

Two Comments on Proposed Changes to the EOAM.

1) In the current EOAM it states:

In boxed Notes (p 8)

“B. the benefits of the offset occur in the same area as the impacts of the proposed clearing”

DNR proposes that the underlined words are incorrect and inconsistent with Section 2.2 (p7), which states:

“In relation to a draft Property Vegetation Plan (PVP), the impacts of the proposed clearing and the benefits from any offset whether the same property or elsewhere, will improve or maintain environmental outcomes for each relevant environmental value.”

The inconsistency of “whether the same property or elsewhere” in this section with B “in the same area” is not simply resolved by the proposed DNR change.

If we are serious about “offsetting” then the impact of an activity in one location on biodiversity can certainly not necessarily be ‘offset’ somewhere else. If the impact is, for example, consequent to clearing of a vegetation community with winter flowering species such as Forest Red Gum for example, if we think of Yellow-bellied Gliders for instance, it will be of no benefit to the local creatures at all if somewhere over the hill and far away there is protection of even this same vegetation community. If species specific requirements of habitat features critical to their survival can be offset, then obviously they need to be located in the area that can provide that which is intended – mitigation of the impact of the proposed activity to even maintain or improve environmental outcomes.

The inconsistency between the wording is resolved by clear definition of “area”, not by including an imprecise term “elsewhere”.

The definition of ‘area’ should reflect the definition of population.

The EOAM PVP defines a population (p46) .

Note:

For the purposes of offsets a local population is defined as the total population of the threatened species on the property or properties subject of the Property Vegetation Plan on which the clearing is proposed.

A loss of individuals of the species, or its habitat or its key habitat features can only be offset by a corresponding gain in individuals of the species, or its habitat based on equivalent vegetation type or its key habitat features.

The Property Vegetation Plan must include management actions in appropriate offset area(s) that will achieve the offset.

The PVP must specify the management actions in the offset area. This infers a specific locality of the offset area. The geographic location of the offset area must be within the locality that affords an actual maintain or improve outcome for the affected species.

2) Currently the EOAM states (at 5.4.2, Assessment) that:

“Different vegetation types must be assessed separately. If the area proposed to be thinned contains more than one vegetation type the proposal must be divided into

vegetation zones each comprising a relatively homogenous vegetation type. Each zone must be separately assessed.

Within each vegetation zone, 0.1 hectare plots must be randomly placed every two hectares, with a minimum of one plot and a maximum of 10 plots per vegetation zone.

The proposed change to replace the underlined above with “In each vegetation zone, plots must be randomly placed” , is apparently only justified by “clarify wording and intent”

This is mystifying. How is the proposed less precise requirement for size and location of plots “clarifying”? It is not. There is no apparent basis for this change. No change is required.

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