

Dominic Crinnion

From: Susan Harrison
Sent: Monday, 13 November 2017 4:21 PM
To: Karen Harragon
Cc: Richard Bonner; Greg Steenbeeke; Dominic Crinnion
Subject: MPE Stage 2 - Biodiversity Assessment Report and Concept Mod
Attachments: OEH detailed comments - MPE Stage 2 RTS BAR.docx

Hello Karen,

OEH has reviewed the revised BAR and advises that it addresses many of the issues raised earlier. There are, however, still some issues which are detailed in the attached table.

The main issue is that the offset quantum identified to be addressed in the Biodiversity Offset Strategy is not identified in the context of the credits required by other components of the intermodal developments (i.e. MPE Stage 1 and MPW). Without knowing the total biodiversity impacts, or at least the quantum of credits generated that have already been quarantined for the other stages on the intermodal developments, it is not possible to gauge the potential for offsets to be supplied.

Other issues include:

- vegetation communities identified in various mapping shown through the BAR change between maps, with different vegetation base layers shown. The impacts are incorrectly identified to different communities depending on the maps referenced. For instance, the text in the BAR mentions seven vegetation communities while the mapping shows nine in the outer assessment circle.
- in at least one instance, a directly impacted species is identified as having no requirement for further action.
- one fauna species identified in the tool is not included in the BAR.
- The assignment of veg types is not done in a quantified way - the justifications are made in qualitative manner
- the scant addressing of efforts to minimise biodiversity impacts, as the BAR presumes the entirety of the site is cleared.
- the reference to the new Biodiversity Conservation Act and method throughout rather than the repealed Threatened Species Conservation Act which continues to apply to this project via the savings and transition provisions.

OEH recommends these and the other issues itemised in the attached be addressed to ensure that the BAR adequately identifies, quantifies and determines the biodiversity impacts.

With regards to the proponent's preference for a consolidated Biodiversity Offset Package, OEH have no objections providing it clearly identifies the specific offset (including its location) to address for the identified impacts of each separate stage of development.

In relation to Aboriginal Cultural Heritage, OEH have no comments on the RtS and the measures proposed to address potential impacts on the 2 isolated artefacts within the revised construction boundary.

Regards

Susan Harrison