PastTraces Heritage Consultants

Aboriginal Cultural Heritage Due Diligence Assessment

Thredbo Sewer Trunk Main Rehabilitation

Report Prepared for Kosciuszko Thredbo Pty Ltd

21 November 2024

Document Control

Revision	Date	Author	Reviewed
V1.0 – Client	18/11/2024	L. O'Brien	Kosciusko Thredbo
V2 – updated with client feedback	21/11/2024	L O'Brien	

Disclaimer

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Restricted Information

Information contained within this report is culturally sensitive and should not be made publically available. The information that is restricted includes (but is not limited to):

- Maps, Mapping Grid Reference Co-ordinates or images for Aboriginal heritage sites, places and objects.
- Location or detailed information regarding places of Aboriginal cultural significance, as expressed or directed by Representative Aboriginal Organisations, Aboriginal elders, or members of the wider Aboriginal community.
- Other culturally appropriate restricted information as advised by Aboriginal representatives and traditional knowledge holders.

Information in the report covered by the above categories should be redacted before being made available to the general public. This information should only be made available to those persons with a just and reasonable need for access.

CONTENTS

EXECUTIVE SUMMARY

Kosciuszko Thredbo Pty Ltd are proposing to rehabilitate the Thredbo Sewer Trunk Main, located within the Thredbo Village. The project area is located on steep middle to lower slopes to the south of the Thredbo River and follows the alignment of the Pipeline path shared use trail. The eastern section is more moderate prior to crossing Friday Drive and terminating at the Wastewater Treatment Plant. Works will remain within the existing infrastructure footprint within the larger Lot 876 DP1243112.

The proposal to reline the sewer trunk main along the pipeline path, will consist of the following works:

Vegetation Trimming

Removal and vegetation trimming to ensure a vegetation free easement generally 3m wide (1.5m either side of the pipeline) is maintained. Vegetation trimming will allow reasonable access to the Pipeline Easement for the rehabilitation of the pipeline and its ongoing maintenance into the future.

Vegetation Removal

This includes the removal of 9 mature Eucalypt species (*Eucalyptus stellulata* and *Eucalyptus pauciflora*) which are currently either growing directly on top of the pipeline or immediately adjacent to a sewer manhole, posing a significant risk of root ingress and subsequent sewer overflow caused by a root ball blockage.

Pipe replacement (section shown in red on Site Plan)

Approximately 50 m of the 1.3 km pipeline requires replacement (refer Site Plan). The works will include:

- Excavation
- Plugging of upstream manhole, setup of temporary sewer bypass network to downstream manhole
- Removal of existing damaged pipeline section
- Installation of new pipe section
- Unplugging of upstream manhole therefore diverting sewer through the new pipeline section
- Backfilling and compaction of excavation
- Site rehabilitation

Pipe relining

The Development will involve re-lining the existing pipeline (approx. 1.3 km long).

The works will include:

- Cleaning the pipeline with high-pressure water jet and root cutter
- Internal CCTV inspection of pipe to ensure no roots/obstructions remain
- Structural relining of 31 manhole lengths x DN 300 sewer main using Interflow's spiral wound PVC Explanda lining system

- Repair and reinstating of 15 existing manholes including benching and joint repairs as required
- Decommission of the remaining 16 existing manholes by lining through the manhole and filling the existing manhole void with stabilised sand
- Final internal CCTV inspection video of finalised works

All ground disturbance works are limited within areas of disturbance from the current pipeline installation. The pipeline and location within Thredbo is shown in Figure 1

This Due Diligence heritage assessment has been undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a) to provide Kosciuszko Thredbo Pty Ltd with information on heritage constraints to inform the development process.

Based on a review of previous reports and an Aboriginal Heritage Information Management Systems (AHIMS) search, no heritage sites and no areas of Potential Archaeological Deposit (PAD) were identified within the project area.

Field survey was undertaken across the project area in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). The field survey covered the pipeline alignment, with particular focus on the trees listed for removal and the degree of previous disturbance.

Ground visibility was high at the time of field survey, due to the majority of the project area being visible due to the presence of the walking trail providing a linear area of exposure. The track and pipeline are placed within moderate to steep gradient terrain on a benched track.

The field survey identified no Aboriginal heritage sites or areas of potential due to the steepness of the landforms, located on low potential landforms and the high degree of previous impacts along the pipeline route.

As a result of the desktop review and field inspection the following recommendations have been developed:

- There are no known heritage sites or areas of PAD within the project area. There are no heritage constraints on the project.
- It is an offence to disturb an Aboriginal site without an AHIP as all Aboriginal objects are protected under the NSW National Parks and Wildlife Act 1974. Should any Aboriginal objects be encountered during works then works must cease and a heritage professional contacted to assess the find. Works may not recommence until cleared by NSW Heritage.
- Further archaeological assessment would be required if the proposal activity extends beyond the area of the current investigation. This would include further field survey.

1 INTRODUCTION

Kosciuszko Thredbo Pty Ltd are proposing to rehabilitate the Thredbo Sewer Trunk Main, located within the Thredbo Village. The project area is located on middle to lower slopes to the south of the Thredbo River and follows the alignment of the Pipeline path shared use trail. Works will remain within the existing infrastructure footprint within the larger Lot 876 DP1243112.

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This includes the removal of 9 mature Eucalypt species (*Eucalyptus stellulata* and *Eucalyptus pauciflora*) which are currently either growing directly on top of the pipeline or immediately adjacent to a sewer manhole, posing a significant risk of root ingress and subsequent sewer overflow caused by a root ball blockage.

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All ground disturbance works are limited within areas of disturbance from the current pipeline installation. The pipeline and location within Thredbo is shown in Figure 1

To assess the potential impacts of the proposed works on Aboriginal heritage this Due Diligence Heritage Assessment has been undertaken.

This Due Diligence heritage assessment has been undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a) to provide Kosciuszko Thredbo Pty Ltd with information on heritage constraints to inform the development process.

1.1 PROJECT OBJECTIVES

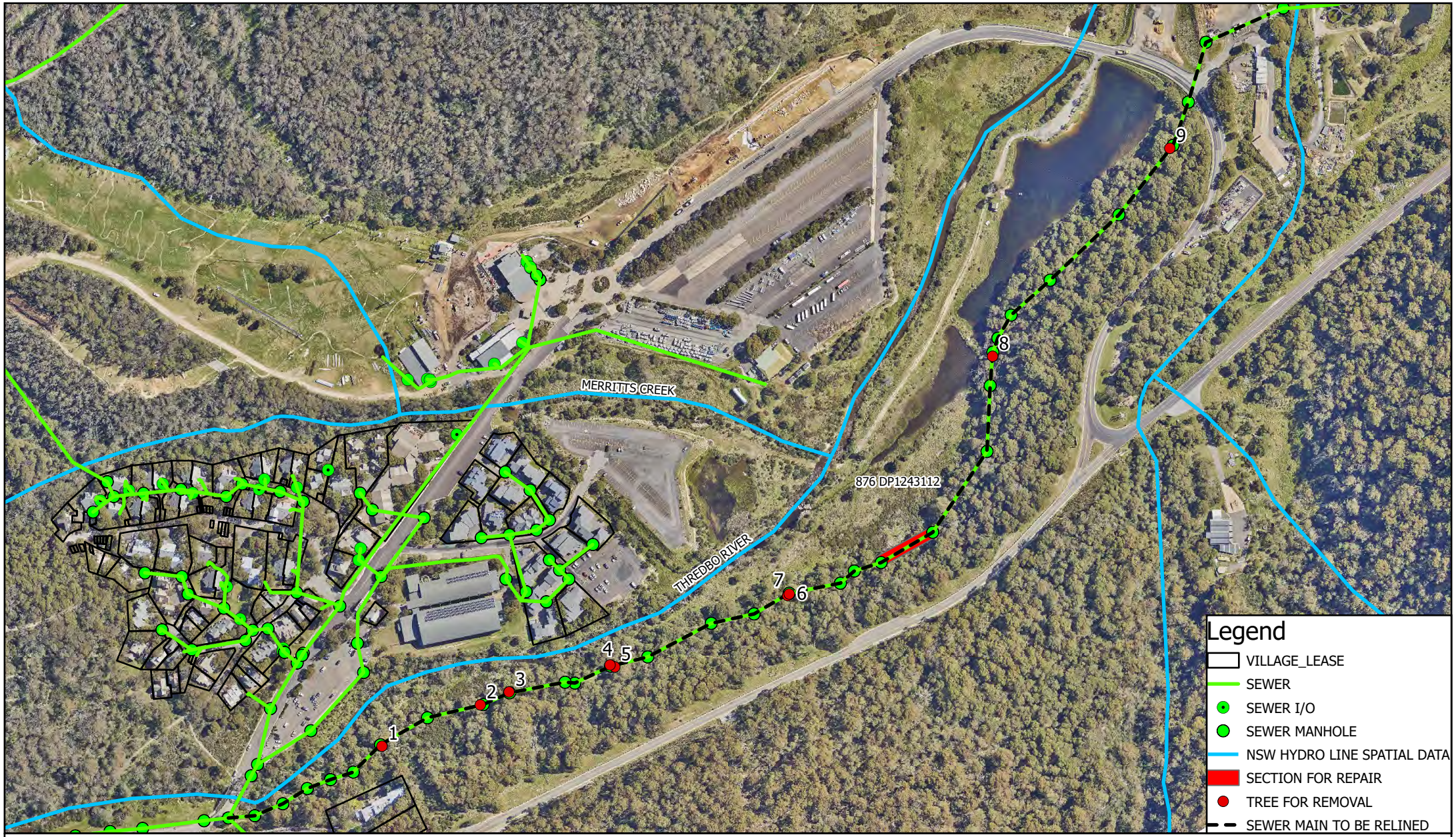
The due diligence assessment is being undertaken to complete the following objectives:

1. Review of the NSW Heritage, Aboriginal Heritage Information Management System (AHIMS), to identify any recorded heritage sites within the project area.
2. Review of previous reports in area to develop predictive model of site location
3. Assess landforms present in project area against predictive model to determine potential for heritage sites and determine level of disturbance
4. Complete site visit to visually inspect impact areas or areas assessed as holding potential based on predictive model and record any identified heritage sites. The site visit will also document levels of disturbance within project area.
5. Complete due diligence report with management recommendations to avoid or minimise impacts within the project area.

1.2 ABORIGINAL CONSULTATION

No consultation with the local Aboriginal community has been undertaken to inform this report. Consultation with the Aboriginal community is not a requirement of the Due Diligence Code of assessment, which is undertaken at the preliminary planning stage of the project.

If the assessment finds that impacts to Aboriginal heritage will occur as a result of the development then consultation will be undertaken with the relevant Local Aboriginal Land Council (LALC) and the wider Aboriginal community, in accordance with the consultation guidelines required by NSW Heritage.



Scale: 1:4,198

0 30 60 120 180 240 Meters

Map Projection: Universal Transverse Mercator
Horizontal Datum: GDA 2020
Grid: GDA 2020 MGA Zone 55

N

THREDBO

SITE PLAN

Project: Thredbo Sewer Trunk Main Rehabilitation

Revision: B

Date: 4/11/2024

Produced By: KOS

2 DESKTOP ASSESSMENT RESULTS

2.1 ABORIGINAL HERITAGE INFORMATION MANAGEMENT SYSTEM (AHIMS) SEARCH

A search of the NSW Heritage AHIMS database was undertaken on the 18 November 2024 covering the approximate 1km surrounding area centred on the project area. The extensive search revealed previously recorded heritage sites (n=22) within the surrounding 1km. Two sites, both isolated finds, are nearby the project area. No previous heritage sites have been located within the Project Area.

The sites located in this 1km area are provided in Table 1 and consist of isolated finds, artefact scatters, and one area of PAD and conform to the wider site predictive model for the Thredbo Valley/Kosciusko area (NOHC 2000, Grinsbergs 2008, Ironbark 2013, OzArk 2021). This model predicts a site location model of small sites located on level ground in proximity to water sources, or on level areas of spur lines, saddles and ridge crests amongst mountainous areas. This predictive model is discussed in more detail in Section 2.2. The location of previously recorded sites within 200m of the project area are shown in Figure 3.

Two sites 61-3-0065 and 61-5-0104 are located 25m and 35m to the alignment respectively. Both of these sites consist of isolated finds in areas of level ground on river flats of midslopes. Neither of these sites will be impacted by the proposed works.

Table 1. AHIMS Site Types

Site Type	Number	Percentage
Isolated find	3	14%
Open camp site	18	82%
PAD	1	5%

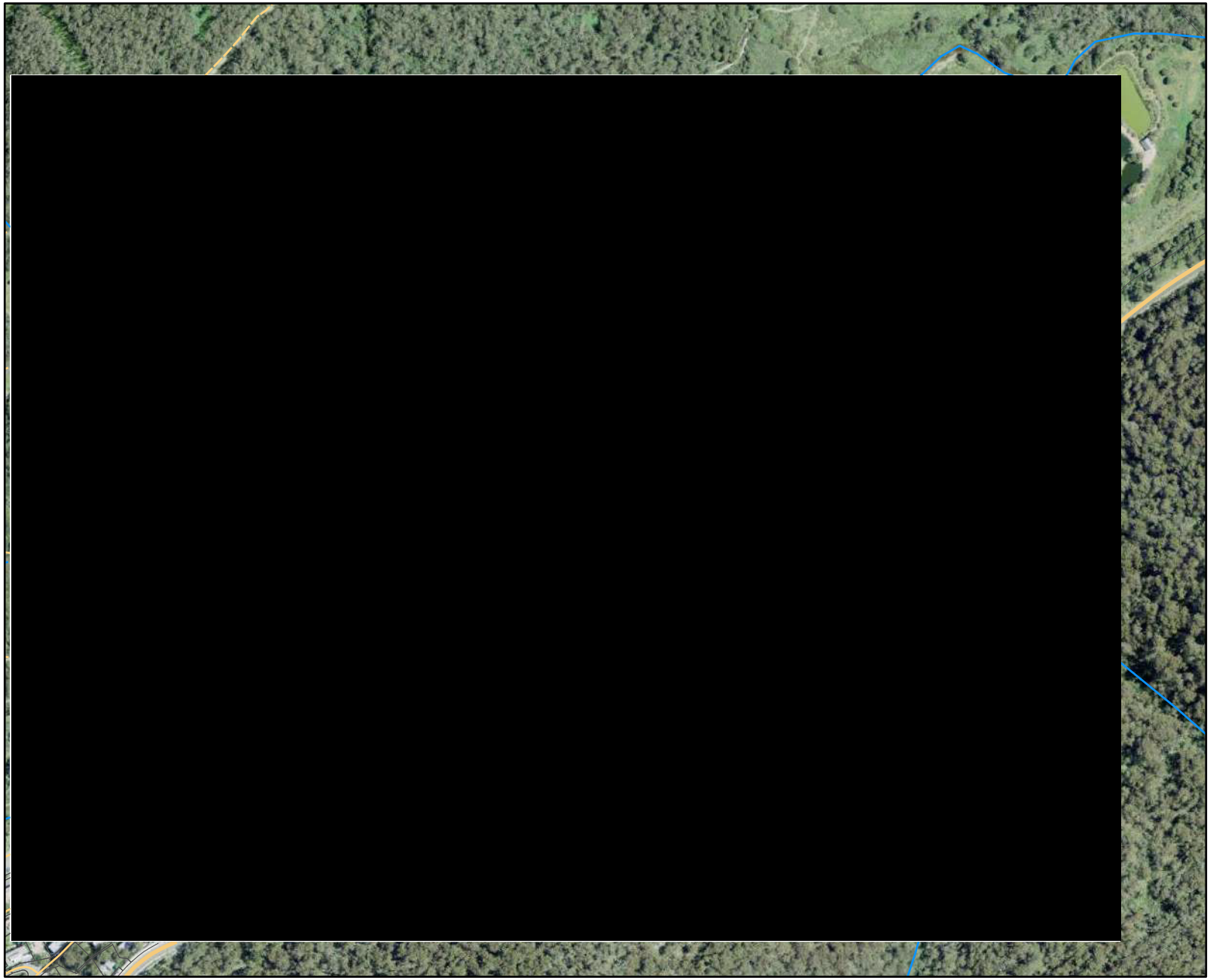


Figure 2: AHIMS

Legend

- Watercourse
- Previously Recorded Site
- 10m Pipeline Buffer
- Cadastre
- Highway
- Major Road
- Minor Road
- Track-Vehicular

N

1:6,000

0 50 100 200

Meters
Coordinate System:
GDA 1994 MGA Zone 55

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2.2 PREVIOUS HERITAGE STUDIES

An extensive number of heritage studies have been undertaken in the immediate area of the Thredbo Valley. These have been mainly small scale and development focused. Studies covering a larger area and generating models of occupation have been undertaken in the Perisher Valley (NOHC 2000) and Thredbo (Ironbark 2013). A review of this large body of work has been undertaken to provide context and site location modelling for the project area. The most relevant reports for the current project are summarised below from this large body of work.

Paton (1985) completed a survey along the Thredbo River valley between the Ranger Station and Dead Horse Gap for the Alpine Way upgrade. This survey covered a range of differing landforms located on site on area of level ground amongst spur line. A locational model of site location on level areas was theorised.

Walkington (1988) completed a survey for a proposed 33kV powerline from Bullocks Flat to Thredbo identifying 11 artefact scatters and two isolated finds. Almost all of the sites found were situated on gently sloping ground such as spurs elevated above the river.

Paton (1988) surveyed the Thredbo Valley for a fibre optic cable route again crossing differing topographies in the area. Paton located a further two site during this assessment which supported his earlier location model.

Fuller (1988) completed a survey of the proposed development areas in Thredbo Village recording seven archaeological sites all consisting of isolated finds or small artefact scatters. The sites were located on level areas on basal and midslopes. Fuller concludes that all of the sites are typical of high-altitude sites in being low-density artefact scatters (1988:7).

Navin and Officer completed two surveys of the Thredbo valley, one for the Alpine Way in 1992 and the other for the Thredbo Alpine Village in 1994. A number of small sites were located, conforming to the site models being isolated finds or small artefact scatters located on level areas or gradual slopes within basal contexts.

Dearling (1997) surveyed a 2 hectare area, for a proposed ski run at Thredbo. He located one site (#61-6-103), which consisted of five artefacts. It was situated on a cleared service road on the crest of a spur in a minor saddle with Merritt's Creek to the south and an unnamed creek to the north. The level location and proximity to creek lines again conform to the modelling for the region. This site is the closest to the current project area but well outside of any area of impact.

NOHC in 2000 completed a large scale and extensive field surveys and subsurface testing of landforms for the Perisher Blue Ski Resort. This study resulted in the development of a site location model which is equally applicable to the Thredbo region as similar topography and landscape features are present. Navin Officer Heritage Consultants concluded that the strongest site determinants were:

- Relatively level, well drained ground
- Shelter from prevailing weather patterns (mainly from the west and northwest)
- Avoidance of cold air drainage contexts

- Preference for terrain which facilitates pedestrian access and through travel
- Proximity to exploitable resources such as open woodland, grassland and herb fields and Bogong moth aestivation sites (2000:41).
- Majority of sites would be small artefact scatters of less than 15 artefacts, found throughout landscape
- Larger sites (minority) would be located on crests of ridges and major spur lines or more commonly on basal valley slopes. The larger sites decreased in artefact density the higher the location from the basal slopes (NOHC 2000:41).

Dibden (2003) completed a survey of proposed upgrade works for Antons and Sponnars T-bars at Thredbo. No sites were found, due to previous disturbance from clearing, land modification for grooming of ski slopes and the fact that the study corridor was located on steep, mid to upper slopes with low archaeological potential (2003:1).

Aecom (Formerly HLA) throughout 2004 and 2005 completed a series of survey and excavations for a proposed works depot at Friday Flat, located on level basal slopes and within a recorded site location (NOHC 1992). The excavations were placed in six differing locations and recovered 99 artefacts.

Grinsbergs (2008) completed a survey for the proposed multi-use trail from Bullocks Flat to Thredbo along the Thredbo Valley floor, which identified 21 sites, comprising 11 artefact scatters, nine isolated artefacts and a grinding groove as well as two areas of potential archaeological deposit. Based on the site locations Grinbergs concludes that general model of site location with sites on level areas in basal contexts and not located on slopes was applicable.

Ironbark Heritage (2013) completed a due diligence assessment for the Thredbo Mountain Bike Trails which included the development of a GIS Slope analysis model. This assessment showed slopes of more than 10 degrees as not being conducive to Aboriginal usage and holding low potential for sites and subsurface deposits. This study included the current project area through which the trail passes.

NGH (2017) completed an Aboriginal heritage due diligence assessment for the Thredbo Mountain Bike Trails covering three new trail locations. The terrain features within the project area were mostly steep slopes, with few potential areas of sensitive landforms. No sites or areas of potential were identified, and the study concluded that the potential for the presence of Aboriginal sites is low due to the level of disturbance associated with previous ski slope work and the general steepness of the terrain.

Past Traces Pty Ltd (2018) completed three heritage assessment for the Thredbo Alpine Resort in regard to the upgrade and redevelopment of the Merritt's Mountain House Restaurant Thredbo NSW, the extension of visitor car park facilities at Friday Flat at Thredbo and the demolition and construction of a new building complex (retail/hospitality) on the site of the Thredboland building. All these three assessments did not locate any Aboriginal heritage sites or areas of Potential Archaeological Deposit (PAD) within the area.

OzArk (2021) completed the regional assessment of the Snowy Mountains Special Activation Precinct (SAP). The assessment area covered 72,211ha of which 330 were surveyed. One of these areas at Thredbo included the eastern portion of the current project area. No sites were identified with a general ranking of low potential based on gradient with moderate to high areas mapped on the eastern end on the flatter river flats close to Thredbo River. These areas will not be impacted by the current works.

Past Traces in 2023 conducted an assessment for the proposed upgrade to the Snowgums Chairlift to provide increased capacity and quality infrastructure. The project area was located predominately within the existing impacted Snowgums Chairlift corridor, at Thredbo, NSW on steep slopes. Based on the models of site location the areas was classified as low potential and this assessment did not identify any new heritage sites or areas of PAD.

2.2.1 Predictive Model

This site prediction model is based on:

- Site distribution in relation to landscape features within the project area
- Consideration of site type and densities likely to be present within the project area
- Slope gradients based on Ironbark (2013) and NOHC (2000).

Table 2 Site Prediction Model

Probability	Site Type	Definition	Landform
Low	Isolated finds and surface scatters of stone artefacts	Stone artefacts ranging from single artefact to high numbers	Elevated level landforms in proximity to water sources – Project area is located on moderate to steep slopes in disturbed areas.
Low	Potential Archaeological Deposits (PADS)	Area considered on landform to hold higher potential for unidentified subsurface deposits	On creek flats or level areas of saddles or crests. Project area confined to slopes – disturbed location
Nil	Culturally Modified Trees (CMTs)	Trees which have been modified by scarring, marking or branch twining	Alpine species not applicable.
Nil	Rock Engravings	Images engraved on flat rock surfaces	Escarpments, rock platforms or rock shelters - not present
Nil	Stone arrangements	Arrangements of stones by human intention, including circles lines or patterns.	Crest lines or large ceremonial areas on creekflats, - not present
Nil	Stone quarries/Ochre sources	Quarry sites where resources have been mined.	Any landform that has not been disturbed – not present

Probability	Site Type	Definition	Landform
Nil	Axe grinding grooves	Grooves in stone caused by the grinding of stone axes	Usually in creek lines, as water is used as abrasive with sand - not present

2.3 LANDFORM AND DISTURBANCE LEVEL ASSESSMENT

The project area consists of moderate to steep terrain descending from middle slopes to lower slopes above the Thredbo River. Based on the predictive model developed by Ironbark (2013) these slopes hold low potential for Aboriginal heritage sites, due to their slope gradient. The current pipeline location and walking trail are heavily disturbed from previous construction, landscaping and ongoing use of the area. This high level of disturbance further reduces heritage potential.

Review of topographic maps and aerial photography show a high level of impact along the existing alignment consisting of vegetation clearance, pipeline installation, water diversion works and ongoing maintenance.

In summary, based on the desktop assessment, the project area is considered to hold low potential for heritage sites. Verification of this finding of low potential and high impact are the main aims of the visual inspection (field survey) of the project area detailed in the following section.

3 FIELD SURVEY RESULTS

A field survey of the project area was undertaken on the 5 November 2024, to verify the findings of the desktop review of landforms and disturbance. The aim of the investigation was to identify heritage objects or places of potential archaeological Deposit (PAD). Based upon the background research, known Aboriginal site patterning, and current aerial photography, the entire length of the pipeline route was inspected.

All surveyed areas and items of interest were recorded on a topographic map of the study area (using a GPS and GDA 94 coordinates), along with levels of visibility, erosion, soil conditions, and evidence of land disturbance.

Ground surface visibility (GSV) is the percentage of ground surface that is visible during the field inspection. GSV increases in areas of exposures such as access roads, cleared areas, mountain bike trails, and along areas of erosion. As a result, surveys undertaken in areas with high exposure rates result in a more effective survey coverage.

The site visit resulted in the following findings.

3.1 SEWER MAIN TRUNK ALIGNMENT

The current pipeline and pipeline walking trail commences at the road head and then proceeds east along the southern bank of Thredbo River along mid slopes with steep gradient slopes. The pipeline and walking trail have been benched into these steep slopes as can be clearly seen in the following plates. Vegetation removal has occurred due to the previous works of pipeline installation and is trimmed to allow for access and recreational use of the track. The pipeline passes under the roadway and then terminates at the wastewater treatment plant located on Friday Drive.

Due to the high level of disturbance and the slope gradient the area of the proposed trail has been assessed as holding low potential. Current infrastructure is present with access points located along the alignment. Each of the nine trees designated for removal were assessed for cultural scarring with none of the trees being of an age or appropriate species. No evidence of any cultural scarring was observed on any of the trees.

As a result of the survey, no heritage sites or areas of potential were identified. Exposures are present along the proposed alignment due to the presence of the walking trail with limited areas of erosion with approximately 80% visibility within them. The general GSV along the trail was considered at 65%.

The conditions at the time of the field survey are shown in plates 1 to 5.

Plate 1. View west along pipeline path, note access point and benching

Plate 2. Example of tree for removal and proximity to access point and underground pipeline

Plate 3. View east along pipeline, note access point and steep gradient slopes

Plate 4. View east tree designated for removal.

Plate 5. Eastern section steep descent to road crossing across flats (under bridge)

Plate 6. Termination point at waste station – approximate location of underground pipeline

3.2 RESULTS - ABORIGINAL HERITAGE SITES

Modelling of landforms within the Thredbo region (NOHC 2000, Ironbark 2013, OzArk 2021) have clearly identified slope gradient as a major determinant of site location. Simple moderate to steep gradient slopes are not conducive to utilisation and are considered to hold low potential. These findings have also been confirmed by the numerous surveys undertaken in the region and listed in Section 2.2. NGH (2017) undertook a large survey for Mountain Bike Trails in the region confirming the earlier modelling.

As a result, the gradients along these alignments do not hold high potential and the locations of current pipeline infrastructure, access points and surrounds have been highly impacted by previous works, benching for access and the walking trail and continued use.

GSV at the time of the field survey was considered to be moderate/high and highly effective for field survey of the alignment.

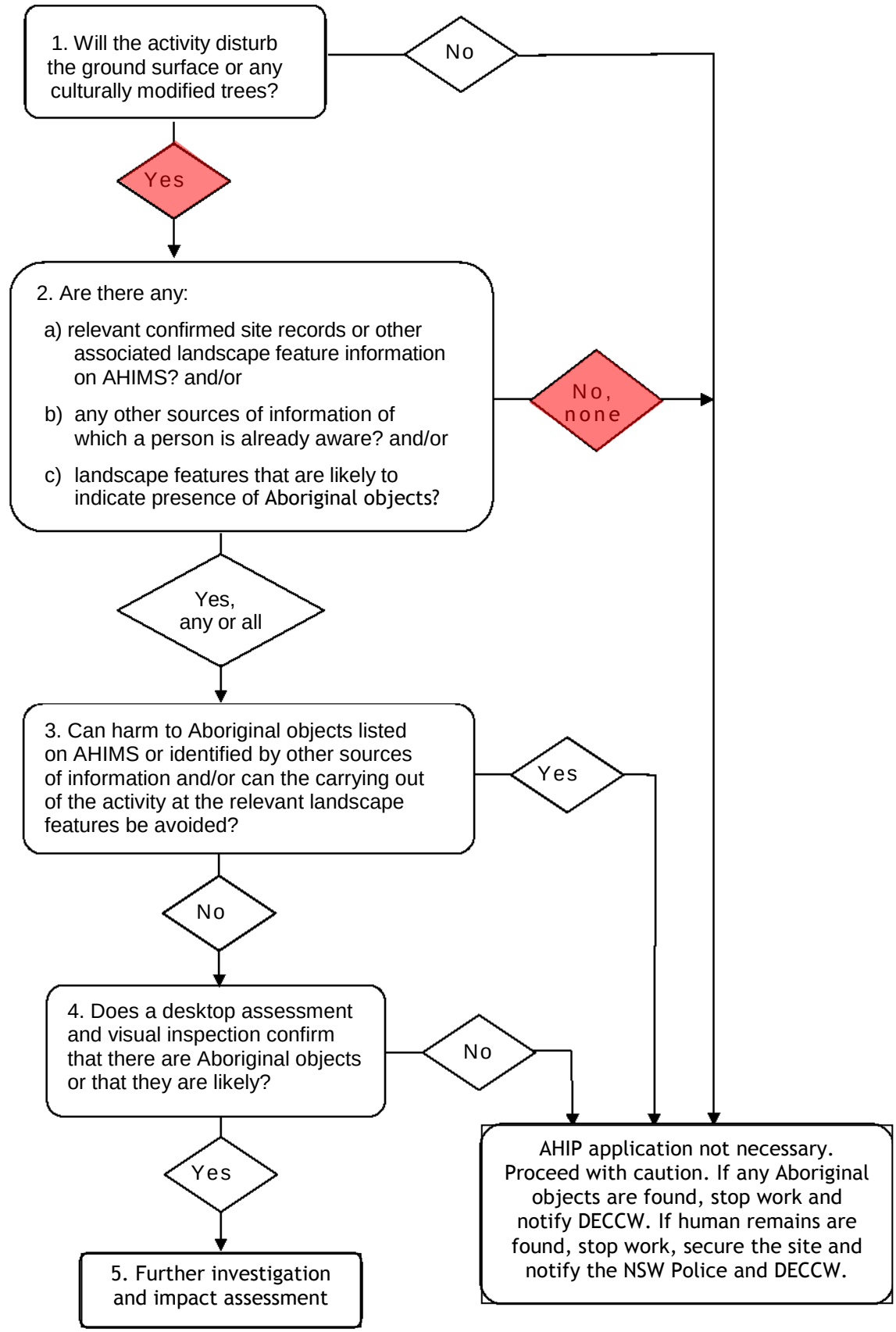
No areas of Aboriginal potential or heritage sites were identified by the field survey and the project is considered to hold low potential to impact on unrecorded Aboriginal heritage sites. The area is also considered to be highly disturbed by the previous installation of the underground pipeline and construction of benching to allow placement and access.

Based on the assessment the impacts from the project are as follows:

- No known Aboriginal objects or places are present in the project area
- No known Historical sites or places are present in the project area.
- No areas of high potential to contain unrecorded Aboriginal or historical objects or places are present in the project area.

The Aboriginal Due Diligence Code provides a flowchart of five questions to identify the presence of and potential harm to Aboriginal heritage. These questions and their applicability to the project are shown in Figure 4. The responses to these questions determine if further heritage investigations are required.

Figure 3. Due Diligence Flow Diagram (OEH 2010:10 – Due Diligence Code of Practice)



4 RECOMMENDATIONS

Based on this due diligence assessment the following actions are recommended for the project:

Recommendation 1: Works to proceed without further heritage assessment with caution.

The proposed works can proceed without further assessment as no Aboriginal or historical heritage sites (objects or places) have been identified within the project area. The potential for impacting on unrecorded heritage sites within the project area is assessed as extremely low, based on landform analysis, high degree of past disturbance and field survey.

Recommendation 2: Discovery of Unidentified Aboriginal cultural material during works.

Under the *NPW Act 1977* all Aboriginal places and objects are protected from harm, even if they have not been previously identified during the assessment process. If Aboriginal material is discovered during works then the steps as outlined below should be followed:

- All work must cease in the vicinity of the find and project manager notified immediately.
- A buffer zone of 10m should be fenced in all direction of the find and construction personnel made aware of the 'no go' zone.
- NSW Heritage must be notified of the find and advice sought on the proper steps to be undertaken.
- After confirmation with NSW Heritage a heritage consultation should be engaged to undertake assessment of the find and provide appropriate management recommendations to the proponent.

Recommendation 3: Alteration of impact footprint

Further archaeological assessment would be required if the proposal activity extends beyond the area of the current investigation.

Implementation of the above management recommendations will result in low potential for the project to impact on heritage values or result in damage to heritage sites.

5 REFERENCES

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A.1 AHIMS SITE SEARCH

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Thredbo Sewer

Client Service ID : 951645

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
[redacted]										

Contact **Recorders** Kerry Navin **Permits**

Report generated by AHIMS Web Service on 18/11/2024 for Lyn O'Brien for the following area at Lot : 876, DP:DP1243112, Section : - with a Buffer of 1000 meters.. Number of Aboriginal sites and Aboriginal objects found is 22

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Thredbo Sewer

Client Service ID : 951645

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
[redacted]										

**** Site Status**

Valid - The site has been recorded and accepted onto the system as valid

Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.

Partially Destroyed - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground

Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 18/11/2024 for Lyn O'Brien for the following area at Lot : 876, DP:DP1243112, Section : - with a Buffer of 1000 meters.. Number of Aboriginal sites and Aboriginal objects found is 22