

13 February 2019

Dear Sir/Madam,

**Re: Public comments on DWER permit number 8191/1**

Thank you for your response to CPS 8191/1. We understand your concerns that the impact of clearing this area may have on flora and fauna populations in the area and some confusion that has stemmed from a variation on the application being submitted.

We had previously submitted an application with a construction area footprint of 39.62 ha and have now changed the footprint to 42.01 ha (which includes the existing drain). The footprint has increased due to a marginal change required along the Northern section of the drain; however the southern section has been able to be refined as the project matured, which meant increasing clarity of design requirements. This has led to a reduction of the clearing area by 3.57 ha in what is classed as supportive and core habitat within the footprint.

We understand you had concerns with the possibility this change was not assessed with the same level of scrutiny as the original application. Please know this change was submitted with the appropriate variation documentation which will be assessed alongside development footprint changes under the EPBC Act.

We acknowledge there is an opportunity to refresh our possum survey data. An additional possum survey is due to be undertaken in February/March 2019 to further inform a possum management strategy for the project. This survey will be undertaken according to Department Biodiversity Conservation and Attraction's (DBCA) Planning Guidelines. As in previous surveys, the whole footprint area will be taken into account, including native and non-native habitat with value as corridors, shelter and non-native food sources. This also includes areas with an absence of understory, as (as noted in your submission) this does not discount use by WRP.

The possum management plan will include a comprehensive approach to minimising impact to WRPs during the project and into the future. We are investigating ways to maintain continuous tree canopy as much as possible, detecting the presence of possums before clearing, staging the clearing to allow them to disperse, best practice relocation if necessary and other solutions to increase habitat value of the remaining peppermint woodland. Work is currently being undertaken to determine whether mature

trees along the footprint boundary can be retained with pruning rather than removing them, to further reduce the impact to local wildlife.

Your concerns relating to the offset from Peppermint Park being cleared as part of this project are noted. This area was classed as drainage reserve prior to becoming an offset area and plans to upgrade the Vasse Diversion Drain existed prior to the offset area being established. Given an existing offset area is within the clearing footprint, a multiplier will be applied to the offset area required.

Offset areas are designed to provide long-term gain to the environment on a broader level than only for the benefit of impacted species as you have suggested. However, the offset proposal is currently being reassessed; which would see the proposed offset move from the Rocky Gully rehabilitation site. In addition to the offset area, Water Corporation is also investigating the feasibility of planting more peppermint trees in areas along the drain where tree canopy is inconsistent, to increase connectivity and habitat value.

As you also mention in your letter, in November 2017, trees were pruned and ground was cleared along the drain in Queen Elizabeth Avenue. This was an activity undertaken by Water Corporation in order to implement long term control measures for the Brazilian Pepper trees as recommended by GeoCatch. Machinery used for these measures require adequate access to the area and pruning of the surrounding trees is necessary to allow for this. Additional pruning of dead branches was carried out at the same time which may have made pruning seem inconsistent, excessive and random. Another spraying of the re-sprouting Brazilian Pepper trees has been undertaken as planned, during the week commencing 28 January 2019.

In relation to your concerns about the Carbanup Spider Orchid, two surveys have already been carried out during spring and they were not reported on either occasion.

*Conospermum Caeruleum* sub-species Busselton was not identified during surveys, as there was limited information on this sub-species available to Water Corporation and GHD. Water Corporation was made aware of this flora on a recent visit to the drain on 15 December 2018, with representatives from DBCA and have since been planning how best to manage impact to *Conospermum* within the development footprint. We are happy to follow best-practice recommendations for this sub-species from DWER and DBCA.

In order to ensure ongoing public safety through flood prevention in Busselton, it is essential that the Vasse Diversion drain is upgraded. Alternatives in design to reduce the clearing footprint present far bigger environmental risks such as acid sulphate soils and a concrete lined drain with steep slopes (risk to wildlife safety) and a significant reduction to visual amenity. Water Corporation believes the solution in the current proposal is the superior design option and that environmental impacts of this upgrade can be effectively managed.

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I trust this has alleviated some of your concerns and thank you again for taking the time to highlight some important environmental considerations for the project.

Kind regards,

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**Project Manager**