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Ref: D2013/5514

Neville Osborne
Team Leader – Energy
Infrastructure Projects
Department of Planning & Infrastructure
23-33 Bridge Street Sydney
GPO Box 39
SYDNEY NSW 2001

Attention: Anna Trimbrell

Dear Mr Osborne

Environmental Assessment for Crookwell 3 Wind Farm (MP 10_0034)

The Sydney Catchment Authority (SCA) appreciates the opportunity to provide comment on the environmental assessment (EA) for the proposed construction and operation of a wind farm at Crookwell (MP 10_0034).

It is noted that the site is located within the Wollondilly River catchment which is part of the Sydney Drinking Water Catchment, and there is some potential water quality impacts on the catchment. Consequently, the SCA considers it important that the proposed Crookwell 3 Wind Farm Project is constructed and operated in a manner which does not adversely affect the quality of surface and ground waters in this catchment beyond the boundaries of the site.

The proposal being considered is for the construction of up to 30 turbines and associated towers, unsealed tracks, two temporary concrete batching plants, and the removal and replacement of vegetation. On-site wastewater management will involve self-contained portable toilets ("portaloos") during the construction phase with the amenities for the Crookwell 2 project (DA-176-8-2004-i) to be used during the operational phase. Consent for the Crookwell 2 project requires the SCA to be consulted during the design of those amenities.

The SCA has completed its review of the EA report and considers that the following issues are not adequately addressed:

1. The protection of existing erosion control works on the land. There are existing erosion control works located on the site, including contour banks, dams and revegetation areas. These works provide an important role in mitigating the effects of erosion on the site and therefore protecting water quality. Measures to protect these erosion control works will need to be proposed and implemented. This is especially important given that the soils on the site can have high salinity and be highly sodic.
2. Protection of water quality from proposed new works. As mentioned above, the site is characterised as having high soil salinity and a high sodicity risk. To help ensure these issues are managed appropriately during the construction phase and do not result in adverse water quality impacts, specific and appropriate erosion and sediment control measures must be applied consistent with the Blue book *Managing*

Urban Stormwater: Soils and Construction Volume 1 4th ed. (Landcom, 2004), Managing Urban Stormwater: Soils and Construction Volume 2A Installation of Services, and Managing Urban Stormwater: Soils and Construction Volume 2C Unsealed Roads (DECC, 2007).

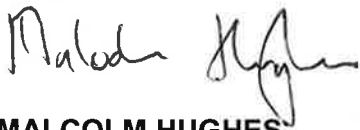
The SCA notes that the key water quality issues will be further addressed as part of the Construction Environmental Management Plan (CEMP) and the Operational Environmental Management Plan (OEMP). It is essential that the issues identified by the SCA above are satisfactorily addressed in these plans.

The SCA also notes the draft Statement of Commitments included in the EA and requests that it be acknowledged as a stakeholder and consulted in the preparation of the CEMP, OEMP and the Rehabilitation Plan.

The SCA considers the proposal is likely to achieve a neutral or beneficial effect on water quality provided the key water quality measures are addressed in the CEMP, OEMP and Rehabilitation Plan, and implemented.

If you wish to discuss any matter raised in this letter, please do not hesitate to contact Jim Caddey on 4824 3401 or james.caddey@sca.nsw.gov.au

Yours sincerely



MALCOLM HUGHES
A/Senior Manager Sustainability

14/2/13