

Department of Planning, Industry and Environment
Major Projects Team
Attention: Anthony Ko

5th November 2019

Submission on Snowy 2.0 Main Works Environmental Impact Statement

I, Ann Sharp, wish to indicate our strong opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS).

The scale and intensity of environmental impact described in the EIS is inappropriate in the sensitive sub alpine region of Kosciuszko National Park (KNP).

Snowy 2.0 project does not meet the standards required of Environmentally Sustainable Development and accordingly the project should be refused by the Minister for Planning.

Environmental impacts

The "Project Area", as depicted in the EIS, covers approximately 250,000 hectares, which is a third of KNP - an area twice the size of Greater Sydney.

The area to be destroyed by Snowy 2.0 is the sub-alpine area, which has some of the rarest habitat in Australia, and will prove increasingly important for the retreat of alpine species affected by the heating climate.

The construction will be largest ever proposed loss of critically important habitats in a NSW National Park.

The construction footprint will permanently damage more than 10,000 ha of KNP (100 square kms), rather than the claimed 1,680 ha. No development of this scale or intensity is appropriate in the sensitive habitats of a declared conservation reserve.

Over 8 million cubic metres is to be dumped in the active storage areas of Talbingo and Tantangara Reservoirs, depleting their capacities.

The project would have extensive impacts on water dependant habitats and species through disruption to ground water systems by the tunnelling as well as in works beside 8 kms of the Yarrangobilly River.

Watertable drawdown, which is predicted to be in excess of 50 m above the tunnel, will have a catastrophic impact on the environment along sections of the 27 km tunnel, as it will dry up existing creeks, impact the local fish and animals and reduce inflows to the reservoirs and hence water releases.

Snowy 2.0 will result in irreversible damage to water dependant ecosystems not just in alpine areas but at the headwaters of our major waterways.

Snowy 2.0 will disperse pest species throughout the waterways of KNP and downstream. Snowy Hydro acknowledges that it is inevitable that these noxious species will be transferred from Talbingo to Tantangara.

Noxious species are likely to transfer downstream to the Murrumbidgee River and Lake Eucumbene and thence throughout the rest of the Snowy Scheme and downstream rivers (Snowy, Murrumbidgee and Murray).

The unspoiled, natural beauty and integrity of the KNP will be seriously diminished by the increases in roads, permanent large structures and transmission lines. Visitor experience and tourism will be adversely affected.

Economically justified alternatives

The renewable energy claims for Snowy 2.0 do not justify the extent and severity of environmental destruction that the project will cause to KNP.

Solar and wind power, which can be achieved without environmental destruction, are readily available alternative sources of renewable energy. Public money would be better spent on solar energy projects rather than on Snowy 2.0, which will destroy pristine alpine areas in KNP.

The legacy of significant and irreversible damage to one of the most sensitive and vulnerable environments in Australia is reprehensible and avoidable.

The project, including transmission, is likely to cost \$10 billion, which is uneconomic. Further costs include loss of income from nature based tourism.

Flawed planning and approval process

The incremental piece-meal planning and assessment process has denied the public a holistic view of the full scope and impacts of Snowy 2.0. The extensive and permanent damage inflicted on the KNP is not in the public interest.

Despite the Environmental Planning and Assessment Regulation 2000 requiring "*an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure*", no such analysis has been provided.

The project must be put on hold until such fundamental information is provided, especially as many alternatives have been identified with far less environmental impacts and better economics, both within and outside KNP.

No appropriate offsets for the habitats that would be destroyed by Snowy 2.0 could be provided, as all of the comparable alpine and subalpine areas of NSW are already included in KNP.

Conclusion

The Snowy 2.0 project, as described in the Main Works EIS, does not meet the principles of Ecologically Sustainable Development as mandated in the Environmental Planning and Assessment Act. The project should be put on hold to avoid irreversible and significant damage to the iconic Alpine National Park.

Yours sincerely,

Ann Sharp