regional community's tourism potential. The social impacts are a double negative on every front, as then Transgrid goes on to explore that *'negative social impacts that have been rated 'high' or above, in significance following implementation measures including; -impacts to the visual landscape and scenic quality, where construction will temporarily disrupt the views and amenity for dwellings near the project footprint and affect people's enjoyment of their local areas and sense of pride.'* But yet, during construction tourism from workers and their visitors will be a highly rated positive? At the same time impacting the enjoyment of our local areas and sense of pride, this is not just a temporary obstruction of view for construction only, this is an obstructed and changed view forever for those impacted, industrialising our beautiful rural landscapes and communities. And *'stress and uncertainty arising from property acquisitions, creation of easements and leases, which may affect how landowners use their properties and go about their day-to-day activities'*, again this is not limited to construction and bullying to acquisition, this is enduring stress imposed on landholders and families, stress around risks to our legacy, our livelihoods, and the imposing of greater fire risks that will burden our generational farming families and long history of volunteer firefighting families. This is enduring stress for the long-term. It has already been 3 years of stress, and time taken out of our lives to be focused on a project that impacts our lives long into the future, one of which we fight with all our might as we object to the conditions, and are not considered by Transgrid or Government, fighting for an underground HVDC solution to protect us, our families, our neighbours, our communities, our workplaces, our environment and our future generations. The only mitigation that will combat this negative impact is going underground, no amount of money, no amount of screening, no amount of noise proofing will replace what Humelink is taking away and destroying, underground is the only way forward.
- On Social impacts, it is negligent of Transgrid to 'leave out' the mental health impacts on impacted landholders and those indirectly impacted. At CCG meetings, this topic has been forced upon Transgrid, and at every instance is ignored, brushed over, not met with empathy or concern as they bulldoze their overhead agenda through. People in our community are experiencing thoughts of 'suicide', anxiety, depression, it is not recognised by Transgrid as to the mental health impact. I can assure you, suicide because of Humelink, it's impacts, and the long term impacts for our lifetime and the next generation, is a real concern in our community, the largest cost of this project I fear will be people.

- Visibility - *'concern related to ongoing visual impacts from the new transmission line structures. These impacts would be relatively localised to the landowners within and next to the project footprint. The visual impact may contribute to a sense of loss when viewed by local residents who have formed an attachment to particular views within the landscape'*. Determinations on no - low- moderate -high visual impact are made by Transgrid, mapped out, yet are severely flawed, and not realistically evaluated or representative of the true visual impact. Transgrid appears to grossly underplay the impact on landholders and neighbours on the landscape. (Attachment H, Ellerslie Range to Wondalga), locates the two residences (Transgrid classifies one on the cusp of low to moderate visibility yet will be substantially high visibility being closest and within 600 m, and one with low visibility, which is also not accurate) on our property that will be heavily, visibly impacted due to elevation of our landscape and traversing our hill while we are located in the valley below. Also high visibility impact as we already have a 330kv line that Humelink will parallel, the cumulative negative impacts are enormous with large amounts of native vegetation of critically endangered significance that will be predominantly cleared, ours, and our neighbours landscape will be dramatically impacted and industrialised. It has been raised with Transgrid before, that our dwelling is not the only part of our property that represents our 'home', our entire property is 'home', the visibility of Humelink impacts the liveability, workability and beauty of our property, 'our home', a lasting and enduring impact seen from every aspect of our property an amenity that can not be replaced. Undergrounding via HVDC avoids this dramatic change and visibility. How are determinations made on classifying no-low-moderate-high visibility? Is there again a biased 'opinion' being made by the proponent here, it most certainly is not representative of what landholders would classify impacts as, impacts that affect them for the next 50-80 years.
- There is gross misrepresentation of the dwellings that are impacted by Humelink, with many dwellings not accounted for. On our relevant map there is one dwelling that is not represented under 1 km from Humelink's footprint, and 3 houses that are just outside the 2km radius (under 2.1km) that will be visibly impacted but Transgrid has inaccurately determined that they are not indirectly impacted. There will be indirect impacts for many kilometres, this is not accurately evidenced in this EIS. With only 28 Public Viewpoints, many of which (with particular reference to the clever photography from the road near our property masking the reality) do not represent accurate impacts due to location, there are many viewpoints that can be taken that would evidence the 'reality' of the impact but these seem to not be present. We request that Transgrid conduct many more view points, with an honest and real impact approach when taking these viewpoints and retake the image from Yaven Creek Rd. If determinations of visibility are made based on these viewpoints within this EIS, it is any wonder the classification of visibility across the project is inaccurate for those impacted.
- Transgrid states that *'to avoid and minimise permanent impacts on landscape character and visual impacts have been considered in the refinement of the project footprint. This includes paralleling existing transmission lines.'* Paralleling existing transmission lines does not minimise permanent impacts on landscape character and visual impacts. Instead there are cumulative negative impacts added to these areas, impact upon impact to industrialise a landscape. The enormous structure of Humelink 500kV dwarfs a 330kV structure, there is an even greater fire risk exposure to those within and near the footprint, a larger area that can not be defended in the next fire event by air or by ground, and an increased risk of fire ignition, from either or both structures. We are ever conscious of the implications of one set of lines, it is fear provoking and stressful to have another set of lines parallel and put us and our community at further risk, especially when the risk is already so high in a bushfire

prone area as we are classified as. Our property is also classified on Transgrid's original bushfire maps as a Tier 2, which Transgrid state as areas they avoid during route selection. Transgrid's mitigation for 'some' properties is to visually screen, I presume with mature planted trees that I can not imagine will be tall enough to screen a +76 m tall structure, and would come at a large cost as a mitigation strategy to 'screen' structures, spending that excess money on undergrounding HVDC would be a more appropriate and successful mitigation, with no permanent visual or landscape character impacts. Due to this EIS it is also now apparent to us the greater noise and vibration impact of paralleling lines. Please provide costings for mature tree screening proposed, and in line with more accurate 'visibility classifications' which currently are inaccurate within this EIS.

- It needs to be noted that we, ourselves have made emailed requests to Transgrid for information on tower location, types of towers that will be on our property, information on depiction of what this will look like for us, and we have never been provided with this information, in fact, we were always told that *'it hasn't been determined yet...still in design phase'*, and yet some of this information we have seen for the first time in this EIS. Transgrid have failed to provide this information to landholders, and the community, on request, and ahead of this EIS being exhibited. This has also been requested at CCG meetings. Transgrid also purchased a new technology called NEARA 3D Visualisation Tool, the community had asked for a 'real life' depiction, as photomontages do not capture the reality. But once they released images to the CCG members and observers using this new technology, no doubt gauging our response to the depictions, that gave a more 'real to life' and 'horrific' sense of what the impact is, they took NEARA off the table for use with the community, hiding behind the line that NEARA is only suitable for Engineers. I request that NEARA be used to create more realistic perspectives, with cleared vegetation beneath for the purpose of this EIS and the community seeing more relevant depictions and real life perspectives.
- On Noise impacts, Transgrid states *'where existing High voltage lines run parallel to the project, cumulative noise levels are expected to be marginally greater, with 65 receivers predicted to potentially exceed criteria'*. They report that the noise from HumeLink, in certain weather conditions, will exceed NSW Noise Guidelines night time criteria (greater than 35dBA). This is unacceptable for those living in and around the lines, and does not give consideration to native fauna and livestock that will be impacted by noise. When Transgrid suggests yet another excess cost as a mitigation strategy to 'sound-proof' homes, again spending this residual cost on HVDC undergrounding HumeLink will go further than putting band-aid solutions across the devastation imposed by overhead infrastructure. Also, what protection measures are there for people when they are outside of their dwelling, whilst working or leisure in close proximity to said dwelling.
- On Soils, contamination and geology, the EIS states that there is *'little risk of soil erosion and transport of sediment into nearby waterways.'* An example of how inaccurate this statement could be, is where we are impacted by HumeLink on our property. From Yaven Creek Rd to the impact area is steep terrain, with an elevation of 340 - 520 metres. From the map of our property included in the Technical Reports, it is concerning that Transgrid appear to underestimate the steep incline, and we have grave concerns for the damage that their construction works will have on soil erosion and sediment finding its way further down the hill into the nearby Yaven Creek. (ADD MAP!) Transgrid has the landscape earmarked as Rural Valleys landscape, being flat and gently undulating open plains, this is completely wrong. The independent Ecology Report provided by Ecology Consulting determines that *'the area affected by the proposed easement falls within the Carabost Hills and Ranges Mitchell Landscape.. This area encompasses a diverse range of landscapes,*

including rolling hills, steep and hilly terrain, undulating ranges...'. Transgrid has our area incorrectly described, and is not taking into consideration the steep terrain of our property in this EIS.

- In response to the EIS references to Hazards and Risks;
Bushfires - Transgrid's inputs in relation to the potential impact and management of Bushfires is disingenuous. This has been a highly contentious issue and Transgrid has done nothing to alleviate community concerns and opposition only grows on this issue. It is negligent to put people and communities at further risk when the risks are already so high. Our communities are fearful of the next fire, accounts and experiences in the Dunn's Rd Fire from family members, volunteer firefighters, incident controllers, and Brigade Captains. Accounts where the 330kV lines impeded the ability for RFS to control the fire before it exploded to devastate our communities, witnessing arcing behaviours of the 330kV line that drove home how dangerous these structures can be and the threat to human life they pose. The proposal for Humelink 500kV overhead, has us even more fearful of what is to come in the next fire event, making swathes of areas undefendable, and further risking lives, property and animals. In the EIS Transgrid cares not for the imposing of greater fire risk they are bringing to people and communities, or the impediment and risk Humelink has on safe fire control. The only focus of this EIS is on the safety and procedures for their workers, and the protection of their infrastructure assets with '*adoption of asset protection Zones and transmission line clearances*', not on the people that will be burdened with the threat for the next 50-80 years. They make reference to their so-called stringent 'vegetation management program', with 40 years experience of their 330kV easement on our property, the 40 years of debris left to bank up as fire fuel load, and the neglect in maintaining their current easement gives us little hope, faith, or confidence in their words. 40 years of evidence of not maintaining these easements can not be replaced by promises to do better. The only confidence method for us and our communities is to put this infrastructure underground and there will not be the need to rely on empty promises by Transgrid, or the extra expense on the consumer to fund ill carried out maintenance programs for the next 50-80 years. In this EIS it is implied that there are emergency preparedness and response procedures, that only point to evacuating, but we are the ones that will be responding, we volunteer firefighters, we community members will be expected to fight fires that result during Humelink construction, Humelink Operation, and those who will have no choice but to risk our lives to control fires in and around the infrastructure. Undergrounding via HVDC has our lives valued and considered, and protected long into the future, an ever mindful solution to avoiding generational impact on families of volunteer firefighters and their children.
EMF - '*exists wherever electricity is generated, transmitted or distributed in transmission lines or cables.. Transgrid has designed the project to comply with the relevant guideline levels. Overall, it is unlikely there would be prolonged human exposure to EMF from the project or any notable adverse effects on animals and plants.*' It is 'unlikely', does not sound like a confidence resulting comment, Transgrid have so little standing in the community, that this 'unlikely' statement is not to be trusted, and feels similarly like 'masking' or 'hiding' the truth. We live in a time where we are conscious of the impacts of human influence and actions on our environment, native habitats, flora and fauna, but what about those that result with impacts on people. Human life should be protected, there should be assurances that 'No' exposure will affect humans, and a HVDC underground solution is assurance of no EMF impacts.
- Transgrid state in Biodiversity Technical Report 1 that they have carried out various Assessment Methods, including '*over the fence surveys from public roads, existing transmission line easements.*' Please provide a map that displays every assessment method

that has been carried out by these unauthorised methods along the route where access has been denied to Transgrid. If this has occurred at our address, we were asked by our Land Officer if we would give permission for surveys to be conducted from the road, our response was no, we do not give permission to do so. If this has occurred, this is in breach of our rights as landholders when we have not given Transgrid consent.

- In relation to the citing of Transgrid's '*independent investigation*' into undergrounding, that was '*carried out in consultation with an Undergrounding Steering Committee*'. Transgrid failed to mention that there were 52 outstanding issues that the community on the Steering Committee still hold outstanding, and due to the report being flawed, and unbalanced with excessive exaggeration of the capital costs, we as the community members on the Steering Committee did NOT endorse the report. It is neglectful and no doubt intentional that Transgrid did not include that the report was NOT endorsed by the Steering Committee but failure to do so is not considered honest or forthcoming. Their reference in this EIS also suggests that '*Transgrid confirmed undergrounding Humelink would not be consistent with the regulatory rules that require Transgrid to propose the most efficient option for consumers based on the capital cost of the solution, the ongoing operational costs, the market benefits, the expected reliability, and the costs associated with the impact on landowners, the community and the environment.*' However, this actually is not even consistent with the regulatory rules and requirements, the only requirement is the cheapest capital cost for consumers, so this is false and incorrect to be stating to the public and in the EIS. Undergrounding is most certainly the cheapest long term solution when you take into account all externalities, non -market social and environmental benefits, protection and no further costs incurred from damage in fire and extreme weather events, and lower operational and lifetime maintenance costs, and internationally is world's best practice due to these factors. If it was the case that all these costs, including lifetime operational costs, lifetime maintenance costs, costs associated with the impact on landowners, the community and the environment, and don't forget agriculture and tourism (All externalities), then please request that Transgrid provide evidence of these costings for the public to review because thus far we have not been provided with them.
- Climate Change is the premise for the need for Snowy 2.0 and Humelink, I support the transition to renewables so that we are decreasing our impacts, but the negative social and environmental impacts of Humelink overhead are too great, undergrounding negates these impacts. Climate Change is also the reason for the importance of protecting our infrastructure assets and protecting people. '*As the project is likely to be exposed to a number of climate change risks, increased temperatures, bushfire, which could damage the transmission lines and reduce their transmission capacity... Climate change is also anticipated to impact materials such as concrete and steel*'. Here we hear from Transgrid admittance that Humelink will be exposed to climate change, and climatic events, damage will occur to the assets just as they did during the Black Summer Fires. Millions of dollars will be required to repair them, and liability claims will no doubt come into play if Humelink is responsible for starting a fire, or impedes control of a fire, who takes responsibility? Transgrid /Government /Consumers? To avoid all of this extra cost and risk, to not only people, communities and environments, but also the infrastructure itself, Underground is the only way forward.

Please consider my objections outlined in this submission, and above all consider Undergrounding Humelink.

Yours sincerely,

Rebecca Tobin

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