

SHIRE OF JERRAMUNGUP

1 PROPOSED PLANTATION – PLANNING APPLICATION

- 9.3.1 g) DPIRD Response Report
- 9.3.1 h) Ediegarrup Reserve
 Plantation Management
 Plan V2
- 9.3.1 i) DPIRD Response Letter

ORDINARY MEETING OF COUNCIL
24 May 2023

9.3.1 g) DPIRD RESPONSE REPORT - PROPOSED PLANTATION - PLANNING APPLICATION

BACKGROUND:

At the time of compiling the report for Agenda item 9.3.1 (14 May 2023), the planning application had been referred to the Department of Primary Industry and Resource Development (DPIRD) for comment, but no response had been received.

In the Consultation section of the report, it was noted that, should a response be received, it would be circulated to Councillors under separate cover, together with comment by the administration.

The application had been referred to DPIRD in line with procedures set out within Council's Local Planning Policy No.10 Agroforestry and Plantations.

The application was received on 5 April 2023 and referred to DPIRD on 6 April 2023, with comments requested to be received by 12 May 2023. DPIRD replied by email on 15 May 2023, and their response was forwarded to the applicant for review and comment on 16 May 2023.

The applicant provided a response to DPIRD's submission on 16 May 2023. They acknowledged comments put by DPIRD and provided an updated Plantation Management Plan (Attachment 9.3.1 h)) addressing the two issues raised by DPIRD for attention.

DPIRD SUBMISSION – SUMMARY:

- 1. DPIRD does not object to the proposal and provided the following comments:
 - Gondwana Link The subject property falls within the Gondwana Link, within a focus area between Fitzgerald River and Stirling Range National Parks. When revegetated, the property would link adjoining Bush Heritage properties with the Corackerup Creek, which feeds into the Pallinup River;
 - The Gondwana Link is supported by a number of State-funded organisations, including a number of Land Conservation Committees who are supported by DPIRD;
 - ii) **Soil Types** Provided an overview of soil types across the property, and identified that the range of landscapes and soil types will permit the proponent to establish a large number of unique terrestrial plant communities which meet some of the Gondwana Link project objectives.
 - iii) **Fire Management and Erosion Control** Identified that the firebreaks and access tracks appear to traverse sloping land. Tracks without measures to control surface water can increase risk of mild to severe water erosion and the proponent has obligations under *Soil and Land Conservation Act* to mitigate and prevent and degradation.
 - DPIRD requests that fire breaks and tracks include appropriate surface water engineering structures to control/capture surface water to minimize the risk of soil erosion.

- **DPIRD supports** that all dams are to remain accessible for firefighting and some dams would aid in fire management on surrounding properties.
- **iv) Biosecurity** DPIRD recommended that weed and pest control be included within the Plantation Management plan as an annual activity for the entire duration of the project. This is an important commitment and will meet their obligations under the *Biosecurity and Agriculture Management Act*.

DPIRD SUBMISSION - APPLICANT'S RESPONSE:

The applicant's response to the submission received from DPIRD is set out below:

1. Fire Management and Erosion Control

Bush Heritage agrees with the recommendation to manage erosion on access tracks and fire breaks through the incorporation of diversion drains and other engineering solutions. These tracks will be inspected and maintained yearly.

2. Biosecurity

Bush Heritage agrees with the recommendation that weed and pest control is included in the Plantation Management Plan as an annual activity for the entire duration of the project. This is an important commitment and will meet our obligations under the *Biosecurity and Agriculture Management Act 2007*.

Both recommendations have been incorporated and/or bolstered in the updated Plantation Management Plan (attached at 9.3.1 h)).

ADMINISTRATION COMMENT:

The Administration's recommendation for support of the project is not altered by the response from DPIRD. The applicant has agreed with the recommendations put forward and has provided an updated Plantation Management Plan (Attachment 9.3.1 h)), which will replace the original Attachment 9.3.1 c) Ediegarrup Reserve Plantation Management Plan.



Ediegarrup Reserve Plantation Management Plan

This Plantation Management Plan (PLP) has been developed for the establishment and ongoing operation and Management of the Revegetation Plantation at Ediegarrup Reserve, located at 1287 Boxwood Hill-Ongerup Road, Boxwood Hill, WA 6337.

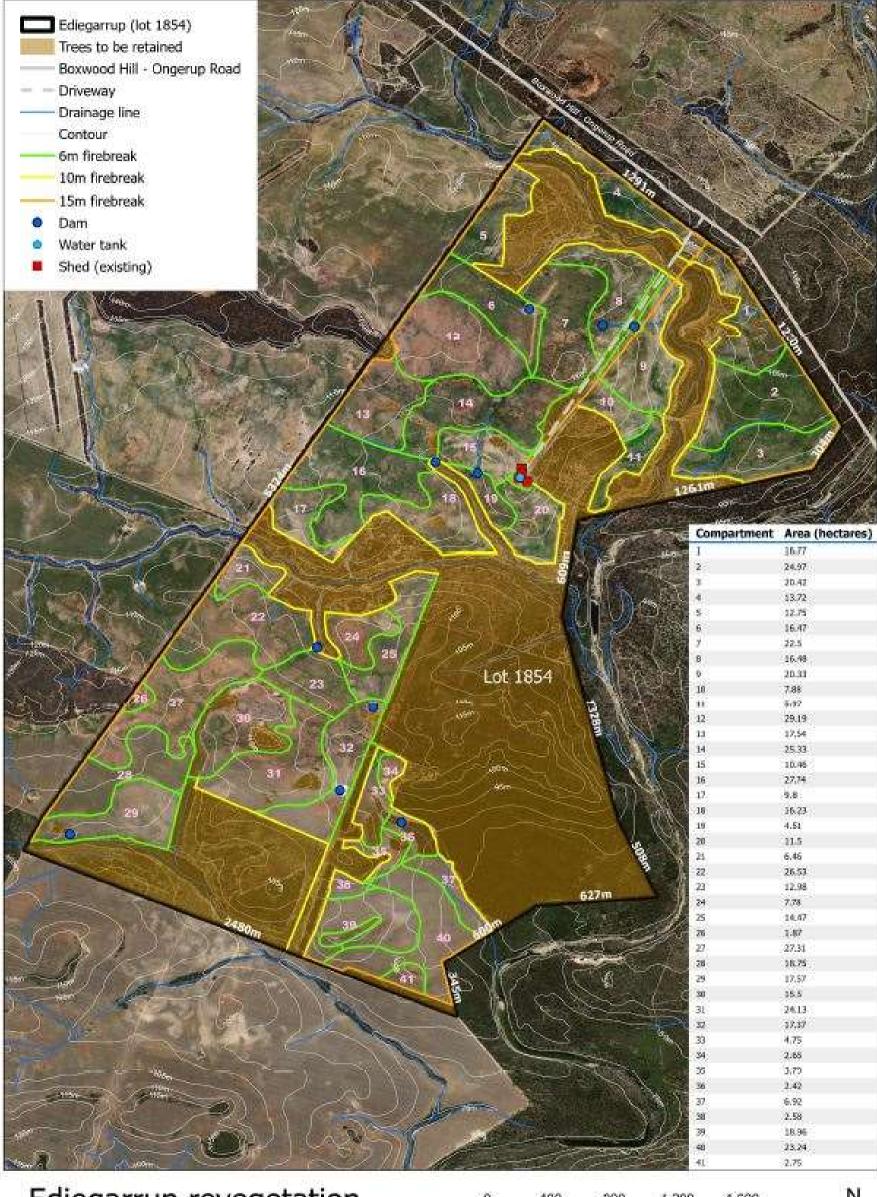
The PLP has been developed in accordance with guidelines contained in the Code of Practice for Timber Plantations In Western Australia, 2014.

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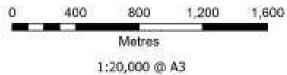
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Plantation Map



Ediegarrup revegetation development application site plan





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Establishment Plan

Areas of native vegetation and significant values

The areas of native vegetation are clearly outlined in the Plantation Map and are to be retained and managed to avoid any loss in either extent or composition.

Setback distances to watercourses, wetlands, reservoirs and significant values

All watercourses on the property have been retained to provide a buffer of at least 30m. None of the plantation area will be located within this buffer zone. All dams are to remain accessible for firefighting purposes (see Bushfire Management Plan).

Statutory setback distances to dwellings and gazetted infrastructure

The only buildings existing on the property are non-habitable sheds, located at the end of the Driveway. An Asset Protection Zone of 50m will be established and maintained around these buildings. This is also the location of the Water Tanks for firefighting purposes.

Control of declared animals, declared plants and other pest plants

All declared pest animals and plants will be management in line with Best Practice. Fox cat and rabbit control have been undertaken on the site since Bush Heritage acquired the property in March 2022 and will be continued annually. Weed control will be undertaken across cleared portions of the property prior to revegetation to remove all weed species, including declared pest species.

Areas to be planted, compartment sizes

The total are to be planted across the property is approximately 600ha and will be separated into blocks of <30ha to allow for effective access and management. The separation into block planting areas of <30ha will also assist in fire fighting operations.

Species to be planted

All species to be planted occur locally and are based on Vegetation Survey conducted on the property in Spring on 2022. The species to be planted are aligned with soil types matching the vegetation communities found in the bushland areas of the property and surrounding conservation reserves.

A list of Species found on Ediegarrup are provided in Appendix 1.

Direction of planting lines in relation to contours and natural drainage

Where possible, planting lines will be aligned with contours and natural drainage lines to minimise erosion across the site and impacts on local waterways.

Description of soil preparation methods

Following weed control, seed will be planted into the soil using a one pass direct drill system that will scalp soil 20cm either side of the drill line. On some of the plating sites, particularly on the Moort Forrest areas, the topsoil (10-50mm) will be removed by a grader to reduce weed burdon, then ploughed to break up soil profile and seed broadcast across the site.

Pest and weed control prescription

Where possible, weeds will be sprayed in the early spring of the year prior to planting to reduce weed seed set and limit additional soil seed stores. Weeds will be sprayed at least 2 weeks prior to planting and will incorporate a knockdown (e.g. Glyphosate) and residual (e.g. Symazine).

Pest Animals including foxes, cats and rabbits will be controlled annually.

Planting prescription

Direct seeding of seed mixes relevant to soil types will be delivered via a one pass direct seeding machine at line spacings of 1.5m and at a rate of approximately 750g/ha. Following direct seeding, seedlings will be planted into the rows to enhance the diversity and improve success rates, particularly for proteaceous species.

Follow-up planting will be conducted in areas where seedlings have failed to achieve full coverage for 2 years post planting.

Access and firebreaks

Access points and fire breaks will be delineated prior to planting of seed or seedlings to ensure correct alignment and sufficient widths are established. The fire breaks and access tracks will be in accordance with the Bushfire Management Plan and Plantation Map.

Appropriate erosion control measures will be incorporated into the track to minimise impact from erosion, particularly on steeper slopes.

Fertilising prescription

No fertiliser will be applied as part of this plantation.

Sensitive neighbours

The only sensitive neighbours are related to Red Moort conservation reserve, owned and managed by Bush Heritage Australia. While some of the neighbouring properties may have crops established at the time of planting, care will be taken to avoid drift when applying chemicals to control weeds.

Security management

Security of the site will be managed through regular patrols and inspections of the property by BHA staff and through the installation of a gate at the front driveway.

Maintenance Plan

Native vegetation management

The areas of native vegetation are clearly outlined in the Plantation Map and are to be retained and managed to avoid any loss in either extent or composition. These areas will not be exposed to chemicals or fertilisers and will not be removed mechanically unless to comply with Fire Control requirements.

Pruning and thinning regimes

No pruning or thinning regimes will be delivered as part of the ongoing management of the plantation.

The Bushfire Management Plan outlines the requirements to regularly inspect and monitor vegetation and manage excessive fuel loads through appropriately planned and delivered prescribed burns.

Control of declared animals, declared plants and other pest plants

Regular (at least quarterly) patrols of the property will be conducted in order to manage declared pest animals and plants on the site. Ongoing management of foxes, cats and rabbits will be undertaken as well as management of declared weed species and other pest plant species.

Weed and pest control prescription

Follow-up spraying of the planted area will be conducted at least 3 times in the 18 months post planting to reduce weed burden and improve plantation success

Fertilising prescription

No fertiliser will be applied as part of this plantation.

Access and firebreak maintenance

Access points and fire breaks will be delineated prior to planting of seed or seedlings to ensure correct alignment and sufficient widths are established. The fire breaks and access tracks will be in accordance with the Bushfire Management Plan and Plantation Map, including access to dams for firefighting.

Grazing strategy

No grazing is planned for the plantation area.

Bio-security issues

Bio-security issues will be managed in line with other Bush Heritage Properties. The most significant threat for native vegetation is the spread of *Phytophthora cinimmomi* or dieback. To manage this threat, all vehicles will need to be cleaned and inspected upon entry to site. Other biosecurity issues will be monitored regularly during onsite inspections.

Pest animals will be controlled at least annually in line with best practice guidelines.

Infrastructure maintenance

There is limited infrastructure present on the property, however all existing infrastructure will be monitored at least annually. Infrastructure to be inspected include:

- Fences and gates
- Sheds
- Firefighting Water Tanks
- Firefighting Equipment
- Dams
- Powerlines

Project Schedule

YEAR 1: 2023	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Development Application												
Site preparation & planting*												
Initial germination monitoring												
Weed/pest control (as req)												
Access and Fire Break Maintenance												
Infrastructure maintenance (as req)												
YEAR 2: 2024	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Survival monitoring (autumn/spring)												
Weed/pest control (as required)												
Infill planting (as required)												
Access and Fire Break Maintenance												
YEAR 3: 2025	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Survival monitoring												
Weed/pest control (as required)												
Infill planting (as required)												
Carbon monitoring												
Access and Fire Break Maintenance												
Infrastructure maintenance (as req)												
YEAR 4: 2026	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Survival monitoring												
Weed/pest control (as required)												
Infill planting (as required)												
Carbon monitoring												
Access and Fire Break Maintenance												
Infrastructure maintenance (as req)												
YEAR 5: 2027	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Survival monitoring												
Weed/pest control (as required)												
Infill planting (as required)												
Carbon monitoring												
Access and Fire Break Maintenance												
Infrastructure maintenance (as req)												
2028 and Beyond	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Weed/pest control (annually)												
Infill planting (as required)												
Carbon monitoring												
Access and Fire Break Maintenance												

^{*} Site preparation and planting will not begin until project registration confirmation and Development Approval have been received.

	Greening Australia
	Bush Heritage Australia - on-going

Appendix 1 – Species List

black = dominant, dark grey = subdominant/emergent., or only recorded as dominant rarely.

Broad veg type	Veg Description	Canopy	Understory
Moort	E. platypus Low Open Forest	Eucalyptus platypus	Melaleuca acuminata
			Melaleuca pauperiflora
			Melaleuca cucullata
			Melaleuca torquata
			Acacia glaucoptera
			Cyathostemon blacketii
			Melaleuca haplantha (rarely)
			Melaleuca undulata (rarely
			Daviesia argillacea (rarely)
			Disphyma crassifolium (rarely)
			Rhagodia preissii (rarely)
		Eucalyptus vesiculosa (rarely)	Melaleuca pentagona
Mallets	E. melanophitra &/or E. astringens Tall Woodland	Eucalyptus melanophitra	Melaleuca acuminata
		&/or	Daviesia argillacea
		E. astringens	Dodonaea viscosa
			Rhagodia preissii
			Hibbertia exasperata
			Phebalium tuberculatum
			Gastrolbobium discolor (complex)
			Philotheca gardneri (ssp not det yet)
			Lasiopetalum compactum
			Cyathostemon blacketii
			Indigofera australis ssp hesperia
			Melaleuca pentagona
			Lepidosperma sp Saltbush Hill
			Lepidosperma humile

	Eucalyptus flocktoniae/ Euc. ssp Open Mallee over		
Mallees	Melaleuca spp (heavy soils)	Eucalyptus flocktoniae	Melaleuca cucculata
		Eucalyputs annulata	Melauca pauperiflora
		Eucalyputs vegrandis ssp vegrandis	Melaleuca torquata
		Eucalyptus conglobata ssp perata	*Melaleuca acuminata
		Eucalyptus platypus (ecotonal)	Melaleuca haplantha
			Daviesia argillacea
			Acacia glaucoptera
			Daviesia aphylla (ex benathmmii)
			Acrotriche dura P4
			Cyathostemon ambiguus
			Boronia inornata
			Exocarpus capnodioides (ex aphylla)
			Melaeuca acuminata (rarely)
			Melaleuca bracteosa (ecotonal
			Melaleuca rigidifolia (ecotonal)
			Hakea commutata (rarely)
			Wilsonia humilis
			Gahnia aristata
			Gahnia ancistrophylla
	Eucalyptus flocktoniae. E vegrandis over Melaleuca		
Mallee	undulata &/or Mel rgidifolia Shrubland	Eucalyptus flocktoniae	Melaleuca undulata
		Eucalyptus vegrandis ssp vegrandis	Melaleuca rigidifolia
		Eucalyputs annulata	Melaleuca hamata
			Melaleuca lateriflora
			Melaleuca bracteosa (rarley)
			Melaleuca haplantha
			Daviesia aphylla (ex benthamii)
			Daviesia argillacea
			Bornina inornata
			Comersperma spinosa

			Coopernookia polygalacea
			Exocarpus capnodioides (ex aphullus)
			Aotus sp Southern Wheatbelt
			Pultenaea rotundifolia
			Hibbertia psilocarpa
			Ozothamnus lepidophyllus
			Acrotriche dura P4
			Templetonia rossii
			Grevillea pectinata
			Hakea commutata
			Acacia bidentata (uncommon)
			Gahnia aristata
			Gahnia ancistrophylla
	E. uncinata/E.pleurocarpa Open Mallee over Banksia media tall Open Shrubland Melaluca spathulata Mixed		
Mallee	Myrtaceae Shrubland/Open Heath	Eucalyptus uncinata	Banksia media
		Eucalyptus thamnoides	Melaleuca spathulata
		Eucalyptus phaenophylla	Melaleuca subfalcata
		Eucalyptus phaenophylla Eucalyptus pleurocarpa	Melaleuca subfalcata Melaleuca bracteosa
		Eucalyptus pleurocarpa	Melaleuca bracteosa
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely)
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely)
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely) Calothamnus gibbosus
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely) Calothamnus gibbosus Beaufortia micrantha
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely) Calothamnus gibbosus Beaufortia micrantha Hibbertia gracilipes
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely) Calothamnus gibbosus Beaufortia micrantha Hibbertia gracilipes Daviesia lancifolia
		Eucalyptus pleurocarpa Eucalyputus incrassata	Melaleuca bracteosa Melaleuca rigidifolia Melalecua lateriflora (rarely) Melaeuca hamata (rarely) Calothamnus gibbosus Beaufortia micrantha Hibbertia gracilipes Daviesia lancifolia Isopogon sp Fitzgerald

			Austrobaeckea tetrapora (ex Tetrapora verracosa)
			L eptomeria pachyphylla
			Banksia alliacae
			Melaleuca apodocephala
			Acacia bidentata
			Acacia chyrsocephala
			Acacia octonervia
			#Acacia declinata
			Boronia crassifolia
			Styphelia intertexa
			Adenanthos glabrescens ssp exasperatus
			Leptospermum aff sp Bandalup Hill
			Leptospermum oligandrum/erubescens complex
	Mixed Euc spp over Melaleuca spathulata/Mel spp Open		
Mallee	Heath	Eucalyptus uncinata	Melaleuca spathulata
		Eucalyptus thamnoides	Melaleuca lateralis
		Eucalyptus phaenophylla	Melaleuca bracteosa
		Eucalyputus incrassata	Melaleuca rigidifolia
		Eucalyutus pluricaulis	Melalecua lateriflora (rarely)
		Eucalyptus flocktoniae	Melaleuca hamata (rarely)
		Eucalyptus vegrandisssp vegrandis	Hibbertia gracilipes
			Leucopogon opponens
			Cyathostemon ambiguus (uncommon)
			Comespermum spinosum
			Hibbertia gracilipes
			Leptomeria pachyphylla
Mallee	Euc spp over Melaleuca hamata Open Shrubland	Eucalyptus vegrandis ssp vegrandis	Melaleuca hamata
		Eucalyptus uncinata	Melaleuca depauperata
		Eucalyptus redunca (both var)	Melaleuca aracarioides
		1	

		Eucalyptus phaenophylla	Hakea laurina
		Eucalytpus thamnoides	Hibbertia exasperata
		Eucalyptus conglobata	Hakea lissocarpha
		7,	Callitris roei
			Rhagodia preissii
			Boronia inornata
			Boronia scabra
			Hibbertia exasperata
			Coopernookia striopholata
			Coopernookia polygalaceae
			Rinzia communis
			Acacia patiagiata
			Acacia bidentata
			Orthrosanthus laxus
			Lomandra effusa
			Lomandra micranthpa
			Gahnia ancistrophylla
			Desmocladus lateriflrous
			Neurachne alopecuoidea
			Lepidosperma sp Bandalup Scabrid
54	E. pleurocarpa Open Mallee over Banksia media (deep	F	No. 1 to Go the sale
Mallee	sand)	E. pleurocarpa	Nuytsia floribunda
		E. uncinata	Banksia media Beaufortia micanatha.
			Melaleuca subtrigona
			Conothamnus aureus
			Isopogon trilobus Lambertia inermis
			Hakea pandanicarpa ssp crassifolia
			Taxandria spathulata
			raxanuria spatiiulata

	Banksia nutans
	Melaleuca carrii
	Hakea corymbosa
	Calothamnus gracilis
	Melaleuca thymoides
	Banksia alliacae
	Banksia brunnea
	Banksia obovatus
	Hakea corymbosa
	Gomphlobium tomentosa
	Acacia pycnocephala
	Hypolaenafastigiata
	Leucopogon sp Coujinup
	Kunzea preissiana
	Banksia sessilis (few plants)
	Banksia attenuata
	Hemiandra pungens
	Calytrix flavescens
	Hypocalymmna asperum
	Gompholobium scabrum
	Adenanthos cuneatus
	Petrophile ericifolia
	Calothamnus sanguineus
	Conospermum floribundum (1 plant)
	Allocasuarina humilis
	Chaeteospora curvifolia (exSchoenus curvifolius)
	Lyginia barbata
	Tricostularia newbeyi
	Mesomelaena stygia
	Hypolaena fastigiata

			Amphipogon turbinatus
Mallee	E. ecotosta &/or E pleurocarpa Open Mallee over Banksia cirsiodes Heath	E. pleurocarpa	Banksia cirsioides
		E. ecostata	Beuafortia micrantha
		E. phaenophylla (rare)	Taxandria spathulata
		E. redunca ssp porphoryea(rare)	Banksia media
		E. thamoides(rare)	Callitris roei
		E.uncinata (rare)	Melaleuca tuberculata
			Hibbertia exasperata
			Banksia alliacea
			Lasiopetalum compactum
			Dampiera lavandulacea
			Hibbertia gracilipes
			Hibbertia lineata(rarely)
			Hovea pungens
			Stachystemon virgatus
			Trymalium elachopyllum (rarely)
			Calothamnus sanguineus (rarely)
			Styphelia depressa (ex L. tamminensis)
			Leucopogon sp short style
			Templetonia retusa (rarely)
			Allocasuarina humilis (rarely)
			Boronia crassifolia
			Stylidium albomontis
			Lepidosperma sp Saltbush Hill
			Lepidosperma spp (unident so far)
			Gahnia ancistrophylla
			Amhipogon turbinatus
			Neurachne alopecuroidea
			Gahnia ancistrophylla (rarely)

Shrublands	Granite Mixed shrublands	Hypocalymma angustifolium
		Calothamnus quadrifidus
		Astus tetragona
		Kunzea affinis
		Leptospermum maxwellii
	includes Astus tetragona Low Open Shurblands	Leptospermum oligandrum erubescens complex
		Leucopogon denticulatus
		Philotheca gardneri
		Melaleuca hamata*
		Melaleuca carrii
		Eutaxia cuneata
		Mirbelia trichocalyx
		Melaleuca tuberculata
		Melaleuca araucariodies
		Hibbertia exasperata
		Prostanthera canaliculata
		Damperia lavandulacea
		Dodoanaea pinifolia
		Acacia mimica ssp angusta
		Acacia sulcata (ssp not det yet)
		Acacia lasiocalyx
		Styphelia lissanthoides
		Verticordia plumosa ssp brachyphylla
		Verticordi endlicheriana
		Verticordia brachypoda
		Lepidsoperma sp C
		Lepidosperma spp undetermined yet
		Lepidosperma sanguinolentum
i		Neurachne alopecuroidea

Your reference: Our reference: LUP 1589 -

1490610

Enquiries: Greg Doncon

Noel Myers
Manager of Development
8 Vasey Street
Jerramungup WA 6337
planning@jerramungup.wa.gov.au

12 May 2023

Dear Noel

Development Application - Plantation at Ediegarrup Reserve

Thank you for inviting the Department of Primary Industries and Regional Development (DPIRD) to comment on the application from Bush Heritage that proposes to revegetate an existing farming property currently used for broadacre farming.

DPIRD does not object to the proposal and offers the following comments:

Gondwana link

This Lot falls into the Gondwana Link project within the focus area between the Fitzgerald River and the Stirling Range National Parks. When revegetated would link the adjoining Bush Heritage property (Monjebup Road, Boxwood Hill) with the Corackerup Creek which feeds into the Pallinup River.

The Gondwana Link project is supported by State funded organisations including a number of Land Conservation District Committees, who are supported by DPIRD.

Soil-landscape

This property is located on the intersection of six soil-landscape units, consisting of the Middle Pallinup subsystems.

Unit	Area	Percentage	
243Mp_1	223	21%	Valley flats and narrow alluvial plains
243Mp_2	100	9%	Valley flats and headwater rises
243Mp_3	211	20%	Mid to lower slopes including foot slopes with deep colluvial deposits
243Mp_4	382	36%	Intensely dissected area
243Mp_5	91	9%	Upper slopes and hillcrests
243Mp_7	61	6%	Breakaways
Total	1067		

The property comprises of a dissected undulating landscape with occasional breakaways and flats. The soils are dominantly shallow sandy, gravelly duplex and loamy duplexes, with occasional patches of hard setting grey clays. The slopes in some areas can be significant ranging between 0-3% on the flats and 3-5% through the undulating rises. The soils are usually sodic and highly dispersive and can easily erode if subsoil clays are exposed.

The range of landscapes and soils types on this property will permit the proponent to establish a large number of unique terrestrial plant communities, which meet some of the Gondwana Link project objectives.

Fire management and erosion control

Firebreaks are anticipated in the forestry plantation areas to assist with property access and fire control. Formed tracks without measures to control surface water flow can increase the risk of mild to severe water erosion. The Bushfire Management Plan (Appendix 2, Figure 2) shows that a few of the tracks appear to traverse sloping land.

The proponent has obligations under the *Soil and Land Conservation Act 1945* to mitigate and prevent land degradation (soil erosion from water and wind, including salinity and nutrient export). DPIRD requests that fire breaks and tracks include appropriate surface water engineering structures to control/capture surface water to minimise the risk of soil erosion. Farm Note 524, Minimising farm track and firebreak erosion is attached (Attachment 1).

DPIRD supports that "all dams are to remain accessible for firefighting purposes". Some of these dams would aid with fire management on not just the Ediegarrup Reserve, but also the Red Moort Reserve, the Chingarrup Sanctuary and Corackerup Creek.

Biosecurity

DPIRD recommends that weed & pest control is included in the Plantation Management Plan as an annual activity for the entire duration of the project. This is an important commitment and will meet their obligations under the *Biosecurity and Agriculture Management Act 2007*.

¹ Ediegarrup Reserve Plantation Management Plan, p4

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Yours sincerely

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Attachment 1: Farm Note 524: Minimising farm track and firebreak erosion