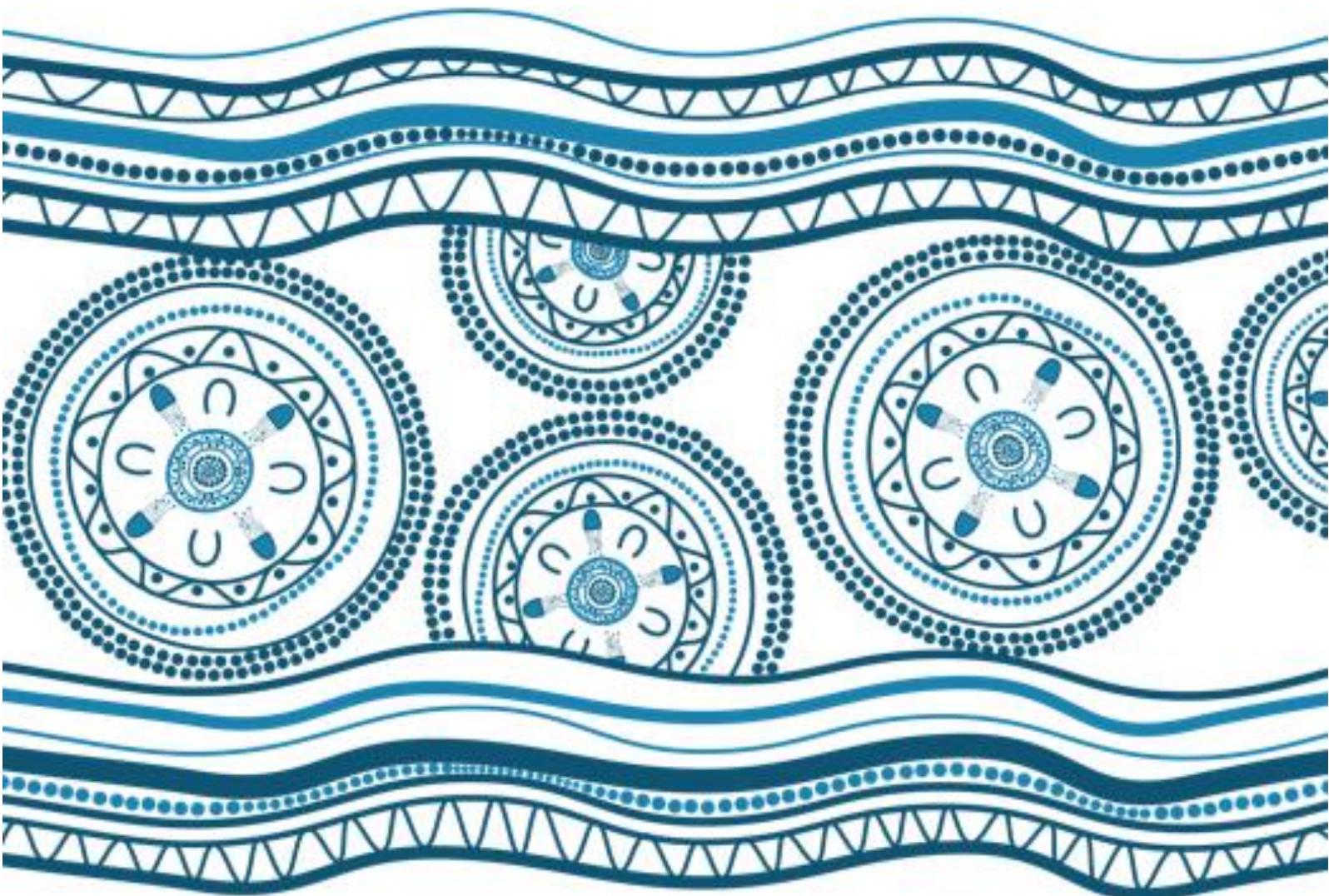


Chapter 9

Underwater heritage



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9 Underwater heritage

This chapter presents an assessment of the impacts of the project on underwater heritage and identifies mitigation and management measures to minimise and reduce these impacts.

The assessment presented in this chapter draws on information from Appendix G (Underwater Cultural Heritage Assessment Report).

9.1 Assessment methodology

The project was referred to the Commonwealth Minister for the Environment on 22 October 2020 under the *Environment Protection and Biodiversity Act 1999* (Cth) (EPBC Act, reference: 2020/8825). The project was declared a 'Controlled Action' on 12 January 2021. This was due, in part, to the project's potentially significant impact on the Kurnell Peninsula Headland. This National Heritage Listing includes the intertidal zone between the high water mark and the low water mark. The assessment of the project's impacts on this matter of national environment significance is to be carried out in accordance with the assessment bilateral agreement between the NSW and Commonwealth Governments. Therefore, this chapter addresses both the State and Commonwealth assessment requirements.

The method for the underwater heritage assessment involved:

- Defining the assessment study areas (which reflect the construction boundary as shown on Figure 5-2 and 5-3 in Chapter 5 (Project description))
- Reviewing available historical information to understand the underwater heritage potential within the study areas. The review looked at archival resources, heritage databases, secondary reports, and marine geophysical data
- Carrying out digital scan surveys and a dive survey in July and August 2020 to identify underwater heritage features
- Establishing maritime heritage potential, significance and sensitivity
- Assessing the potential impacts and identifying appropriate mitigation measures.

Impacts on underwater heritage are defined as 'direct', 'potential direct' or 'indirect' as described in Table 9-1.

Table 9-1: Types of impact

Type of impact	Definition	Project activities causing impact
Direct	Planned intentional physical damage (i.e. removal and/or destruction)	<ul style="list-style-type: none">• Piling• Installation of temporary construction crane platform at La Perouse, and temporary causeway at Kurnell.
Potential direct	Incidental physical impact and consequences (ie inappropriate access by vessels)	<ul style="list-style-type: none">• Construction vessel anchoring• Propeller jet turbulence.
Indirect	Indirect impact that would reduce the cultural heritage value of that site or item	<ul style="list-style-type: none">• Vibration• Visual.

9.1.1 Policy framework

The underwater heritage assessment has been prepared in accordance with the following legislation, regulations and policies:

- *Heritage Act 1977* (NSW)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- Convention of the Protection of Underwater Cultural Heritage (UNESCO, 2001)

- Guidelines for the Management of Australia's Shipwrecks (Australian Institute for Maritime Archaeology, 1994)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (NSW Office of Environment and Heritage, 2011)
- Criteria for the Assessment of Excavation Directors (NSW Heritage Council, 2019)
- NSW Heritage Manual (NSW Heritage Office, 1996)
- Assessing Heritage Significance (NSW Heritage Office, 2001)
- The Burra Charter (ICOMOS, 2013).

Underwater heritage is all known or potential material on or underneath the seabed up to the high-water mark. This includes Aboriginal and non-Aboriginal heritage. All known or potential heritage material above the high-water mark is assessed in Chapter 7 (Aboriginal heritage) and Chapter 8 (Non-Aboriginal heritage).

9.2 Existing environment

This section provides a brief historical context of Botany Bay and a description of the existing environment for underwater heritage.

9.2.1 History

Submerged landscape

Several river systems were present within the Botany Bay area at the time Aboriginal people started living in the area. This included the Botany River that extended from the location of Sydney (Kingsford Smith) Airport out to sea. At the end of the last glacial period, a climate reversal caused a rapid rise in global sea levels. This led to the formation of Botany Bay. Before the sea level rise and associated inundation, the topography and vegetation within Botany Bay would have been like that which existed along the shores of Botany Bay at the time of European arrival. This was characterised by scrubby sand dune systems with occasional swamps linked by watercourses. This landscape supported the Aboriginal populations in the area (refer to Chapter 7 (Aboriginal heritage) for further detail).

Aboriginal underwater heritage

Aboriginal people are known to have occupied the greater Sydney Basin region for at least 36,000 years. As the sea level gradually rose, evidence of Aboriginal occupation along the valley floors and lower slopes of Botany Bay would have been progressively submerged.

The most likely types of submerged Aboriginal archaeological sites that may occur within the construction boundary include:

- Rock shelters with evidence of artefacts, engravings/art, or human burials
- Engravings, pigment art and grinding grooves on exposed sandstone ledges
- Stone artefact scatters or stone quarry sites
- Fish traps.

The Aboriginal people of Botany Bay have historically maintained a close relationship with the waters; using the food resources available within the area. Canoes were used for transport and fishing. Aboriginal people regularly used the La Perouse area for commercial and subsistence fishing, as well as guiding tours for European settlers from Sydney. More information on the Aboriginal people use of Botany Bay is provided in Chapter 7 (Aboriginal heritage).

Non-Aboriginal underwater heritage

Captain Cook and the crew of the Endeavour arrived in Botany Bay on 29 April 1770; becoming the first Europeans to visit the Greater Sydney region of Australia. The Europeans explored Botany Bay, collecting floral and faunal scientific samples, hunting game and birds, gathering water, and cutting grass to feed their shipboard livestock. Captain Cook first called the area as Sting-Ray

Harbour. This was then changed to Botanist Bay and finally Botany Bay after Joseph Banks collected several unique species from the area.

The first British fleet arrived in Botany Bay on 18 January 1788 followed shortly by French explorer La Perouse who spent six weeks repairing his ships before departing. Following the departure of the British fleet and La Perouse, there was a period of limited activity in Botany Bay as the European's occupied Sydney Cove and Port Jackson. In 1820, troops were stationed at La Perouse headland to control shipping in and out of Botany Bay, and to prevent convicts from escaping. In 1833 this station was turned into a customs house with facilities for people working at the station. Fishing was one of the earliest activities that took place at Botany Bay by European settlers, with two fishing villages erected around the 1840s.

Other industries began to develop along the shores of Botany Bay including the Sir Joseph Banks Hotel, which became a major holiday destination for the region. There were 40 tanneries and wool scouring establishments within the Botany municipality by 1914. Before the development of Port Botany in 1970, several smaller wharves supported the growing industry in Botany Bay.

The Kurnell Port and Berthing Facility (including a wharf) was established at Kurnell in the 1950s. Dredging was carried out to provide the approach channel to the jetty that was constructed to service the refinery. This is about 200 metres west of the proposed wharf at Kurnell.

Sydney (Kingsford Smith) Airport was first built in the 1920s. By the late 1940s, the airport had grown substantially, requiring the relocation of the mouth of the Cooks River. In the 1960s, dredging was undertaken to construct the runway into Botany Bay.

The construction of the port facilities in Botany Bay began in 1970s. A large area was reclaimed to build Port Botany, and the shipping channels were dredged. Since then, ongoing dredging is carried out to maintain the shipping channel.

9.2.2 Heritage listings

There is one mapped Aboriginal Heritage Information Management Systems (AHIMS) listed item within the water of the La Perouse study area. However, following a site inspection in 2020, it was considered unlikely that this site is recorded in the correct location and is more likely located on land (refer to Chapter 7 (Aboriginal heritage)).

There are no AHIMS listed items or sites mapped within the Kurnell study area. However, there are several AHIMS items or sites located on the foreshore (refer to Chapter 7 (Aboriginal heritage)).

Table 9-2 shows the statutory and non-statutory heritage listed items in the study areas.

Table 9-2: Items listed on heritage registers within the study areas

Area	Heritage item	Heritage listing
La Perouse and Kurnell	Kamay Botany Bay National Park and Towra Point Nature Reserve	State Heritage Register
Kurnell	Kurnell Peninsula Headland	National Heritage List
	Captain Cook's Landing Site	Sutherland Shire LEP 2015
	Landing place wharf abutment	
	Kurnell Historic Site	
	Captain Cook's Landing Place	Register of the National Estate (non-statutory)
Isaac Smith Memorial		

9.2.3 Known heritage

There is known maritime heritage within both study areas.

La Perouse

Known or identified maritime heritage remains or sites at La Perouse are summarised in Table 9-3. These have been identified based on reviews of previous surveys/investigation or were identified during field or dive surveys carried out for the project.

There are no known shipwrecks within the La Perouse study area, and it is unlikely that large vessels have been wrecked in the area that remain undocumented. There is the possibility of smaller vessels that may have been lost in the area.

Table 9-3: Known underwater heritage at La Perouse

Site/item and description	
<p>First slipway (1882-1905) Two corroded iron rails bedded in cement on sandstone bedrock located to the south and west of the proposed wharf location. The rails extend into the water from the shoreline and are approximately 25 m long. This feature is listed on the La Perouse Conservation Management Plan (CMP).</p>	
<p>Second slipway (mid-20th century) Second slipway, about 20m north east of the slipway described above. Removed in about 1995 however remains are still present in the sandstone. This feature is listed on the La Perouse CMP.</p>	

Site/item and description

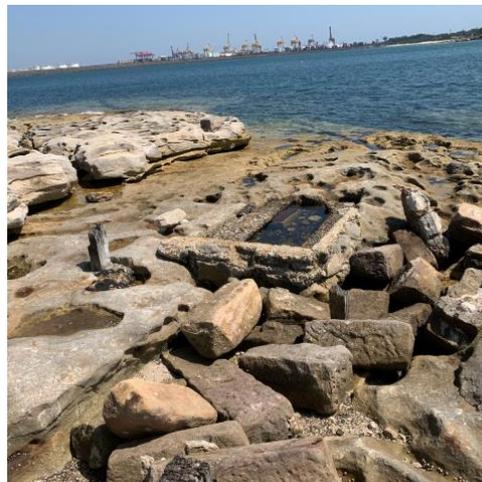
Wharf and approach (1905)

Remains of the original La Perouse ferry wharf destroyed in 1974, including concrete and sandstone footings, timber piles and remains of the sandstone block causeway. This feature is listed on the La Perouse CMP.



Remains of wharf buildings (1930s-40s)

Sandstone blocks, concrete footings and cut-off timber posts set in concrete associated with the Paragon restaurant. This feature is listed on the La Perouse CMP.



Boat davits (1869)

Boat davits (two cranes installed on the rocky shelf) were in place to the northeast of the proposed wharf location. No remains have been identified however any surviving remains would be similar in appearance to other piles drilled into the sandstone.

Boat moorings

27 mooring devices were identified during dive inspections, including concrete blocks, ferrous rails and an anchor.

Unidentified ferrous object

A strong magnetic anomaly was discovered during geophysical survey and located during dive surveys. The object is covered in concretion and marine growth and is currently unidentified. Located in close proximity to the second slipway and may be associated with the slipway or other maritime infrastructure.

Pile beacon

A pile beacon is a simple navigational device consisting of a timber or metal pile.

Maritime charting sheets show the location of a pile beacon in the western portion of the study area. There may be remains of the pile underwater or below the seabed.

Kurnell

Known or identified maritime heritage remains or sites at Kurnell are summarised in Table 9-4. These have been identified based on reviews of previous surveys/investigation or were identified

during field or dive surveys carried out for the project. There are no known Aboriginal sites within the study area.

There are no known shipwrecks within the Kurnell study area, and it is very unlikely that large vessels have been wrecked in the area and remain undocumented.

Table 9-4: Known underwater heritage sites at Kurnell

Site/item and description	
<p>Holts Jetty (c.1880) Remains of timber posts embedded in the rock shelf to the west of the Captain Cook Monument. Listed in the Kurnell CMP as having high archaeological potential.</p>	
<p>Trust Wharf remains (1902) Remains of the original timber piled ferry wharf destroyed in 1974. This structure is also noted within the Kurnell Peninsula Headland heritage listing. It includes sandstone blocks associated with the causeway and a collapsed timber pile. Listed in the Kurnell CMP as having high archaeological potential.</p>	
<p>Isaac Smith Monument (1948) Memorial to midshipman Isaac Smith, a member of Captain Cook's Crew. Located on the rock shelf to the west of the Captain Cook Monument. Listed item within the Kurnell CMP.</p>	

Site/item and description

Admiralty Pattern Anchor (late 19th century)

Anchor identified during Ausgrid cable installation works in 2010 that was relocated and may be located within the Kurnell study area (relocated about 280 m north west of the Cook Monument). Likely to have been associated with a small fishing boat in the second half of the 19th and early 20th centuries.



Tipped stone sea wall

Likely to be covered by modern sandbags placed along the high-water mark to prevent shore erosion, and currently not visible. A small visible section was identified further north, outside of the study area. Listed in the Kurnell CMP as having high archaeological potential.

9.2.4 Potential heritage

There is potential heritage within both study areas which may not have been sighted during the dive survey or which is covered by sediment on the seabed. A number of seabed anomalies were detected within the construction boundary by sonar surveys which were not dived during the diving inspection.

It is expected that the following types of underwater heritage sites or items may occur at La Perouse and Kurnell based on the anomalies detected on the seabed:

- Maritime infrastructure from the 19th Century onwards such as sea wall remains, jetties, mooring devices, beacons and slipways
- Discarded maritime infrastructure including personal objects, food and drink containers, fishing equipment and damaged/discarded infrastructure material
- Discarded items from vessels such as personal objects, food and drink containers, ship fittings and equipment, fishing and boating equipment
- Shipwrecks, including recreational, commercial and industrial vessels. There is no record of shipwrecks within the study area, however there is a small likelihood that shipwreck material may have washed into the study area and there is a possibility for remains of small vessels such as dinghies, tenders, canoes, kayaks and surf skis.

For Aboriginal archaeological potential, the study areas have very unlikely or remote potential to contain archaeological remains associated with submerged Aboriginal sites including art, grinding grooves, middens, stone artefact scatters or rock shelters.

9.2.5 Heritage significance and sensitivity

Section 7 of Appendix G (Underwater Cultural Heritage Assessment Report) assesses the heritage significance and sensitivity of the known and potential heritage within the La Perouse and Kurnell study areas.

Heritage significance determines the value associated with the heritage site/feature and helps to determine the appropriate level of mitigation proportionate to the level of significance.

Consultation with Registered Aboriginal Parties (RAPs) was carried out as part of Transport for NSW's Procedure for Aboriginal Heritage Consultation and Investigation (PACHCI) process. Information provided by the RAPs contributed to an understanding of the cultural value of the broader landscape within which the project would be located. The project area is considered to have moderate-high significance (refer to section 7.3 of Appendix G (Underwater Cultural Heritage Assessment Report)).

The known and potential non-Aboriginal heritage within both study areas (summarised in section 9.2.3 and 9.2.4) is assessed to have National, State and local significance depending on the heritage listing status of the item.

Heritage sensitivity combines heritage potential with significance (heritage value). Aboriginal heritage sensitivity within the study areas has been assessed as low as it's considered very unlikely that pre-inundation sites have survived. There is a higher likelihood of artefacts being present and concentrated closer to shore at Kurnell because of shell middens being documented along the high tide mark.

The known features, such as the slipways and remains of former wharfs are considered to have medium heritage sensitivity. The area around Captain Cook's landing site at Kurnell is the only site considered to have high heritage sensitivity. Unidentified anomalies at each site are considered to have medium heritage sensitivity. The potential non-Aboriginal heritage sensitivity for both study areas is low sensitivity given that shipwrecks are unlikely to be present and the low significance of known cultural objects in the area.

The area of the Kurnell Peninsula Headland National Heritage Listing within the intertidal zone is considered to be of medium sensitivity.

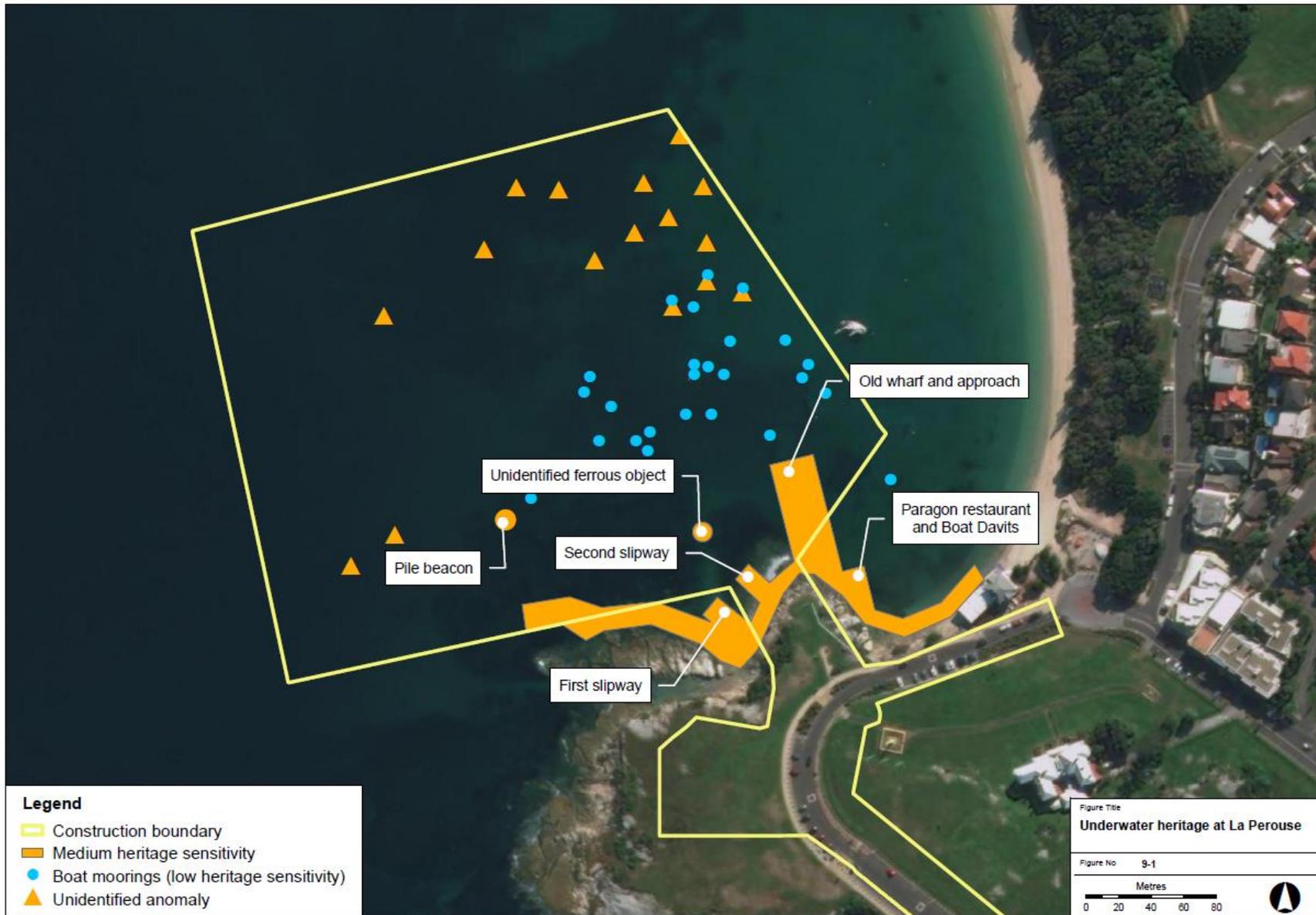


Figure 9-1: Underwater heritage at La Perouse



Figure 9-2: Underwater heritage at Kurnell

9.3 Assessment of potential impacts

The following sections summarise the potential underwater heritage impacts during construction and operation of the project. The assessment considers the heritage sensitivity (as outlined in section 9.2.5) and the likelihood of the impact occurring to provide an overall impact rating. A summary of impacts is provided in Table 9-5.

9.3.1 Assessment of construction impacts

Direct impacts

Construction of the temporary crane platform at La Perouse, the temporary causeway at Kurnell and piling activities could have direct impacts on underwater heritage in these locations.

At La Perouse, construction of the crane platform would impact the second slipway, the old wharf and approach and potential for unknown Aboriginal heritage in the form of submerged sites (unidentified heritage), if present within the crane platform location. Piling would have direct impacts on underwater heritage within the wharf alignment. At La Perouse this may include old boat moorings, the unidentified ferrous object and any potential Aboriginal or non-Aboriginal heritage.

At Kurnell, the construction of the temporary causeway would impact the Trust Wharf remains and any potential unidentified Aboriginal heritage if present within the temporary causeway location. There is no known heritage at Kurnell that would be impacted directly by piling, however if there was potential Aboriginal or non-Aboriginal heritage along the alignment of the wharf, this could be impacted.

Potential direct impacts

Other potential direct impacts could arise from anchoring of construction vessels and propeller jet scour, where construction vessels could mobilise sediment and cause either exposure or covering of heritage features.

At La Perouse, anchoring and propeller jet turbulence could impact the old wharf and approach, boat moorings and the unidentified ferrous object. Anchoring could also impact potential unidentified Aboriginal and non-Aboriginal heritage, if present within the construction footprint.

At Kurnell, anchoring and propeller jet turbulence could impact the Holts Jetty remains, the Trust Wharf remains and any potential unidentified Aboriginal and non-Aboriginal heritage in the construction boundary.

Indirect impacts

Indirect impacts could arise from vibration from piling activities and indirect visual impacts.

There would be less ground vibration at a given distance from a piling source used underwater than there would be from the same source in air (because more of the energy escapes into the water column). Therefore, separation distances for piling above ground are used as conservative estimates for safe working distances underwater. Any heritage which is within safe working distances from piling activities would be impacted by vibration. It is likely that the impacts from vibration would impact heritage features already directly impacted from the piling activities. Therefore, indirect vibration impacts are considered to be negligible on underwater heritage including unidentified Aboriginal and non-Aboriginal heritage that is buried if present.

Temporary visual impacts may occur due to the presence of infrastructure and construction vessels however this is unlikely to affect the aesthetics of the maritime heritage items at La Perouse and Kurnell.

Table 9-5: Summary of construction impacts on underwater heritage

Item	Sensitivity	Impact (probability and level of impact)						Indirect impact	
		Direct impact		Potential direct impact			Vibration	Visual	
La Perouse									
			Construction pad or causeway	Piling	Anchoring	Propeller jet turbulence			
Known heritage	First slipway	Medium	None	None	None	None	Certain, negligible	Certain, positive	
	Second slipway	Medium	Certain, moderate	None	None	None	Certain, negligible	Certain, positive	
	Wharf and approach	Medium	Probable, minor	None	Highly probable, minor	Improbable, minor	Certain, negligible	Certain, positive	
	Remains of wharf buildings (paragon restaurant)	Medium	None	None	None	None	Certain, negligible	Certain, positive	
	Boat davits	Medium	None	None	None	None	Certain, negligible	None	
	Boat moorings	Low	None	Probable, minor	Probable, negligible	Probable/Improbable, negligible	Certain, negligible	None	
	Unidentified ferrous object	Medium	None	Highly probably, minor	Highly improbable, minor	Improbable, minor	Certain, negligible	None	
	Pile beacon	Low	None	None	Highly improbable, negligible	Improbably, negligible	Certain, negligible	None	
	Kamay Botany Bay National Park heritage listing	Medium	Certain, negligible	Certain, negligible	None	None	Certain, negligible	Certain, minor	
Potential Aboriginal heritage	Across the whole study area	Low	Almost impossible, minor	Almost impossible, minor	None	None	Certain, negligible	None	
Potential non-Aboriginal heritage	Potential maritime infrastructure	Low	None	Highly improbable, minor	Highly probable, minor	Highly improbable, minor	Certain, negligible	None	
	Potential shipwrecks	Low	None	Highly improbable, minor	Highly improbable, moderate	Highly improbable, moderate	Certain, negligible	None	

Item	Sensitivity	Impact (probability and level of impact)						
		Direct impact		Potential direct impact			Indirect impact	
		Construction pad or causeway	Piling	Anchoring	Propeller jet turbulence	Vibration	Visual	
Potential discard	Low	None	Highly improbable, minor	Highly probable, minor	Highly improbable, negligible	Certain, negligible	None	
Kurnell								
Known heritage	Holts jetty	Medium	None	None	Highly improbable, minor	Highly improbable, negligible	Certain, negligible	Certain, positive
	Trust wharf remains	Medium	Certain, moderate	None	Probable, minor	Improbable, negligible	Certain, negligible	Certain, positive
	Isaac Smith Monument	Medium	None	None	None	None	Certain, negligible	Certain, positive
	Tipped stone sea wall	Medium	None	None	None	None	Certain, negligible	None
	Silver beach seawall	Medium	None	None	None	None	Certain, negligible	None
	Kurnell Peninsula Headland heritage listing	Medium	Certain, negligible	Certain, negligible	None	None	Certain, negligible	Certain, positive
	Kamay Botany Bay National Park heritage listing	Medium	Certain, negligible	Certain, negligible	None	None	Certain, negligible	Certain, positive
Potential Aboriginal heritage	Close to foreshore	Low to medium	Probably, minor	Highly improbable, minor	None	None	Certain, negligible	None
	Beyond foreshore	Low	None	Almost impossible, minor	None	None	Certain, negligible	None
Potential non-Aboriginal heritage	Potential maritime infrastructure	Low	None	Highly improbable, minor	None	None	Certain, negligible	None
	Potential shipwrecks	Low	None	Highly improbable, moderate	Highly improbable, negligible	Improbable, negligible	Certain, negligible	None
	Potential discard	Low	None	Highly improbable, minor	Highly probable, minor	Improbable, minor	Certain, negligible	None

9.3.2 Assessment of operation impacts

Operational impacts on underwater heritage are limited but may include sediment exposure or covering of heritage features from the ferries' propeller jet turbulence. Sedimentation mobilisation from the operation of the ferry service is assessed in Chapter 18 (Coastal processes). Propeller turbulence may cause localised changes to sediment around the wharves. This is unlikely to impact underwater heritage beyond that already impacted during construction.

It is likely that the project would have a positive visual impact on the maritime heritage at La Perouse and Kurnell by offering greater heritage and functional context to the remains of the slipways, the former wharf and the Paragon Restaurant at La Perouse and Holts Jetty and Trust Wharf at Kurnell. The project would recreate a 100-year-old historic structure functioning as an attractive waterfront for La Perouse and enhance the maritime cultural heritage at Kurnell. The wharves would provide a viewing platform for remaining heritage, therefore improving the accessibility and visibility of these features.

9.3.3 Significant impact criteria for Kurnell Peninsula Headland

The project has been declared by the Commonwealth to be a Controlled Action due, in part, to the potential for significant impacts on the Kurnell Peninsula Headland. The impacts on this listing have been assessed in accordance with the requirements under the EPBC Act against the values of these heritage items in accordance with the Significant Impact Criteria outlined in the Significant Impact Guidelines 1.1 – Matters of National Environmental Significance (Australia Government, Department of Environment, 2013). Further detail from this assessment against the criteria is provided in Appendix G (Underwater Cultural Heritage Assessment Report).

The assessed scale of impact upon the Kurnell Peninsula Headland from the construction of the causeway, piling and vibration would be negligible as it is expected that there would be no discernible alterations to existing natural and human processes already impacting on them. The visual impact is assessed to be positive.

9.4 Environmental management measures

The design of the wharves has been refined to avoid impacts to known heritage features where possible. Further mitigation to reduce impacts would involve exclusion zones during construction to avoid heritage features and developing specific work methodologies for construction within sensitive heritage areas.

Table 9-6: Environmental management measures for underwater heritage impacts

Impact	ID	Environmental management measure	Responsibility	Timing
Underwater heritage construction management	UH1	Underwater heritage management measures will be included as part of the Construction Heritage Management Plan (HMP). The HMP will include: <ul style="list-style-type: none"> a) Construction measures and procedures to minimise and manage impacts on underwater heritage b) Sensitive area maps that identify areas of underwater heritage sensitivity and constraints in the study area c) Artefact management procedures, including identification of approved submerged reburial locations d) Relevant work method requirements, including the installation and removal 	Contractor	Pre-construction and construction

Impact	ID	Environmental management measure	Responsibility	Timing
		<p>of the construction platform at La Perouse, temporary causeway at Kurnell and any other temporary structures</p> <p>e) Maritime heritage inductions tailored for underwater work activities including, but not limited to anchoring or trenching</p> <p>f) Restricted zones to be established for the following heritage items; First Slipway at La Perouse, Remains of the sandstone block causeway for La Perouse wharf, Paragon Restaurant / Boat Davits, Holts Jetty / Isaac Smith memorial/ Captain Cook's Landing Site which limit activities and movements ie no tracked machines.</p> <p>g) Archival, baseline and periodic monitoring protocols (before and during construction, including a final site inspection within three months of completion of works) for the heritage items identified in UH1(g)</p> <p>h) Unexpected Heritage Items Procedure (NSW Roads and Maritime Services, 2015d)</p> <p>i) Consultation requirements with National Parks and Wildlife Service, Heritage NSW, Randwick City Council and Sutherland Shire Council.</p>		
Underwater heritage finds during wharf construction	UH2	An archaeological dive inspection will be carried out within the footprint of the wharves. Where a culturally significant heritage item is present, any movable heritage items will be relocated away from the impact area before starting work.	Contractor	Pre-construction
Unidentified seabed anomalies	UH3	Unidentified seabed anomalies will be avoided through the use of a five metre no-anchoring exclusion zone. If these areas are required for anchoring or mooring, a dive inspection will determine if the item is of low cultural heritage sensitivity to enable these activities to occur.	Contractor	Pre-construction