

SUGARLOAF PIPELINE ALLIANCE RESPONSE TO DEWHA COMMENTS ON THE SUGARLOAF PROJECT IMPACT ASSESSMENT REPORT

The Sugarloaf Pipeline Alliance refers to the submission made by the Australian Government Department of the Environment, Water, Heritage and the Arts on 20 March 2008 in relation to the aforementioned project.

The Alliance have reviewed the comments and provide the following response.

DEWHA comment

1. Specific

P.24 Please provide details of further flora and fauna investigations to be undertaken, including when investigations are occurring and when the information will be available to the Department.

Alliance Response

- a. Vegetation and fauna habitat assessments of sections of the preferred (and non-preferred) pipeline alignments have been on-going, and are still being undertaken. Surveys are now focussing on the preferred alignment and will continue up until June 2008. Survey of the preferred pipeline alignment will:
- finalise vegetation mapping for the Offset Management Plan (OMP), particularly the required Habitat Hectare calculations, large tree assessment and threatened species component;
 - provide a final assessment of threatened species (particularly flora) within the proposed areas to be disturbed within the preferred alignment;
 - provide consideration and assessment to any Groundwater Dependant Ecosystems (GDE) and any threatened species they may provide habitat for;
 - assess specific areas of habitat interest (i.e. waterway crossings); and
 - record specific details of management issues such as weed densities and revegetation/construction management requirements as they relate to flora and fauna.
- This information will be available to the Department by July 2008 as part of a general addendum to the existing report updating the Department of the outcomes of the survey listed above.

Further liaison will occur on an ongoing basis in relation to seasonal and ongoing management surveys pursuant to the Environmental Management Strategy (eg. Striped Legless Lizard, Matted Flax-lily and Golden Sun Moth as set out in b-h below). The Alliance will inform the Department should any new significant information become available. These are set out below:

Initial Striped Legless Lizard *Delma impar* surveys were undertaken within the study area in section A in October and November 2007. Following discussions with the Victorian Striped Legless Lizard Working Group in December 2007 and early January 2008, an agreed survey program for the Striped Legless Lizard was developed for the project. In accordance with this agreed program, detailed surveys for the Striped Legless Lizard were undertaken along (or within the immediate vicinity of) the preferred pipeline alignment in sections A, B and C between 18 February 2008 and 28 March 2008. Over a period of 6 weeks, we have undertaken surveys at 18 properties. We have installed a total of 38 pitfall lines across these 18 properties, with each pitfall line containing between 5 and 8 pitfall buckets (with one pitfall line containing 13 buckets). In total, we have undertaken 924 pitfall bucket nights surveys during 2008, where one pitfall night is equivalent to one bucket being present in the field for one night.

We have captured an additional two legless lizards during this recent period of survey. One lizard was captured in a private property on the eastern side of Killingworth Road on a non-preferred alignment. One was captured at the Sheoak property to the south of Yea (the proposed High Lift Pump Station property). A number of other non-threatened frogs and lizards were also captured at many sites.

Table 1: *Striped Legless Lizard Survey effort*

	# of Properties			# of Pitfall Lines			# of Pitfall Nights			# of Striped Legless Lizards caught		
	2007	2008	total	2007	2008	total	2007	2008	total	2007	2008	total
Section A	6	9	14*	10	14	28	222	376	598	3	1	4
Section B	-	4	4	-	15	15	-	334	334	-	1	1
Section C	-	5	5	-	9	9	-	214	214	-	-	-
Overall	6	18	23*	10	38	48	222	924	1146	3	2	5

* = one property repeated

Therefore, overall, one Striped Legless Lizard has been recorded on the preferred alignment to the west of Killingworth Road, one Striped Legless Lizard has been recorded on the preferred alignment to the east of Killingworth Rd, another two nearby on the non-preferred alignment to the east of Killingsworth Road, and one on the proposed She-Oak Hi-lift Pump station site to the south of Yea. A population is also known to persist at the Yea cemetery, which occurs to the south of Yea near a non-preferred alignment.

Potential impacts to the species resulting from the project were identified in the Flora and Fauna report (Appendix H of the PIA report). Suitable mitigation measures are being developed for the project in conjunction with the Victorian Striped Legless Lizard Working Group. On-going surveys and monitoring for the species in the greater Yea area are also proposed for spring-summer 2008/09.

- b. An extensive targeted survey for Matted Flax-lily *Dianella amoena* has been largely completed in Sections F, G and H of the pipeline corridor, where the species is considered to be most likely to occur. A second phase of assessments will be undertaken as part of the detailed ecological review of the final alignment to ensure as detailed an assessment as possible is provided in relation to this species. This is not expected to be initiated until mid-late May 2008, however, the main targeted survey will be undertaken during the flowering season for the species (late November 2008 –

January 2009) – DEWHA will be advised of the findings of this assessment as detailed in the addendum report described above.

No targeted survey is required in Section E of the pipeline corridor as it does not contain suitable habitat for Matted Flax-lily. Targeted surveys are required in Sections A, B, C and D, and will be conducted during the flowering season for the species for Matted Flax-lily (**between late November 2008 and late January 2009**). Survey will focus as a first priority on areas of remnant grassland and grassy woodland, and subsequently on areas of more modified habitat, particularly where the pipeline alignment is situated within road reserves and other areas of public land. This information will be provided to the Department at the completion of the targeted survey, which is likely to be in January 2009.

- c. Targeted survey for River Swamp Wallaby-grass *Amphibromus fluitans* will be undertaken during the flowering period of this species (**between November 2008 and January 2009**). Survey will focus on permanent to semi-permanent wetlands and dams associated with the Goulburn and Yea River floodplains in sections A and B. This information will be provided to the Department at the completion of the targeted survey, which is likely to be in February 2009.
- d. Targeted survey for Little Pink Spider-orchid *Caladenia rosella* will be undertaken during the flowering period of this species in **August and September 2008**, in any areas where the final pipeline alignment passes through forested areas south of the southern edge of Toolangi State Forest (i.e. primarily Sugarloaf Reservoir and road reserves supporting Grassy Dry Forest EVC within Sections G and H). The results of this survey will be provided as a separate addendum report for this species, which is likely to be provided to the Department in October 2008.
- e. Continuing targeted survey for Clover Glycine *Glycine latrobeana* will be undertaken during the flowering period of this species between **September and December 2008**, in Sections A, B, C and D of the pipeline corridor. Survey could be undertaken at the same time and place as Matted Flax-lily surveys, owing to their similar habitat preferences. Survey will focus as a first priority on areas of remnant grassland and grassy woodland, and subsequently on areas of more modified habitat, particularly where the pipeline alignment is situated within road reserves and areas of public land. The results of this survey will be provided as a separate addendum report for this species, which is likely to be provided to the Department in February 2009.
- f. Further surveys for the Growling Grass Frog *Litoria raniformis* have been undertaken at a number of additional properties with suitable habitat along the pipeline alignment. No further individuals were located during these surveys, but individuals are still being assumed to be present within areas of suitable habitat. The results of this survey will be provided as part of the addendum to the existing report, intended to update the Department of further work undertaken.
- g. Depending upon the timing of construction and other matters (see below for more information), Golden Sun Moth (*Synemon plana*) surveys are to be undertaken in identified areas of suitable habitat at an appropriate time of the year (**between October and December 2008**). Detailed management and surveys procedures for the Golden Sun Moth will be developed as part of a Fauna Management Plan for this species. This will be developed and available for the Department by mid-May 2008, based on the assumption that the species is present within areas of suitable habitat in sections A, B and possibly C and D. Further liaison with local DSE representatives will be undertaken to develop a workable response to this cryptic species.
- h. Habitat Assessments, bird surveys, active searching, spotlighting and call playback survey techniques have been continuing at a number of public and private properties along (mostly) the preferred pipeline alignment. No additional EPBC listed fauna species have been recorded as part of this process. The results will be provided as part of the addendum to the existing report.

- i. Within the broader EMP, there will be separate sub-sections that relate to each of the relevant EPBC listed species (i.e. Species-specific Flora and Fauna Management Plans will be developed within the broader EMP documentation) which will detail any further survey work required.

DEWHA comment

Page 81. Specific details on mitigation measures are required for the Striped Legless Lizard. If this is to be included in the Striped Legless Lizard Management Plan, provide details on when this management plan will be made available to the Department.

Alliance Response

Following discussions with DSE and the Victorian Striped Legless Lizard Working Group (VSLLWG) in December 2007 and early January 2008, an agreed survey program for the Striped Legless Lizard was developed for this project. Discussions on appropriate and workable management actions for this species are continuing. Details of future survey and management tasks to be undertaken for the Striped Legless Lizard will be included in a Fauna Management Plan to be prepared for this species. This management plan is expected to be available to the Department by mid-May 2008.

A general summary of the details on the management measures for the Striped Legless Lizard as agreed with the VSLLWG are:

1. Liaison with VSLLWG as to preferred survey approach (completed);
2. Targeted pitfall survey in preferred alignment November – December 2007/February – March 2008 (completed on 28 March 2008).
3. Broad survey of wider area to contextualise local population; set up tile grids or equivalent in winter 2008, survey then ongoing (there is the potential to hand these grids over to the VSLLWG as continuing project). The tile grid is to be established during the winter months (2008), and therefore available for assessment by the survey season for 2008/2009.
4. Detailed Management Plan to be developed in liaison with DSE and the VSLLWG, focussing on habitat identification, impact avoidance and minimisation during the construction phase, possible detailed salvage and local transfer to suitable habitat previously identified in the immediate vicinity of any potential Striped Legless Lizard location (as a last resort) and the post-construction rehabilitation of disturbed habitats.

DEWHA comment

On both pages of the report page 88 and 95: states that “detailed fauna surveys through suitable habitat”. Clarify what these surveys are for, including when they are occurring and when the information will be available to the Department.

Alliance Response

‘Detailed fauna surveys through suitable habitat’ on these pages relates to the detailed survey work for the Striped Legless Lizard that has been on-going, and is still to occur. See the responses above to the queries relating to the Striped Legless Lizard.

2. Appendices

B. Hydrology, Water Resources and Water Crossing Impact Statement

DEWHA comment

Provide details of any investigations into potential impacts on EPBC listed species habitat from 'dewatering of groundwater'. If investigations were not undertaken, provide details of why investigations were not undertaken.

Alliance Response

Impacts on EPBC listed species as a result of 'dewatering of ground water dependant ecosystems' are considered unlikely as a result of the development of the Sugarloaf Pipeline Project. Few groundwater dependant ecosystems have been identified within the final corridor, the main one being a Fern Swamp in Section F, and it is considered that the development of the pipeline will not have an impact on these areas due to either avoidance (eg avoidance of Yea wetlands) or management measures (eg indirect impacts associated with sedimentation, managed through sediment control methods).

C Environmental Implications of Transferring Water Report

DEWHA comment

Page 28 and 30: states that EPBVC fish species are restricted to downstream of the Goulburn weir. Provide details of the impacts on EPBC listed species downstream of the Goulburn weir. If no investigations have been undertaken, please say why.

Alliance Response

The scope of works upon which the report "*Environmental implications of transferring water savings from the Goulburn River*" (Appendix C to the PIA report) were provided for an examination of the impacts of taking water from on the Goulburn River between the off-take point north of Yea and Goulburn Weir. This, along with a scope of works, was agreed in consultation with DPCD and DEWHA as the potential impacts on flow downstream of Goulburn Weir are to be managed as part of the existing environmental assessment being undertaken on these issues for the Food Bowl Modernisation Project. . A copy of the scope of works is contained in Appendix A of the report contained in Appendix C of the PIA in the form of a memorandum.

In any event, it is worth noting that the report does describe the presence of EPBC listed fish species in the Goulburn River downstream of Goulburn Weir, including the recent discovery of breeding Trout Cod. However, it is expected that flow changes downstream of Goulburn Weir would be minimal, provided environmental flow requirements downstream of Goulburn Weir as specified under the Bulk Entitlements are continued to be met. It is noted that the Trout Cod is heavily stocked below the Goulburn Weir, with population demonstrating it is also self sustaining, evidenced by the presence of juveniles prior to restocking events. Macquarie Perch has not been located below the Goulburn Weir since the 1980s. Restocking programs in the Yea River in the early 1990s appear to have established a self sustaining population in the vicinity of Devlin's Bridge, indicating the species may be in the lower Goulburn in low densities, therefore impacts associated with the pipeline development are considered unlikely. Similarly, impacts on the Trout Cod and Murray Cod downstream of the Weir are also considered unlikely as a result of the development of the pipeline. The seasonal reversal of the flow regime associated with the release of bulk entitlements is considered a much greater issue.

D Desktop Hydrological Assessment

DEWHA comment

Page 6. Impacts on ground water dependent ecosystems and possible implications for EPBC listed species. Clarify if there is habitat for any EPBC listed species associated with groundwater that could be impacted by the project.

Alliance Response

The main area considered to be as ground water dependant ecosystem known in the study area is a section of Fern Swamp in Section E immediately south of the final Yea River crossing, approximately 50m east of the Melba Highway. The Fern Swamp area will not be directly affected by the installation of the Sugarloaf Pipeline Project, with indirect impacts associated with sedimentation, managed through sediment control methods. The Fern Swamp area is not known to support any EPBC listed species.

The Yea River at low flow may be considered as a ground water dependant system however these impacts have been addressed in the Aquatic Ecology report which forms Appendix B of the PIA.

DEWHA comment

Page 28: Provide details of the further work to be undertaken to identify groundwater dependent ecosystems and potential impacts, including EPBC listed species and their habitat.

Alliance Response

Ground Water Dependant Ecosystems are to be further assessed as part of the ongoing survey works along the final preferred corridor. Any threatened species they may support will be further considered as part of the detailed investigations of the final alignment outlined in the part 1.a of this response.

DEWHA comment

Page 39: states that 'groundwater (and environmental investigation) will be undertaken ..' Provide details on when results will be made to department. Clarify if this includes identifying impacts of EPBC listed species and their habitat.

Alliance Response

See response above to Appendix B (2.B).

H Flora and Fauna Assessment

DEWHA comment

Page 70: mentions Growling Grass Frog surveys and states that further surveys are recommended. Clarify whether further targeted surveys will be undertaken for this species and if they will not be undertaken provide details of why targeted surveys are not required.

Alliance Response

Please refer to response above at 1.g. Further surveys for the Growling Grass Frog *Litoria raniformis* have been undertaken at a number of additional properties where suitable habitat occurs along the preferred pipeline alignment, and are continuing at additional properties. To date, no individuals have been recorded. This information will be available to the Department in (April / May 2008) as part of an addendum report.

DEWHA comment

Page 150: makes specific reference to Environmental Management Plans to be developed and says that they will contain more detail and site specific mitigation measures for flora and fauna. Provide details of when these plans will be available to the Department and whether all EPBC listed species potentially impacted by the action will be addressed.

Alliance Response

Environmental Management Plans (EMPs) are currently being developed. These EMPs will reference recovery plans where appropriate. The Alliance flora and fauna team will incorporate established management approaches detailed in the recovery plans, along with liaison with specialists to develop the relevant plans. It has been agreed with DSE that plans will initially be developed as 'strategies' (EMS), where by best practice management and mitigation measures are collated, which will subsequently be applied to relevant sections of the alignment through the final Environmental Management Plan (EMP), Work Activity Plans (WAPs) and Site Environment Plans (SEPs). An example EMS for Matted Flax-lily has been developed and submitted to the Department in April 2008.

All of the EPBC listed species that are known or suspected to potentially occur within the preferred pipeline corridor (or be otherwise affected by the project) will be addressed through this process. However, they will particularly focus on species for which DEWHA has identified that the project may have a significant impact.

The Alliance will seek guidance as to whether it is appropriate to focus the EMPs and threatened species management plans on relevant functional groups rather than individual species (ie. amphibians, arboreal mammals, ground dwelling mammals, migratory bird species, etc) to reduce the amount of material required for interpretation by environmental managers/construction crews, while not compromising on the intent of the plans.

DEWHA comment

Page 158: suggests that other flora species and the significance of any impacts on them will be determined through further surveys. Provide details on when available to the Department.

Alliance Response

See comments for Matted Flax-lily (1.c), River Swamp Wallaby-grass (1.d), Little Pink Spider-orchid (1.e) and Clover Glycine (1.f) in Section 1 of this response.

DEWHA comment

Page 161: in relation to the Golden Sun Moth, the Flora and Fauna Report says that ‘until further survey is completed and species range confirmed, it can not be concluded that the project will not have a ‘significant’ impact on the species’ whereas the referral stated that ‘the area of grassland within the proposed pipeline corridor is highly disturbed and modified, mostly containing exotic species. High quality habitat areas exist in the road reserves, which will not be affected by construction’. Please advise the Department of whether further surveys for Golden Sun Moth have been undertaken and if so when the results will be available. If further surveys referred to in the Flora and Fauna Report are not to be undertaken please provide details on the ways in which the action is being undertaken so as to avoid Golden Sun Moth habitat.

Alliance Response

Please refer to response in Section 1 (a & h) of this response.

The Flora and Fauna Report conclusions state that the species has suitable habitat north of the Great Dividing Range (sections A to D) in Wallaby Grass *Austrodanthonia* spp. dominated habitats (it is noted that many of these habitats are modified through current agricultural land use) and that in the absence of further information, it could not be concluded that a significant impact would not occur from the project (page 161 of Appendix H). It is noted that the referral documentation was provided at an earlier point in the project development than the final information presented in the PIA, where a more comprehensive picture of the assessment corridor had been developed.

Due to a range of constraints (e.g. timing, land access), detailed surveys for the Golden Sun Moth were not undertaken in the summer of 2007 / 2008. Due to the limited flight patterns of adult animals of this species, detailed surveys for this species cannot now occur until late spring - early summer 2008.

During the planning and detailed design phases of the project, areas of suitable habitat have been (and will continue to be) avoided wherever possible by the preferred pipeline alignment. Detailed assessments of the final preferred pipeline alignment will also identify additional areas of suitable habitat for this species within sections A to D (if any).

Detailed mitigation strategies will be developed as part of the management plan for this species, which will involve liaison with specialists and reference to suitable recovery plans, actions statements and other relevant documents. Draft mitigation measures are provided below but may need to be refined in response to liaison with the abovementioned stakeholders. A Management Plan will be made available to the Department by mid-May 2008.

- ❖ Some of the identified areas of suitable habitat may be avoidable through micro realignment and reduced construction widths.
- ❖ In areas where native grasslands have been avoided, the construction timing is not constrained by the Golden Sun Moth. However, should the timing of construction allow, surveys will be undertaken for the Golden Sun Moth at a sample of ‘unsuitable’ habitats prior to construction. Other mitigation measures will also be implemented (e.g. minimising construction footprints, rehabilitation) throughout these areas of unsuitable habitat in sections A, B, C and D.

- ❖ In areas where native grasslands are unavoidable, construction should not proceed in these areas until after surveys have been undertaken at a suitable time of the year (i.e. when adults are in flight between October – December 2008).
 - In patches of native grassland where no individuals are found to be present, construction may then proceed as per the non-native grassland areas (subject to other constraints).
 - For patches of native grassland where individuals are found, additional mitigation measures will need to be developed and implemented (in consultation with stakeholders) depending on the size and extent of the population. Techniques such as avoidance and minimisation, topsoil and vegetation preservation, translocation and long-term monitoring may need to be considered.
 - If it is not possible to avoid construction through native grasslands prior to surveys being undertaken, techniques will be developed and implemented for the Golden Sun Moth (in conjunction with DSE and other Stakeholders) which assume that the species is present. These techniques may be the same as those described immediately above.

- ❖ Post-construction techniques will include the appropriate rehabilitation of areas of disturbed native grassland with suitable grassland species (i.e. *Austrodanthonia* spp.) and longer term monitoring for this species throughout the northern section of the alignment. Where possible, vegetation offsets sought as part of the Net Gain process will aim to include suitable habitat for the Golden Sun Moth and other threatened fauna.

DEWHA comment

Page 172: Provide details of how much vegetation that is habitat for EPBC listed species will be removed and fragmented if tunnelling is not feasible.

Alliance Response

One 800m tunnel is now preferred within the very steep section of Toolangi State Forest (section E), but no other tunnel options as set out in the Design Options Report (non-preferred options E4) are currently proposed due to cost and timing constraints.

On this basis, Table 1 below outlines vegetation loss required for the project within the three bioregions through which the project is to be developed. Remnant native vegetation usually contains potentially suitable habitat for at least one species listed under the EPBC Act. It is noted that the main impact on EPBC listed threatened species relate to:

- Matted Flax-lily is relevant to the Highlands Southern Fall (confirmed presence) and the Central Victorian Uplands (confirmed presence), and possibly the Highlands Northern Fall;
- River Swamp Wallaby-grass is relevant to the Central Victorian Uplands;
- Clover Glycine is relevant to the Central Victorian Uplands and Highlands Northern Fall;
- Little Pink Spider-orchid is relevant to the Highlands Southern Fall;
- Striped Legless Lizard and Golden Sun Moth are relevant to the Central Victorian Uplands;
- Some threatened woodland- and forest-dependent fauna including the, Grey-headed Flying-fox, , Swift Parrot) generally relate to both the Highlands Southern and Northern Fall;
- Some threatened woodland- and forest-dependent fauna including Spotted Tail Quoll, Southern Brown Bandicoot, Regent Honeyeater (and to a lesser extent Leadbeater's Possum and Smoky Mouse) relate mostly to the Highlands Northern Fall; and
- Some wetland dependent threatened fauna including the Growling Grass Frog and Australian Painted Snipe could potentially occur widely along the alignment, but their preferred habitat are not specific to 'native vegetation'.

The Toolangi State Forest represents the main area of vegetation loss for the project, with lesser impacts acknowledged for the Central Victorian Uplands in degraded woodland and grassland areas,

waterway crossings, small patches in private land and public roadsides and at the Sugarloaf Reservoir reserve. While Toolangi State Forest represents obvious flora and fauna habitat for a variety of species detailed in the PIA and referral documentation, the specific habitat attributes of the corridor that will require removal needs to be formally assessed.

The Toolangi State Forest area is currently used for a variety of standard State Forest activities, including timber management practices, prescribed burning and recreational usage in the immediate vicinity of the pipeline alignment options. Generally speaking, the area consists of a relative homogeneous age structure of canopy species, and although there are few hollow bearing trees evident within the pipeline alignment, there are several dead stags that provide suitable habitat for a suite of fauna species. There are a range of habitats throughout Toolangi State Forest, which are utilised by a suite of native flora and fauna species. There is a high diversity of native fauna within the State Forest, including the threatened '*Temperate Woodland Bird Community*'. In addition to a diversity of avian fauna, the State Forest provides a dense understory suitable for a range of ground-dwelling mammals, reptiles and amphibians. There is also evidence of a high level of invertebrate species diversity. The vegetation throughout Toolangi is remarkably weed free and is part of a broader habitat corridor extending extensive to the west and east. Present studies have identified a suite of threatened flora and fauna species. In addition to this, the range of habitat types and previous database records indicate that there is potential for a number of additional species to use this habitat to some extent, either as residents or visitors. Once the final alignment and construction footprint is determined, it will be assessed, with any potential core habitat mapped and considered accordingly.

Table 1 - Vegetation Loss and Offsetting Requirements

Bioregion	Estimated Vegetation to be removed (Ha)	Estimated Habitat Hectares (HH) Required to Achieve Net Gain**	Estimated Areas of Land Required (Ha) for Offset
Central Victorian Uplands (CVU)	11	10	35
Highlands Northern Fall (HNF)	65*	120	290
Highlands Southern Fall (HSF)	43	70	170

* Please note this includes the proposed 800m tunnel which avoids approximately 3.5ha of vegetation.

** Net Gain refers to the requirement of Victoria's Native Vegetation Management Framework.

The results of the detailed assessment in relation to the disturbance of core habitat will be provided to the Department in June 2008.

DEWHA comment

Page 172: the flora and fauna report states that complete detailed field investigations are 'next step'. Please provide details of the field investigations to be completed. Clarify if EPBC listed species surveys will be undertaken and when this information will be available.

Alliance Response

See comments in section 1a of this letter.

DEWHA comment

When will the offset management plan and other management plans, which are referred to throughout the document, be available to the Department?

Alliance Response

The OMP will be made available once preferred pipeline corridor finalised and offsets in place. This is expected to occur by mid April 2008. The plans may be further refined after the final pipeline alignment is determined by the Victorian Minister for Planning.

R Framework Environmental Management Plan

DEWHA comment

Page 36: Native vegetation and Terrestrial Ecology Management Plan. Where it is not possible to avoid and reduce the impact of vegetation loss, provide details of mitigation measures / offsets to be implemented in relation to any loss of habitat relating to EPBC listed species.

Alliance Response

Once the final alignment and construction footprint is determined, vegetation loss will be quantified through the OMP, which is being developed in accordance with the requirements of *Victoria's Native Vegetation Management Framework*. The Net Gain process required by the Framework requires threatened species to be considered as part of the scoring process and determining conservation significance. The threatened species component of this assessment, along with the further studies detailed above (Section 1), will be provided to DEWHA as an addendum to the existing report (February 2008).

DEWHA comment

Page 40: Provide details of the offsets required in relation to the loss of EPBC listed species habitat.

Alliance Response

See response above.

DEWHA comment

Clarify if there will be separate management plans for EPBC listed species, such as the Striped Legless Lizard and Matted Flax-lily.

Alliance Response

Within the broader EMP, there will be separate sub-sections that relate to each of the relevant EPBC listed species (i.e. Species-specific Flora and Fauna Management Plans will be developed within the broader EMP documentation). Initially, an Environmental Management Strategy (EMS) will be developed, where all relevant information and detail relating to Threatened Species management, will be collated from relevant literature/specialist input. DSE will approve the proposed methods outlined in the EMS documentation. The EMP will subsequently link the methods outlined with the relevant sections of the alignment where management requirements are necessary.

The draft Matted Flax-lily EMP has now been provided to the Department and the Department has indicated it is broadly acceptable [refer letter to DPCD attached dated 9 April 2008]