RECOMMENDATION REPORT

First Nine master planned residential development, Brookwater, Qld (2016/7676)

Recommendation

The Department has not made a recommendation as there is not enough information to make an informed decision whether or not to approve the proposed action to develop the First Nine master planned residential development located to the east of Brookwater, Queensland.

Conditions

The Department has not made a recommendation on conditions of approval because there is not enough information for the Department to make a recommendation on whether or not to approve the proposed action.

1. <u>Background</u>

Description of the project and location

- 1.1. Springfield Land Corporation Pty Limited (person proposing to take the action and the proponent) proposes to construct the First Nine master planned residential development in Ipswich, Queensland (the proposed action).
- 1.2. The original proposed action covered one 40.8 hectare (ha) site. The Department accepted a request for a variation to the proposed action on 2 August 2016 to include a second site covering 6.45 ha.
- 1.3. The proposed action now covers two sites totalling 47.25 ha; 40.8 ha will involve the construction of 800-900 residential lots, terraces, units, apartments, an open space network, and 6.45 ha will be used for the disposal of approximately 287,500 m3 of cut earth material.

Controlling provisions, assessment approach and public consultation

- 1.4. On 30 March 2016 the Department received a referral from the proponent for the proposed action (the referral).
- 1.5. On 1 April 2016 the Department published the referral on its website inviting public comments until 15 April 2016. One comment was received on 21 April 2016 following communication with the Department regarding unclear public comment timeframes. The submission noted that the proposed action involves clearing koala habitat, which is a clear threat to the species. The submission also suggested that the Ipswich koala population contains unique genetic information.
- 1.6. On 1 April 2016 the Department invited comments on the referral from the following Commonwealth Ministers:
 - a) Senator the Hon Nigel Scullion, Minister for Indigenous Affairs
 - b) Mr Lloyd Woodford, delegate of the Hon Kevin Andrews MP, Minister for Defence
- 1.7. No response was received from the Minister for Indigenous Affairs.
- 1.8. Two submissions were received in response to the invitation to the Minister for Defence. One dated 8 April 2016 and one on 12 April 2016. The latter stated the proposed action is unlikely to affect Defence land or activities. The 8 April 2016 response indicated that the

proposed action has the potential to affect activities at the Greenbank Training Area; however this did not relate to matters covered by the EPBC Act and therefore the Department cannot consider this information in making the referral decision.

- 1.9. On 1 April 2016 the Department invited comments from Mr Chris Loveday, delegate for the Hon Steven Miles MP, Queensland Minister for Environment and Heritage Protection.
- 1.10. On 11 April 2016 Mr Loveday responded noting that the referral was not suitable for assessment under the bilateral agreement.
- 1.11. On 13 May 2016 a delegate of the Minister determined the proposed action to be a controlled action due to likely significant impacts on listed threatened species and communities (section 18 and section 18A of the EPBC Act). On the same day, a delegate of the Minister decided that the proposed action would be assessed by preliminary documentation under Part 8 of the EPBC Act.
- 1.12. On 15 June 2016 a delegate of the Minister requested the proponent to provide specified information relevant to assessing the impacts of the proposed action (the further information request).
- 1.13. On 2 August 2016 a delegate of the Minister accepted a variation to the proposal to include the second site covering 6.45 ha as part of the proposed action.
- 1.14. On 30 June 2016 (before the proposed action was varied) and 19 July 2017 the proponent submitted documentation in response to the further information request. In both instances, the Department reviewed the documentation and considered it did not adequately meet the requirements of the further information request.
- 1.15. On 7 August 2017 the proponent again submitted documentation in response to the further information request. The Department reviewed the documentation and considered that while the environmental offsets proposal did not meet the requirements of the *EPBC Act environmental offsets policy* (offsets policy), the documentation was adequate to allow the public to comment on the proposed action.
- 1.16. On 10 August 2017 a delegate of the Minister directed the proponent to publish the referral along with the response to the further information request (together being the draft preliminary documentation), inviting anyone to give the proponent comments relating to the proposed action. In the direction to publish the delegate noted that an adequate environmental offset is needed to finalise the assessment of the proposed action.
- 1.17. On 14 August 2017 the proponent published the draft preliminary documentation inviting comments from 15 August 2017 to 29 August 2017. The proponent received no comments during this period.
- 1.18. On 11 September 2017 the proponent published the documents referred to in paragraph1.16 (the preliminary documentation) for information in accordance with subsection 95B(2) of the EPBC Act.

2. Assessment

Mandatory Considerations – section 136(1)(a) Part 3 controlling provisions

- 2.1. The proposal was determined a controlled action under the following controlling provisions of the EPBC Act:
 - a) Listed threatened species and ecological communities (sections 18 and 18A);

2.2. This controlling provision is discussed respectively below.

Listed threatened species and ecological communities (sections 18 and 18A)

2.3. The following listed threatened species were considered for assessment.

a) Koala (combined populations of Queensland, New South Wales, and the Australian Capital Territory) (*Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)* – vulnerable (hereafter referred to as the koala).

2.4. No other listed species or communities were considered likely to incur a significant impact.

<u>Koala</u>

- 2.5. The proponent states that surveys were undertaken at the proposed action site in September 2015, May 2016, and July 2017 to assess the presence of koalas and their habitat. The methods used during the survey were in accordance with the *EPBC Act referral guidelines for the vulnerable koala* (koala referral guidelines).
- 2.6. One koala was directly observed. Evidence of koalas in the form of scats was found across the entire site, with every survey site returning evidence of koalas (scats). Field surveys also confirmed the presence of at least six (6) koala food tree species.
- 2.7. The proponent states that the proposed action will clear 46.2 ha of habitat critical to the survival of the koala, determined using the habitat assessment tool in the koala referral guidelines. The proponent scored the koala habitat 6/10. The Department disagrees with this assessment, scoring the habitat 9/10 (see below table):

Attribute	Score	reason
Koala occurrence	2	Koalas observed onsite within last 2 years.
Vegetation composition	2	Woodland with 2 or more known koala food tree species
Habitat connectivity	2	Area is part of a contiguous landscape ≥ 500 ha
Key existing threats	2	No evidence of koala mortality from vehicle strike or dog attack at present in areas that score 1 or 2 for koala occurrence.
Recovery value	1	Uncertain
TOTAL	9	

- 2.8. The Department considers that direct impacts to the koala may occur during clearance and construction activities. These impacts involve permanent loss of 46.2 ha of habitat critical to the survival of the koala and mortality from clearing, vehicle strike, and dog attack.
- 2.9. The proponent has proposed measures to mitigate the mortality related impacts.
- 2.10. The Department considers that the clearing of 46.2 ha of habitat critical to the survival of the koala is not able to be avoided or mitigated and constitutes a residual significant impact.
- 2.11. In accordance with the offsets policy the further information request included a requirement for the proponent to provide an environmental offset to compensate for the proposed action's residual significant impact to the koala.
- 2.12. The Department considers the proposed offset is not in accordance with the offsets policy. Below is the Department's analysis of the offset proposal. The Department has assessed that the offset compensates for 0 (zero) per cent of the proposed action's residual significant impact. The offset is lacking in size (area), will not change the future quality of koala habitat onsite, and will not change the risk of loss.

- 2.13. The proposed offset was reviewed by officers of two other EPBC assessment teams. Both teams reached the same conclusion that the offset would compensate for 0 per cent of the proposed action's residual significant impact.
- 2.14. A comparison of proponent's offset calculation and the Department's is provided.

Offset value	Proponent	Department	Reason for Department's scoring
Impact habitat quality	6	9	Koalas are present at the impact site with 2 or more koala food trees. It is part of a contiguous landscape over 500 ha and there is no current evidence of koala mortality onsite. The recovery value is uncertain.
Offset starting habitat quality	8	8	Koalas are present at the offset site with 2 or more koala food trees. It is part of a contiguous landscape over 500 ha. While there is no current evidence of koala mortality onsite, the Council considers wild dogs a 'major pest' in the area, increasing confidence in the threat of dog attack. The recovery value is uncertain.
Habitat quality without the offset	6	8	The proponent claims weed infestation is impacting the quality of koala habitat and that this impact will worsen without the offset. The proponent also claims the offset site contains threats to the koala and that these threats will also worsen without the offset.
			There is a lack of evidence to support these claims, that they're present or impacting the koala, and that they will worsen in the future. As such, the Department considers there will be no change in koala habitat quality without the offset.
Habitat quality with the offset	9	8	The proponent claims the proposed management measures, such as weeding, will improve habitat for the koala with the offset. The proponent has also proposed management actions intended to reduce threats to the koala with the offset.
			There is a lack of evidence weeds are impacting koalas, and a lack of evidence weeding will improve koala habitat. There is a lack of evidence that the claimed threats are present, meaning they cannot be reduced. Further, there are no performance measures for the management actions. As such, it is unclear if the management actions would be effective in reducing the threats, if they were present. The Department considers there will be no change in koala habitat quality with the offset.
Time until ecological benefit	15 years	0 years	Time until ecological benefit is zero (0) years because there will be no change in ecological benefit.
Risk of loss without the offset	85%	5%	Longstanding infrastructure agreement and council zoning the offset site as 'conservation' mean the risk of the site being cleared was very low in 2006.
Risk of loss with the offset	5%	5%	Risk of the site being cleared was already very low.
Confidence in result	90%	85%	Relatively high confidence result will not change
Percentage of impact offset	99%	0%	Output from offset guide (calculator)

2.15. The Department considers that without an environmental offset that meets the requirements of the EPBC Act environmental offsets policy there is not enough information to make an informed decision whether or not to approve the proposed action.

3. Considerations for approval and conditions

- 3.1. The Department is unable to make a recommendation as to whether or not the proposed action should be approved. As no decision is being recommended the considerations for approval and conditions are not relevant at this time.
- 3.2. Should specified information on the proposed action be sought and provided, the Department will prepare a supplementary recommendation report addressing the considerations for approval and conditions as appropriate.

4. Conclusion

4.1. The Department considers there is not enough information to make an informed decision whether or not to approve the proposed action.

5. Material used to prepare Recommendation Report

- a) Final preliminary documentation, including the referral information and additional information received.
- b) EPBC Act environmental offsets policy
- c) EPBC Act referral guidelines for the vulnerable koala



PROPOSED APPROVAL

First Nine master planned residential development, Brookwater, Qld (2016/7676)

This decision is made under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth).*

Details

Person to whom the approval is granted (approval holder)	Springfield Land Corporation Pty Limited
ACN or ABN of approval holder	ABN 055 714 531
Action	First Nine master planned residential development located to the east of Brookwater, Queensland, subject to the variation of the action accepted by the Minister under section 156B on Tuesday, 2 August 2016.

Approval decision

My decision on whether or not to approve the taking of the action for the purposes of each controlling provision for the action are as follows.

Controlling Provisions

Listed Threatened Species and Communities				
Section 18	Approve			
Section 18A	Approve			

Period for which the approval has effect

This approval has effect until Tuesday, 21 December 2038

Decision-maker

Name and position	
	James Barker
	Assistant Secretary, Assessments and Governance Branch
Signature	PROPOSED DECISION DO NOT SIGN
Date of decision	PROPOSED DECISION - DO NOT DATE

Conditions of approval

This approval is subject to the conditions under the EPBC Act as set out in ANNEXURE A.

ANNEXURE A – CONDITIONS OF APPROVAL

Part A – Conditions specific to the action

Project site

1. The **approval holder** must not clear more than 46.2 hectares of **koala habitat** within the **project site**.

Compensation for residual significant impact

- 2. To compensate for the loss of 46.2 hectares of **koala habitat** within the **project site**, the **approval holder** must:
 - a. Within 20 years of the date of decision, achieve a gain in koala habitat quality across the **offset site**, as described and measured by Item 6 of <u>Attachment B</u>.
 - b. Within two years of **commencement**, construct, and maintain for the **life of the approval**, **koala exclusion fencing** along the Springfield-Greenbank Arterial Road, where the road passes through the **offset site**.
 - c. In consultation with a **suitably qualified person**, prepare and implement a Koala Offset Management Plan for the **offset site**, which includes at least:
 - i. the management actions at Attachment B
 - ii. an adaptive management strategy, including milestone targets, to achieve the outcome identified in condition 2(a)
 - iii. a process for implementing the adaptive management strategy, which includes:
 - 1. a monitoring program to demonstrate whether milestones and outcomes described in conditions 2(a) and 2(b) have been met
 - 2. use of the data generated by the monitoring program to inform adaptive management.
- 3. If monitoring indicates that the outcomes identified at conditions 2(a) or 2(b) are not likely to be achieved, the **approval holder** must:
 - a. revise the Koala Offset Management Plan in consultation with a **suitably qualified person**
 - b. inform the **Department** in writing of the contingency measures that will be implemented to ensure condition 2(a) and 2(b) are met.

Part B – Standard administrative conditions

- 4. Within 20 business days after the commencement, the approval holder must advise the **Department** of the actual date of commencement.
- 5. The **approval holder** must maintain accurate **records** substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement any management plans or monitoring programs required by this approval, and make them available upon request to the **Department**. Such **records** may be subject to audit by the **Department** or an independent auditor in accordance with section 458 of the **EPBC Act**, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the **Department's** website. The results of audits may also be publicised through the general media.
- 6. Within 60 **business days** of every 12 month anniversary of **commencement**, the **approval holder** must publish a report on its website addressing compliance with each of the conditions of this approval, including implementation of any management plans or monitoring programs as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the **Department** at the



Australian Government

Department of the Environment and Energy

same time as the compliance report is published. The **Minister** may provide written consent to the **approval holder** to cease reporting under this condition if satisfied additional reports are not warranted.

- 7. The **approval holder** must report any potential or actual contravention of the conditions of this approval to the **Department** in writing within 5 **business days** of the **approval holder** becoming aware of the potential or actual contravention.
- 8. Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor and criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the criteria to the satisfaction of the Minister.
- 9. If, at any time after 5 years from the date of this approval, the **approval holder** has not **commenced**, then the **approval holder** must not **commence** without the written agreement of the **Minister**.

Part C - Definitions

- 10. In these conditions, except where contrary intention is expressed, the following definitions are used:
 - a. **Approval holder** means the name of the person to whom the approval is granted, or any person acting on their behalf, or to whom the approval is transferred under section 145B of the **EPBC Act**.
 - b. **Business days** means a day that is not a Saturday, a Sunday or a public holiday in the location of the **action**.
 - c. Clear/ clearing means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of native vegetation (but not including weeds see the Australian weeds strategy 2017 to 2027 available from http://www.agriculture.gov.au/pests-diseases-weeds/pest-animals-and-weeds/review-aus-pest-animal-weed-strategy/aus-weeds-strategy for further guidance.
 - d. **Commence/ commencement** means the point at which any **clearing** occurs on the **project site**.
 - e. **Department** means the Commonwealth Department of Environment and Energy or any other agency that administers the **EPBC Act** from time to time and includes, where the context permits, the officers, delegates, employees and successors of the **Department**.
 - f. **EPBC Act** means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).
 - g. **Koala exclusion fencing** means fencing constructed in accordance with section 6.11.2 a) 'Fauna exclusion/ koala proof fencing' of *Fauna Sensitive Road Design Manual Volume 2*, Queensland Department of Transport and Main Roads, 2010.
 - h. **Koala habitat** means any vegetation that scores five or more using the *Koala habitat assessment tool* from the *EPBC Act referral guidelines for the vulnerable koala*.
 - i. Life of the approval means the period for which the approval has effect.
 - j. **Minister** means the Minister administering the **EPBC Act** including any delegate of the Minister.
 - k. **Offset site** means the areas designated as Proposed First Nine offset (89.5 ha) on the map at <u>Attachment C</u>.
 - I. **Project site** means the area defined as 'First Nine referral area' on the map, and by the coordinates, at <u>Attachment A</u>.



- m. **Records** means all documentation or other material in whatever form, including without limitation any correspondence, reports, assessments, methodologies, operations manuals, specifications, training materials and instructions or data.
- n. **Suitably qualified person** means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

ATTACHMENTS

- Attachment A Project site
- Attachment B Management actions
- Attachment C Offset site

Project site map



Project site coordinates

Area	ID	<u>Longitude</u>	<u>Latitude</u>
1	1	152.901666033	27.6587342667
1	2	152.901807189	27.6592116111
1	3	152.902838389	27.6606015222
1	4	152.903166133	27.6615477333
1	5	152.903353189	27.6624894333
1	6	152.903537422	27.6655083556
1	7	152.903244833	27.6657696889
1	8	152.901981589	27.6664580667
1	9	152.901363222	27.6670157000
1	10	152.899929756	27.6676810000
1	11	152.898743289	27.6686368667
1	12	152.897404078	27.6696047778
1	13	152.896827356	27.6689880000
1	14	152.896364922	27.6687022111
1	15	152.896001633	27.6683559111
1	16	152.895789822	27.6677650333
1	17	152.896649044	27.6677680333
1	18	152.897286800	27.6670793111
1	19	152.897543611	27.6663209667
1	20	152.898242589	27.6645993111
1	21	152.898826711	27.6633530556
1	22	152.898855833	27.6629978667
1	23	152.898779344	27.6627726556
1	24	152.899396811	27.6621404222
1	25	152.900321233	27.6607629667
1	26	152.900671522	27.6600363667
1	27	152.901069378	27.6593637444
1	28	152.901343233	27.6590306111

Area	ID	<u>Longitude</u>	<u>Latitude</u>
2	29	152.902609849	27.6706093963
2	30	152.900517299	27.6705183378
2	31	152.900253474	27.6702319172
2	32	152.899323667	27.6702547309
2	33	152.899162455	27.6705173585
2	34	152.898895924	27.6704488400
2	35	152.898999978	27.6701027444
2	36	152.899864789	27.6692237000
2	37	152.900991438	27.6683874172
2	38	152.901728991	27.6685928048
2	39	152.902056520	27.6683398461
2	40	152.902213931	27.6678156617
2	41	152.902352158	27.6677452957
2	42	152.902394787	27.6680773398
2	43	152.902366349	27.6683794764
2	44	152.902143360	27.6687340248
2	45	152.902063945	27.6690397082
2	46	152.902576269	27.6691475558
2	47	152.903016260	27.6691383101
2	48	152.902945888	27.6698393119
2	49	152.902824668	27.6703945740

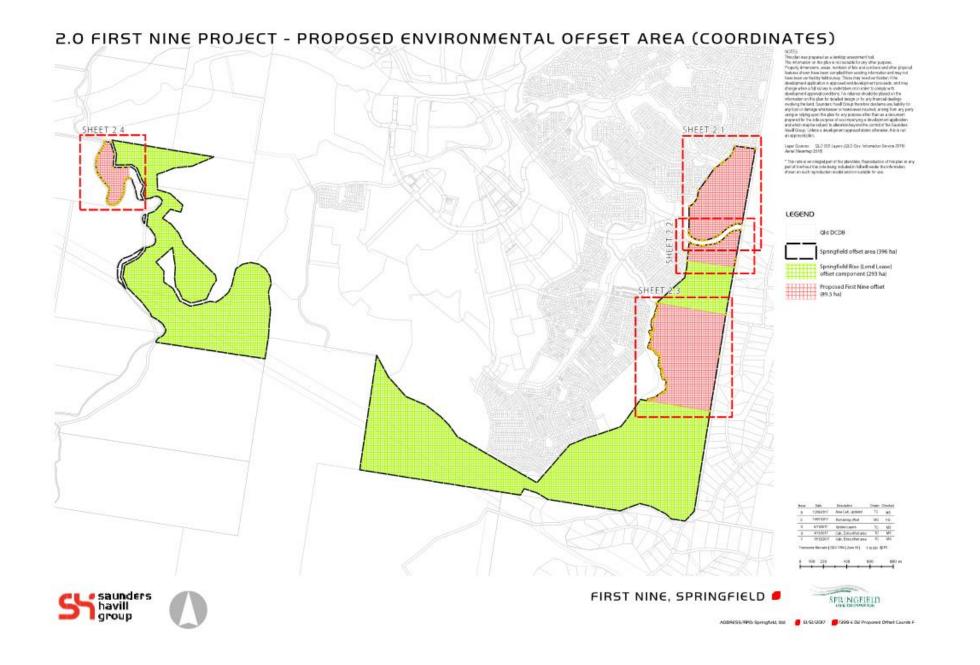
Attachment B

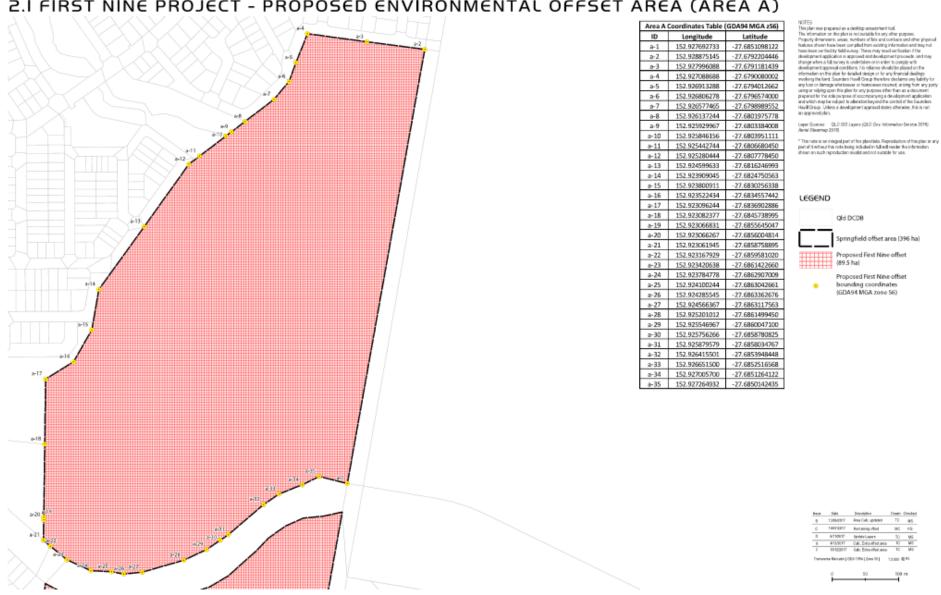
Management actions

Management actions							
Current Threat / Quality Improvement Restoration	Base Case	Improvement Proposed	Achievement Criteria	Measured By	Timeframes	Reporting	Funded By:
 Removal of Weeds of National Significance (WONS – Namely Lantana) 	17% of the 81.5ha offset land has been mapped as containing Lantana of varying infestations (Approx. 14 ha of area effected by weeds)	Reduction and management of WONS through the Offset Area	Decrease and maintain WONS cover in the offset area to 5% or less (12% improvement to area of offset = 9.8ha of land)	Weed Survey Extent Mapping – repeated annually / measured against base line study already completed.	WONS reduced through the offset area to 5% by 3 years post the commencement of the Action. WONS maintained at 5% or below for 10 years post the Commencement of the Action	Weed Survey Extent Mapping included in the ACR for the project.	All weed management to be funded by the Approval Holder using licensed and registered contractors.
2. Pest Management – Wild (& Unwanted) Dog usage of Offset Area	 Site survey located fresh Dog prints within the offset area. ICC White Rock – Spring Mountain Conservation Estate – Tier 2 Management Plan lists Wild Dogs, Red Foxes, Feral Pigs and Cane Toads as significant pest issues. This land is contiguous with the offset land – no dividing fence. 2011 Environmental Impact Assessment (Aurecon) for the adjoining Department of Defence bushland property to the east of the offset land located wild dogs as part of site surveys. Wild Dogs and Foxes were recorded on the Spring Mountain project as listed in the November 2013 Austecology MNES vertebrate Fauna Assessment. This land is contiguous with the offset land. 	Reduction and management of Pest Species (namely wild dogs)	Trapping and removal program for pest species through the Offset Area (in- conjunction with the same activity over the adjoining land as forming the offset for Lendlease)	Results of annual pest trapping, capture and removal program. (Exact numbers of the local / contextual wild dog population are not known – results will be measured on the trapped animals as a minimum being a reduction in the population – if reduction is not demonstrated intensity of program and trapping will be revised)	Annual Program to include quarterly trappings for years 1 and 2 post commencement and twice yearly for balance of offset program. Program to run annually for the life of the offset (20 years)	Program will include an annual pest management report to be included as part of the ACR for the project.	Pest Management Program to be funded by the Approval Holder using registered Pest Management Contractor.
3. Koala Exclusion / Directional Fencing – At offset conflict location	Currently the proposed offset land is severed by Springfield-Greenbank Arterial Road. The road design includes a number of natural barriers to fauna movement (Large cut / Fill road batters), however retains no fencing at the key location where a bridge has been constructed.	Decrease koala / vehicle conflict opportunities at key locations along the road.	Construct Koala Exclusion / Directional Fencing at bridge crossing access point. Estimated 200 Lineal metres of fencing is required to cover exposure point and link to existing natural barriers.	GPS extent and photo graphs of constructed Fauna Exclusion / Directional Fencing. Annual check of fence integrity during offset period.	Fence constructed within 2 years from the commencement of the action (<i>Timeframe to allow for</i> <i>permission and approvals</i> <i>required by Local and State</i> <i>Government to install fencing</i> <i>on their land holdings</i>)	Reporting as built in the 2 nd ACR for the project. Fence inspection annually confirming integrity reported as part of the project ACR.	Cost of fencing, inclusive of necessary applications and approvals to be funded by the Approval Holder
4. Koala Habitat Replanting and Regeneration	At existing major erosion points and areas of extensive weed removal revegetation, inclusive of koala trees will be reinstated.	Increases in Koala Habitat resources (food and shelter trees)	Reinstated existing degraded areas, and those created through mass weed removal with revegetation, inclusive of koala habitat species.	Number of Koala trees replanted within the offset area = Equal or greater than 750 trees (Estimated between 3-5 ha of land sporadically	All tree planting complete on or before 3 years post commencement of construction. (<i>Timeframe to allow for weed</i> <i>management measures to</i>	Tree installation reporting within the ACR period for which it occurs. Includes confirmation of total tree milestone	Replanting to be completed by a registered and experienced contractor at the cost of the Approval Holder

Attachment B

5. Reduce unlawfu and use of the C land by 4wd, tra and all terrain w (ATV)	ffset of unlawful access tracks, entry points I bikes resulting in degraded and eroded sections	Reduce unlawful access and use by 4wd, trail bikes and ATV	Installation of new or substantial upgrades and extensions to barrier fencing at 6 identified locations of unlawful entry. Maintenance of access point during the offset period to confirm success of barrier works. Alteration and further upgrades to barriers where demonstrated to be unsuccessful.	requiring patches and broad areas of revegetation - Assume koala trees density of 150 trees per ha = total 750 trees) Documented evidence of barrier installation (working drawings and photographs) provided during ACR. Annual review of installed and upgraded barriers for measurement of success (observation evidence of tyre tracks and damage circumventing barrier structures) Reporting on any adaptive alterations to barriers not shown to be successful (eg extension of fencing where new tracks show access occurring around the fence.)	occur prior to some areas of resulting tree planting) 2 barriers completed every 2 years. All 6 barriers constructed and operational with 6 years of the commencement of the action.	achieved on or prior to 3 rd ACR. Success of tree planting and survival rates reporting on annually for period of the offset reporting. (note 750 trees is the minimum outcome meaning additional trees will need to be planted to account for stock failure or other losses) Evidence of barrier installation, monitoring and success provided to DoEE as part of relevant ACR.	
 Overall Improve the quality of th area from and 8 	e offset the Guide to Determining Terrestrial Habitat	Improve the quality from an 8 to a 9. (10% improvement)	By measure of achieving a 9 out of 10 average score at the 6 transect locations from surveys completed in accordance with the <i>Guide</i> <i>to Determining Terrestrial</i> <i>Habitat Quality</i> – Queensland Department of Environment and Heritage Protection.	Transect Data collected at 5 year intervals for the life of the offset.	Achieve a 9 out of 10 at the 10 year ACR and maintained for the life of the approval.	Transect data to be presented in a report completed in accordance with <i>Guide to Determining</i> <i>Terrestrial Habitat Quality</i> – Queensland Department of Environment and Heritage Protection and to form part of the ACR every 5 th year.	Transect completion and reporting to be funded by the Approval Holder.





2.I FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA A)



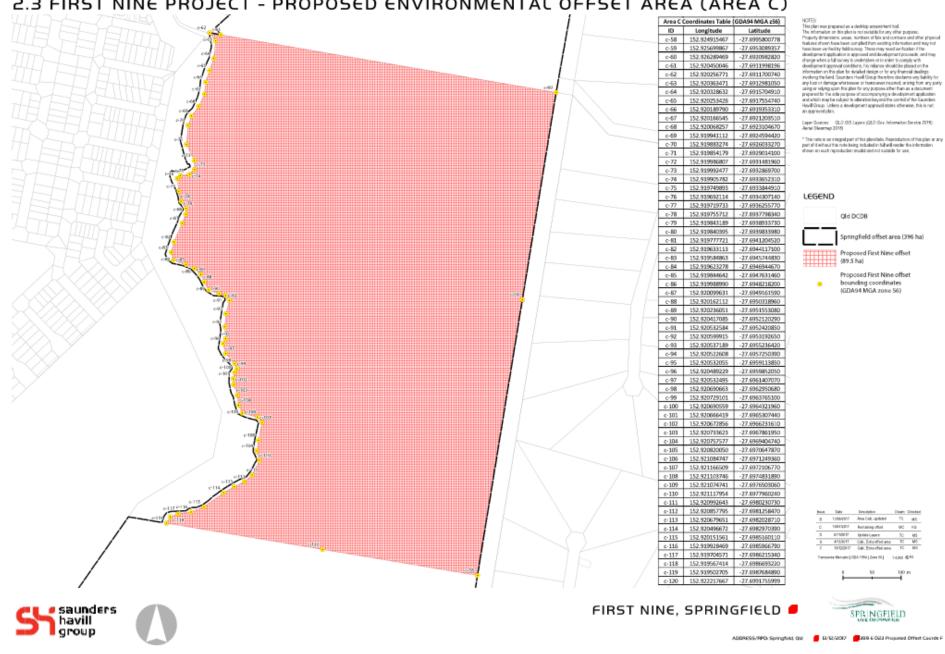
ADDRESS/RPD: Springfield, Gld 🛛 🧧 B/B/2007 🛑 299 6 Gel Proposed Offset Courds F



2.2 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA B)

group

ADDRESS/RPD: Springfield, Old 🛛 🧧 12/32/2017 📕 299 6 022 Proposed Offset Courds F



2.3 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA C)



2.4 FIRST NINE PROJECT - PROPOSED ENVIRONMENTAL OFFSET AREA (AREA D)