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SNOWY MONARO REGIONAL COUNCIL
Stronger together Better together

6 November 2019

Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sirs

RE: Submission - Snowy 2.0 Major Project Main Works EIS (SSI-9687)

Thank you for the opportunity to provide comment in relation to the Snowy 2.0 Main Project Works. Snowy Monaro Regional Council (SMRC) strongly supports the Snowy 2.0 project and would like to acknowledge the efforts made by Snowy Hydro Limited (SHL) to engage with Council during the formative stages of the project in order to identify issues of potential concern and possible mitigation measures. SMRC also wishes to acknowledge the efforts made by SHL to ensure that local communities receive benefits from the proposal, and particularly for those communities likely to be more affected by some of the project's impacts.

SMRC wishes to provide the following comments:

Doc Ref	EIS Comment	Submission
Appendix F - Rehabilitation Strategy 5.1.5.3 – Weed Control pg 46	The strategy identifies that where priority weeds are identified, removal or spraying will be undertaken. There is no mention of good practice of vehicle hygiene off the site. The KNP area and Northern SMRC has Orange hawkweed infestation that is under an annual detection and removal program as priority weeds that must be prevented from spreading. The Tantangara Dam area is a well-known area that has infestations of Ox-eye daisy. Ox-eye daisy should be minimised from spreading to protect economical assets such as the agricultural industry. Good vehicle hygiene preventing both Orange Hawkweed and Ox-eye daisy seed from spreading into clean areas is required.	Orange hawkweed is a state priority weed with seed that must be prevented from moving off site if any is identified. Good vehicle hygiene is required at the site for vehicles leaving the area. Ox-eye daisy is a weed of local significance and the seed should be prevented from leaving the site by good vehicle hygiene. A vehicular washdown station and associated management plan containing washdown procedures to manage vehicles leaving the site is to be installed and implemented. SMRC also recommends installation of vehicle washdown bays as part of the overall weed management strategy. This is considered to be a high priority and it is suggested that it be addressed through a comprehensive weed management plan. This should be addressed prior to project commencement.

Appendix L - Excavated rock management pg 15	Excess excavated material that cannot be re-used during construction will be disposed of within Talbingo and Tantangara reservoirs, used in permanent rehabilitation of construction pads to be left in situ in Lobs Hole, or transported for on-land disposal if required.	SMRC encourages discussions with SHL on the acceptance of Virgin Excavated Natural Material (VENM) at either the Cooma or Jindabyne Landfills which could be utilized as landfill cover. Disposal of such material is free of charge, however it is recognised that transportation costs would be borne by the proponent. If viewed as favourable, SMRC will engage with SHL and FGJV regarding quantities and timing.
Appendix N.1 - Excavated rock management	Any Naturally Occurring Asbestos (NOA) material should be placed in a wet condition into the aquatic environment.	SMRC's waste facilities do not have capacity to accept any spoil containing asbestos, should placement in the reservoirs not occur.
Appendix N.1 - Excavated rock management Table 9.1 - asbestos management pg 79	Where more than 100 kg of asbestos waste or more than 10 square metres of asbestos sheeting is transported, the NSW EPA online tool WasteLocate will be used.	SMRC's waste facilities have limited capacity due to licensing requirements to accept asbestos waste from the main works or ancillary works associated with the Snowy 2.0 project. SMRC may accept small quantities up to approximately five tonnes at a time with prior notification. In the event that excessive volumes of asbestos waste are produced, SMRC may require an alternative facility to be used. SMRC is happy to discuss asbestos disposal requirements with SHL/FGJV before commencement of the project.
Appendix N.1 - Excavated rock management Table 9.1 - waste management and transport pg 81	Material which has been assessed as not suitable for reuse on land or for subaqueous disposal or cannot be otherwise reused or managed (eg via encapsulation or treatment) will be appropriately characterized prior to offsite disposal.	SMRC's waste facilities do not have the capacity to accept more than 4000t of general waste, 1000t of C&D waste or 250t of green waste per annum from the main works. SHL (or their nominated representative) should discuss waste management disposal requirements with SMRC, prior to project commencement, if it is intended to use a SMRC waste management facility for the disposal of any waste material. The Adaminaby Transfer Station has limited capacity and opening hours for waste acceptance and/or transfer. Details can be provided in an overall Waste Management Plan which SMRC is happy to consider.
Appendix Q - Traffic and Transport pg 1	The Snowy 2.0 Main Works do not include the transmission works proposed by TransGrid (TransGrid 2018) that provide connection between the cable-yard and the NEM. These transmission works will provide the ability for Snowy 2.0 to efficiently and reliably transmit renewable energy to major load centres during periods of peak demand, as well as supply renewable energy to pump water from Talbingo Reservoir to Tantangara Reservoir during periods of low demand.	The increase in traffic levels to Snowy 2.0 construction sites is considerable. Clarification is required as to whether the traffic numbers in the EIS include the anticipated cumulative effect of traffic associated with the TransGrid project.

Appendix Q - Traffic and Transport - excavated rock management pg 7	Excavated rock will be generated as a result of tunnelling activities and earthworks. The material produced through these activities will be stockpiled and either reused by the contractor (or NPWS), placed permanently within Tantangara or Talbingo reservoirs, used in final land forming and rehabilitation of construction pads in Lobs Hole or transported offsite.	Excavated Rock generated as a result of tunnelling activities and earthworks could provide a useful source of material for SMRC road maintenance and construction activities. The availability of this material to SMRC should be explored further.
Appendix Q - Traffic and Transport - projected mid-block traffic volumes pg 46	Average and peak daily heavy and light traffic movements have been determined at critical locations of the study area road network as illustrated in Annexure D. A summary of estimated daily light and heavy traffic generation during the peak month in 2022 of Main Works and the proposed segment factory works is shown in Table 4-1.	SMRC understands that clarification has recently been provided regarding the expected peak traffic movements and that figures have been revised to 410 total movements (i.e. 205 movements each way).
Appendix Q - Traffic and Transport - Table 4-8 pg 58-59. Route Study pg 13-14 and 28-33	Cooma Option 2	The route proposed as Cooma Option 2 is not supported due to the additional disruption this route would create to residential and business areas, and to on-street parking. It is also unknown whether the vertical aspects of the OSOM movements through the Massie Street causeway and roundabout have been adequately addressed for this option. Finalisation of the proposed route through Cooma should be made prior to project commencement.
Appendix Q - Traffic and Transport - intersection upgrades pg 60	The intersections of Monaro Highway/ Yallakool Road and Monaro Highway/Polo Flat Road will require upgrades based on the forecast growth of the corridor specified by RMS, even without the consideration of construction vehicles during typical (non-winter) traffic conditions; some upgrades are required for the existing roundabout intersections of Monaro Highway (Snowy Mountains Highway)/Bombala Street and Snowy Mountains Highway/Vale Street in Cooma to provide adequate performance during winter peak conditions, when considered together with construction traffic. It should be noted this roundabout is expected to fail (i.e. performs poorly) under existing winter peak traffic conditions (during the peak hours on the weekends of the ski season) regardless of construction traffic.	SMRC supports the identified need to upgrade these key intersections and roundabouts. This should be completed prior to the expected peak traffic movements.
Appendix Q - Traffic and transport road safety audit pg 13 Annexure C - Road safety audit Section 7(b)	Investigate angle parking to be remarked to parallel parking.	SMRC does not support the change of parking bays in Sharp Street from angled to parallel. Alternatives to improve sight distances and buffers should therefore be investigated. Zebra crossings in Sharp Street are not preferable as it will result in increased traffic queues in the CBD area. Wombat crossings have been investigated in past and RMS recommended that they are not acceptable with HV traffic.

Appendix Q - Traffic and Transport 3.2.3 walking and cycling pg 18	The local councils have also facilitated the location and construction of walking and cycling trails in the study area.	The EIS does not include the impact of construction traffic on the key cycling routes along the Snowy Mountains and Monaro Highways. The regional road network outside the Cooma CBD area is a popular biking route (https://www.strava.com/heatmap#9.93/148.98342/-35.86290/hot/all). With increased construction traffic the risk of an incident involving a cyclist and car/ truck is likely to increase. It is recommended that mitigation measures to reduce the impact of the construction traffic along these key cycling routes be considered.
Appendix Q - Traffic and Transport Road condition/ safety assessment	Appendix Q – Table 3.6 – Summary of accident history Table 3.7 refers to accidents per kilometre Table 3.9 – Summary of issues	The assessment of likelihood does not appear to have been rated in accordance with the likelihood from Austroads 2019 and the crash/accident data presented in the Road safety audit. The level of risk in these areas is ranked as 'improbable' but may actually be higher, so additional mitigation measures need to be considered.
Appendix G - Table G.1 - ID #TRA04 - Road Maintenance Appendix Q - Section 5.4 Road maintenance pg 61	Road maintenance will be managed through the following measures: - a Road Dilapidation Report will be prepared and approved prior to and following Snowy 2.0 Main Works; - routine defect identification and rectification of the internal road network will be managed as part of the project maintenance procedure; and - internal access roads will be designed in accordance with the relevant vehicle loading requirements.	Impact assessment and repairs should be ideally completed at least every 6 months through the life of the project. FGJV, SMRC and RMS should agree on a routine defects and rectifications regime of all the road networks affected (not just Snowy 2.0 internal roads).
Appendix R - Noise and Vibration	The NVIA does not appear to address the impact of construction traffic in residential and business areas along Polo Flat Road, Monaro Highway/Snowy Mountains Highway (Sharp St). It is likely that the significant increase in HV traffic in these areas (24hrs a day) will affect residents and businesses. It is recommended that mitigation measures be considered for affected areas along the transport route. This should be addressed prior to project commencement.	
General Comments	• The LEP map layers for terrestrial biodiversity, riparian land and wetlands apply to the Rock Forrest site. Although SMRC recognises that Part 4 of the Act does not apply to this project, this does not change the presence of these constraints on the site and they should be considered in the assessment. It appears that there may be some impact from the proposed laydown area on these constrained areas however there also appears to be adequate area on the site free of constraints for the proposal. SMRC recommends the design of the laydown facility be reviewed and if deemed necessary moved/amended within the site to avoid the mapped sensitive areas. • As included in its submission on the Exploratory Works EIS, SMRC highlights that there is an opportunity to utilise Bobeyan Road as a transport route for DIDO or FIFO employees. The NSW State Government has allocated $20m to upgrade the section of Bobeyan Road within NSW, which will provide much improved connectivity between Adaminaby and Canberra. Discussions with the ACT Government would be required to ensure the ACT section of the road was upgraded at the same time. • It is noted that the prevention of passage of pest aquatic species such as redfin perch from the Talbingo reservoir to the Murrumbidgee system relies on the ability of Tantagara Dam as a physical barrier. Recreational fishing is an important economic activity for the Snowy Monaro area and protection of prime trout fishing waters from invasive species is paramount.	

	It is recommended that steps be required to ensure adequate monitoring is undertaken to ensure the effectiveness of this proposal, and that measures can be put in place if the physical barrier is not proven to be adequate. • As the sub-aqueous placement of excavated material into Tantagara Dam will reduce the effective holding capacity of that reservoir, confirmation is requested to ensure that the current requirement in the Snowy Water License to maintain flows at Mittagang Crossing will not be altered due to the project.

The Snowy 2.0 project is a monumental project for our Region. SMRC considers this as a 'once in several generations' opportunity, and subject to appropriate measures to address environmental and operational impacts, the project should be supported.

Council would welcome the opportunity to discuss any of the items included in this submission.

Yours faithfully

Peter Bascomb
General Manager