

OUT18/6463

Ms Meghna D'souza
Resource and Energy Assessments
NSW Department of Planning and Environment

By email: meghna.dsouza@planning.nsw.gov.au

Dear Ms D'souza

Bomen Solar Project (SSD 8835)
Comment on the Environmental Impact Statement

I refer to the email of 19 April 2018 to the Department of Industry in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries. Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The department provides the following recommendations and comments for consideration in assessment of the proposal.

Recommendations prior to project approval

- An assessment should be provided of the impacts of removing dams on aquatic habitat, and the impacts of discharging water stored in the dams. A commitment is requested that rehabilitation of the dams would ensure adequate reconstruction and stabilisation of the drainage channels to address the requirements of the [Guidelines for Controlled Activities on Waterfront Land](#) (DPI 2012).
- An alternative source of water should be provided for operation of the project due to the current reliance on rainfall.
- Clarification is requested of proposed works within waterfront land of the first order watercourse in the southern development area. An impact assessment and proposed mitigation measures should be provided where required. Implementation of buffer requirements to watercourses as detailed in the Guidelines for Controlled Activities on Waterfront Land (DPI 2012) is recommended.
- Grazing should be used for vegetation and weed control in the solar farm rather than herbicide application. This will maintain a vegetative cover over the soil surface and provide opportunities for local graziers to access an alternative food source.
- All underground infrastructure should be removed following decommissioning of the site. This will mitigate potential impacts to cultivation if the land is to be returned to cropping as outlined as a possibility in the EIS. The removal of underground cables will also prevent any inconvenience to following development if the site is to be used for industrial purposes.
- The addition of soil ameliorants such as gypsum should be added to the Soil Mitigation Measures outline in table 6.73 of the EIS.

Recommendations post project approval

- The proponent prepares a Construction Environmental Management Plan (CEMP) in consultation with NRAR prior to commencement of activities.

Comment

- Groundwater is predicted to be intercepted for transmission pole installation however dewatering is predicted at less than 3ML. The impacts of this are considered to be minor. If dewatering requirements are increased the proponent will be required to consult with NRAR to determine the requirement to obtain water entitlement and additional assessment requirements.
- The proponent has indicated three onsite dams will be decommissioned, however no assessment has been provided of the impacts of removing these dams on aquatic habitat, or on the environment where discharge of the water may be required. The EIS also refers to the potential for construction of additional dams in the future to maintain runoff characteristics if required. If this is proposed consultation will be required with NRAR to determine additional assessment or licensing requirements. Rehabilitation of the dams will need to ensure adequate reconstruction and stabilisation of the drainage channel.
- The department supports the safeguards and mitigation measures to hydrology and water quality management measures through the proposed development and implementation of an Erosion and Sediment Control Plan (ESCP) and a Groundcover Management Plan as a part of a Construction Environmental Management Plan (CEMP) - in accordance with the guideline, *"Managing Urban Stormwater: Soils and Construction"*.

Yours sincerely



Alison Collaros
A/Manager, Assessment Advice
21 May 2018