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11 December 2025

Ethan Brice
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Ethan

Subject: Gunlake Modification 3- Western Emplacement (SSD-12469087-Mod-3)

Thank you for the opportunity for Goulburn Mulwaree Council to provide comments on the Modification Report for Gunlake Modification 3 – Western Emplacement.

Council has reviewed the Modification Report prepared by EMM, dated November 2025 and are generally supportive of the proposal. However, there are issues with the description of the vegetation present in the impact area, its biodiversity values and the locations of Biodiversity Assessment Method (BAM) plots used to collect data.

Specifically:

- The area is described as a derived grassland with scattered trees and shrubs, but the BAM plots appear to have been located to avoid trees. Aerial imagery and site photographs appear to show patches of significant regenerating Eucalypts, but BAM plots appear to have been located to avoid these areas.
- Trees, including smaller regenerating trees of various stem diameter classes, all contribute to the Vegetation Integrity Score and ultimately to BOS Ecosystem Credits.
- Examination of aerial imagery shows many large fallen trees and logs in the impact area, all of which also contribute to the Vegetation Integrity Score and ultimately to BOS Ecosystem Credits. BAM plots appear to have been located to avoid any areas featuring fallen trees and logs.
- The credit report provided from the BAM calculator shows the assessor has selected “no hollow bearing trees present”. This conflicts with a photograph of a large stringybark tree identified in the ACHAR as an Aboriginally significant tree and now registered in AHIMS as such. The photograph of this tree clearly shows a significant hollow.
- The photograph of the identified Aboriginally significant tree also clearly shows numerous fallen logs and abundant regenerating Eucalypts in the area.

Overall, the VIS (Vegetation Integrity Score) provided by the BDAR is extremely low, and it seems this is because the BAM plots have been placed in areas that do not contain any logs and trees and is likely to be a significant underestimate of the true VIS score for the impact area.

Appendix B "Vegetation Survey Data" of the BDAR summarises the data from the three BAM plots used and shows that no logs were recorded, and no trees of any size were recorded in any of the BAM Plots. This is important because if the VIS is below a certain threshold, the BAM will determine that no BOS credits are required (which has happened in this case).

Marked-up screen shots have been attached to illustrate these issues. Based on the available information, the BAM plots have not sampled a true representation of the vegetation on the site and the VIS score presented is a significant underestimate.

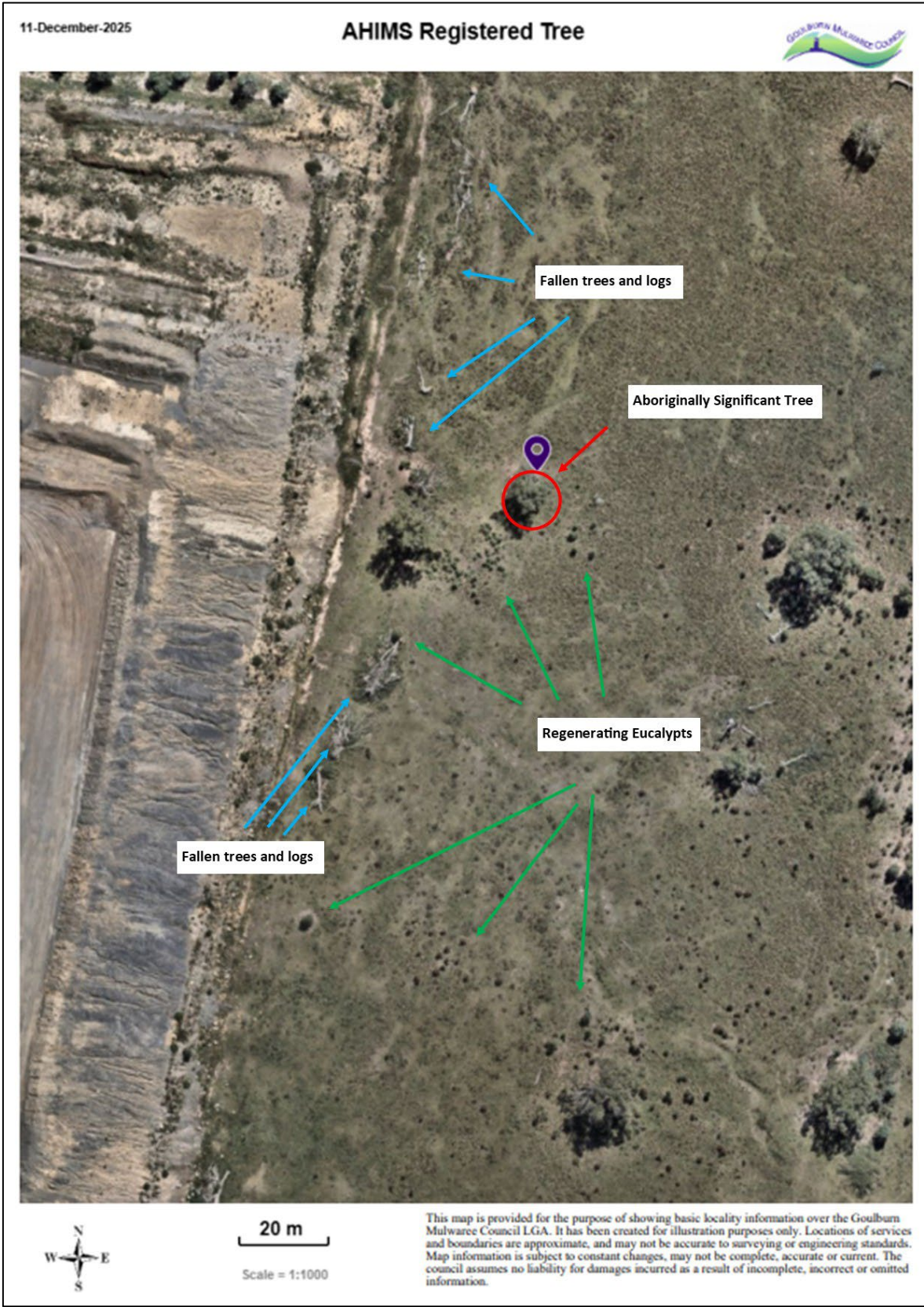
Should you require any further information, please contact Brian Faulkner, Environment & Biodiversity Assessment Officer on (02) 4823 4519.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'SA Mc', is positioned above a thin horizontal line.

Scot Martin
Director Planning & Environment

Biodiversity Values Not Considered Adequately in BDAR



Location of Trees in Relation to BAM Plots



Proposed Modification Area Large Eucalypt

