



Our ref: DOC20/954332-2

Your ref: SSD 5850 MOD 6

Mr Joe Fittell

Senior Environmental Assessment Officer
Minerals and Quarry Assessments
Planning and Assessment Group
Department of Planning, Industry and Environment
joe.fittell@planning.nsw.gov.au

Dear Mr Fittell

Mount Owen Continued Operations Project – Modification 6 – Realignment of Narama Pipeline (SSD 5850 MOD 6) - assessment

I refer to your e-mail dated 18 November 2020 in which Planning and Assessment Group invited Biodiversity and Conservation Division (BCD) to review the proposed modification to the Mount Owen Continued Operations Project (SSD 5850 MOD 6). BCD understands that the proposed modification aims to:

- Upgrade and realign the Narama Pipeline between Mount Owen and Ravensworth
- Upgrade existing access roads and establish new laydown areas for the pipeline
- Install a new pumping station at the Mount Owen Complex.

BCD has reviewed the 'Mount Owen Continued Operations Project Modification 6: Modification Report', prepared by Umwelt (Australia) Pty Limited (dated November 2020), in relation to biodiversity and flood risk matters. BCD has no comment to make in relation to the flood risk assessment.

BCD does not agree that there is not suitable habitat present to trigger further assessment of the striped legless lizard (*Delma impar*). The species' habitat requirements are not well known and the striped legless lizard may occur in disturbed and degraded habitats. Additionally surveys are being undertaken at the nearby Glendell Continued Operations Project (SSD 9349) where similar habitat exists.

BCD recommends that the proponent either undertakes seasonal surveys, assumes presence or has an expert report prepared to determine the species-credit offset obligation for the species. It is likely that seasonal surveys (September to December) cannot be undertaken before determination of the modification application and that the credit liability will need to be determined from assumed presence or an expert report. Under this scenario, BCD would agree to the credit liability for the striped legless lizard being revised if the proponent conducts appropriate surveys after consent has been granted.

If you require any further information regarding this matter, please contact Robert Gibson, Regional Biodiversity Conservation Officer, on 4927 3154 or via email at rog.hcc@environment.nsw.gov.au

Yours sincerely

A handwritten signature in dark ink, appearing to be 'SC', with a long horizontal flourish extending to the right.

17 December 2020

STEVEN COX
Senior Team Leader Planning
Hunter Central Coast Branch
Biodiversity and Conservation Division