

24 November 2015

Carmel O'Dwyer
Senior Statutory Planner,
Regional Planning & Approvals,
Hume Region, DELWP,
15 Hume & Hovell Rd,
SEYMOUR, VIC 3660

Dear Carmel

Subject: SP453335 – Draft Management and Rehabilitation Plan V1 re Proposed Gasline Duplication within Chiltern-Mt Pilot National Park (APA GasNet Australia Operations PL)

Parks Victoria has considered the draft Management and Rehabilitation Plan for Chiltern-Mt Pilot NP provided by APA.

As the public land manager for Chiltern-Mt Pilot NP, Parks Victoria has a view that the highest level of conservation reserve within our management merits the highest level of environmental protection possible, particularly given the large number of EPBC and FFG listed threatened flora/fauna species associated with this Park. The Park is also characterised by dry environments and undulating terrain where loss of topsoil, erosion and difficulties establishing regeneration are recognised management issues.

Parks Victoria has had an opportunity to discuss the details included in the Plan with APA at an on-site meeting on 16/11/15.

As a result, Park Victoria offers the following final comments with regard to the draft Plan:

Site Meeting, Induction and Advice

1. Parks Victoria Ranger Team Leader Brian Pritchard (Beechworth Office) must be contacted on mobile 0409 533 220 by the Site Supervisor, to arrange a site meeting to discuss all conditions, and undertake a Contractor Induction, at least seven days before the commencement of any works. The Site Supervisor will then be responsible to ensure that all persons undertaking the works on site are aware of all relevant conditions.

Brian Pritchard will remain the primary Parks Victoria contact for all operational requirements within the Park associated with this project. However for urgent matters when Brian is

unavailable, Andrew McDougall (Area Chief Ranger- Hume) on mobile 0427 867 141 and then Dan McLaughlin (District Manager – Northern Rivers) on mobile 0407 529 723 can be contacted for assistance.

2. Restrictions on public access to the area and associated marking requirements for contractors are agreed as follows:

- A combination of temporary gateways, fences, stakes and flagging will be used to mark the boundary of the Right of Way (ROW).
- Crossing of existing tracks within the National Park will be treated similarly to crossing tracks on private properties where all the construction processes (trenching, installation of pipe and backfill) are completed in one day. Appropriate construction signage will be placed on both sides of any crossing tracks at the intersection with the construction ROW and tracks kept open until trenching is required to install the pipe.
- PV will be advised in advance of when trenching across any existing tracks is to commence.
- A specific Traffic Management Plan for works within the National Park will be prepared to address works within the Park. This plan will be provided to PV prior to the commencement of construction activities within the Park.

Avoiding Vegetation Damage

3. It is accepted that a 7m wide safety buffer is required between the two pipelines and a variable ROW upto 20m wide to allow for access and stockpiling of materials. The rationale of relocating the existing Pipeline Track between the two pipelines is also supported.

However Parks Victoria believes that it is critical that all machine contractors/operators in particular, are thoroughly briefed by APA before works commence to ensure that tree clearance and understorey impacts are absolutely minimal. In particular where tree felling decisions need to be made, clear priority should be given to retaining as many trees greater than 40cm DBHOB as possible within the ROW.

In addition Parks Victoria generally supports the concept to remove topsoil and mulched vegetation for stockpiling to facilitate rehabilitation, and also to use large logs to deter off-road access, but suggests that better outcomes may be realised as follows:

- Whilst mulching some cleared vegetation would be useful to stabilise topsoil, some small forked branches (about 1m high) should also be retained for placement along the western side of the new Pipeline Track (pointing both ways) where possible. These forked branches will deter vehicles from driving off-road and will not be usable as firewood. Some placement of stumps and rotten/hollow logs would also be useful in this regard but any solid timber greater than 100mm DBHOB will be targeted by illegal firewood cutters. These placed materials will also provide enhanced habitat values.
- On the eastern side of the new Pipeline Track, where such materials may interfere with the maintenance of the Powerline corridor, staked hay bales perhaps 15m apart may be an alternative to deter off-road driving. Staked hay bales may also be required in steeper sections to avoid soil loss during heavy rainfall events.
- Most timber greater than 100mm DBHOB generated by the project should preferably be stockpiled at an agreed location for either future use within the Park or for donation to the local community.
- Revegetation areas will also need to be shallow ripped (200mm deep) with tynes 200 to 300mm apart, prior to respreading topsoil and mulch, to provide more suitable soil conditions for seedling development and survival. This ripping will improve both moisture infiltration and root growth.

- As discussed, APA should arrange for seed collection to occur without further delay after gaining any necessary approvals from DELWP.

4. Parks Victoria agrees that boring will not be necessary where the proposed new pipeline crosses minor drainage lines within the Park. As agreed, in order to minimise areas of construction disturbance, all drainage lines will be open cut per standard construction requirements. APA will be responsible for ensuring appropriate erosion and sediment control during the construction program and will continue to monitor the site following the completion of construction.

5. Vehicle and plant access to the site must be via existing tracks or agreed ROW. No off road driving is permitted or usage of informal unsigned tracks or tracks signed as 'Management Vehicle Only'.

6. All excavation and associated works including top soil and subsoil stockpiling and pipeline storage must be undertaken within the agreed ROW and in a manner that minimises vegetation impact.

7. Before construction equipment enters the site, all designated Work Zones/Exclusion Zones must be correctly and clearly marked to the satisfaction of Parks Victoria.

8. There is to be no stockpiling of material or storage of machinery/equipment outside the agreed ROW, unless approved by the Ranger Team Leader.

9. Works must not occur on Code Red Days. On Total Fire Ban days all work will be subject to relevant DELWP and CFA approvals. Sufficient water and other precautions should be made at all times whilst works are in progress, in accordance with the *Fire Protection Regulations 2004*.

Weed/Pathogen Management

10. To reduce the spread of weeds, all work vehicles, plant and equipment must be free of soil and seed by pressure washing before entering the Park, and again before re-entering the Park if dirt road or off road driving has occurred since leaving the Park.

11. Similarly to reduce the spread of pathogens, all work vehicles, plant and equipment must be sprayed with Phytoclean before being entering the Park, and again before re-entering the Park if dirt road or off road driving has occurred since leaving the Park.

12. Materials imported to the site for infill or bedding must be classified as clean fill according to EPA Industrial Waste Guidelines (Publication IWRG600.2 December 2010).

13. Weeds will need to be controlled along the ROW by APA on an ongoing basis. As recently advised, targeted weed control within the ROW without delay, is recommended to significantly reduce the future spread of weeds due to soil disturbance.

Avoiding Disturbance to Heritage Sites

14. A copy of the draft CHMP for Looping 7 must be forwarded to Parks Victoria for appraisal before works commence. Any Aboriginal and European cultural heritage sites identified within the Park should be clearly mapped and proposed protection measures indicated.

Also liaison with Aboriginal Affairs Victoria and Heritage Victoria, and feedback from relevant local community groups should be outlined.

Completion of Works

15. The new Pipeline Track realignment will need to conform to relevant DELWP standards before leaving the site, to allow for safe usage and surface stability. District staff will confirm the required standards at a later date.

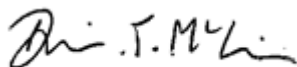
16. On completion of works all surplus materials, construction equipment and rubbish must be removed and the site left in a clean and tidy condition.

17. The site must be rehabilitated and regenerated to the satisfaction of Parks Victoria and DELWP.

Where not indicated above to the contrary, Parks Victoria is generally supportive of draft Plan.

Should you require further advice on this matter, please don't hesitate to contact Martin Woodward (Regional Statutory Planning Officer) on tel. 03 5430 4472.

Yours sincerely



Daniel McLaughlin
District Manager, Northern Rivers District
Northern Victoria Region