

APPENDIX G – SUBMISSION RESPONSES

Submission Number	Issue	Response
Telstra	Telstra has assets in the vicinity of proposed site. Development could impact adversely on the Telstra assets by physical damage during construction activities, Low Frequency Induction (LFI) during earth faults on connected transmission lines or Earth Potential Rise (EPR) surrounding the earth mat and nearby tower foundations. When available; the area and perimeter of the earth mat/s, ohmic resistance, and value of earth fault currents are required to determine the value and extent of the EPR during fault conditions. It is likely that joint current injection tests will be required to measure the actual values of EPR	The Powerlink design team will contact Telstra technical staff to discuss potential engineering solutions.
Telstra	If a Telstra connected telephone service is required for the substation or construction crews, early planning of the location of the control building, and also contractor huts is recommended.	The Powerlink appointed construction contractor will contact Telstra technical staff to discuss telephone service requirements as necessary.
Department of Employment, Economic Development and Innovation (DPI&F)	EIS provides comprehensive mitigation information on biosecurity risk associated with project.	Noted.
Department of Employment, Economic Development and Innovation	4.2.16 Water Act 2000 and Table 4-4 Licence Permit & Approval that May be Required The EIS states that, as Powerlink Queensland is identified as an 'Entity' under the DERM 'Guideline – Activities in a watercourse, lake or spring', a permit is not required for activities within a watercourse where the guidelines are met. Recommendation: Fisheries Queensland advises that any works undertaken within a watercourse that may constitute a waterway barrier (e.g. filling of a watercourse or waterway crossings) will require assessment under the <i>Fisheries Act 1994</i>. An operational works permit for waterway barrier works would likely be required should any works be undertaken within a watercourse	Noted.
Department of Employment, Economic Development and Innovation	EIS indicates no waterways, or other fisheries values will be impacted, therefore, Fisheries Queensland has no objection to proposed project.	Noted.
Department of Transport and Main Roads	Officers from the Department of Transport and Main Roads in Toowoomba have previously been consulted about this project. The Department will make submissions regarding traffic impacts and mitigations as appropriate.	Noted.
Department of Community Safety	Flooding (refer to sections): 7.2.4, 7.3.1, and 7.4.1 Substations require 0.5% AEP immunity (equivalent to Q200) in accordance with the SPP 1/03 Guideline/Appendix 9 (Page 70). The Proponent is requested to confirm that during operation the substation can function effectively during and immediately after in a Q200 event. It is advised that the Proponent's commitment to the development and	No flood modeling or data is available for the study area. Section 7.2.4 has been amended to show that the nearest historical flood (December 1975) was 4.5 kms from the substation.

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	implementation of an Emergency Response Plan as part of the Environmental Management Plan is prepared in accordance with the SPP 1/03 Guideline/Appendix 9 (Page 70) and in consultation with the emergency services agencies as recommended below.	
Department of Community Safety	Bushfire Areas of bushfire risk have been determined by the Queensland Rural Fire Service and are identified on Western Downs Regional Council's Chinchilla Town Planning Scheme Overlay Map 4 <i>Bushfire Hazard Areas</i>. Refer to sections 8.2, 8.3 - Potential Impacts, and 8.4 As demonstrated in the above sections, the Proponent commits to bushfire hazard analysis to ensure the project site is designed to function effectively during and immediately following bushfire events. The proposed mitigation measures will achieve SPP 1/03 compliance. Thus DCS requires no further information regarding bushfire hazard mitigation in addition to consultation with regional officers from QFRS as recommended below in relation to emergency response.	Emergency response arrangements and the Site Safety Management Plan (SSMP) for the construction project will be established by Powerlink Queensland's Construction Manager and the Principal Contractor, prior to construction commencing. Such arrangement will include formally contacting the relevant representatives of the Queensland Fire and Rescue Service, Queensland Ambulance Service and Emergency Management Queensland to seek appropriate guidance in the establishment of the SSMP as well as reviewing guidelines such as that established by SPP 1/03 Guidelines/Appendix 5A.
Department of Community Safety	EIS appropriately addresses bushfire hazard. Mitigation measures will achieve SPP 1/03 compliance.	Noted.
Department of Community Safety	Landslide (refer to sections 5.2 Topography/Geomorphology (pg.45), Section 5.2.2 Potential Impacts (pg.46) and Section 5.8.3 of the Environmental Management Plan (Appendix E, pg.34) As demonstrated in the above sections, the EIS commits to geotechnical investigations for the subject site and asserts the substation will not be subject to landslide hazard. DCS requires no further information regarding landslide hazard in addition to consultation with regional officers from QFRS as recommended below in relation to emergency response	Noted.
Department of Community Safety	Queensland Fire and Rescue Unit – State Community Safety Unit – The Queensland Fire and Rescue Service (QFRS) has a legislative jurisdiction to provide input into the design of a building or a structure's fire safety systems as an advice agency. The advice provided by QFRS must be in accordance with the <i>Integrated Planning Regulation 1998</i> – Schedule 2 – Table 1; Building work assessable against the <i>Building Act 1975</i>. QFRS understands that the approval for the Western Downs Substation project will be under the <i>Integrated Planning Act 1997</i> Therefore, the QFRS seeks formal engagement from the "Authority Having Jurisdiction" (AHJ) or the relevant Assessment Manager for the project clearly	The roles and responsibilities of the QFRS will be developed, identified and defined when QFRS is formally engaged by Powerlink Queensland's Construction Manager and the Principal Contractor in the development of the SSMP.

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	defining the roles and responsibilities of the QFRS in the project development process.	
Department of Community Safety	QFRS also seeks clarification of above ground buildings and/or special structures assessed as assessable development and self-assessable development in accordance with the <i>Integrated Planning Act (IPA)</i> 1997 Schedule 8 and development that is exempt from assessment against a planning scheme as per <i>IPA</i> 1997.	This Project does not include the development of habitable buildings. All structures are metal clad and the surface of the substation (gravel) and buildings (metal clad) are of fire resistant material.
Department of Community Safety	QFRS seeks formal engagement (in the form of a Memorandum of Understanding) from the AHJ or the relevant Assessment Manager for the project clearly defining the roles and responsibilities of the QFRS in the hazard and risk coordination process, as stated in Section 8 - Fire and Section 9 – Waste Management.	QFRS will be formally engaged during the preparation of the emergency response plan.
Department of Community Safety	QFRS have been involved with the development of power stations across the south western region of Queensland providing operational response advice right from the pre construction phase. Early consultation with the QFRS, in relation to the design concept and development of the substation is required to ensure building compliance and access for emergency response vehicles in the event of an incident. Consultation with emergency service agents is required to assist in the development of emergency procedures for the substation.	This Project does not include the development of habitable buildings. All structures are metal clad and the surface of the substation (gravel) and buildings (metal clad) are of fire resistant material. Access tracks from Banana Bridge Road to the substation location will be developed.
Department of Community Safety	EMQ concerns relating to all development proposals throughout the Surat Basin region are in relation to the impact such developments may have on existing emergency services. Many of the local emergency services are volunteer based and are used to dealing with minor incidents, generally with limited resources. Increased population (work / construction crews), increased road traffic and transportation requirements have the potential to place a significant burden on local services. EMQ requests that Local Government and the local Emergency Services be kept fully informed of proposed developments and timeframes. An Emergency Response Plan should also be produced as part of the development process.	Local government and local emergency services officers will be kept fully informed of developments and timeframes. EMP and ERP will be developed and adhered to.
Western Downs Regional Council	Roads The Western Downs Regional Council (WDRC) requests that if the Coordinator General approves the project, that the approval includes the condition that: Powerlink enters in to Infrastructure Agreement to fund any upgrading of roads required for construction vehicles and any additional maintenance required during construction period;	Powerlink will work with Council to address the issues noted. Projected volumes of traffic and potential routes can be found within Section 16 of the EIS. Powerlink will also work with Council on pre and post construction surveys. For details, please see the Environmental Management Plan in Appendix E.

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	- Includes two joint asset condition assessments be carried out – one prior to construction traffic and the second at the completion of project to determine whether any additional maintenance is required to restore the road networks to the original condition, with identifiable works required being at the cost of Powerlink; - Powerlink enters into a Traffic Management Plan for approval prior to commencement of the construction phase for any temporary road closures and detours and any variations to receive timely approvals; - All roads providing access to work camps be constructed to an all weather access standard, with appropriate turning facilities provided from major roads; and - Powerlink funds a comprehensive traffic impact study to assess the impact of the project, particularly on the local road network	
Western Downs Regional Council	Washdown of Construction Vehicles and Equipment WDRC requires that all vehicles and heavy plant equipment entering and leaving the construction site within the region be adequately washed down to prevent the spread of noxious weeds. WDRC requests that Powerlink make a contribution to washdown facilities to be located at Chinchilla or other nearby facility.	Noted. Please see the Environmental Management Plan (Appendix E) and Section 10 of the Environmental Impact Statement. Powerlink is currently considering a proposal from Council regarding a potential contribution to a washdown facility.
Western Downs Regional Council	Waste Management The Western Downs Regional Council (WDRC) requests that if the Coordinator General approves the project, that the approval includes the condition: - That prior to the commencement of construction a Waste Management Plan is drafted for Council's review and approval. The Waste Management Plan is to be developed in accordance with relevant DERM guidelines and the waste hierarchy, i.e. avoid, reduce, reuse, recycle; - Residual, non-regulated wastes are disposed of at approved disposal facilities located at Dalby, Chinchilla or Tara subject to payment of applicable fees and charges; and - Waste service providers (either in-house or contracted) must hold a current Waste Management Works Approval as per the <i>Environmental Protection Act</i> and subordinate legislation.	Section 9 of the EIS describes the predicted waste sources expected to occur as a result of this project. Waste Management Strategies are also discussed in this section as well as in the Environmental Management Plan (see Appendix E). Powerlink appointed construction contractors will be responsible for developing a waste management plan for the Project.
Western Downs Regional Council	Local Business Engagement WDRC requests that every endeavor is taken to include local business for the sourcing of supplies and to service any construction accommodation facilities. WDRC therefore requests that Powerlink to provide what measures they will undertake to specifically address how they intend to establish local procurement processes to engage with the local and regional businesses.	Noted. Powerlink intends to include local business for the sourcing of supplies and services necessary for the Project, where practicable.
Department of Environment and Resource Management	Development Footprint: Clarification is required on the actual area impacted by the proposed development. Total area of the subject lots is 218.8 ha. Section 5.3.1.2, (p50) refers to the	Gypsum will only be applied over the area impacted by construction. The construction contractor will develop detailed infrastructure mapping as the Project progresses into the detailed design stage. The location of the substation site within

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	intention to apply gypsum to the construction site area of 70 ha to ameliorate sodic soil constraints. Recommendation <i>Provide a suitably scaled map that depicts the footprint of the development including construction earth pads, lay-down areas, storage facilities, firebreak and vegetation buffers, and other planned infrastructure.</i> <i>Provide details on management of the balance area of land outside the substation facility, including fire and weed and pest management measures.</i>	the Project site can be viewed in Section 5 (Figure 5.1).
Department of Environment and Resource Management	Management of balance area of subject lots outside construction site is unclear. Provide details on management of the balance area of land outside substation facility, including fire and weed and pest management measures.	Powerlink has no intention of disturbing areas outside of the construction site for the proposed substation and the access roads. The construction contractor will be responsible for development of the construction management plan which will discuss management details for the Project site. Powerlink plans to manage the balance of the site as a buffer zone for the substation site.
Department of Environment and Resource Management	Vegetation Buffers There are inconsistencies between the levels of commitment to vegetation buffering. On Page 9 (Landscape Character and Visual Amenity) it is stated ... <i>“With the establishment of woodland buffers to the south and west of the site, the permanent facility will have no long-term visual impacts regionally and will have no significant long-term visual impacts locally.”</i> While on Page 21 (3.3.1.1 Vegetation Clearing) ... <i>“Revegetation of areas outside the substation footprint will be a consideration to reduce the visual amenity of the site from a nearby residence to the west.”</i> Revegetation of disturbed areas outside of the substation site will help buffer the neighbouring farm land from the substation and aid in the continued use of the area for agricultural purposes. Recommendation <i>Vegetation buffers should be established on all disturbed areas outside of the substation site.</i>	Powerlink intends to allow natural revegetation to occur across the Project site as noted in Section 10.4.3 of the EIS. Recent removal of livestock from the Project site has already resulted in considerable natural revegetation and it is anticipated that this revegetation will continue as the site is converted for usage as a substation location.
Department of Environment and Resource Management	Vegetation Clearing, Sect 3.3.1.1, p21 The proponent indicates that “... <i>revegetation of areas outside the substation footprint will be a consideration to reduce visual amenity of the site from a nearby residence to the west.</i>” It is suggested that enrichment plantings for vegetation buffers not only match existing site species, but an attempt be made to source species of local provenance in order to protect biodiversity values within the area.	Noted. Where necessary, vegetation buffers will be enriched with species which are endemic to the local area. As noted in Section 10.4.3 of the EIS, rehabilitation will aim to encourage natural revegetation. In most cases, if areas of the Project site are left to naturally regenerate, seed banks in the soil will germinate and provide adequate additional cover. In the even that seed harvesting needs to occur, Powerlink will attempt to ensure that seed stocks are collected from local areas where practicable.

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	Recommendation <i>For plantings of vegetation buffers the proponent uses species of local provenance.</i>	
Department of Environment and Resource Management	Vegetation Clearing, Sect 3.3.1.1, p21 cont. The EIS states: "... cleared material will be stacked for later disposal by burning or chipping". Burning of vegetation is not a preferred option. Recommendation <i>That chipping or mulching is used for disposal of cleared vegetation and this used on disturbed areas to minimise erosion and reduce weed growth.</i>	Chipping or spreading of cleared material are preferred options, however where there is a large amount, and it would be impractical or inefficient to use other disposal methods, stockpiling & or burning may be adopted. This is especially relevant where substantial volumes of cleared material would result in significant timber heaps, or unmanageable volumes of wood chip. If cleared vegetation is stockpiled, the stacks are to be free of dirt and clear of standing trees. No burning is to occur unless permitted by the local fire warden. Permits for vegetation burning must be obtained and provided to the Powerlink Construction Manager/PEA prior to the burn. All conditions of any permit must be adhered to.
Department of Environment and Resource Management	Water Source for Concrete Plant, Section 3.3.1.2, Civil Works, p22 The EIS states: "Supply of concrete for the foundations will be from a local commercial batching plant, or a plant established specifically for this project." No information is provided on the source of water if such a plant is constructed. Recommendation <i>That water requirements and source of the water for the project be identified.</i> <i>The proponent ensures that the relevant approvals are obtained for the concreting plant.</i>	The construction contractor will be responsible for determining the provisions associated with sources of water necessary during construction however it is anticipated that non-potable water for the Project during construction will be sourced from the farm dams located on the Project site. In the event that these dams do not have sufficient water for construction activities, water will be brought on the site with trucks. Potable water will also be brought onto the site via the usage of water trucks.
Department of Environment and Resource Management	Aboriginal Cultural Heritage Act 2003, Sect 4.2.1, p27 The EIS acknowledges that the Powerlink is developing a Cultural Heritage Management Plan (CHMP) apart from the EIS. The EIS should recognise the Cultural Heritage duty of care guidelines to ensure the full environmental and social impact of the project can be considered. Recommendation <i>The EIS recognise the development will cause additional surface disturbance (Category 5 – Duty of Care Guidelines) and therefore the activity has the potential to impact relevant Aboriginal Cultural Heritage that may exist on the site. Thus a CHMP is being developed.</i>	Noted.
Department of Environment and Resource Management	Electricity Act 1994, Sect 4.2.2, p28 The EIS correctly identifies that once the proposed operating works have been designated as "community infrastructure" via the Integrated Planning Act 1997, the	Clearing on the Project site will be restricted to areas necessary for the construction of the substation and associated access roads, transmission lines and stockpiling areas. Refer to Sections 10.4.1, 10.4.2 and 10.4.3 of the EIS.

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	clearing of native vegetation for establishment of the works becomes an exempt activity via IPA Schedule 8 and Section 112A of the <i>Electricity Act 1994</i>. In this case, the remnant vegetation located within the substation site has little unique value other than the provision of general habitat and connectivity in what is already a highly fragmented landscape. The regional ecosystems that occur on the site are <i>Least Concern</i> systems and as such it is unlikely that the proposed clearing would trigger any offset requirements during a normal code assessment scenario. It is noted that DERM offered no objection to the designation of the Springdale to Halys Transmission Line project and did not require the provision of vegetation offsets for the clearing of vegetation that had significant unique qualities compared with this current proposal. Recommendation <i>The proponent ensures that any clearing is limited to the extent that is necessary for the operating works.</i>	
Department of Environment and Resource Management	Land Title Act 1994, Sect 4.2.7, p35 This section should refer to the <i>Land Act 1994</i> not the <i>Land Title Act</i>. Details within the section are incorrect and should be clarified as below. Recommendation <i>Amend this section to read as follows:</i> <i>"The Land Act 1994 provides a framework for the administration and management of non-freehold land and deeds of grant in trust and the creation of freehold land, and for related purposes. Under Chapter 4, Part 4 of the Act, a permit to occupy may be required from the chief executive of the Department of Environment & Resource Management (DERM) where the proposed alignment is developed on unallocated State land, a reserve or a road. However, Sections 101 and 102 of the Electricity Act 1994 provide exemptions to the Land Act 1994 allowing electricity entities to undertake necessary actions on roads and publicly controlled places such as Unallocated State Land (USL)."</i>	Noted & Section 4.2.7 amended to refer to the Land Act 1994.
Department of Environment and Resource Management	Water requirements for the project, Application of the Water Act 2000, Sect. 4.2.16, p40 Although the EIS makes reference of the need to obtain a permit to take water, no details are provided on the water that may be required for the project, such as for concrete batching, dust suppression (other than mentioning "recycled water" may be used), or potable water supplies. No details are provided on the source of any water	Non-potable water for the Project during construction will be sourced from the farm dams located on the Project site. In the event that these dams do not have sufficient water for construction activities, water will be brought on the site with trucks. Potable water will also be brought onto the site via the usage of water trucks.

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	that may be required. The EIS also refers to the need for water supplies to establish and maintain revegetated disturbed areas — see Sections 5.1 Land; 10.4.3, Habitat Rehabilitation; and various sections in the EMP. The source, quantity and quality of water required for these purpose and for revegetation for erosion control should be provided in detail. Allowance should be considered for on-going water supply needs post-construction, and operational maintenance purposes until the requirements for adequate rehabilitation/revegetation have been met. Recommendation <i>The EIS should detail the water requirements for the project, including the source, quantity and quality of this water.</i>	
Department of Environment and Resource Management	Water requirements for the project Cont. Include “Water Supply Permits” in Table 4.4 (p44) under the <i>Water Act</i> 2000 row for State Legislation.	Noted. Please see Table 4.4 of the EIS.
Department of Environment and Resource Management	Water requirements for the project Cont. The security or reliability of the water source should be detailed and alternative sources identified, if required, to ensure continual availability of water until such time that the revegetated ground cover meets the criteria detailed in the EMP.	The construction contractor will be responsible for determining the water source/s for the Project. In it anticipate that non-potable water for the Project during construction will be sourced from the farm dams located on the Project site. In the event that these dams do not have sufficient water for construction activities, water will be brought on the site with trucks. Potable water will also be brought onto the site via the usage of water trucks.
Department of Environment and Resource Management	EMP should prescribe guidelines for the quality of water used for the purpose of watering revegetated areas.	Section 5.15 of the EMP has been amended to prescribe Primary Industries water quality (ANZECC 2000) to be used for the purpose of watering revegetated areas.
Department of Environment and Resource Management	Depth of Soil Sampling, Sect 5.3.1.2, Soils pp48-50 Table 5.2, p49, of the EIS indicates that soil sampling has been only to a depth of 30 and 40 cm. The depth of soil sampling should be at least to the depth of the proposed disturbance of the project to enable accurate assessment of the soil that may be exposed during construction, and to inform remedial action such as application of gypsum. Table 5.2 identifies the maximum depth of sampling, however it is unclear what will be the maximum depth of excavation. Recommendation <i>Soils should be reassessed to the depth of the proposed excavation/disturbance and, if necessary, appropriate mitigation measures be redefined</i>	The sodic soils which dominate the landscape across the Project site have a shallow A horizon (to a depth of approximately 30cm) and a very deep B horizon which, in some cases, extends several metres. Soil sampling was only undertaken to a depth of 40cm as the soil type from this B horizon, extends down further than the depth likely to be disturbed during construction. Foundation design will be undertaken following targeted geotechnical investigations which identify deeper, subsurface soil conditions.
Department of Environment and Resource Management	Application of gypsum, Section 5.3.1.2, Soils p50 The EIS infers the whole 70 ha area to be developed will be treated with gypsum mitigate the effects of the sodic subsoils. Rather than applying gypsum to the entire	Noted. Section 5.3.12 has been amended to incorporate this.

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	70ha site before construction begins it may be more effective to treat the unstable soils that have been left exposed following the construction. Recommendation <i>Prior to revegetation of disturbed areas Gypsum should be applied to unstable soils that have been left exposed.</i>	
Department of Environment and Resource Management	Soil Erosion Mitigation Measures, Sect. 5.3.3.1, pp55-56 Construction works will include measures that limit the exposure of sodic subsoils. This will include the method of constructing banks/channels to direct runoff water away specialised facilities and storage areas. Such banks may also be effective in directing runoff water away from areas where surface soils have been disturbed. Water flowing over such disturbed areas may lead to an increase in erosion. Recommendation <i>That specially constructed drainage banks/channels be implemented to direct water away from disturbed areas.</i>	Noted. Section 5.3.3.1 recommends the use of drainage banks/channels to divert water and specifies that erosion and sediment control has to be in accordance with Best Practice Erosion and Sediment Control (IECA 2008).
Department of Environment and Resource Management	Soil Erosion Mitigation Measures, Sect. 5.3.3.1, pp55-56 cont. Deep ripping is proposed to repair existing eroded areas. DERM advises that deep ripping is not recommended for lands where sodic subsoils occur and where the land condition is such that an increase in the subsurface hydraulic gradient can lead to tunnel erosion. That is, deep ripping may exacerbate the erosion risk. Recommendation <i>That deep ripping is not carried out in areas prone to tunnel erosion.</i>	Section 5.3.3.1 recommends bunding/drainage channels to be developed in disturbed areas. Deep ripping is proposed to be used as a means of incorporating gypsum into the subsoil.
Department of Environment and Resource Management	Source of recycled water for dust suppression, Sect. 6.3.1, Air Quality, p68 This section of the EIS proposes the use of recycled water during construction works to minimise dust originating from traffic movement on access roads, bulk earthworks and other activities. No details are provided on the source, or quality, of this water or measures to ensure this activity does not cause environmental harm. Recommendation <i>Provide details on the sources of all water proposed for the project, including water</i>	Section 6.3.1 has been amended to note that recycled water should be used if feasible. This water is likely to be sourced from the Kogan Creek Power Station or urban sources if available. The construction contractor will be responsible for ensuring the water meets relevant health, safety and environmental standards.

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	<i>quality and measures proposed to mitigate any risks to land and water resources.</i>	
Department of Environment and Resource Management	Disposal of excess Spoil Section 9.2.1, Solid Waste Disposal p78-79 It is noted that the proposed waste management strategy allows for excess spoil to be stockpiled on site for reuse during landscaping and rehabilitation works. Care should be taken to ensure sodic subsoils left exposed do not adversely affect the success of the rehabilitation program. Also, clarification is required on likelihood of a having sodic subsoils surplus to rehabilitation requirements, and if so, the method of disposal of any surplus. Recommendation <i>Provide details to ensure excess sodic soils will not be left exposed during the landscaping and rehabilitation activities, and the intentions of managing any surplus subsoil material, if any.</i>	Section 5.3.3.1 has been amended to note that excess sodic soils are to be treated with gypsum. Any excess surface subsoil (if any) will also be treated with gypsum and spread across the disturbed site.
Department of Environment and Resource Management	Septic tank requirements, Sect. 9.2.2, Liquid waste, p79 The waste management strategy for sewerage identifies the possibility of an appropriate treatment facility/septic tank being used to process sewerage during the construction phase. DERM requires information on the expected capacity of such facilities to determine whether an Environmentally Relevant Activity (ERA) approval is necessary. Recommendation <i>Determine anticipated numbers of people for which a sewerage treatment facility may be required during the construction phase, and if necessary make an application for an appropriate Environmentally Relevant Activity (ERA).</i>	The construction contractor will be responsible for ensuring adequate sewerage facilities are provided for and approved by DERM for the construction phase of the Project. If necessary, appropriate approvals will be sought.
Department of Environment and Resource Management	Storage of fuel and chemicals Section 9.2.2, Liquid waste, p79 No details are provided on the amount and type of fuel and chemicals that will be stored on site. Such information is required to determine applications for Environmentally Relevant Activities (ERAs) for the site development. Recommendation <i>Determine the amount and type of fuels and chemicals to be stored on-site to make application for any applicable Environmentally Relevant Activities (ERAs).</i>	The construction contractor will be responsible for all fuels and chemicals to be stored on-site and for making any application for any applicable ERAs.
Department of Environment and Resource Management	Rehabilitation Management Plan, Sect. 10.4.3, Habitat Rehabilitation, page 97 This section refers to the need to prepare a Rehabilitation Management Plan to include details on the treatments of revegetation, weed control and monitoring of	As noted in Section 10.4.3 of the EIS, a Rehabilitation Management Plan will be developed for the Project prior to construction commencing.

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	these areas. A draft Plan should include the timing and intervals for monitoring weed Recommendation <i>This Rehabilitation Management Plan should be included in the EIS or at least a date should be given for the completion of this Rehabilitation Management Plan. This Plan should include the timing and intervals for monitoring weed growth, the control treatments and success of controls used, for both construction and operational phases of the development.</i>	
Department of Environment and Resource Management	Vegetation Clearing, Sect. 15.2.2, Visual Amenity Mitigation Measures, p135 This section outlines the following as one mitigation measures: <i>“Minimise the removal of existing woodland vegetation outside of the immediate construction site area”</i>. DERM strongly supports this statement, particularly with respect to a project being established within a highly fragmented landscape. The exemption for the clearing of vegetation for this project relates to what is necessary for construction of the operating works, therefore any removal of vegetation that is located outside of the construction site area would require approval, unless otherwise made exempt via provisions within the <i>Integrated Planning Act 1997</i>, Schedule 8. Once built, the clearing of a fire break around the infrastructure is exempt activity via IPA Schedule 8. The proponent is advised that the firebreak distance is twenty (20) metres or 1.5 times the height of the tallest vegetation adjacent to the infrastructure. Given that the proponent has identified 15 metres as being the upper height limit for vegetation at the site, a firebreak should not exceed approximately 23 metres in width. The proponent has identified that bushfire hazard on the project site is deemed low to medium, therefore justification would be required should the proponent wish to establish a fire break distance that exceeds those outlined above. This is particularly important given the already fragmented nature of the vegetation within the locality. Recommendation <i>That clearing is limited to the extent that is necessary for the operating works. To prevent excessive clearing within a fragmented landscape, the clearing of a firebreak around the operating works should conform to the provisions of “essential management” as defined within the Integrated Planning Act 1997.</i>	Noted. Powerlink intends to limit all clearing on the site to only that which is necessary.
Department of Environment	Burning cleared vegetation, EMP Section 5.1.4, Construction Phase,	Cleared vegetation should be left in-situ (e.g. where appropriate to assist

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and Resource Management	Implementation Strategy, page 22 The last dot point of this section states: <i>“Cleared vegetation should be left in-situ (e.g. where appropriate to assist revegetation or erosion control), mulched and/or removed. If burning of cleared vegetation is planned, no burning is to occur unless permitted by the local fire warden. Permits for vegetation burning must be obtained and provided to the Powerlink Construction Manager/PEA prior to the burn. All conditions of any permit must be adhered to.”</i> It is not clear under what conditions cleared vegetation will be left in-situ, mulched and/or removed, or when burning of cleared vegetation will be planned. DERM advises that burning is not a preferred option, and that preference be given to using mulched vegetation material for erosion control and/or revegetation purposes. Recommendation <i>Provide details on the conditions cleared vegetation will be left in-situ (e.g. where appropriate to assist revegetation or erosion control), mulched and/or removed, or when burning of cleared vegetation will be anticipated.</i>	revegetation or erosion control), mulched , stockpiled and/or removed. The selected disposal method will be assessed on a site specific basis. The option for stockpiling & or burning may be adopted where there is a large amount of material, and it would be impractical or inefficient to use other disposal methods. This is especially relevant where substantial volumes of cleared material would result in significant timber heaps, or unmanageable volumes of wood chip. Spread vegetation is to be “topped and tailed”, the root ball removed and trunks/branches laid across the contour to impede cross country flow and provide micro sediment traps. If cleared vegetation is stockpiled, the stacks are to be free of dirt and clear of standing trees. No burning is to occur unless permitted by the local fire warden. Permits for vegetation burning must be obtained and provided to the Powerlink Construction Manager/PEA prior to the burn. All conditions of any permit must be adhered to.
Department of Environment and Resource Management	Dewatering Construction Site, EMP Erosion and Sediment Control, Sect. 5.8.4, Construction Phase, Implementation Strategy, pp35-36 This section recognises the potential need for a dewatering plan for rainwater filled excavations, and for such a plan to consider the receiving environment and quality and quantity of water. The process of deriving water quality trigger values and necessary monitoring requirements for the Project site and downstream receiving environments is not provided. To inform the design of any proposed monitoring programs reference may be made to the <i>Queensland Water Quality Guidelines (2009)</i>, and <i>Monitoring and Sample Manual 2009 Environmental Protection (Water) Policy 2009</i>. Recommendation <i>The EMP to include consideration of the quality and quantity of water released from the site, options for pre-treatment and the derivation of trigger values; and these details to form part of the dewatering plan, or work procedure, to be provided to DERM.</i>	Other than natural runoff resulting from rainfall events, no other water is expected to be released from the site. Should it be identified that controlled discharge of other water is required, this shall be undertaken in accordance with the ESCP. The construction contractor will be responsible for providing details of the quantity and quality of all water leaving the site to DERM.
Department of Environment and Resource Management	Fauna, EMP Sect. 5.9.2, Construction activities Performance Requirements, p38 The EIS notes the existence of four farm dams, two of which are located outside the development site. One other is to be retained as retention basin to trap sediment from the site — see EIS Section 7.4.2, Hydrology, Water Quality Mitigation	The farm dams proposed for development impact are constructed artificial water-bodies that are not mapped in the latest DERM Wetland Mapping and Classification for Queensland (version 2.0, October 2009). These dams have been managed as agricultural storages since their construction and, as such, have been subject to highly variable and interrupted hydrological regimes. The dams have remained

APPENDIX G – SUBMISSION RESPONSES

Submission Number	Issue	Response
	Measures p74. The fourth dam is to be filled being within the construction footprint — EIS Section 10.3.1, Fauna Potential Construction Impacts. The EMP does not include provision for the removal of aquatic fauna prior to dewatering of farm dams. Recommendation: <i>Include the measures proposed to remove aquatic fauna from the farm dams, including identification of suitable habitat for relocation. This should include permit requirements and certification/authority of personnel contracted; and provision for the quantitative monitoring of quality of surface water that is habitat for aquatic fauna.</i>	completely dry for extended periods since their construction and were dry or mostly dry at times of field inspection during the EIS process. Our experience in southern and western Queensland shows that natural aquatic ecological values in water-bodies managed in this way remain low and fauna occurrence is primarily restricted to noxious species, including Carp and Goldfish in some cases. Water quality in these water-bodies is also highly variable with particularly significant changes in dissolved oxygen and turbidity through agricultural water management cycles. There will be no local or regional aquatic ecological benefit in focused faunal removal activities or water quality monitoring in the case of these dams. Irrespective of this, Powerlink will implement a monitoring and recovery program during the dewatering of the dam to ensure that any aquatic fauna is identified and relocated in accordance with legislative requirements.
Department of Communities	Section 17.2 Population figures quoted in the EIS report should be reviewed to ensure that the latest FTE estimations are used with reference to the Surat Population Report produced by the Department of Infrastructure and Planning (refer Section 12.1.1). The project also presents an opportunity for the proponents to potentially provide additional employment and recruitment for members of the community. The Department recommends some consideration be given to employment strategies for Indigenous and disadvantaged groups, specifically young people, people with disabilities and people from culturally and linguistically diverse backgrounds.	The latest population figures have been used in the EIS. Additional employment and recruitment for members of the community (including Indigenous and disadvantaged groups) will be the responsibility of the Construction Contractor. Having said that, Powerlink's selection criteria for Construction Contractors includes assessment of Human Resources policies and strategies.

Received 17th December 2009

**Western Downs Substation Project - Draft Environmental Impact
Statement
DCS Comments**

Policy and Legislative Reform (PLR)

Flood -

As demonstrated in section 7.2.4 *Flooding* (pg.70) -

"The Project site is not subject to flood risk for the Condamine River or its tributaries. The site is several kilometres from the nearest area defined as floodplain and over 5m above the nearest floodplain level (floodplain level is approximately 320m AHD at the closest point to the east of the site) (see Figure 7.2)."

Section 7.3.1 *Surface Hydrology and Localised Flooding* (pg.73) states -

"As the project site is flat and the subsoils impermeable, it is likely to suffer some minor local surface water flooding during moderate rainfall events, however this flooding will be limited by the small catchment area above the site (the exact size is difficult to distinguish due to the poorly defined drainage lines and catchment boundaries)."

Further, Mitigation Measure for Surface Hydrology are identified in section 7.4.1 (pg.74) including -

"Levelling of the site will be conducted in a fashion as to maintain sheet flow of water across the site with the aim of minimising flow concentration. Possible impediments to flow such as roads should either be constructed flat with ground level or constructed of coarse gravel to allow water to flow through. Where bunding and drainage channels are required to direct water away from areas with critical equipment or where chemical or hydrocarbon storage is required, the bank will be pushed up from the back so not as to expose the sodic subsoils to water flows.... All works are to be undertaken in accordance with the EMP."

Comment

Substations require 0.5% AEP immunity (equivalent to Q200) in accordance with the SPP 1/03 Guideline/Appendix 9 (Page 70). The Proponent is requested to confirm that during operation the substation can function effectively during and immediately after in a Q200 event.

It is advised that the Proponent's commitment to the development and implementation of an Emergency Response Plan as part of the Environmental Management Plan is prepared in accordance with the SPP 1/03 Guideline/Appendix 9 (Page 70) and in consultation with the emergency services agencies as recommended below.

Bushfire -

Areas of bushfire risk have been determined by the Queensland Rural Fire Service and are identified on Western Downs Regional Council's Chinchilla Town Planning Scheme Overlay Map 4 *Bushfire Hazard Areas*.

According to section 8.2 (pg.75) –

"The mapping identifies the Project site as occurring within a Low to Medium Bushfire Hazard classified area. An assessment of three main determinants of bushfire hazard severity (vegetation, slope, aspect) was conducted during preliminary site investigations."

Section 8.3 *Potential Impacts* (pg.75-76) states that -

"The prevailing fire regime is unlikely to be significantly altered due to the Project. Although no noticeable change in the local fire regime is expected, the intensity and occurrence of fires may actually be reduced by the presence of the substation, particularly due to vegetation/fuel clearing. The most probable time for a fire to occur is during construction, however the risk of such an event occurring during this phase of the development is considered low."

Fire may potentially arise from construction machinery/equipment as a result of ignition of dry flammable materials on site. Excessive heat generated by machinery/vehicles, sparks, and/or careless disposal of cigarettes and matches pose the highest risk to the Project locale. Flammable matter providing the highest fire risk on site includes stockpiles of mulched/chipped vegetation, dead/dry on-site vegetation, and paper. Fuel, oil and flammable chemicals increase the risk of fire. In accordance with the SPP 1/03, the proposed development, although located within a natural hazard management area (bushfire), it is designed to function effectively during and immediately following bushfire events."

Section 8.4 of the EIS commits to the following mitigation measures to reduce the risk and impact of a fire on the proposed development and surrounding area –

- *A Bushfire Management Plan would be prepared and adhered to;*
- *Materials used for the construction of the substation will be fire resistant in order to reduce the chance of damage the substation;*
- *All mobile construction equipment would be fitted with spark arresters to prevent accidental spark ignition;*
- *Where naked flames are required (e.g. when oxy-acetylene is used) two full fire extinguishers shall be located within 10m of the work face;*
- *All construction sites would have fire extinguishers and first aid officer/s; In the unlikely event of a fire, emergency exit plans would be utilised;*
- *Water trucks will be present, when practicable, on construction sites that are in areas identified as a potential fire risk; and*
- *The relevant emergency services (e.g. Fire Rescue and Ambulance Services) would be notified of the numbers and location of construction personnel and any proposed temporary road closures.*

*All works are to be undertaken in accordance with the EMP (see **Appendix E**).*

Comment

As demonstrated above, the Proponent commits to bushfire hazard analysis to ensure the project site is designed to function effectively during and immediately following bushfire events. The proposed mitigation measures will achieve SPP 1/03 compliance. Thus DCS requires no further information regarding bushfire hazard mitigation in addition to consultation with regional officers from QFRS as recommended below in relation to emergency response.

Landslide -

According to section 5.2 *Topography/Geomorphology* (pg.45) –

*The project site is on a flat elevated plain that falls uniformly from North to South, with an average slope of less than 0.5%. The site at its highest point has an approximate elevation of 336m AHD in the North-East corner, and at its lowest, 325m AHD in the South-East corner. Slopes increase in the South-East corner of the site up to 2.5%, sloping South-East (see **Figure 5.1**).*

Potential Impacts (5.2.2, pg.46) in relation to landslide are limited to -

"Levelling of the substation platform and associated infrastructure will result in minimal changes to the topography of the Project site as the site is already very flat and will require minimal earthworks."

Section 5.8.3 of the Environmental Management Plan (Appendix E, pg.34) state that -

"Due to the flat nature of the site no areas have been identified which would be subject to landslip or mass slope movements."

Comment

As demonstrated above, the EIS commits to geotechnical investigations for the subject site and asserts the substation will not be subject to landslide hazard. DCS requires no further information regarding landslide hazard in addition to consultation with regional officers from QFRS as recommended below in relation to emergency response.

Emergency Response Planning

The proposed Emergency Response Plan as part of the EMP should be prepared in consultation with the regional offices of Queensland Fire and Rescue Service, Queensland Ambulance Service, and Emergency Management Queensland.

Appropriate contact details are attached.

Queensland Fire and Rescue Service (QFRS)**QFRS State Community Safety Unit –**

The Queensland Fire and Rescue Service (QFRS) has a legislative jurisdiction to provide input into the design of a building or a structure's fire safety systems as an advice agency. The advice provided by QFRS must be in accordance with the *Integrated Planning Regulation 1998 – Schedule 2 – Table 1; Building work assessable against the Building Act 1975*

QFRS understands that the approval for the Western Downs Substation project will be under the *Integrated Planning Act 1997*

Therefore, the QFRS seeks formal engagement from the "Authority Having Jurisdiction" (AHJ) or the relevant Assessment Manager for the project clearly defining the roles and responsibilities of the QFRS in the project development process. The formal engagement should also clarify;

- Above ground buildings and or special structures will be assessed as assessable development and self-assessable development in accordance with the *Integrated Planning Act (IPA) 1997* Schedule 8 and development that is exempt from assessment against a planning scheme as per *IPA 1997*.

In addition, the QFRS seeks formal engagement (in the form of a Memorandum of Understanding) from the AHJ or the relevant Assessment Manager for the project clearly defining the roles and responsibilities of the QFRS in the hazard and risk process coordination for the project as stated in:

- Section 8 – Fire and;
- Section 9 – Waste Management

QFRS have been involved with the development of power stations across the south western region of Queensland providing operational response advice right from the pre construction phase.

Early consultation with the QFRS, in relation to the design concept and development of the substation is required to ensure building compliance and access for emergency response vehicles in the event of an incident.

Consultation with emergency service agents is required to assist in the development of emergency procedures for the substation

Emergency Management Queensland (EMQ)

EMQ concerns relating to all development proposals throughout the Surat Basin region are in relation to the impact such developments may have on existing emergency services. Many of the local emergency services are volunteer based and are used to dealing with minor incidents, generally with limited resources. Increased population (work / construction crews), increased road traffic and transportation requirements have the potential to place a significant burden on local services.

EMQ requests that Local Government and the local Emergency Services be kept fully informed of proposed developments and timeframes. An Emergency Response Plan should also be produced as part of the development process.

Reference: 12563/09

Department of
Primary Industries and Fisheries

9 DEC 2009

Mr David Carberry
Principal – Environment
Conics (Brisbane) Pty Ltd
PO Box 1185
Toowoomba Qld 4350

Dear Mr Carberry

**Western Downs Substation and Western Downs to Halys 275kV High
Voltage Transmission Line Project Environmental Impact Statement**

Thank you for your letter of 20 November 2009 concerning the release of the draft Environmental Impact Statement (EIS) for the Western Downs Substation. A response to the EIS will cover issues with regards to fisheries, biosecurity, and agriculture, and will be sent to the project email address by the due date of 18 December 2009.

If you require any further information regarding this matter, please do not hesitate to contact Mr Michael Ross on telephone 07 3247 5545 or email michael.ross@deedi.qld.gov.au.

Yours sincerely



Robert Setter
Associate Director-General
Queensland Primary Industries and Fisheries
Department of Employment, Economic Development and Innovation

Received 18th December 2009

Western Downs Substation EIS

Queensland Primary Industries and Fisheries (Department of Employment,
Economic Development and Innovation)

These comments were prepared with input from the following QPIF (DEEDI)
Staff:

Name	Position	Location	Phone	Email
Jane Morton	Senior Project Officer (Biosecurity Qld)	Brisbane, Mineral House	07 3247 5552	jane.morton@deedi.qld.gov.au
Dan Mayer	Manager, Planning and Assessment	Southern Fisheries Centre, Deception Bay	07 3817 9505	dan.mayer@deedi.qld.gov.au
Michael Ross (Coordinator)	Policy Officer (Strategic Directions)	Brisbane (PIB)	07 3247 5545	michael.ross@deedi.qld.gov.au

Biosecurity Queensland

The Western Downs Substation IPA project Environmental Impact Statement provides comprehensive mitigation information on biosecurity risk associated with the project. The use of Powerlink's Biosecurity Management - pest and pathogen control measures and vehicle and equipment clean down procedures in the EMP is very beneficial to reduce potential biosecurity risks associated with the project.

Fisheries Queensland

The following comments pertain to the *Powerlink Western Downs Substation* draft Environmental Impact Statement. Fisheries Queensland advises that a site inspection has not been conducted for the purpose of this response. Comments outlined below have been compiled on the basis of submitted information.

Background

Powerlink Queensland is proposing to construct the new Western Downs, 275kV/500kV electrical substation within the Kogan District of the Western Downs Regional Council. The proposed project site is located on Banana Bridge Rd, Hopelands, in close proximity to the Kogan Creek Power Station. The initial stage of the development, covered by this EIS, involves the construction of the switchyard and connection of the facility to the Braemar to Kogan Creek 275kV transmission line.

The proposed project site is located approximately 140km north-west of Toowoomba, on land formerly used for grazing. No wetlands or permanent waterbodies occur within the proposed site boundaries. The EIS identified five vegetation communities

likely to be affected by the proposed development. These vegetation communities consist only of terrestrial vegetation.

The EIS briefly refers to a new transmission line to connect the proposed Western Downs Substation to the proposed Halys Substation in the Tarong Region. This portion of the project, including investigation of potential alignments will be conducted as a separate study from the current Western Downs Substation assessment.

Current Correspondence

The current correspondence is the draft Environmental Impact Statement *Powerlink Western Downs Substation* (Conics, 2009).

Specific Comments

Please be advised that the basis of Fisheries Queensland's comments lie within the jurisdiction of the *Fisheries Act 1994*, and that a site inspection was not undertaken for the purposes of these comments.

Fisheries Queensland's interest is the management and protection of the fisheries value of any *aquatic features* within or adjacent to the development site and the capacity of the proposal to impact upon fisheries productivity, fish habitat and fish migration paths.

The EIS indicates that no waterways, or other fisheries values, will be impacted by the proposed substation construction. As such, Fisheries Queensland has no objection to the proposed project. However, Fisheries Queensland provides the following comment:

Section	Describe the issue	Suggested solution
4.2.16 Water Act 2000 and Table 4-4 Licence Permit & Approval that May be Required	The EIS states that, as Powerlink Queensland is identified as an 'Entity' under the DERM 'Guideline – Activities in a watercourse, lake or spring', a permit is not required for activities within a watercourse where the guidelines are met.	Fisheries Queensland advises that any works undertaken within a watercourse that may constitute a waterway barrier (e.g. filling of a watercourse or waterway crossings) will require assessment under the <i>Fisheries Act 1994</i> . An operational works permit for waterway barrier works would likely be required should any works be undertaken within a watercourse.

CONFIRMATION OF EMAIL.

Author: Cath de Voil
File/Ref number: T00/310/134(0009); NM1109TOR0017
Directorate/Unit: Catchment and Regional Planning
Phone: (07) 4688 1065



Department of
**Environment and Resource
Management**

18 December 2009

The Project Manager – Western Downs Conics
PO Box 1185
Toowoomba QLD 4350

Dear Sir/Madam

**RE: Draft Environmental Impact Assessment Powerlink Western
Downs Substation Project**

I refer to your letter of 2 November 2009 inviting comments on the Draft Environmental Impact Assessment for this project.

On the whole this report is very comprehensive, detailed, and succinct. The report is written in a remarkably comfortable, smooth and flowing style, and therefore makes for an 'easy' read.

Please find attached the Department of Environment and Resource Management's (DERM) detailed comments on the draft Terms of reference for this project.

If you have any queries or require clarification in relation to the attached comments please contact Mr Barry Stone on 07 4688 1063.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Cath de Voil", written in a cursive style.

Cath de Voil
A/ Senior Natural Resource Officer
Regional Planning & Assessment
Toowoomba

Attachment 1:
DERM Comments on the Draft EIS Western Downs Substation Project

**Comments on the Draft EIS - Western Downs Substation—
Department of Environment and Resource Management**

Issue: Development footprint

Clarification is required on the actual area impacted by the proposed development. Total area of the subject lots is 218.8 ha. Section 5.3.1.2, (p50) refers to the intention to apply gypsum to the construction site area of 70 ha to ameliorate sodic soil constraints. Management of the balance area is unclear.

Recommendation

Provide a suitably scaled map that depicts the footprint of the development including construction earth pads, lay-down areas, storage facilities, firebreak and vegetation buffers, and other planned infrastructure.

Provide details on management of the balance area of land outside the substation facility, including fire and weed and pest management measures.

Issue: Vegetation Buffers

There are inconsistencies between the levels of commitment to vegetation buffering. On Page 9 (Landscape Character and Visual Amenity) it is stated ... *"With the establishment of woodland buffers to the south and west of the site, the permanent facility will have no long-term visual impacts regionally and will have no significant long-term visual impacts locally."*

While on Page 21 (3.3.1.1 Vegetation Clearing) ... *"Revegetation of areas outside the substation footprint will be a consideration to reduce the visual amenity of the site from a nearby residence to the west."*

Revegetation of disturbed areas outside of the substation site will help buffer the neighbouring farm land from the substation and aid in the continued use of the area for agricultural purposes.

Recommendation

Vegetation buffers should be established on all disturbed areas outside of the substation site.

Issue: Vegetation Clearing, Sect 3.3.1.1, p21

A. The proponent indicates that *".... revegetation of areas outside the substation footprint will be a consideration to reduce visual amenity of the site from a nearby residence to the west."*

It is suggested that enrichment plantings for vegetation buffers not only match existing site species, but an attempt be made to source species of local provenance in order to protect biodiversity values within the area.

Recommendation

For plantings of vegetation buffers the proponent uses species of local provenance.

B. The EIS states: *"... cleared material will be stacked for later disposal by burning or chipping".*
Burning of vegetation is not a preferred option.

Recommendation

That chipping or mulching is used for disposal of cleared vegetation and this used on disturbed areas to minimise erosion and reduce weed growth.

Issue: Water source for concrete plant, Section 3.3.1.2, Civil Works, p22

The EIS states: "Supply of concrete for the foundations will be from a local commercial batching plant, or a plant established specifically for this project." No information is provided on the source of water if such a plant is constructed.

Recommendation

That water requirements and source of the water for the project be identified.

The proponent ensures that the relevant approvals are obtained for the concreting plant.

Issue: Aboriginal Cultural Heritage Act 2003, Sect 4.2.1, p27

The EIS acknowledges that the Powerlink is developing a Cultural Heritage Management Plan (CHMP) apart from the EIS. The EIS should recognise the Cultural Heritage duty of care guidelines to ensure the full environmental and social impact of the project can be considered.

Recommendation

The EIS recognise the development will cause additional surface disturbance (Category 5 – Duty of Care Guidelines) and therefore the activity has the potential to impact relevant Aboriginal Cultural Heritage that may exist on the site. Thus a CHMP is being developed.

Issue: Electricity Act 1994, Sect 4.2.2, p28

The EIS correctly identifies that once the proposed operating works have been designated as "community infrastructure" via the *Integrated Planning Act 1997*, the clearing of native vegetation for establishment of the works becomes an exempt activity via IPA Schedule 8 and Section 112A of the *Electricity Act 1994*.

In this case, the remnant vegetation located within the substation site has little unique value other than the provision of general habitat and connectivity in what is already a highly fragmented landscape. The regional ecosystems that occur on the site are *Least Concern* systems and as such it is unlikely that the proposed clearing would trigger any offset requirements during a normal code assessment scenario.

It is noted that DERM offered no objection to the designation of the Springdale to Halys Transmission Line project and did not require the provision of vegetation offsets for the clearing of vegetation that had significant unique qualities compared with this current proposal.

Recommendation

The proponent ensures that any clearing is limited to the extent that is necessary for the operating works.

Issue: Land Title Act 1994, Sect 4.2.7, p35

This section should refer to the *Land Act 1994* not the *Land Title Act*. Details within the section are incorrect and should be clarified as below.

Recommendation

Amend this section to read as follows:

"The Land Act 1994 provides a framework for the administration and management of non-freehold land and deeds of grant in trust and the creation of freehold land, and for related purposes. Under Chapter 4, Part 4 of the Act, a permit to occupy may be required from the chief executive of the Department of Environment & Resource Management (DERM) where

the proposed alignment is developed on unallocated State land, a reserve or a road. However, Sections 101 and 102 of the Electricity Act 1994 provide exemptions to the Land Act 1994 allowing electricity entities to undertake necessary actions on roads and publicly controlled places such as Unallocated State Land (USL)."

Issue: Water requirements for the project, Application of the Water Act 2000, Sect. 4.2.16, p40

Although the EIS makes reference of the need to obtain a permit to take water, no details are provided on the water that may be required for the project, such as for concrete batching, dust suppression (other than mentioning "recycled water" may be used), or potable water supplies. No details are provided on the source of any water that may be required.

The EIS also refers to the need for water supplies to establish and maintain revegetated disturbed areas — see Sections 5.1 Land; 10.4.3, Habitat Rehabilitation; and various sections in the EMP. The source, quantity and quality of water required for these purpose and for revegetation for erosion control should be provided in detail. Allowance should be considered for on-going water supply needs post-construction, and operational maintenance purposes until the requirements for adequate rehabilitation/revegetation have been met.

Recommendation

The EIS should detail the water requirements for the project, including the source, quantity and quality of this water.

Include "Water Supply Permits" in Table 4.4, (p44) under the Water Act 2000 row for State Legislation.

The security or reliability of the water source should be detailed and alternative sources identified, if required, to ensure the continual availability of water until such time that the revegetated ground cover meets the criteria detailed in the EMP. The EMP should prescribe guidelines for the quality of water used for the purpose of watering revegetated areas.

Issue: Depth of Soil Sampling, Sect 5.3.1.2, Soils pp48-50

Table 5.2, p49, of the EIS indicates that soil sampling has been only to a depth of 30 and 40 cm. The depth of soil sampling should be at least to the depth of the proposed disturbance of the project to enable accurate assessment of the soil that may be exposed during construction, and to inform remedial action such as application of gypsum. Table 5.2 identifies the maximum depth of sampling, however it is unclear what will be the maximum depth of excavation.

Recommendation

Soils should be reassessed to the depth of the proposed excavation/disturbance and, if necessary, appropriate mitigation measures be redefined.

Issue: Application of gypsum, Section 5.3.1.2, Soils p50

The EIS infers the whole 70 ha area to be developed will be treated with gypsum mitigate the effects of the sodic subsoils. Rather than applying gypsum to the entire 70ha site before construction begins it may be more effective to treat the unstable soils that have been left exposed following the construction.

Recommendation

Prior to revegetation of disturbed areas Gypsum should be applied to unstable soils that have been left exposed.

Issue: Soil Erosion Mitigation Measures, Sect. 5.3.3.1, pp55-56

The EIS proposes two activities to address erosion issues.

Firstly, construction works will include measures that limit the exposure of sodic subsoils. This will include the method of constructing banks/channels to direct runoff water away specialised facilities and storage areas. Such banks may also be effective in directing runoff water away from areas where surface soils have been disturbed. Water flowing over such disturbed areas may lead to an increase in erosion.

Secondly, deep ripping is proposed to repair existing eroded areas. DERM advises that deep ripping is not recommended for lands where sodic subsoils occur and where the land condition is such that an increase in the subsurface hydraulic gradient can lead to tunnel erosion. That is, deep ripping may exacerbate the erosion risk.

Recommendation

That specially constructed drainage banks/channels be implemented to direct water away from disturbed areas.

That deep ripping is not carried out in areas prone to tunnel erosion.

Issue: Source of recycled water for dust suppression, Sect. 6.3.1, Air Quality, p68

This section of the EIS proposes the use of recycled water during construction works to minimise dust originating from traffic movement on access roads, bulk earthworks and other activities. No details are provided on the source, or quality, of this water or measures to ensure this activity does not cause environmental harm.

Recommendation

Provide details on the sources of all water proposed for the project, including water quality and measures proposed to mitigate any risks to land and water resources.

Issue: Disposal of excess Spoil Section 9.2.1, Solid Waste Disposal p78-79

It is noted that the proposed waste management strategy allows for excess spoil to be stockpiled on site for reuse during landscaping and rehabilitation works. Care should be taken to ensure sodic subsoils left exposed do not adversely affect the success of the rehabilitation program. Also, clarification is required on likelihood of a having sodic subsoils surplus to rehabilitation requirements, and if so, the method of disposal of any surplus.

Recommendation

Provide details to ensure excess sodic soils will not be left exposed during the landscaping and rehabilitation activities, and the intentions of managing any surplus subsoil material, if any.

Issue: Septic tank requirements, Sect. 9.2.2, Liquid waste, p79

The waste management strategy for sewerage identifies the possibility of an appropriate treatment facility/septic tank being used to process sewerage during the construction phase. DERM requires information on the expected capacity of such facilities to determine whether an Environmentally Relevant Activity (ERA) approval is necessary.

Recommendation

Determine anticipated numbers of people for which a sewerage treatment facility may be required during the construction phase, and if necessary make an application for an appropriate Environmentally Relevant Activity (ERA).

Issue: Storage of fuel and chemicals Section 9.2.2, Liquid waste, p79

No details are provided on the amount and type of fuel and chemicals that will be stored on site. Such information is required to determine applications for Environmentally Relevant Activities (ERAs) for the site development.

Recommendation

Determine the amount and type of fuels and chemicals to be stored on-site to make application for any applicable Environmentally Relevant Activities (ERAs).

Issue: Rehabilitation Management Plan, Sect. 10.4.3, Habitat Rehabilitation, page 97

This section refers to the need to prepare a Rehabilitation Management Plan to include details on the treatments of revegetation, weed control and monitoring of these areas. A draft Plan should include the timing and intervals for monitoring weed

Recommendation

This Rehabilitation Management Plan should be included in the EIS or at least a date should be given for the completion of this Rehabilitation Management Plan. This Plan should include the timing and intervals for monitoring weed growth, the control treatments and success of controls used, for both construction and operational phases of the development.

Issue: Vegetation Clearing, Sect. 15.2.2, Visual Amenity Mitigation Measures, p135

This section outlines the following as one mitigation measures: *"Minimise the removal of existing woodland vegetation outside of the immediate construction site area"*.

DERM strongly supports this statement, particularly with respect to a project being established within a highly fragmented landscape. The exemption for the clearing of vegetation for this project relates to what is necessary for construction of the operating works, therefore any removal of vegetation that is located outside of the construction site area would require approval, unless otherwise made exempt via provisions within the *Integrated Planning Act 1997*, Schedule 8.

Once built, the clearing of a fire break around the infrastructure is exempt activity via IPA Schedule 8. The proponent is advised that the firebreak distance is twenty (20) metres or 1.5 times the height of the tallest vegetation adjacent to the infrastructure. Given that the proponent has identified 15 metres as being the upper height limit for vegetation at the site, a firebreak should not exceed approximately 23 metres in width.

The proponent has identified that bushfire hazard on the project site is deemed low to medium, therefore justification would be required should the proponent wish to establish a fire break distance that exceeds those outlined above. This is particularly important given the already fragmented nature of the vegetation within the locality.

Recommendation

That clearing is limited to the extent that is necessary for the operating works. To prevent excessive clearing within a fragmented landscape, the clearing of a firebreak around the operating works should conform to the provisions of "essential management" as defined within the Integrated Planning Act 1997.

Environmental Management Plan

Issue: Burning cleared vegetation, EMP Section 5.1.4, Construction Phase, Implementation Strategy, page 22

The last dot point of this section states: *"Cleared vegetation should be left in-situ (e.g. where appropriate to assist revegetation or erosion control), mulched and/or removed. If burning of cleared vegetation is planned, no burning is to occur unless permitted by the local fire warden. Permits for vegetation burning must be obtained and provided to the Powerlink Construction Manager/PEA prior to the burn. All conditions of any permit must be adhered to."* It is not clear under what conditions cleared vegetation will be left in-situ, mulched and/or removed, or when burning of cleared vegetation will be planned. DERM advises that burning is not a preferred option, and that preference be given to using mulched vegetation material for erosion control and/or revegetation purposes.

Recommendation

Provide details on the conditions cleared vegetation will be left in-situ (e.g. where appropriate to assist revegetation or erosion control), mulched and/or removed, or when burning of cleared vegetation will be anticipated.

Issue: Dewatering Construction Site, EMP Erosion and Sediment Control, Sect. 5.8.4, Construction Phase, Implementation Strategy, pp35-36

This section recognises the potential need for a dewatering plan for rainwater filled excavations, and for such a plan to consider the receiving environment and quality and quantity of water. The process of deriving water quality trigger values and necessary monitoring requirements for the Project site and downstream receiving environments is not provided. To inform the design of any proposed monitoring programs reference may be made to the *Queensland Water Quality Guidelines (2009)*, and *Monitoring and Sample Manual 2009 Environmental Protection (Water) Policy 2009*.

Recommendation

The EMP to include consideration of the quality and quantity of water released from the site, options for pre-treatment and the derivation of trigger values; and these details to form part of the dewatering plan, or work procedure, to be provided to DERM.

Issue: Aquatic Fauna, EMP Sect. 5.9.2, Construction activities Performance Requirements, p38

The EIS notes the existence of four farm dams, two of which are located outside the development site. One other is to be retained as retention basin to trap sediment from the site — see EIS Section 7.4.2, Hydrology, Water Quality Mitigation Measures p74. The fourth dam is to be filled being within the construction footprint — EIS Section 10.3.1, Fauna Potential Construction Impacts.

The EMP does not include provision for the removal of aquatic fauna prior to dewatering of farm dams.

Recommendation:

Include the measures proposed to remove aquatic fauna from the farm dams, including identification of suitable habitat for relocation. This should include permit requirements and certification/authority of personnel contracted; and provision for the quantitative monitoring of quality of surface water that is habitat for aquatic fauna.



**Queensland
Government**

Your reference: PR23495
Our reference: COM 08918-2009

Department of
Communities

Office of the
Director-General

04 JAN 2010

Mr David Carberry
Principal - Environment
Conics
PO Box 1185
TOOWOOMBA QLD 4350

Dear Mr Carberry

Thank you for your letter of 20 November 2009 concerning the Western Downs Substation Project.

The Department of Communities recognises that this project will address the requirement for a secure and reliable power network for southern Queensland. However, the department is particularly interested in how consideration will be given by the project to identify and consult with the Traditional Owners of the area (Section 17.2).

Population figures quoted in the Environmental Impact Statement report should be reviewed to ensure that the latest FTE estimations are used with reference to the Surat Population Report produced by the Department of Infrastructure and Planning (refer Section 12.1.1). The project also presents an opportunity for the proponents to potentially provide additional employment and recruitment for members of the community. The department recommends some consideration be given to employment strategies for Indigenous and disadvantaged groups, specifically young people, people with disabilities and people from culturally and linguistically diverse backgrounds.

If you require any further information or assistance in relation to this matter, please contact Mr Bradley Saunders, Regional Director, Sport and Recreation and Community Participation, Department of Communities on 4699 4205.

Yours sincerely

Bette Kill
Acting Director-General

13th Floor 111 George Street
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Queensland 4001 Australia

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11 January 2010

The Project Manager – Western Downs Conics
Conics (Brisbane) Pty Ltd
Suite 1 Capital Place
195 Hume Street
TOOWOOMBA QLD 4350

Attn: David Carberry

RE: EIS FOR PROPOSED WESTERN DOWNS SUBSTATION PROJECT

Dear David

Thank you for the opportunity to comment on the EIS for the Western Downs Substation and Halys 275kV Transmission Line Project.

Having reviewed the EIS document and the proposed transmission line route, it is unlikely that the project will have any effects on Linc Energy's Chinchilla project or the prospectivity of the exploration permit underlying the proposed transmission line. As such, we have no submissions to make.

Thank you once again for the opportunity to comment.

Yours sincerely



Matthew Buchanan
Manager – Environmental Affairs

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Our ref: DG13828

Your ref: PR23495

11 DEC 2009

Mr David Carberry
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Toowoomba Qld 4350

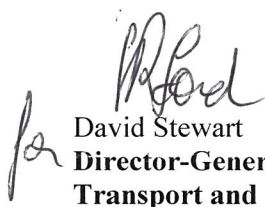
Dear Mr Carberry

Thank you for your letter of 20 November 2009 about the draft Environmental Impact Statement (EIS) for the future Western Downs Substation near Kogan.

Officers from the Department of Transport and Main Roads in Toowoomba have previously been consulted about this project. We currently have processes in place to make submissions regarding traffic impacts and mitigations and will do so as appropriate.

If you require any further information, please contact Mr Harvey Campbell, Principal Advisor (Integrated Planning and Development), in Toowoomba on 4639 0887. Mr Campbell will be pleased to assist.

Yours sincerely



David Stewart
Director-General
Transport and Main Roads



24 November 2009

Network Integrity

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Proposed Western Downs Substation Project

Dear David,

Thank you for the Draft Report of the Western Downs Substation Project; your Ref PR23495. A preliminary examination indicates that Telstra has assets in the vicinity of Lots 3 and 4 of RP176346 as indicated on the attached sketch plan.

The substation development could impact adversely on the Telstra assets by: -

- Physical damage during construction activities
- Low Frequency Induction (LFI) during earth faults on connected transmission lines
- Earth Potential Rise (EPR) surrounding the earth mat and nearby tower foundations.

When available; the area and perimeter of the earth mat/s, ohmic resistance, and value of earth fault currents are required to determine the value and extent of the EPR during fault conditions. It is likely that joint current injection tests will be required to measure the actual values of EPR.

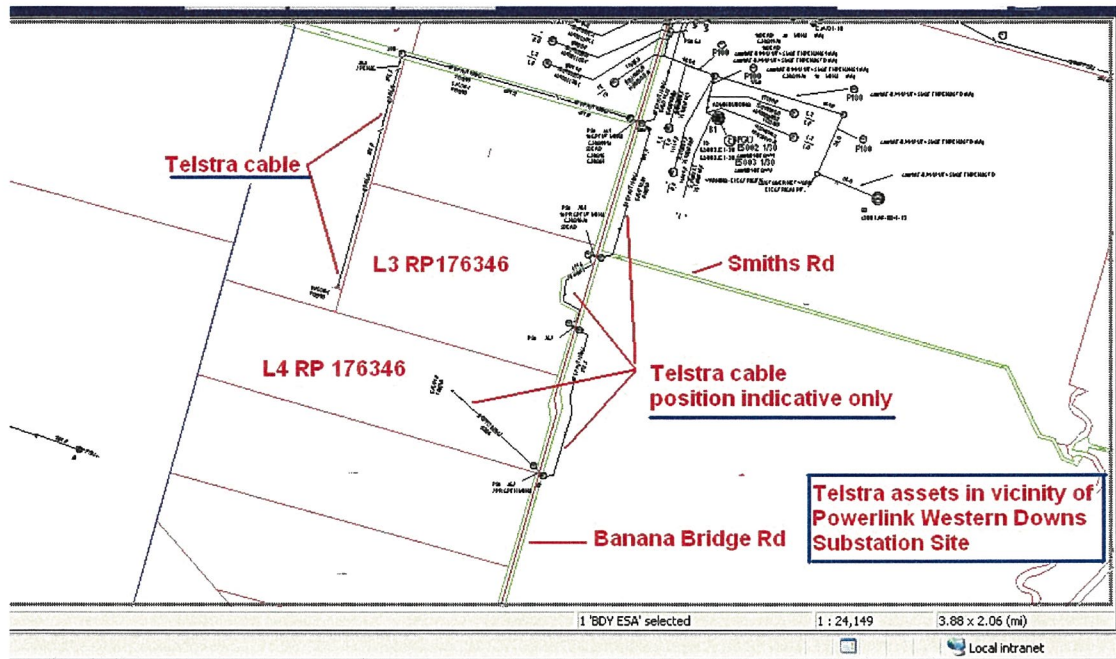
If a Telstra connected telephone service is required for the substation or construction crews, early planning of the location of the control building, and also contractor huts is recommended.

Yours sincerely

Mark Kerr
Copper and Protection Management
Telstra Network Integrity

Western Downs Substation Project

Location of Telstra assets in the vicinity

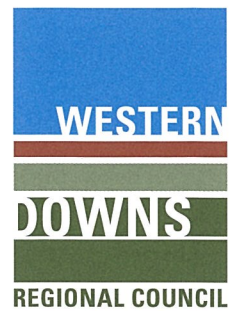


Received 21st December

Customer Service **1300 728 500**

www.wdrc.qld.gov.au

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ENQUIRIES TO:
Jane Holdsworth
P (07) 4672 1103

FILE REF:
10/11/1

DOC NO:
1215976

JH:FMH

15 December 2009

Address all correspondence
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info@wdrc.qld.gov.au

Western Downs Conics
The Project Manager
P O Box 1185
TOOWOOMBA QLD 4350

By Email: westerndowns@conics.com.au

Dear Sir/Madam

RE: POWERLINK WESTERN DOWNS SUBSTATION

The Western Downs Regional Council (WDRC) welcomes the opportunity to respond to the Powerlink Western Downs Substation Environmental Impact Statement (EIS).

In response to the EIS, WDRC raises the following issues of concern for your consideration and action:

1. ROADS:

With the increased number of major projects operating in the region, the volume of traffic has increased significantly. This increase in traffic has placed an unsustainable burden on the local road network, increasing the maintenance costs and the frequency rates that WDRC has had to carry out its road maintenance programs. It is therefore vital that the proponent clearly accounts for any road infrastructure upgrading and maintenance created by the project.

The WDRC requests that if the Coordinator General approves the project, that the approval includes the condition that:

- Powerlink enters into an Infrastructure Agreement to fund any upgrading of roads required for construction vehicles and any additional maintenance required during the construction period;
- Includes two joint asset condition assessments be carried out – one prior to construction traffic using WDRC roads and the second at the completion of the project to determine

whether any additional maintenance is required to restore the road networks to the original condition, with any identifiable works required being at the cost of Powerlink;

- Powerlink enters into a Traffic Management Plan for approval prior to commencement of the construction phase for any temporary road closures and detours and any variations to receive timely approvals;
- That all roads providing access to work camps be constructed to an all weather access standard, with appropriate turning facilities provided from major roads; and
- Powerlink funds a comprehensive traffic impact study to assess the impact of the project, particularly on the local road network.

2. WASHDOWN OF CONSTRUCTION VEHICLES AND EQUIPMENT:

WDRC requires that all vehicles and heavy plant and equipment entering and leaving the construction site within the region be adequately washed down to prevent the spread of noxious weeds.

We would request therefore that the proponent make a contribution to washdown facilities to be located at Chinchilla or other nearby facility.

3. WASTE MANGEMENT

With the increased number of major projects operating in the Region the volume of waste requiring disposal has also increased, quite significantly. This increase in waste production has placed additional and unsustainable strain on a number of the Region's waste disposal facilities.

The WDRC requests that if the Coordinator General approves the project, that the approval include the following conditions:

- a. That prior to the commencement of construction a Waste Management Plan is drafted for Council's review and approval. The Waste Management Plan is to be developed in accordance with relevant Department of Environment and Resource Management guidelines and the waste hierarchy, i.e. avoid, reduce, reuse, and recycle.
- b. Residual, non-regulated wastes are disposed of at approved disposal facilities located at Dalby, Chinchilla, or Tara subject to the payment of applicable fees & charges.
- c. Waste service providers (either in-house or contracted) must hold a current Waste Management Works Approval as per the Environmental Protection Act and subordinate legislation.

4. LOCAL BUSINESS ENGAGEMENT:

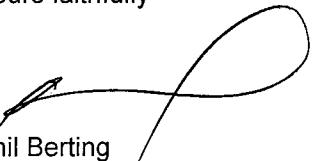
WDRC recognises the many positive economic benefits such as increased employment due to the energy sector activities in the region. However, to maximise the retention of economic benefits that will provide economic resilience and strength to our local business communities, we request, that every endeavour is taken to include local business for the sourcing of supplies and to service any construction accommodation facilities. WDRC therefore requests the proponent provide what measures they will undertake to specifically address how they intend to establish local procurement processes to engage with the local and regional businesses.

CONCLUSION:

In conclusion, the WDRC and community recognise and embrace the benefits to our local communities of the energy resource sector activities in our region; however, we also recognise the negative impacts. As a result, we urge the proponent to collaboratively work together with the Western Downs Regional Council, to minimize the negative impacts the project may have on our local communities and residents.

If you require any further information in regard to this matter, please contact Council's Major Projects and Economic Development Manager, Ms Jane Holdsworth on (07) 4672 1103.

Yours faithfully



Phil Berting
CHIEF EXECUTIVE OFFICER