



Our Ref: 405062_LEO_025

5 January 2007

Major Development Assessment
Department of Planning
GPO Box 30
SYDNEY NSW 2001

Attention: Paul Weiner

Dear Paul,

Re: Review of Submissions – Application # 05_0174 Proposed Dredging of Oyster Lease and Operation of Sand Stockpile – Oyster Lease # 80-178 and Lots 59, 101, 123, 124, 125 DP 753207, Lot 12 DP 816473, 2 – 6 Rodmay St, Tuncurry

We refer to the above Environmental Assessment (EA) and to additional public submissions received by the Department during the public exhibition period, in addition to submissions from Great Lakes Council and the Department of Natural Resources (DNR). This report constitutes a response to issues raised in the submissions.

Summary of EA Report submission and response

Great Lakes Council

Our response is provided in order of the issues raised by Council.

1. There are inadequacies in respect of ecological survey and assessment and the relevant legislative requirements.

- *No discussion of potential hydraulic impacts to SEPP 14 wetland of Oaky Island.*

The hydrodynamic modelling reported in the EA provided information on potential areas of erosion and accretion in the vicinity of the dredge area. The modelling did not indicate any impacts on the SEPP 14 wetland of Oaky Island.

- *Hydrodynamic modelling should be peer reviewed.*

Hydrodynamic modelling has been peer reviewed by experts from the Department of Natural Resources.

- *Consideration of *Lindernia alsinoides**

Targeted searches were undertaken for this species by an appropriately qualified and experienced botanist who has previous experience with this species, having recorded populations of this taxon in the south Forster locality during 2006. Council's Draft LES for Chapman's Road does not provide any information on the location of this species, while the record on the DEC Atlas of NSW Wildlife is accurate to within 1 km.

Environmental Planning, Assessment & Management

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Despite the targeted searches, the species was not located. Further, the species is highly unlikely to be affected by the proposal, due to the limited impacts associated with the proposal (*ie.* negligible clearing).

- *Reference to ecological reports for adjoining lands*

Reference to previously document ecological investigations in the area were made in preparation of the subject species table.

- *Consistency with DEC survey and assessment guidelines*

Survey effort differed from the draft DEC survey guidelines due to the nature of the proposed development (*ie.* negligible clearing involved) and lack of impacts associated with the development (*eg.* minor loss of hollows).

- *Pipeline impacts on saltmarsh*

The impacts of installing the pipeline in the saltmarsh area were addressed adequately in the EA, through the Section 5A Assessment and development of mitigation measures. To summarise, the pipeline will be assembled in 100 m sections and towed by a tractor through the saltmarsh through an existing degraded area of saltmarsh (compacted cattle track) to the Wallamba River edge at booster pump 2. This will necessitate approximately five trips, although each trip will be progressively shorter, as the pipeline gradually extends north towards booster pump 3. The impact will be limited to a single, defined tractor track and the pipeline itself, although the pipeline alignment will be along an existing, compacted, degraded track formed by cattle.

As indicated in the EA, following decommissioning of the pipeline, the route will be inspected for compaction of the pipeline alignment and where required, rehabilitation techniques implemented. These will include ripping of compacted areas along the alignment using a rotary hoe to de-compact and re-aerate the soil to facilitate recruitment of adjacent saltmarsh propagules. Planting of saltmarsh taxa or transplantation would only be required should monitoring show a lack of recruitment to the disturbed area, although this is considered to be highly unlikely.

Contrary to Council's concerns, modern saltmarsh restoration practices in NSW have achieved numerous successes (*eg.* Mason Park Homebush Bay, Federal Park Annandale, Settlement Point Shores Port Macquarie, Salt Pan Creek Western Sydney, Tempe Reserve, Duck River Silverwater, Tom Thumb Lagoon Wollongong) . The proposed rehabilitation of the saltmarsh is expected to be straightforward and effective, given that both no major re-contouring of the area (to achieve correct tidal levels) would be required and an existing saltmarsh is present to provide a source of recruitment. Ongoing monitoring of the rehabilitation works will ensure that the saltmarsh is rehabilitated appropriately. Further, this rehabilitation will improve the existing situation, as the proposed pipeline alignment through the saltmarsh is currently compacted (from previous cattle grazing) and would otherwise remain in a degraded state.

Advice provided by DEC officers to Council regarding a suggested amount (400 m) of additional clearing required for the pipeline is incorrect. There are sufficient cleared and highly modified linear tracks along which the pipeline will be placed. Potential impacts of the installation and maintenance of the pipeline on the adjacent saltmarsh environment was assessed adequately in the EA. Mitigation measures regarding monitoring of the pipeline, raising it in sections and rehabilitation of any disturbed areas post decommissioning were all adequately addressed in the EA.

Council's reference to blockage of surface flows is incorrect. The entire pipeline route through the saltmarsh area is subject to tidal inundation and during spring tides would be totally inundated. Tidal flow of water will not be blocked or altered by the existence of the pipeline, as the pipeline is not located parallel to the river bank alignment. Being located on an angle to the perpendicular, the tidal wave will simply surge up either side of the pipeline and recede in the same manner. Surface flows from rainfall events will also not be significantly altered, as surface water in this area recedes towards the Wallamba River in the same way as tidal flow, which it will still be able to do either side of the pipeline.

- *Impact assessment subjective or unqualified*

All of the assessments undertaken in the EA, particularly in respect of ecological impacts are supported by field data, personal observations, reference material and logically/obvious created arguments. Council's assertions regarding the validity of the conclusions drawn, particularly with respect to Section 5A Assessment of Threatened species, populations and ecological communities, are rejected.

- *Impacts of dredge spoil on Wallum Froglets*

Impacts on Wallum Froglet habitats (note that none of the habitats referred to in the EA are 'significant' as stated by Council) within the vicinity of Council were addressed adequately in the EA. Those areas through which the pipeline traverse have been assessed for potential impacts, with the results indicating that there was a very low risk of impacting adversely upon the Wallum Froglet population. This is due to the pipeline being all new pipe, rated to twice the booster pump pressure output and the pipeline monitoring regime of regular checking that will be in place.

- *Risk of diesel spills*

Risks associated with contamination due to diesel spills were addressed in Section 2.3.5 and 2.4.7 of the EA, which indicates the procedures for refuelling of machinery and booster pumps. Were this operation considered to be a significant threat, additional mitigation measures, over and above standard best practice for refuelling would have been considered and detailed.

- *Loss of Wallum Froglet habitat*

It is well documented that Wallum Froglets utilise a diverse array of disturbed areas from cane fields in northern NSW, to sand quarries at 80 m elevation on Stradbroke Island in Qld. The Section 5A Assessment

addressed the potential impacts on Wallum Froglets as a result of the proposal. This included consideration of all habitat areas within the vicinity of the site and any potential impacts to the species as a result of any externalities. It concluded that the location of Pond 1 in an area of poor (though potential) Wallum Froglet habitat would have minimal impact, considering the extent of available good habitat in the vicinity of the site (*ie.* SEPP 14 wetland area). Council's assertions regarding cumulative impacts on the species as a result of a (Council- approved) development to the north of the site is not substantiated by any sort of research and is therefore mere speculation and hence irrelevant to the objective impact assessment reported in the EA.

2. There is inadequate explanation or there is evidence of inconsistencies in respect of the type, nature and significance of potential environmental impacts arising from the activity.

- *Depth of dredging*

The issue of the maximum dredge depth of 1 m stated in the draft OISAS has been addressed in previous correspondence responding to comments from the DPI. In summary, the draft OISAS is not relevant, as a permit is not required for dredging under Section 201 of the *Fisheries Management Act 1995* for the project, as a Licence will be issued under the *Crown Lands Act 1989* for dredging purposes (refer to Dept Lands submission on project). Further, the DPI has a published policy for dredging and reclamation (Section 5.1.3 of the *Aquatic Habitat Management and Fish Conservation Update 1999* – copy attached). Part (d) of Section 5.1.3 clearly states:

(d) Dredging in shallow areas generally must not exceed a depth of 2 m below mean low water mark, to facilitate water mixing and ensure that the substrate remains in the light penetration (euphotic) zone to allow recolonisation of algae, seagrasses or macrophytes.

Therefore, the proposal to dredge to a depth of 2 m below mean low water is consistent with published DPI policy for dredging. Further, Council's assertion regarding the potential conflict between seagrass regeneration and increased water draw through the dredge area is not based on any realistic understanding of the ecological functioning of seagrass. There is absolutely no basis in science or reason for this assertion by Council, given that seagrass regularly grows in areas with strong tidal currents, unlike the low velocities expected through the proposed dredge area.

- *Impact of dredge depth on biota*

DPI, the public authority with expertise in aquatic ecology, has not raised this as an issue of concern. It is well known and established that seagrass recolonises the areas in between the racks within an oyster lease and will also sporadically recolonise underneath rack areas, particularly during times when racks are absent. Predictions regarding alterations to benthic communities were addressed in the aquatic ecology report and EA. Again, DPI did not raise this as an issue of concern.

- *Seagrass loss mitigation*

DPI has already indicated that they would be unlikely to support the transplant of seagrass. This mitigation measure was, however, included in the EA as it is believed to have some merit. Notwithstanding, the dredging would create conditions over the lease area more conducive to seagrass colonisation, as has occurred in all previously dredged lease areas in Wallis Lake, as the areas would be permanently inundated, rather than being periodically exposed to wetting and drying.

- *Significance of dredge area for yabbies*

This issue was addressed in detail in the response provided to DPI. As indicated in that response, the importance and use of this area as a yabbie bait collection ground is overstated and not a reflection of its actual utilisation, as reported by the owners of the lease over many years of observation, as reported in the EA.

- *Hairy pipefish mitigation*

Council's concerns regarding the Hairy Pipefish mitigation are unfounded and not supported. The mitigation strategy reported for the Hairy Pipefish was not questioned by DPI.

- *Sustainability of dredge operation and potential infilling*

Council's arguments simply do not have any credibility. In attempting to lock up cleared grazing land (of which the stockpile site is included) through rezoning to Environmental Protection, Council has rejected the same arguments regarding adjustment of the landscape to anthropogenic change. The depth of dredging required will ensure that there is minimal accretion inside the dredge area, as evidenced by two areas within the lease area that have not accreted sediment despite being dredged to depths of 1.5 m and 2 m, approximately 16 and 25 years ago respectively. Further, the lease previously accreted sediment as it was initially infilled to create an artificially shallow environment, conducive to the labour intensive (shallow water) oyster farming practices of the early 20th century. This infilling to a very shallow depth was conducive to further accretion. Council's arguments regarding the sustainability and viability of the oyster farming are not supported by any factual analysis of the dynamics of the estuary or by evidence from previous dredge operations in the lease area.

- *Wallum Froglet and EEC in stockpile site clearing area*

The 'Threatened species' referred to in the text on pg. 14 of the EA refer to flora. While it is acknowledged that this is incorrect (as there are threatened fauna sp in this location), the existence of known Wallum Froglet habitat was assessed in the Flora and Fauna Assessment and Section 5A Assessment. Further, the statement goes on to indicate that the habitats were not found to be of any significance, as indicated by the results of the Section 5A Assessment, due to the relatively small area of clearing when compared to the expansive areas of known Wallum Froglet habitat surrounding the site in the SEPP 14 wetland area.

- *Salinity intrusion to groundwater windows*

As indicated in the EA, the settling ponds will be ‘turkey nest’ ponds (*ie.* no excavation required), with the walls built up above the existing ground surface. Therefore, the ponds will not intercept the groundwater table and therefore will not provide a window into the water table. Pond 1 is located on relatively impermeable fine silts and clays with little potential for seepage into the groundwater, based on the low hydraulic conductivity and relatively short residence time in this pond, before being transferred to Pond 2, which will be plastic lined.

The walls of Pond 1 are highly unlikely to seep water into the surrounding land, due to the short residence time in Pond 1 resulting from the existence of a ‘foot valve’, which will instantaneously drain water from the dredge slurry entering Pond 1 to a pump directing water to Pond 2. Further, the walls will not ‘seep’ saline water at saturated hydraulic conductivity, given the wall thickness (9 m at the base) and shallow depth of water maintained in Pond 1.

- *Appropriateness of replanting pasture grasses in stockpile site area*

The areas to be replanted with pasture grasses include those areas that are currently comprised of pasture. There is no intention to replant pasture grasses in any EEC along the pipeline route.

- *Reference to Pond 3 in text*

It is acknowledged that this is an error. As indicated in Section 2.4.1 of the EA, it is proposed to only have two settling ponds.

- *Oyster lease would negate commercial fishing opportunities*

This statement by Council is totally false and obviously made without an understanding of commercial fishing practices in Wallis Lake. The areas between the racks in oyster leases (where deep enough) are productive seine netting grounds for mullet. The proponent’s experience in oyster farming in the area is that the lease area would be utilised regularly during seasonal conditions for commercial fishing operations.

- *Discrepancy between composition of dredge material as stated in EA and as identified in the aquatic assessment*

The areas of fine material identified in the aquatic ecology report relate to small areas of fine surface material. The sampling undertaken in the geotechnical assessment was representative of the entire lease area and more importantly, throughout the entire depth profile of 2 m. The reporting of the silt/clay/sand ratios in the Geotechnical report are valid and expected in this part of the estuary.

3. It is my understanding that there is a current investigation of a possible breach of environmental legislation or statutes by Council and by DEC over part of the area proposed for the dredge spoil pipeline.

- *Area of wetland to be cleared greater than stated in EA*

The current investigation by Council and the DEC of alleged breaches of relevant legislation by the landowner in regards to fenceline clearing on lots proposed to be used for the dredge spoil pipeline route are irrelevant to the assessment of the potential impacts of the proposed development. These comments by Council should be read by the DoP in the knowledge that Council has been taken to the Land and Environment Court by this landowner in relation to a SEPP 5 development proposal located to the north of the proposed stockpile site.

Advice from DEC officers to Council staff that 400 m of swamp sclerophyll forest along the proposed pipeline route may need to be removed to facilitate the development is totally incorrect. The removal of 400 m of swamp sclerophyll forest is not part of the proposal and is not required to facilitate the development. If this was the case, then the impact of this clearing would have formed part of the flora and fauna assessment.

4. There is, in our opinion, an unreasonable and unacceptable risk of serious harm to significant and sensitive ecological values and possibly inadequate levels of justification, prediction and mitigation prevention of such.

- *Potential for breach of dredge spoil pipeline and pond walls and impacts on biodiversity and EEC*

There is a very low probability of the pipeline breaching for reasons stated previously. The pipe used will be brand new and rated to twice the pressure output of the booster pumps. Further mitigation measures including regular inspection of the pipeline for any signs of stress and the constant monitoring of dredge pipe pressure by the dredge operator will ensure that this risk is minimised. The issue of the pond walls seeping water was addressed previously and indicated that this is not an issue of concern for reasons state previously.

- *Project assessment panel workshop needs to be conducted to assess impacts*

At the commencement of the project, an invitation was extended to all authorities, including Council, to attend a site meeting to discuss the project and potential issues. All authorities declined to attend a meeting and the DoP also indicated that such a meeting was not required. It is submitted that a project workshop at this late stage of the project is not required to address any of the issues raised by Council or any other authority, as they have been addressed adequately in our recent correspondence back to the Department.

- *Potential impacts of stockpile site operations on 1:100 year flood level upstream of the site*

Flooding issues were addressed adequately in Section 4.1.6 of the EA. Council's comment regarding assessment of the impact of the operations on 1:100 year flooding upstream presumably is in reference to the existence of Pond 1 and whether its surface area is of sufficient size to affect this flood height, by means of reducing the available area on the floodplain for flood flows.

Pond 1 is approximately 1.7 ha in area. Compared to the area of available floodplain during a 1:100 year ARI flood, this area is infinitesimally small and based on a 'first principles' assessment, would have absolutely no impact whatsoever on 1:100 year ARI flood heights upstream. There is no requirement for any modelling of flood behaviour to confirm this. We note that the DNR, the government agency responsible for flooding, has not raised this as an issue of concern.

- *Rehabilitation of all native vegetation removed or damaged*

Section 7 of the EA outlines mitigation measures which include revegetation of all affected areas, the process of which will be outlined in the Environmental Management Strategy that will be prepared for the project, as indicated in Section 7.2 of the EA.

- *Vegetation on Lot 59 contains vegetation of high habitat and high conservation significance*

The area of Lot 59 proposed for part of the stockpile site operations does not contain any vegetation identified as high habitat value or high conservation significance. This vegetation occurs elsewhere on Lot 59 and is not in the area of Lot 59 proposed for stockpile site operations.

- *Oyster lease should become operational within 12 – 18 months of completion of dredging*

It is the intention of the proponent to commence operations on the lease immediately upon cessation of dredging.

- *Construction certificate required for installation of pipeline and fixings and site offices and amenities*

It is our understanding that there is no legislative requirement for issuing of a construction certificate for the pipeline installation, as it is not building work as defined under the *Local Government Act 1993* that Council is required to certify in accordance with the BCA (the pipeline is not covered by the BCA). Further, the pipeline is not infrastructure work that is required to be certified by Council in accordance with any standards or building codes administered by Council.

- *Access for persons with disabilities*

There is no requirement for access to be provided for persons with disabilities to the stockpile site. The site is not a retail outlet and will be visited only by clients seeking sand (ie. persons driving trucks). The

operation of machinery such as excavators, dozers loaders and trucks is not consistent with a need to provide for persons with disabilities.

Department of Natural Resources

Our response is provided in order of the issues raised by DNR.

Justification for the proposal

The proponent is an oyster farmer whose intention is to improve an existing lease area to farm oysters. In order to do this the lease area needs to be dredged. The utilisation of the sand resource is stated in the EA as a means of paying for the dredge operation, which would be undertaken at the proponent's expense, by the proponent, using his own equipment. Further, the utilisation of the sand resource is consistent with ESD principles of sustainable use of resources in that there is economic 'value-adding' to the dredge spoil. No external contractors would be involved in the dredge works. The DNR's (incorrect) view of the project's intent is irrelevant to assessment of the economic, social and environmental impacts of the development.

Location of the dredge area and the oyster lease

Figures 1.2 and 1.4 of the EA show the location of the oyster lease area for illustration purposes only. The survey plan shown in Appendix B shows the surveyed extents of the area within the lease area proposed for dredging. This outline is shown in Figures 1.2 and 1.4. Figure 1.3 of the EA shows a previous plan of the oyster lease, with a modification made to the lease area. The lease area has been modified (increased) since that time.

Attached is a figure as requested which shows the surveyed extents of the lease area (9.2387 ha) and the area proposed for dredging (8.152 ha) overlaid on the aerial photo of the lease area. A cadastral plan of the lease is also attached. The two areas (1.0867 ha) not included in the proposed dredge area were dredged previously approximately 16 and 25 years ago respectively. These areas have not accreted sediment since being dredged.

Draft NSW Oyster Industry Sustainable Aquaculture Strategy

The maximum dredge depth is stated as being 2 m below mean low water mark. The DNR has indicated that the final maximum dredge depth might be -2.1 m AHD. Our experience with recent large dredging projects (Harrington Waters in the Manning River) is that a 0.3 m tolerance will be acceptable for the maximum dredge depth to accommodate dredge operator error, and this would normally be included as a condition of consent. This therefore negates any arguments regarding dredge depths being possibly 0.1 m greater than stated in the EA.

While not being a responsibility of the DNR, the issue of the maximum dredge depth of 1m stated in the draft OISAS has been addressed in previous correspondence responding to comments from the DPI. In summary, the draft OISAS is not relevant, as a permit is not required for dredging under Section 201 of the

Fisheries Management Act 1995 for the project, as a Licence will be issued under the *Crown Lands Act 1989* for dredging purposes (refer to Dept Lands submission on project). Further, the DPI has a published policy for dredging and reclamation (Section 5.1.3 of the Aquatic Habitat Management and Fish Conservation Update 1999 – copy attached). Part (d) of Section 5.1.3 states:

(d) Dredging in shallow areas generally must not exceed a depth of 2 m below mean low water mark, to facilitate water mixing and ensure that the substrate remains in the light penetration (euphotic) zone to allow recolonisation of algae, seagrasses or macrophytes.

Therefore, the proposal to dredge to a depth of 2 m below mean low water is consistent with published DPI policy for dredging.

Hydrodynamics

The DNR has indicated that the predicted localised effects may “further exacerbate community concerns about shoaling in the vicinity of Jonnell Cove”. While this may be the case, in terms of impacts, the DNR has not indicated that the predicted impacts of the dredging on the hydrodynamics of the lake in the vicinity of the dredge site are unacceptable. The DNR therefore concurs with the results of the hydrodynamic investigations and there are no outstanding matters in respect of this issue.

Wetland and saltmarsh

Concerns regarding the establishment and decommissioning of the dredge spoil pipeline in the saltmarsh area of the SEPP 14 wetland have been addressed previously in this correspondence.

Rehabilitation of the saltmarsh area has also been addressed, with detail being provided in the EA, including the need to provide a rehabilitation plan as part of the Environmental Management Strategy for the project (prior to commencement of the project). There is no requirement to provide the detail of this plan in the Statement of Commitments.

Mitigation measures

Mitigation measures regarding the pipeline would be addressed in the Pipeline Management Plan, which would form part of the Environmental Management Strategy for the project (prepared and approved prior to commencement of the project).

Riparian issues

Impact assessment on the hydraulic functioning of the channel were addressed in the EA. The assessment concluded that the proposal would not impact adversely on the hydraulic functioning of the Wallamba River or Wallis Lake.

Stormwater and flooding

These comments were raised by the DNR in their review of the document prior to public exhibition and were addressed in the final document. As indicated in Section 2.8.3 of the EA, the ground surface of the lot on which it is proposed to operate the stockpile is relatively flat, which is typical of an area of Holocene-age beach ridge deposits (DMR, 1991). Elevation varies between 1 – 2 m AHD. The ground surface has been extensively modified, having been ploughed and sown with pasture grasses since the area was first settled and used as a dairy 80 – 90 years ago. There are no surface drainage features on site, apart from a constructed small dam at the eastern end of the site, due to the highly permeable soils on site. In the lower elevations of the site, where soils are finer and less permeable, surface water flows over a broad area in a generally north west direction into the adjacent swamp sclerophyll forest area. Stormwater management on the site is a very minor issue, due to the negligible runoff from the site at present and the absence of any proposed hard stand surfaces as part of the development proposal.

The area of the stockpile site that has not been filled is subject to inundation during low frequency flood events. Natural ground levels are between 1 and 1.5 m AHD. Modelled peak (100 year ARI) flood levels recorded in the Wallamba River less than 1 km upstream of the site are reported in the Forster Tuncurry Floodplain Management Study (DLWC, 1998) as 2.44 m AHD.

Given the distance of the stockpile site downstream of this point and large area of forest between the river and the proposed site, this level would be expected to be slightly reduced. Therefore, during a 100 year ARI event, the site might be expected to be inundated by between 0.9 – 1.4 m. Given that the area of Pond 1 (located on low permeability soils) is approximately 1.7 ha, it would be expected that Pond 1 would displace between 15,300 m³ – 23,800 m³ of floodwaters. In light of the available area of floodplain in the vicinity of the site, the spread of this volume over such a large area would not contribute to a measurable (or meaningful) increase in flood height.

For example, a conservative estimate of the available floodplain within the study area alone is approximately 1.25 km². Under a worst case scenario of 23,800 m³ displacement, this would equate to approximately a 0.019 m increase in flood height over this area. This approximation, however, is a gross over estimate, as it does not include the several km² of available floodplain on the opposite side of the Wallamba River (or the rest of the floodplain for that matter), which would also act to accommodate any displaced volume of water. A review of the topographic map for this area indicates a conservative estimate of 2 km² for this part of the local floodplain. The corresponding increase in flood height is reduced to 0.0076 m (0.76 cm) when this is included along with the floodplain area (1.25 km²) within the study area.

As this analysis shows, the effect on localised flooding would be negligible. Further, floodwaters in this area of the Wallamba generally recede after several days. Therefore the impact of the settling ponds on localised flooding would be imperceptible and hence negligible.

The settling ponds and stockpile sites are mostly confined to existing cleared areas and not located in ‘sensitive communities’ or nearby watercourses. Some minor clearing of habitat is required for Pond 1 and the impact of this clearing has been assessed in the Flora and Fauna Assessment, with no significant impacts predicted.

Groundwater

As indicated in Section 2.4.3 of the EA, the settling ponds will be ‘turkey nest’ ponds (*ie.* no excavation required), with the walls built up above the existing ground surface. Therefore, the ponds will not intercept the groundwater table and therefore will not provide a window into the water table. The comments from the DNR regarding a request for additional information regarding potential impacts to groundwater are therefore not relevant to assessment of the project.

Summary

We trust that the response provided in this letter has addressed the issues raised and look forward to working with the Department further if required to resolve any other outstanding issues. If you have any queries, please do not hesitate to contact the undersigned.

Yours faithfully
Orogen Pty Ltd



DR JUSTIN MELEO
Project Director