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Dear Tara,

RE – Targeted Threatened Species Surveys – Anderson's Clay Mine VGT 17-244

Please find attached the methodology, results, and impact assessment associated with the future expansion of the clay mine at Anderson's Clay Mine. In 2016, NGH Environmental completed flora and fauna surveys across the site. The subsequent report made the following recommendations:

- A spring survey to assess the possibility of Sloane's Froglet (*Crinia sloanei*) within and adjacent to the small dams and Pink-tailed Legless Lizard (*Aprasia parapulchella*) within the rock outcrops.
- A biobanking plot survey be undertaken during spring, particularly within the Box-Gum woodland to determine whether it meets the community definitions under both the TSC and EPBC Acts. This would clarify the extent of the Box-Gum woodland on the site and its quality. This information would then inform the Assessment of Significance under both TSC and EPBC acts. It would also determine whether Consent is required from OEH under the *Native Vegetation Act 2003*.
- A detailed flora and fauna assessment should be prepared to assess the impacts of the proposed development under the TSC and EPBC Acts.

This report aims to address these recommendations. Targeted surveys were undertaken on foot at the areas of threatened species habitat identified in Figure 2. The survey found no evidence of Sloane's Froglet *Crinia sloanei* or Pink-tailed Legless Lizard *Aprasia parapulchella*. Plot surveys identified about 2.64 ha of TSC listed Box Gum Woodland which would be cleared. Of this, 1.6 ha also meets the criteria for the EPBC listed community. Assessments of Significance were conducted for these communities which concluded a significant impact is unlikely.

If you have any questions, please do not hesitate to contact me, or Lizzie Olesen-Jensen (Project Manager) on (02) 6923 1508.

Yours sincerely,

NGH Environmental



Jess Murphy
Environmental Consultant
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METHODS

Fauna Surveys

Two NGH Environmental ecologists attended the Anderson's Clay Mine site on two occasions, Friday 24 August and Friday 14 September. The purpose of the site visits was to conduct targeted threatened species surveys for Sloane's Froglet *Crinia sloanei*, and Pink-tailed Legless-lizard *Aprasia parapulchella*, in the habitat areas identified in a previous survey (Figure 2). Opportunistic sightings of other fauna species were also recorded throughout site visits.

On the first visit, call playback surveys for Sloane's Froglet were conducted within and adjacent to the two small dams in the subject land. In accordance with current best practice survey methods, recorded calls were played around each dam followed by a period of listening for responses by this species, between dawn and midday during the survey window.

On the second visit, an active search under surface rocks for Pink-tailed Legless Lizard was conducted in and around the rock outcrops in the subject land. In accordance with the *Survey Guidelines for Australia's Threatened Reptiles* (Commonwealth of Australia, 2011), between 150 and 200 shallowly-embedded surface rocks were turned and the ground beneath searched for this species, during warm spring conditions.

Vegetation surveys

Six 50m by 20m biometric plots were undertaken on 15th and 16th November 2016. Plots were undertaken according to the Biometric methodology. Location of the plot locations are shown in Figure 2.

RESULTS

Fauna Surveys

No Sloane's Froglets were heard calling in or around either dam during the August targeted survey.

No Pink-tailed Legless Lizards were found in or around either rock outcrop during the September targeted survey.

It is therefore concluded that the proposal area does not support either of these species. An impact on these species, or their habitat is therefore unlikely from the proposed development. As a result, no Assessment of Significance is required for either species.

No other threatened species were recorded during the site visits. However, Eastern Striped Skink *Ctenotus robustus* (Figure 1) was recorded sheltering under surface rocks at both rock outcrops.



Figure 1: Eastern Striped Skink *Ctenotus robustus*.

Vegetation Surveys

50 plant species were detected within the 6 biometric plots. The results of the plot data are shown in Appendix 2.

An assessment of whether the Box-gum Woodland in the proposal area met the condition threshold for the EPBC listed community was undertaken (Table 1). Based on the presence of natural regeneration of Blakely's Red Gum, the woodland areas were considered to form part of the EPBC listed *White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland* EEC.

The area of derived grassland did not meet the condition threshold for the EPBC listed community due to the predominantly exotic groundcover.

About 2.64 ha of TSC Act listed Box Gum woodland, of which 1.6 ha also conforms with the EPBC Act listing, would be impacted by the proposal. Assessments of Significance were completed and are presented in the Appendix of this report. This assessment found that the impact on this endangered ecological community would not be significant, and so no Species Impact Statement or referral to the Minister is required

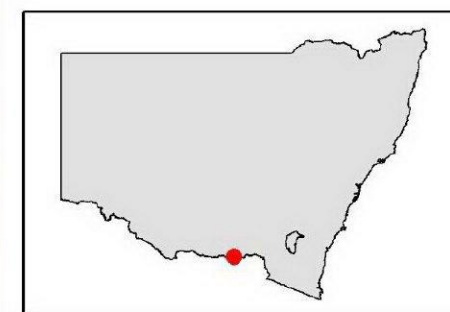
Table 1 Condition threshold for EPBC listed Box-gum Woodland

Condition Threshold	Woodland area	Derived Grassland
Is or was previously the most common overstory species, White Box and /or Yellow Box and/or Blakely's Red Gum	Yes, Blakely's Red Gum common	Likely based on surrounding vegetation
Does the patch have a predominantly native ground layer	Yes, greater than 50 native perennials	No, dominated by exotic perennials
Is the patch 0.1 ha or greater in size	Yes, patch greater than 0.1 ha	-
There are 12 or more native understory species, within the patch, excluding grasses.	No, no more than 10 understory species found within the six plots.	-
Is the patch 2 ha or greater in size	Yes, patch extends outside the proposal area	-
Does the patch have an average of 20 or more mature trees per hectare	No, 1 or 2 mature trees per hectare	-
Is there natural regeneration of the dominant overstory eucalypts	Yes, regeneration of Blakely's Red Gum	-
CONCLUSION	Forms part of the EPBC listed <i>White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland</i> EEC	Not the listed EPBC Community



Andersons Quarry

- Site boundary
- Proposal area
- ▲ Hollow Bearing Tree
- Threatened Species Searches**
- ▨ Pink-Tailed Legless Lizard
- ▨ Sloanes Froglet
- Biometric Plots
- Vegetation Communities**
- Box Gum Woodland (TSC EEC & EPBC EEC)
- Derived Grassland (TSC EEC)
- Exotic
- White Cypress Pine Plantation



Notes:

- Data collected by ngenvironmental (2016)
- Base map Copyright © Esri and its data suppliers.

0 50 100 Metres

Ref: VGT Andersons Quarry
Author: J. Gooding



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Figure 2 Vegetation communities and threatened species habitat in the proposal area.

APPENDIX 1 – BIOMETRIC PLOT DATA

Table 2 Floristic Plot Data

Family	Species Name	Common Name	Plot						Incidentals
			1	2	3	4	5	6	
Anthericaceae	<i>Dichopogon strictus</i>	Chocolate Lily		*					
Asteraceae	<i>*Arctotheca calendula</i>	Capeweed	*	*			*		
Asteraceae	<i>*Hypochaeris radicata</i>	Cats Ear	*		*	*	*		
Boraginaceae	<i>*Echium plantaginuem</i>	Paterson's Curse			*		*		
Caryophyllaceae	<i>*Petrorhagia sp.</i>	Proliferous Pink	*						
Clusiaceae	<i>*Hypericum perforatum</i>	St Johns Wort	*	*			*		
Colchicaceae	<i>Burchardia umbellata</i>	Milkmaids				*			
Cyperaceae	<i>Carex sp.</i>	Sedge		*			*		
Fabaceae	<i>Pultanea foliolosa</i>	Small Leaf Bush Pea	*						
Fabaceae	<i>Dillwynia sericea</i>	Showy Parrot Pea	*						
Fabaceae	<i>*Trifolium arvense</i>	Haresfoot Clover					*		
Fabaceae	<i>*Trifolium sp.</i>	Clover	*	*	*		*		
Haloragaceae	<i>Gonocarpus elatus</i>	Raspwort	*			*			
Juncaceae	<i>Juncus sp.</i>	Rush		*	*	*	*		
Lomandraceae	<i>Lomandra filiformis</i>	Mat Rush	*			*			
Mimosaceae	<i>Acacia implexa</i>	Hickory Wattle	*						
Myrtaceae	<i>Eucalyptus albens</i>	White Box					*		
Myrtaceae	<i>Eucalyptus blakelyi</i>	Blakely's Red Gum	*	*		*		*	
Myrtaceae	<i>Eucalyptus bridgesiana</i>	Apple Box							*
Myrtaceae	<i>Eucalyptus macrorhyncha</i>	Red Stringybark							*
Myrtaceae	<i>Eucalyptus melliodora</i>	Yellow Box							*
Myrtaceae	<i>Eucalyptus polyanthemus</i>	Red Box	*	*					
Poaceae	<i>*Aira cupaniana</i>	Hair Grass	*	*	*	*	*	*	
Poaceae	<i>Aristida sp.</i>	Wire Grass				*			
Poaceae	<i>Austrostipa sp.</i>	Spear Grass	*	*		*	*	*	

Family	Species Name	Common Name	Plot						Incidentals
			1	2	3	4	5	6	
Poaceae	<i>*Avena fatua</i>	Wild Oats	*	*	*	*	*		
Poaceae	<i>*Briza maxima</i>	Quaking Grass	*	*		*		*	
Poaceae	<i>*Briza minor</i>	Shivery Grass	*			*		*	
Poaceae	<i>*Bromus diandrus</i>	Great Brome	*	*		*			
Poaceae	<i>*Bromus hordaceus</i>	Soft Brome		*	*		*		
Poaceae	<i>*Cenchrus clandestinus</i>	Kikuyu					*		
Poaceae	<i>*Dactylis glomerata</i>	Cocksfoot	*	*		*			
Poaceae	<i>Dichanthium sericeum</i>	Queensland Bluegrass		*					
Poaceae	<i>Dichelachne micrantha</i>	Plume Grass	*			*	*		
Poaceae	<i>Echinopogon sp.</i>	Echidna Grass	*						
Poaceae	<i>*Hordeum leporinum</i>	Barley Grass					*		
Poaceae	<i>*Lolium multiflorum</i>	Rye Grass	*	*		*	*		
Poaceae	<i>Microlaena stipoides</i>	Weeping Grass	*			*		*	
Poaceae	<i>Poa sp.</i>	Snow Grass							
Poaceae	<i>Phalaris sp.</i>	Phalaris			*				
Poaceae	<i>Rytidosperma pallidum</i>	Silvertop Wallaby Grass	*	*					
Poaceae	<i>Rytidosperma sp.</i>	Wallaby Grass	*	*		*	*	*	
Poaceae	<i>Themeda triandra</i>	Kangaroo Grass		*		*			
Poaceae	<i>Un id. Grass (Annual)</i>	Annual Grass			*				
Poaceae	<i>*Vulpia sp.</i>	Fescue					*	*	
Polygonaceae	<i>*Acetosella vulgaris</i>	Sheep Sorrel					*		
Polygonaceae	<i>*Rumex sp.</i>	Dock		*	*		*		
Pteridaceae	<i>Cheilanthes austrotenuifolia</i>	Rock Fern				*			
Rosaceae	<i>*Rubus sp</i>	Blackberry						*	
Rubiaceae	<i>Asperula scoparia</i>	Prickly Woodruff				*			

Table 3 Biometric plot data

Plot No.	Location		Native plant species richness	Native over-storey cover	Native mid-storey cover	Native ground cover (grasses)	Native ground cover (shrubs)	Native ground cover (other)	Exotic plant cover	Number of trees with hollows	Overstorey regeneration	Total length of fallen logs
Plot 1	-36.019594	146.947227	14	20.6	0	41.3	0	4	50.6	0	Yes	12
Plot 2	-36.020243	146.946012	11	12.1	0	31.3	0	0	53.3	0	Yes	0
Plot 3	-36.019989	146.946866	1	0	0	20.0	0	0	80.0	0	No	0
Plot 4	-36.021452	146.945776	14	0	0	40.6	0	2.6	54	0	Yes	0
Plot 5	-36.022102	146.946637	6	2	0	11.3	0	2	83.3	0	Yes	12
Plot 6	-36.0213	146.946599	4	1.5	0	36.6	0	0	54	0	Yes	0

APPENDIX 2 - PLOT PHOTOS



Figure 1 – Plot 1



Figure 2 - Plot 2



Figure 3 - Plot 3



Figure 4 - Plot 4



Figure 5 - Plot 5



Figure 6 - Plot 6

APPENDIX 2 – ASSESSMENTS OF SIGNIFICANCE

BC Act: White Box – Yellow Box – Blakely's Red Gum Woodland (Box-gum Woodland)

- a) In the case of a threatened species, whether the action proposed is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction.**

Not applicable.

- b) In the case of an endangered population, whether the action proposed is likely to have an adverse effect on the life cycle of the species that constitutes the endangered population such that a viable local population of the species is likely to be placed at risk of extinction.**

Not applicable.

- c) In the case of an endangered ecological community or critically endangered ecological community, whether the proposed development or activity:**
- i. is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction.**
 - ii. Is likely to substantially and adversely modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction**

- I. The proposal would result in the removal of around 2.6ha of the Box-gum Woodland. 1.0 ha of this area is a derived grassland in low condition. The other 1.6 ha is a regenerating woodland. This woodland has been disturbed through prior farming activities and clearing. Although a few mature trees remain, the overstory is mostly comprised of regenerating eucalypts. The understory is comprised of a mix of native grasses and exotic annual grasses and forbs. 2.0ha of Box-gum woodland would be avoided by the development and remain in the proposal site. Existing vegetation mapping (VIS_4469) shows a further 38.5ha of Box-gum Woodland is mapped within a 1000m² radius. The 2.6 ha to be removed would lead to a small reduction in the extent of the community, however this area is a small proportion (6%) of the EEC present in the locality. The removal of 2.6ha is not likely to substantially reduce the extent of this EEC so that its local occurrence is likely to be placed at risk of extinction.
- II. The proposal would result in the clearing of a small area of this EEC. 38.5ha of Box-gum Woodland would remain in the local area. No clearing of vegetation for the proposal would occur in the remaining areas of EEC in the locality. There may be a reduction in surface water runoff into the surrounding EEC but this reduction is considered to be fairly minor in the landscape. No further impacts are considered to occur to the composition of the remaining areas of the EEC. The proposal is not likely to modify the EEC to the extent that would place the local occurrence of this EEC at risk of extinction.

- d) In relation to the habitat of a threatened species or ecological community:**
- i. the extent to which habitat is likely to be removed or modified as a result of the action proposed, and**
 - ii. whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed action, and**
 - iii. the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species, population or ecological community in the locality.**

- I. The proposal would result in the removal of around 2.6 ha of Box-gum Woodland. This EEC is already disturbed as a result of previous activity on the site, with the existing quarry and associated roads, fences and dams, and so is already modified from its natural condition.
- II. The proposal would result in the clearing of a small area of disturbed EEC which is part of a larger contiguous patch of remnant woodland. The proposal would not result in the fragmentation or isolation of this EEC.
- III. The habitat within the study area has been previously disturbed, and the amount of habitat to be removed is very small in the local context. 1.0 ha is comprised of a low condition derived grassland that would be unlikely to regenerate without assisted rehabilitation.
38.5ha of the EEC will remain in the locality that will continue to contribute to the ongoing survival of the community in the vicinity of the proposal area. The 2.6ha to be removed is not considered to be important to the long-term survival of the EEC in the locality.

- e) Whether the action proposed is likely to have an adverse effect on critical habitat (either directly or indirectly).**

Habitat critical to the survival of the Box Gum Woodland includes the moderate to highly fertile slopes of the Western Slopes of NSW. Areas of Box Gum Grassy Woodland that meet the condition criteria for the EPBC listed community should be considered critical to the survival of the ecological community (National Recovery Plan, 2010). 1.6ha of the EPBC listed

community would be affected by the proposal. This habitat has been previously disturbed from past farming activities and the amount of habitat to be removed is very small in the local context. The habitat to be removed is not considered to be important to the long-term survival of the EEC in the locality.

f) Whether the action proposed is consistent with the objectives or actions of a recovery plan or threat abatement plan.

The recovery objectives for the National Recovery Plan for this EEC include:

- I. Achieving no net loss in extent and condition of the ecological community throughout its geographic distribution.
- II. Increasing protection of sites with high recovery potential.
- III. Increasing landscape functionality of the ecological community through management and restoration of degraded sites.
- IV. Increasing transitional areas around remnants and linkages between remnants.
- V. Bringing about enduring changes in participating land manager attitudes and behaviours towards environmental protection and sustainable land management practices to increase extent, integrity and function of Box Gum Grassy Woodland.

The proposal does not support all the objectives of the recovery plan. Around 2.6 ha of disturbed EEC would be cleared as a result of the proposal but given the minimal amount of habitat to be removed and the extent of habitat that would remain in the local area, the proposal is not likely to interfere with the recovery of this EEC.

g) Whether the action proposed constitutes or is part of a key threatening process or is likely to result in the operation of, or increase the impact of, a key threatening process.

Key threatening processes relevant to the proposal include the following:

i) Clearing of native vegetation

The clearing of native vegetation is considered a major contributor to the loss of biodiversity. In the determination, the NSW Scientific Committee found that 'clearing of any area of native vegetation, including areas less than two hectares in extent, may have significant impacts on biological diversity'. Clearing can lead to direct habitat loss, habitat fragmentation and associated genetic impacts, habitat degradation and off-site impacts such as downstream sedimentation. Given that 2.6 ha of native vegetation would be removed, the proposal has the potential to increase the impact of this key threatening process.

ii) Loss of hollow-bearing trees

The proposal will result in the removal of 4 hollow-bearing trees. 4 hollow-bearing trees will be retained by the proposal. The majority of the site is comprised of immature Eucalypts that have not yet developed hollows. The loss of 4 hollow-bearing trees is considered to be a small contribution to this key threatening process.

iii) Invasion and establishment of exotic vines and scramblers

The proposal has the potential to contribute to the spread of exotic vines and scramblers in the proposal area through the transfer and introduction of plant material and soil on machinery. Standard mitigation measures for weed and hygiene protocols and sediment control would reduce the risk of spreading weeds on site. These mitigation measures would reduce the risk of spreading weeds on site, thus the proposal is unlikely to contribute to this key threatening process.

iv) Invasion of native plant communities by exotic perennial grasses.

The proposal has the potential to contribute to the spread of exotic perennial grasses in the proposal area through the transfer and introduction of plant material and soil on machinery. Standard mitigation measures for weed and hygiene protocols and sediment control would reduce the risk of spreading weeds on site. These mitigation measures would reduce the risk of spreading weeds on site, thus the proposal is unlikely to contribute to this key threatening process.

v) Removal of dead wood and dead trees

Dead trees and dead wood that occur within the proposal area are also likely to be removed as part of the proposed works. The presence of scattered dead trees and wood in surrounding farmland means that the removal of dead wood within the proposal area is unlikely to have a large impact on this key threatening process.

Conclusion

A significant impact on the White Box Yellow Box Blakely's Red Gum Woodland and Inland Grey Box Woodland EEC is not anticipated for four main reasons; (1) A large proportion of the community to be impacted by the proposal has some form of disturbance; (2) the amount of the community to be removed by the proposal is relatively small compared to the known local occurrence and estimated extent of the community in the locality; (3) The proposal would not isolate areas of the community and (4) Viable areas of the local occurrence of the community that are generally well connected will remain within the locality area that will continue to contribute to the ongoing survival of the community.

a) Will the action lead to a reduction in the extent of an ecological community?

The proposal would result in the removal of around 1.6 ha of this EEC, comprised of two separate smaller patches (0.5ha & 1.1ha). This patch of EEC has been disturbed through prior farming activities and clearing. Although a few mature trees remain, the overstory is mostly comprised of regenerating eucalypts. The understory is comprised of a mix of native grasses and exotic annual grasses and forbs. 2.0ha of Box Gum woodland would be avoided by the development and remain in the proposal site. Existing vegetation mapping (VIS_4469) shows a further 38.5ha of Box-gum Woodland is mapped within a 1000m² radius. The 1.6 ha to be removed would lead to a small reduction in the extent of the community but this area is a small proportion (4%) of the EEC present in the locality, and its removal is not likely to substantially reduce the extent of this EEC.

b) Will the action fragment or increase fragmentation of an ecological community, for example by clearing vegetation for roads or transmission lines?

The proposal would result in the clearing of a small area of disturbed EEC which is part of a larger contiguous patch of remnant woodland in the subject land. The two patches to be removed are currently fragmented by a cleared grassland and the existing quarry. The proposal would slightly increase the effects of fragmentation currently caused by the existing quarry. However, the proposal area is surrounded by a vast expanse of intact remnant woodland (approx. 812ha) that maintains connectivity around the proposal area. The proposal would not result in any substantial fragmentation or isolation of this EEC.

c) Will the action adversely affect habitat critical to the survival of an ecological community?

Habitat critical to the survival of the Box Gum Woodland includes the moderate to highly fertile slopes of the Western Slopes of NSW. Areas of Box Gum Grassy Woodland that meet the condition criteria for the EPBC listed community should be considered critical to the survival of the ecological community (National Recovery Plan, 2010). 1.6ha of the EEC would be affected by the proposal. This habitat has been previously disturbed from past farming activities and the amount of habitat to be removed is very small in the local context. The habitat to be removed is not considered to be important to the long-term survival of the EEC in the locality.

d) Will the action modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for an ecological community's survival, including reduction of groundwater levels or substantial alteration of surface water drainage patterns?

The proposal would result in the clearing of a small area of disturbed EEC for the expansion of a quarry. The extraction of the quarry would be likely to alter surface water drainage. The proposed quarry expansion sits on top of a ridgeline with water catchment running to the North and South West. No Box-gum woodland occurs to the north of the proposal area. The water catchment to the south would be reduced by about 0.5 ha. This gully runs into the adjacent Box-gum woodland in the West and South West. Water on these skeletal hilltops runs off quickly and the small catchment area to be removed would have a negligible effect on water drainage into the surrounding environment.

Groundwater can be increased by the pooling of water within the quarry, however this impact is very low in the expanse of the hilltop landscape. The Box-Gum Woodland has low potential to be a groundwater dependent ecosystem (BOM).

The planted Cypress Pines would be retained as a 60 buffer to protect the Box-gum Woodland in the South from impacts from the quarry such as shading, surface water and nutrient run-off.

The Box-gum Woodland surrounding the existing quarry in the East and South East has not appeared to be impacted by a loss of surface water drainage. Thus, given the small extent of the proposal within the landscape, the proposal is not likely to significantly modify abiotic factors necessary to the survival of the local extent of this EEC.

e) Will the action cause a substantial change in the species composition of an occurrence of an ecological community, including causing a decline or loss of functionally important species, for example through regular burning or flora or fauna harvesting?

The proposal would result in the clearing of a small area of this EEC. No further impacts are anticipated to occur to the remaining EEC in the proposal area or adjacent areas. No selective clearing, increased burning or flora and fauna harvesting would occur in the remaining area. The area is already disturbed as a result of previous quarry and farming activities on the site. The proposal is not likely to cause a substantial change in the species composition of the local occurrence of this EEC.

f) Will the action cause a substantial reduction in the quality or integrity of an occurrence of an ecological community, including but not limited to:

- Assisting invasive species, that are harmful to the listed ecological community, to become established; or
- Causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the ecological community which kill or inhibit the growth of species in the ecological community?

The proposal has the potential to contribute to the introduction or spread of invasive weed species to the proposal area through the transfer and introduction of plant material and soil on machinery. Standard mitigation measures for weed and hygiene protocols and sediment control would reduce the risk of spreading weeds on site.

The proposal would not increase the risk of invasive fauna species such as feral cats and foxes. These species are likely to already occur in the area and the proposal would increase their ability to become established.

The proposal would not involve the regular use of chemicals or pollutants such as fertilisers or herbicides.

g) Will the action interfere with the recovery of an ecological community?

The objectives for the Box Gum Grassy Woodland Recovery Plan are to minimise the risk of extinction of the ecological community through:

1. Achieving no net loss in extent and condition of the ecological community
2. Increasing protection of sites with high recovery potential
3. Increasing landscape functionality of the ecological community through management and restoration of degraded sites
4. Increasing transitional areas around remnants and linkages between remnants
5. Bringing about enduring changes in participating land manager attitudes and behaviours towards environmental protection and sustainable land management practices to increase extent, integrity and function of Box-gum Grassy Woodland.

The proposal does not support all the objectives of the recovery plan. Around 1.6 ha of disturbed EEC would be cleared as a result of the proposal but given the minimal amount of habitat to be removed and the extent of habitat that would remain in the local area, the proposal is not likely to interfere with the recovery of this EEC.