

Date: 30 March 2022

Our ref: 15933

Geoanalysis Pty Ltd
9 Boyce Ave
Austinmer NSW 2515

Attention: Steve House



Department of Planning
and Environment

Issued under the Environmental Planning and Assessment Act 1979

Approved Application No DA 21/11288

Granted on the 23 June 2023

Signed M Brown

Sheet No 11 of 44

Dear Steve,

Proposed APZ, Perisher Views, Perisher Valley

As requested, I have reviewed the proposed asset protection zone (APZ) Implementation / management plan for the proposed Perisher Views lodge at Lot 1 DP 1192372 Perisher Valley, as shown Figure 1 and Figure 2 below. I also inspected the site with Marion Battishall from the NPWS on 21 March 2022.

There is considerable evidence of the threatened *Mastacomys fuscus* (Broad-toothed Rat) within those parts of the APZ that support reasonable shrub cover, particularly in the outer parts of the APZ, beyond Lot 1.

To mitigate potential impacts on the Broad-toothed Rat, I support the strategies identified in the proposed APZ Implementation/Management Plan, which can be summarised as:

- Concentrating more intensive vegetation management within the subject land, where all shrub cover will be removed.
- Retaining shrub cover in the highlighted green areas, in the outer parts of the APZ, to limit impacts on the Broad-toothed Rat, by increasing the likelihood that the species will continue to utilise the habitats in this area.
- Largely removing the dieback affected tree canopy within the proposed APZ.

The proposed strategies, by retaining much of the shrub cover in the outer parts of the proposed APZ, will increase the likelihood that the species will continue to utilise the habitats in this area. The proposed strategies will also reduce the likelihood that the home range, which are thought to range between approximately 0.1 ha and 0.27 ha, of one or more individuals of the species will be rendered unviable. Shrubs provide cover during the daytime for the species, and also provide structure that supports the subnivean space that the species uses whilst living under the snow during the winter.

Whilst the species continues to occur in suitable habitats within the Front Valley area, measures to mitigate impacts on the species, such as those proposed, are important to the continued viability of the local population of the species.

I believe that the proposed measures are appropriate given that:

- Vegetation/bushfire hazard management will be intensive in the majority of the APZ, in particular, in those parts that are closest to the proposed lodge.
- The APZ includes several large rock outcrops which break up the bushfire fuels to the north.
- The vegetation to the north of the proposed APZ largely comprises patchy shrub cover interspersed with areas of subalpine grassland and herbfield.
- The canopy cover surrounding the subject land has been significantly reduced by the extensive Snow Gum dieback that has occurred in the area in recent years, as shown in Photo 1.
- The area to the north and east of the subject land includes buildings and roads which break up the bushfire fuels to the north.



Photo 1: The dieback affected trees on the margins of the proposed APZ will be removed or heavily pruned. As such there will very little tree canopy within the proposed APZ.

Should you require any further information please contact me on 4476 1151 or 0422 802 447.

Regards,



Ryan Smithers
Senior Ecologist

Perisher Views, Perisher Valley.

APZ – Implementation /Management Plan



The areas highlighted in Green are Broad-toothed Rat habitat. Herbs, low shrubs, rocky areas and existing grassy spaces are to be retained

APZ Composition (within blue boundary)

- Maximum 15% of the APZ as canopy (trees at maturity)
- Maximum 15.7% of the APZ as understory (heath)
- The shaded areas highlighted are Threatened Species Habitat. Herbs, low shrubs, rocky areas and existing grassy spaces are to be retained
- Remainder APZ to have vegetation managed to a height of 100mm or below.
- ** No shrubs beneath trees.
- ** Where APZ management works leads to bare ground then this area must be planted with native Poa and be maintained until an erosion resistant state is achieved.

APZ Management

- Removal of weeds and more flammable species first.
- Removal of fine fuels.
- Regular maintenance of grass
- Tree canopy should not overhang the building.
- Prune or remove trees so there is not a continuous tree canopy from hazard to asset. Separate tree crowns by 2-5 metres.
- Prune lower branches from trees up to 2m above ground.
- Native trees and shrubs can be retained as clumps or islands.
- Vegetation should not touch the building.

- Building Footprint
- APZ
- Rock outcrop

Plan Name: Perisher Views APZ Management Plan. Plan date: 24/02/22 Who drew the plan: Steven House	Site address: Perisher View Address: Burrmys Road, Perisher Valley, NSW.	Other notes: Not to scale This Plan is for an Inner Protection Area (IPA) Asset Protection Zone (APZ). APZ to be maintained according to RFS APZ standards whilst protecting Environmentally sensitive areas.
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Figure 1: Proposed works APZ Implementation/ Management Plan.

Perisher Views, Perisher Valley. Northern APZ



APZ component	Area (sqm)	Shrub cover %	Shrub cover (sqm)
Within lot	500	0	0
Roads and cleared land (Burrmys road and kuringai driveway)	415	0	0
Cleared land (adjacent ski patrol)	125	0	0
Rocky outcrops	450	10	45
Broad toothed rat shrubby zone (excluding rock outcrops)	330	80	264
Remainder of APZ	391	10	39
TOTAL cover			348
Percent shrub cover			15.7%



Photo: Rocky outcrop and snow gum dieback located between powerline and Kuringai lodge



Trees		Shrubs	
Tree canopy less than 15%	Tree canopy will be less than 5%	Create discontinuities or gaps	Large shrub free zone adjacent to building. Rock outcrops and inter shrub gaps provide discontinuity
At maturity should not touch or overhand building	Trees are located well away from the building and at the outer APZ	No shrubs under trees	There are very few trees remaining due to dieback. No shrubs will be under trees
Lower limbs removed	Trees have been subject to dieback. Dead limbs will be pruned	Shrubs should not form more than 10% groundcover	Shrubs are 0% adjacent to the building. However due to the threatened broad-toothed rat habitat, overall shrub cover is 15.7%. This is offset through the naturally low height of alpine shrubs (generally below 1 metre) and lack of canopy trees within the APZ
Canopies separated to 2 to 5m	Trees have been subject to dieback and are well separated	Clumps of shrubs should be separate from doors and windows by twice the height of the vegetation (ie 2 metres)	Shrub separation will be a minimum of 6 metres from doors and windows
Smoothbarked in preference to evergreen	Snowgums are relatively smooth-barked		

Figure 2: Detail of northern part of APZ.