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Ms Barbara Jones  
Assistant Secretary  
Environment Assessment Branch  
Department of the Sustainability, Environment, Water,  
Population and Communities  
GPO Box 787  
CANBERRA ACT 2601

Attn: Liz McMillan

30 January 2012

Dear Ms Jones,

**Alkimos Lot 1004 Residential Development, Alkimos WA (EPBC 2011/5902)  
Re: Request for Additional Information - Revised Offsets Package**

I refer to your email of 2 August 2011 advising of the Department's request for further information in relation to mitigation of impacts to both 75.2 ha of Graceful Sun Moth and 21.1 ha of Carnaby's Black-Cockatoo habitat in Lot 1004 Alkimos and the requirement for providing further conservation outcomes outside those that were achieved through District Structure Planning process.

Lend Lease has responded to this request through augmentation of its environmental mitigation strategy to facilitate the progress of the statutory approval process. Lend Lease has revised the *Mitigation and Offsets Management Plan* (attached) which aims to provide the outcomes requested from the Department in a manner that is consistent with current regulatory policies and guidelines.

The Plan provides and sets out the following 'package' in further detail:

- On site retention and on-site mitigation measures for both species as previously discussed.
- Offsite acquisition of Carnaby's Black-Cockatoo habitat for conservation, which involves collaborative liaison with similar proponents within the District Structure Plan (in this case LandCorp) to acquire a large strategic site in the vicinity of Gingin approximately 45 km from Lot 1004 providing greater conservation value for the species. Accordingly, Lend Lease will provide sufficient funding for a portion of 126 ha of this land ha (to offset the 21 ha proposed to be cleared on site). This will form a component of a larger consolidated offset site composing a size of up to 2,700 ha to incorporate both Lot 1004 requirements and one of LandCorp's proposed offsets for Eglinton and South Yanchep (EPBC 2011/6021)
- Further offsets for Carnaby's Black-Cockatoo through investment in ongoing/improved management as a supporting form of offset beyond that which would be normally applied for areas set aside for ROS. The management package will include:

- The preparation and implementation of a CMP for the land acquired for conservation of Carnaby's Black-Cockatoo habitat
- Funding of preparatory conservation works for transfer of this land to the DEC
- Upfront provision of funding to DEC for on-going management of the land and associated with implementation of the CMP.
- Retention and conservation (offsetting impacts) of 20.6 ha of Graceful Sun Moth habitat in Regional Open Space (ROS) and conservation based Public Open Space (POS) on site, which will be supported by:
  - The preparation and implementation of a Conservation Management Plan (CMP) for the ROS
  - Funding of preparatory conservation works for transfer of ROS/POS to the DEC
  - Upfront provision of funding to DEC for on-going management of the ROS/POS and associated with implementation of the CMP.
  - Propagation and translocation of *Lomandra* sp. into degraded *Lomandra* habitat for the purpose of rehabilitation involving approximately 2 – 3 ha of land.
- Funding contribution towards management of approximately 400 ha of GSM habitat for known populations in the nearby Wilbinga Conservation Park to address threatening processes. Actions would include management planning, fencing, weed control, fire management, rubbish removal and recreation management.
- Indirect offsets to be addressed through upfront funding provided to the DEC to support actions from priority research and survey programs.

Please refer to the attached *Mitigation and Offsets Management Plan* for greater detail on the above proposed package and commitments. Excluding proposed funding of DEC research-based offsets, the revised package represents an offset ratio of 9.6:1 for Carnaby's Black-Cockatoo (increased from 6.2:1) and a ratio of 9.5:1 for the Graceful Sun Moth (increased from 0.6:1) as compared to the offset package previously presented.

We would appreciate the opportunity to meet to discuss the Plan and the remainder of the assessment process. I will be in contact to organise an appropriate time but please do not hesitate to contact me in the meantime if you have any questions on the proposed offsets and approach. Email: warrenm@ecoaus.com.au Phone: 08 9227 1070.

Yours sincerely,



**Teresa Gepp**  
**Principal Environmental Consultant**  
**Eco Logical Australia**