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OFFICE OF THE MINISTER FOR PLANNING  
AND INFRASTRUCTURE

DEC2417-02

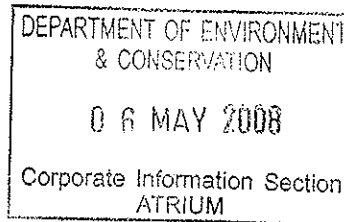
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- 1 MAY 2008

Mr C J Murray  
Acting Director  
Environmental Impact Assessment Division  
Level 8, 168 St Georges Terrace  
PERTH WA 6000

Dear Mr Murray

**Yannarie Solar Salt Farm Proposal (Assessment 1521) Supplementary Information**

I refer to your letter dated 22 February 2008 inviting the Department for Planning and Infrastructure (DPI) to comment on Straits' modified proposal and supplementary reports for the Yannarie Solar Project (Assessment 1512). In addition, the Minister for Planning and Infrastructure, Hon Alannah MacTiernan MLA, has asked me to thank you for your letter of 22 February 2008 regarding the modified proposal. In response to both letters, the following advice and comments are provided for your consideration.

The DPI has considered the modified proposal within the context of the Ningaloo Coast Regional Strategy Carnarvon to Exmouth and State Planning Policy No. 2.6. The DPI's previous advice and comments of 14 March 2007 (refer attachment), provided in response to Straits original Yannarie Solar Project proposal, remain current with regard to the modified proposal.

In summary, the DPI makes the following points:

- The Ningaloo Coast Regional Strategy Carnarvon to Exmouth 2004 (NCRS), adopted by the WAPC and endorsed by Cabinet, identifies relevant areas within Exmouth Gulf as 'Recommended Marine Protected Areas', consistent with the 1994 findings of the Marine Parks and Reserves Selection Working Group. The NCRS explicitly states that development in these areas should be in accordance with the recommendations of this report.
- The proposal does not adequately demonstrate that the impacts of coastal processes - particularly cyclonic storm surge inundation and sea level rise - on the project area have been assessed, nor does it fully explain the implications for development setbacks and the structural integrity of proposed infrastructure.

The modified proposal contains several changes relevant to DPI's concerns about the impacts of coastal processes. For example, the diesel fuel farm at Hope Point has been relocated to higher ground (8-9m AHD) to reduce the risk of fuel spill in extreme weather conditions, and the setback for the crystalliser and concentrator ponds has been increased from 40m to 100m from the landward edge of the algal mat. With regard to the latter, the increase in the setback distance appears to have been motivated by concerns about the impacts on algal mats and mangroves from seepage. However, this setback distance does not appear to be supported with reference to any detailed assessment of coastal processes.

DPI advises that the proponent should be asked to provide the following:

- A detailed assessment of shoreline response to sea level rise over the expected period of operation at the site;
- An assessment of the adequacy of the development setback in terms of severe cyclonic impact, historic shoreline change and potential sea level rise; and
- Evidence that the proposed structural design of the external seawall, and the proposed maintenance of the structure, are adequate to enable it to withstand severe weather events. Modelling should be based on historical cyclonic storm surge data and potential future weather conditions under climate change scenarios.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rob Giles', with a long horizontal flourish extending to the right.

**ROB GILES**  
**CHIEF OF STAFF**

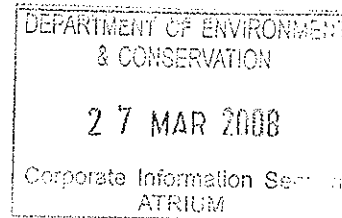


**SCANNED**

Your ref: DEC 3994  
Our ref: NWK3198  
Enquiries: Louise 9144 0214

The Chairman  
Environmental Protection Authority  
Locked Bag 33  
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PERTH WA 6850

ATTENTION: DR SUE OSBORNE



**YANNARIE SOLAR SALT  
SUPPLEMENTARY INFORMATION  
ASSESSMENT 1521**

Thank you for your letter dated 22 February 2008 requesting comment on the supplementary information relating to the proposed Yannarie Solar Salt Farm on the East Coast of the Exmouth Gulf. The Department of Water (DoW) Pilbara Region has reviewed the information and offers the following advice.

*Groundwater Impacts*

The DoW previously raised concerns that natural hydrological processes were not sufficiently understood to allow appropriate assessment on the potential impacts of the project on natural groundwater flows. Following discussions with the DoW, the proponent has undertaken a hydrogeological investigation drilling program. The DoW has made the following assessment of the drilling results provided in the technical report:

- The drilling indicates that the subsurface clay zone extends for 5m or more, is generally above water table and these zones have very low permeability, so there is unlikely to be significant vertical flux of brines.
- No fresh or brackish aquifers were identified in drilling, so there is no freshwater resource to protect for the environment or other users.
- No offshore springs have been located in investigations to date, but these may occur, and may contribute to the specific habitat of the Gulf. There is no evidence either way for project impacts on such springs to be assessed, and the amount of work needed would be very expensive and costly for incomplete information. A desktop risk-assessed judgment of possible impacts could be made, but would be based on little observation, and the DoW sees such an approach as being of limited practical value.

*Surface Water Flow Impacts*

- The reduced project footprint will allow outflows from Rouse Creek and Yannarie River, across the flats to the sea, reducing the impacts on algal mats and mangrove communities and allow more natural hydrology away from the ponds.

- Surface water hydrology around the containment bunds will need active management throughout the life of the project, given cyclonic frequency and predicted climate changes.

*Subterranean Fauna*

- The DoW is satisfied that there is a low impact level in regards to any subterranean ecosystems present. Given the observed highly-saline samples collected during drilling, any likely stygofauna habitat would be below the depth of influence of the changed hydrology.

*Exmouth Gulf East Wetland*

- The proponent has not discussed the value and the impact of the loss of this Nationally Important Wetland. It should be considered as a major asset that will be adversely impacted by the project. The DoW requests that the EPA considers whether the changes to this wetland as a result of the project are consistent with the EPA's principles.

The Department of Water, Pilbara Region has considered the supplementary information and considers the water issues to be manageable. The Department would provide technical advice to the DEC regarding the management of other environmental impacts as requested.

Yours sincerely,



Darryl Abbott  
A/Regional Manager  
Pilbara Region

26 March 2008