



REVIEW OF BYLONG COAL MINING ENVIRONMENTAL IMPACT STATEMENT (EIS)

SUBMISSION REPORT

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Signed: 

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1. Introduction

This report represents the submission of comments as invited, from a review of the Environmental Assessment process conducted as part of the development application process as required under Division 4.1 of Part 4 of the New South Wales (NSW) Environmental Planning and Assessment (EP&A) Act, 1979, as outlined in the Environmental Impact Statement (EIS) document prepared by the proponent.

Included herein is a summary of the issues of concern highlighted within areas of expertise for the Community within the locality of the Bylong township in the Upper Hunter Region of NSW. The report represents the efforts of the Community to address items of concern with regards to the prepared ecological assessment (in particular bird species), surface water and groundwater and those interactions between the existing environment within the locality and the proposed development.

The site for the proposed development is outlined in great detail in an extensive EIS co-ordinated by Worley Parsons Pty Ltd and prepared by Hansen & Bailey Pty Ltd on behalf of the proponent (Korea Electric Power Corporation – KEPCO). This document attempts to address the basic potential for the project for significant impact to the ecological communities of the locality, which is within the Bylong Valley, and adjoining the Goulburn River National Park in the north, and the Wollemi National Park immediately to the south. Importantly, effects on the surface water (quantity and quality) and groundwater are equally important, including the links between these and the ecology.

Additional impacts that are obvious to the community of the locality include the visual impacts to the landowners in the township, the potential for a loss of local tourism to the community through the association with primary industries, a lack of recognition of native title to the heritage of the community (which is traditionally a place of transit in linking the eastern communities with the western regions), and the cost to the local community to the educational facilities at the open cut site combined with the drastic impact to the visual amenity due to open-cut mining operations. From quite a detailed review of the EIS, perhaps the most significant discrepancy of the process is the absence of any mitigation for the intrinsic historical values of the local community. There are heritage recording measures in place, which must manage the heritage that is under threat from the development, and there can, and should be, measures to replace the churches within the local community. The absence of these mitigation measures is quite apparent (Section 8 and Section 9.4.6.).

2. Ecological Assessment

The ecological assessment of the mining proposal on the remnant bushland of the local environment and the subsequent effects on the fauna has been co-ordinated by a separate Consultant (Cumberland Ecology), and is addressed in Appendix J of the EIS. The particular items of legislation that are relevant to the ecological assessment for the project are the Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act, 1999 and the NSW Threatened Species Conservation (TSC) Act, 1995.

2.1. Biodiversity Values of the Region

In brief, the ecology of the locality is quite unique in the regional siting between two extensive national park areas (Goulburn River & Wollemi), whilst there are vegetation communities of intrinsic value and an extraordinarily broad diversity of birdlife that is quite unusual in localities around Australia.

In summary, there are over 550 individual flora species (including 100 exotics), with these comprising an estimated 24 separate vegetation communities that were mapped by the Consultant. These were assessed through a wide variety of survey techniques for significance and value, as evidenced by the extensive nature of their reporting. The fauna communities are also assessed, including birds, amphibians, aquatic species and mammals in the region. The focus on this submission of comments is on the 130+ bird species within the study area. Of important note were the identification of 3 entirely new flora species through the assessment process.

2.2. Summary of Effects on the Native Vegetation

Of immediate concern for the flora within the project area are the species at risk which are already identified in the legislation. These are identified in the summary in Section S3.3:

Tylophora linearis (Narrow-leafed Tylophora) - (TSC Act: Vulnerable, EPBC Act: Endangered),
Ozothamnus tessellatus (Shrubby Dogwood) - (TSC Act: Vulnerable, EPBC Act: Endangered),
Acacia pendula (Western Myall) – population in the Hunter catchment (TSC Act: Endangered Population, EPBC Act: Not Listed),
Eucalyptus camaldulensis (River Red-gum) – population in the Hunter catchment (TSC Act: Endangered Population, EPBC Act: Not Listed),
Cymbidium canaliculatum (Tiger Orchid) – population in the Hunter catchment (TSC Act: Endangered Population, EPBC Act: Not Listed),
Diuris tricolor (Pine Donkey Orchid) – (TSC Act: Vulnerable, EPBC Act: Not Listed),
Pomaderris queenslandica (Scant Pomaderris) – (TSC Act: Endangered, EPBC Act: Not Listed).

In addition to these species which are at risk in the study area, there are a total of 14 recorded species which are considered regionally significant and are known to occur. The basis of the biodiversity offset scheme (BOS) planning requires that these species be addressed in any offsets to the proposed development. The offset planning requirements are essential to mitigate risk to these species.

With regards to the vegetation communities within the study area (from Appendix J of the EIS), there were three (3) Threatened Ecological Communities (TECs) that were identified, also a necessary component of the BOS:

- ❖ Hunter Valley Footslopes Slaty Gum Woodland (TSC Act: Vulnerable Ecological Community (VEC), EPBC Act: Not Listed),
- ❖ Hunter Floodplain Redgum Woodland (TSC Act: Endangered Ecological Community (EEC), EPBC Act: Not Listed),
- ❖ Box Gum Woodland and Derived Native Grassland (TSC Act: EEC, EPBC Act: Critically Endangered Ecological Community (CEEC)).

Of immediate and obvious concern, considering both the legislation and the value of this legal means to the ecological system, is the absence of reference to the BOS in Section 9.4.4 of the EIS. There is no mention of a BOS for the Blakeley's Red Gum, which is identified by the ecological consultant as 'at risk,' as a groundwater dependant ecosystem (GDE). The groundwater impact assessment report identifies that there is a possible 2m drawdown in the groundwater for this area of the proposed development.

It is reassuring to note that the consultant summary in Table S.2. identifies that of the three ecological communities noted above, the area that represents the concern for the ecology forms only 2ha, and is affected only by the subsidence effects due to longwall mining. The main risk to ecological systems is to the grassland above, which is mitigated by the BOS planning through the assessment process. Consideration however, should be complete, in the possible scenario of species at risk to loss of habitat within the Redgum Woodland. This reassures that the mitigation measures are genuine, and allows for the greater scope outlined in Table S.2.

Similarly, in section 7.15.3 of the EIS, the measures to address the rehabilitation planning for the ecological systems which are at risk stands for significantly greater potential for improvement in planning. The section inadequately addresses any potential for re-growth of remnant bushland following rehabilitation of the open cut areas, with some consideration for native seeds, the section addresses weeds, and should consider a commitment to re-instate the affected areas with native establishment through association with community or regional nurseries within reach.

Of important note is that the conclusions to the summary section of the ecological report (Appendix J of the EIS), section S7, refer to >750ha of remnant bushland at risk from the proposed development. Cross-referencing this with the Threatened Ecological Communities (TEC's) (Table S.2), demonstrates that approximately 217ha of these communities are at direct risk due to the open-cut activities, whilst studies of the subsidence effects on >950ha, have also been conducted. The mitigation of these risks through the BOS or through revegetation planning is essential.

2.3. Summary of Effects on Species at Risk

Ecological consulting highlighted over 180 vertebrate species within the Study Area, including amphibians, mammals, reptiles and birds. The focus of this review is primarily on the 130 species of birds identified within the Study Area (either recorded or known to occur), whilst all vertebrate species are required for consideration, particularly those identified through conservation legislation. Table 1, below, highlights the birds that were identified through observation or being known to occur in the study area during the ecological study of the EIS that are vulnerable or endangered in the species conservation legislation.

Table 1: Bird Species Listed for Conservation within the Study Area of Proposed Mining at Bylong.

Scientific Name	Common Name	TSC Act Status	EPBC Act Status
<i>Anthochaera phrygia</i>	Regent Honeyeater	CE	E
<i>Melithreptus gularis gularis</i>	Black-chinned Honeyeater (eastern sub-species)	V	
** <i>Pomatostomas temporalis temporalis</i>	Grey-crowned Babbler (eastern sub-species)	V	
<i>Chthonicola sagittata</i>	Speckled Warbler	V	
<i>Glossopsitta pusilla</i>	Little Lorikeet	V	
<i>Neophema pulchella</i>	Turquoise Parrot	V	
* <i>Calyptorhynchus lathami</i>	Glossy Black Cockatoo	V	
<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo	V	
<i>Stagonopleura guttata</i>	Diamond Firetail	V	
<i>Melanodryas cucullata cucullata</i>	Hooded Robin (south-eastern form)	V	
<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (eastern sub-species)	V	
<i>Circus assimilis</i>	Spotted Harrier	V	
<i>Hieraaetus morphnoides</i>	Little Eagle	V	
<i>Ninox strenua</i>	Powerful Owl	V	
<i>Ninox connivens</i>	Barking Owl	V	
* <i>Merops ornatus</i>	Rainbow Bee-eater		M
<i>Hirundapus caudacutus</i>	White-throated Needletail		M

TSC Act, EPBC Act: V – Vulnerable; E – Endangered; CE – Critically Endangered; M – Migratory.

** - Observed at Kerrabee over several years.

* - Observed at Kerrabee several years ago, and with a small group in transit from the Wollemi.

Please note that the following bird species have been observed within a reasonable distance from the Study Area, at Kerrabee Homestead (around 30km east on the Bylong Valley Way), and are not listed as observed Fauna Species in Appendix E of the ecological impact assessment report (in Appendix J of the EIS). These are likely to occur in the Study Area, and were not considered (they are not listed in the TSC Act):

- ❖ *Platalea flavipes* – Yellow-billed Spoonbill,
- ❖ *Phylidonyris nigra* – White-cheeked Honeyeater,
- ❖ *Psophodes olivaceus* – Eastern Whipbird,
- ❖ *Chrysococcyx osculans* – Black-eared Cuckoo,

- ❖ *Artemis personatus* – Masked Wood-swallow,

In addition to these additional species observed at Kerrabee, that are likely to occur in the vicinity of Bylong, the following species have the possibility of occurring at Bylong, although are more likely closer to the coastal regions. These have a reliance on the riverine and alluvial environments and may be limited by any mining effects on water flow regimes.

- ❖ *Calidris ruficollis* – Red-necked Stint,
- ❖ *Pelecanus generalis* – Australian Pelican,
- ❖ *Circus approximans* – Swamp Harrier,
- ❖ *Halieaetus leucogaster* – White-bellied Sea-eagle.

The assessment of the fauna for the bird species was thoroughly addressed, although it is worth noting that several of the species that are addressed as at risk in Appendix F, are not listed in the species listing. This can be quite confusing, particularly for those seeking a general overview.

Note that in addition to these bird species identified, there were 7 species of mammals that are listed in the legislation as at risk and require consideration for their conservation. These species are listed in Table 2 below.

Table 2: Mammals Listed for Conservation within the Study Area of Proposed Mining at Bylong.

Scientific Name	Common Name	TSC Act Status	EPBC Act Status
<i>Dasyurus maculatus</i>	Spotted-tailed Quoll	V	E
<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat	V	V
<i>Miniopterus schreibersii oceanensis</i>	Eastern Bentwing-bat	V	
<i>Nyctophilus corbeni</i>	Corben's Long-eared Bat	V	V
<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	V	
<i>Pseudomys novaehollandiae</i>	New Holland Mouse		V
<i>Petrogale penicillata</i>	Brush-tailed Rock-wallaby	E	V

Note: The status abbreviations are as for Table 1.

Of high importance, in the conservation of the species and ecological communities at risk, is the requirement for surveys of flora and fauna immediately before any threatening process, allowing for the correct approach in mitigating any impacts (summarised in section S5.1 and S5.2 of App. J of the EIS). This is preliminary to the implementation of BOS.

The ecological assessment report in Appendix J of the EIS reassures the reader in Section S6 that a biodiversity offset strategy (BOS), will protect an equivalent section of bushland to that at risk. However, the conclusions in Section S7, advise that there is a loss of >750ha of bushland, without any advice as to a strategy to assess re-vegetation planning, bushland regeneration planning or even funding for these and no mention whatsoever of planning for restoration of habitat post-mining through rehabilitation. Any threatening process for this habitat needs to be carefully addressed for the implementation of suitable mitigation measures, and for any proposal for threat abatement planning.

3. Surface Water Assessment

A surface water assessment process was conducted by WRM Water & Environment, with the purpose being to conduct a water balance for the management of water resources affected by the proposed development, including flooding study and assessment of water quality.

3.1. Assessment of Surface Water Hydrology

The principle concern with regards to the existing waterways in the Study Area is quite dismissive in the section on Surface Water, under “Impacts, Management and Mitigation,” on page 31. The

summary states that there is no real effect on the catchment run-off. Whilst this may be the case for the greater catchment of the Goulburn River, the effect on the smaller catchments of Lee Creek, Cousins Creek and the Bylong River can be quite significant.

This is particularly the case with consideration that the affected area has notable run-off co-efficients (due to topography). Estimating run-off by the Rational Method, based on catchment area, can indicate that there can be a reduction in these catchment by up to 10-20% for Lee Creek and Cousins Creek, and from 5-10% for the Bylong River Catchment (estimated from Figure 1.3 on page 17 of Appendix L). This can have significant costs to the localised ecology of the waterways, for amphibians (and small insects), and associated predatory birds and reptiles, with a lesser effect on the aquatic ecology of these systems.

Section 9.4.2 of the main EIS report highlights that there is "... potential for reduction of catchment flows to the surrounding waterways," although there is no relationship established between the requirement of the ecological systems for the water comprising the run-off through catchment flows. The report does note that KEPCO intends to maintain a sophisticated water management system to mitigate any effects on the surface water, however they also advise there are no controlled discharges, indicating a focus is on flooding management for higher flows, with higher costs during periods of low and intermittent flow.

3.1.1. Assessment of Flood Modelling Results

The results from the modelling of flows and velocities along the Lee Creek and Bylong River are shown in Appendix L – Part 2. These demonstrate that there are 3 sites along the river where there are effectively dams forming in significant rain events (1 in 100 year average recurrence interval (ARI)).

This acts in two ways, one of which is to provide localised regions of water sources for the ecology (dams), along the waterways, whilst the second is to reduce the availability of water for sections of the waterway downstream of the dams. This is a common problem with water resources management, and is addressed through environmental flow releases when projects are of a larger scale. Consideration of these flows should still be provided through the management of the water in the clean water storage areas, to better manage the environment affected downstream of the three apparent dams. This can be managed in such a way as to minimise any risk of flooding downstream of the dams.

3.2. Assessment of Water Quality

Of particular note with regards to water quality for the Study Area, is the reference (or lack thereof), of surface water quality risk management in Table 24 of the main EIS document. Run-off is represented as a low risk, whilst surface water is represented as a moderate risk. An argument could easily be made that these are too conservative. Run-off appears to represent a moderate risk, whilst the risks to surface water quality could easily represent a moderate to high risk.

The formation of this risk assessment category is derived from the trigger values given in the surface water assessment report of Appendix L – Part 1. The concentration of many parameters for water quality is outlined in the Australian and New Zealand Environment and Conservation Council (ANZECC) Water Quality Guidelines, as developed by the National Health and Medical Research Council (NH&MRC). There are several elemental ions in solution (in the creeks locally) that represent the presence of traces of heavy metals in the catchment, a risk to bioaccumulation in the ecological systems that could be exacerbated through open cut activities. This risk does not seem to be addressed at all through the main EIS or the Executive Summary.

3.2.1. Surface Water Chemistry

The water quality parameters for the surface water in the catchments of the Study Area are detailed in Section 3.7 of Part 1 of Appendix L of the EIS. Interestingly there is an error in naming the site at

Coggan Creek in Table 3.7. There are trigger values for a large range of parameters (from salinity to dissolved metallic ions in solution).

The salinity parameters are the most relevant to the project, and are measured at several sites (SW1 to SW9). These parameters are in excess of the values within guidelines for a strong ecosystem, and indicate that the increase in mining activity could act to worsen the salinity problem in the catchments studied. In particular the salinity has in the past been close to the median values for safe irrigation.

It is not only salinity that represents a risk to the ecology and the water quality of Lee Creek, Cousins Creek and the Bylong River. The parameters for Iron are exceeded for irrigation, Manganese for recreation and irrigation and Zinc is exceeded for ecosystem health along some sections of the catchment waterways.

Section 7.4.3 (on page 190 of the EIS), again makes no mention of maintaining the natural drainage lines, stating that “run-off draining to most of the sediment dams should have salinity consistent with receiving waterways and therefore it is unlikely that a measurable impact will be experienced to receiving water quality.” The level of uncertainty in this approach is neither reassuring or worth stating, based on the above parameters already existing in the catchment environment. Open cut activities are almost certain to elevate the levels of several of the parameters (EC, Iron, Manganese, Zinc) identified that can cause a risk to recreation, irrigation and the ecosystem, requiring measures to mitigate this risk.

It is worth noting that the planning process in the past for previous mining approvals in the Goulburn River catchment, at Ulan, Moolarben and Wilpinjong have in each case highlighted the cumulative effects of the mining on the river management practices. In each case, the effects on the groundwater and surface water flows and water quality have been adversely affected, and these cumulative effects must be considered in assessing the proposed activities.

4. Ground Water Assessment

The assessment of the proposed development on the groundwater resources for the Bylong locality was conducted by Australasian Groundwater and Environmental Consultants in association with borefield monitoring conducted by Douglas Partners Pty Ltd. These studies have resulted in groundwater modelling, whereby calculations based on the sampling data demonstrate a predicted groundwater response to extraction.

The water entitlement for the Bylong River (total) under the Hunter Water Sharing Plan (WSP) is around 5,843ML/Yr (megalitres per year), intended for irrigation purposes. This is made up by 23 separate groundwater licences and 2 surface water licences. The quantities sought through the development assessment process indicate through modelling that a peak supply sought is around 1,172ML/Yr. This provides some security for Landowners, negating any risks, as the developer claims that from 1 June, 2015 they hold 8 Water Allocation Licences (WAL's) with a total availability very much in excess (200%) of that sought above (at 2,535ML/Yr). These licences are granted under the unregulated Hunter WSP, which indicates that the granting of these licences (much in excess of the requirements indicated by modelling), could be questionable, especially with consideration that the vast majority of the peak requirement above is for dust suppression.

The activities of the open cut mining, in the first sequence of operation of the development (before longwall) have been forecast to reduce the baseflow of the groundwater to the Bylong River by 918ML/Yr. This may be due to extraction from the aquifer and also loss of recharge through storage in dams. This does however, reduce to 150-200ML/Yr following open cut operations. The affects are noted in section 4.2 below.

4.1. Assessment of Hydraulic Gradient

The hydraulic gradient shows significant variation throughout the Study Area, with extensive testing through the conduct of borefield sampling. Extraction from a borehole and measurement

of the recovery time indicates a rate of flow through the aquifer that is demonstrated in the hydraulic gradient. The measurements through the EIS have established a variation from 0.4m/day to 14m/day through the alluvium sections of the Study Area.

4.2. Assessment of Groundwater Levels

The reporting comprising the EIS document refers to a drawdown within the alluvium of the groundwater in the Study Area of up to 2m in some cases. The effect of this on the ecological systems are such that where the water table would reach the surface, there is the possibility for a loss of surface water, as the drawdown prevents surface water recharge, causing surface waters to recharge groundwaters. The primary concern for the locality is on Groundwater Dependant Ecosystems (GDE's), of which there is a Threatened Ecological Community (TEC) identified at risk above as a GDE (Section 2.2). Figure 10.19 of the Groundwater Assessment report (App. M of the EIS) is particularly alarming with regards to the drawdown of the groundwater in the locality of GDE's.

The drawdown effects on private bores for Landowners in the locality is expected to be minimal at <0.1m, including the irrigation licences mentioned above.

It is important to note that Section 7.6.3 of the EIS refers to the non-discretionary development standards for Mining requirements in the State Environment Planning Policy (SEPP – Mining) of Section 12AB(7). These may not be complied with in this case within the Bylong River water source, in the absence of mitigation measures for the protection of TEC's at risk as GDE's. The protection and restoration of native vegetation is a mitigation measure that should be acceptable for suitable compliance with the SEPP.

4.3. Assessment of Hydrogeological & Geochemistry

The detailed assessment of the geochemistry is conducted in Appendix AB of the EIS, whilst there is a section of the groundwater geochemistry (groundwater quality), in section 10.11.3. On page 145 of the groundwater quality assessment report (Appendix M of the EIS), the conclusion is that the overburden from the open cut mining would result in a similarly elevated EC reading for salinity that is at the upper end of the quality suitable for irrigation. The report conceded that the leachate from the overburden was within the existing salinity ("at the upper end,") indicating that there is certainly a risk of salinity effects on the groundwater. Concluding that these effects are unlikely to increase the salinity for the irrigation (locally) has not been completed by the EIS process with any certainty.

5. Conclusions

The perspective of the local community in the development assessment process is absolutely critical to assess the future of the Bylong locality from an environmentally considerate approach. This approach intends to consider the economic, ecological, hydrological, groundwater, social, heritage, geological and atmospheric effects of the proposed development on the local community. This is preliminary to consideration of the effects on the wider community in the region, state, nation and global perspective to be thorough, and is a requirement of the NSW Planning legislation developed through the EP&A Act, 1979. This particular proposed development is being assessed under Division 4.1 of Part 4 of the Act. These comments are proposed for review by the determining authority (NSW Department of Planning & Environment), in accordance with the legislative requirements for the invitation and consideration of public comments on development planning. Consideration should be given to the development of threat abatement planning under the TSC Act, 1995 for the protection of the ecological systems of the locality.

This submission of comments on the proposed development is based on the Environmental Impact Statement (EIS) prepared by the proponent's consultant in association with a team of consultative

experts for the appropriate consideration of planning concerns. Review as a consultant has been prepared on behalf of the local landowners in the locality of Bylong as a concerned member of the public, a qualified Environmental Engineer practicing in a small business and as a local resident at Kerrabee Homestead, approximately 30km from the township of Bylong. One concern which was alleviated by the extent of the assessment process was a referral to the SEPP – State Significant Development, whereby many items that seemed important approval processes appeared to be being bypassed due to the significance of the project. This case may represent an opportunity to restore some of these approval processes despite the relevance of the significance to NSW, with consideration of national and global relevance of the local ecological systems (plus cultural and indigenous heritage).

The main focus of this submission is on the basis of the locality lying between the two National Parks (Goulburn River and Wollemi, respectively north and south). These national parks and the region along the Bylong Valley from Sandy Hollow to Rylstone represent an intrinsically important ecosystem for the representation of a wide variety of Australian bird-life in the community, some of which are species threatened with loss of habitat and facing a future of decline. Suitable development processes should allow for a process that improves on these intrinsic values, which seems to be the case when Biodiversity Offset Schemes (BOS) are mentioned. These are deceptive however, as they do not seem to be replacing the loss of habitat, and appear to be the management of unaffected habitat in exchange for the development process. The EIS main document does not effectively address measures to re-instate habitat that is threatened, even after classifying much of the species at risk as threatened ecological communities (TEC).

The EIS refers in the ecological assessment of Appendix J, to >750ha of remnant bushland at risk. The restoration of remnant bushland is the focus of bush regeneration planning and vegetation management for local government in NSW statewide. Thus, the development impacts on this bushland should be a requirement for effective implementation of recovery planning, restoration or regeneration plans for mitigation measures. Of this 750ha, there is 217ha of TECs at risk from the open-cut mining operations. The EIS reassures that there is little or no loss of threatened species, however the loss of the extraordinary large area of bushland questions the conclusion and argues that the protection of these species may be at risk. This habitat at risk is not only a threat to the floral species (nine species), but also at least 17 bird species (as outlined above) and seven species of mammal. These risks form the basis for threat abatement planning for the locality.

The risk to species above is reduced with a focus on mitigation measures. However, more detailed review of surface and groundwater effects appears to demonstrate a reduction in flows and quality, notably enough to further exacerbate the risk to biodiversity. For example, there is a reduction of at least 2m for groundwater in the vicinity of the River Redgum, a species listed as an Endangered Population in the Hunter catchment.

With detail on the ecology and the relationship with surface and groundwater, the remainder of the EIS was reviewed in brief, highlighting other areas of concern mainly with regards to heritage. The risk to the historical structures (dating to 1915), and the church (including Our Lady of the Sacred Heart), without any replacement measures (in the main EIS) did not consider the value of the heritage. Perhaps the most important, is the planning required for the structures at risk on the Upper Bylong Road at the proposed operations.

Measures to address the Community concerns are essential, with those identified above highlighting improvements to mitigation measures. Without consideration of matters above, planning approval justification is extraordinarily difficult for the local and regional Community, and finds acceptance only through great difficulty. With careful planning, the review of the EIS document can manage growth, that best represents the interests of all that are affected, establishing a basis for fair and effective consideration of all of the issues represented.