



Nicole Brewer
Director of Resources Assessments
Attention: Anthony Ko
anthony.ko@planning.nsw.gov.au

Our ref: DOC19/859620-6
Your ref: SSI 10034

01 November 2019

Dear Ms Brewer

Subject: Segment Factory - Environmental Impact Statement for Snowy 2.0 – SSI 10034

I refer to your request for comments from the Biodiversity and Conservation Division (BCD) regarding the above development. We have assessed the accompanying documents and have the following comments regarding biodiversity and Aboriginal cultural heritage matters:

Biodiversity

There is an error in the application of the BAM. Two species credit species, *Calotis glandulosa* and *Dodonaea procumbens*, have been assumed present however the number or number of hectares was not entered.

There are three options to resolve this:

1. Get an expert report to provide the individual counts for each species, or
2. extrapolate the species' numbers from a reference site, or
3. survey for the species (now is a suitable time).

Vehicle strike of threatened species is identified as a prescribed impact in Table 7.2 of the Biodiversity development application report (BDAR). In accordance to the Biodiversity Assessment Method (BAM Section 9.4 – 9.4.2.4) the proponent must develop an adaptive management strategy in accordance with the guidelines for adaptive management for impacts on biodiversity values that are uncertain. This could be done post consent.

Vehicle strikes for threatened species needs to incorporate the cumulative impacts from the entire Snowy 2.0 development, meaning that they need to consider the added trucks and vehicle hits to and from this development, not just within the Segment factory footprint.

Aboriginal Cultural Heritage:

BCD do not have any concerns regarding Aboriginal cultural heritage (ACH) matters in the area surveyed. However, we note that there may be future road upgrades. BCD recommends that the following conditions are including in any consent issued:

1. An Aboriginal Heritage Management Plan (AHMP) is to be prepared. This AHMP is to provide guidance in the event that any Aboriginal objects are found during construction and operation of the area.
2. Any future road upgrades that may be required for traffic access to and from the site must be surveyed and assessed for ACH.
3. Further ACH assessment is required if the proposal area is increased outside the current footprint documented in the Aboriginal cultural heritage assessment report.

Please contact Allison Treweek on (02) 62297082 if you would like to discuss our advice.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Saxon', with a stylized, flowing script.

04/11/2019

MICHAEL SAXON
DIRECTOR
South East, Biodiversity and Conservation