



Notification of approval decision

Melbourne Airport Pavement Maintenance Program 2 (EPBC 2023/09527)

This decision is made under section 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Note that section 134(1A) of the EPBC Act also applies to this approval. That provision provides, in general terms, that if the approval holder authorises another person to undertake any part of the Action, the approval holder must take all reasonable steps to ensure that the other person is informed of any conditions attached to this approval, and that the other person complies with any such conditions.


Approved Action

person to whom the approval is granted (approval holder)	AUSTRALIA PACIFIC AIRPORTS (MELBOURNE) PTY LIMITED ACN: 076 999 114
Action	The upgrade of two existing taxiways at Melbourne Airport, Victoria that will involve the replacement of existing infrastructure, the re-grading of the taxiway and shoulder areas, and the installation of new services and connection with existing services. See EPBC Act referral 2023/09527.

Approval decision

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 Provision	Decision
	Listed threatened species and communities (section 18 and section 18A)	Approved
	Commonwealth land (section 26 and section 27A)	Approved
period for which the approval has effect	This approval has effect until 1 August 2045.	
conditions of approval	The approval is subject to conditions under the EPBC Act as set out in Annexure A.	

Person authorised to make decision

name and position	Brendan Linton-Smith A/g Branch Head Environment Assessments (Vic and Tas) and Post Approvals Branch Nature Positive Regulation Division
signature	
date of decision	23 July 2025

Annexure A

Note: Words and terms appearing in **bold** (excluding headings) have the meaning assigned to them at **Part C – Definitions**.

CLEARING LIMITS

- 1) The approval holder must not:
 - a) Take the Action outside of the **Action area**.
 - b) **Clear** more than 2.856 ha of **NTGVVP** within the **extent of disturbance** area and **laydown area**.
 - c) **Harm** **NTGVVP** outside the **extent of disturbance** area or **laydown area**

EXCLUSION FENCING AND MACHINERY STORAGE

- 2) To avoid and mitigate **harm** to **NTGVVP within the Action area**, the approval holder must, before **commencement of the action**, install **temporary exclusion fencing** around all the **extent of disturbance** area and **laydown** area.
- 3) To avoid and mitigate **harm** to **NTGVVP**, the approval holder must ensure no material stockpiles, vehicle parking and/or machinery storage within the **action area** are located outside the **laydown area** and/or within areas which are not **cleared** or are not permitted to be **cleared** in accordance with the conditions of this approval, until the **completion of the Action**.

INDIRECT IMPACTS

- 4) From the **commencement of the Action** and at least until 12 months from the **completion of the Action**, the approval holder must monitor the **habitat quality** and site condition of the **avoided areas** of **NTGVVP**.
- 5) The approval holder must submit all **monitoring data**, surveys, maps, other spatial and metadata electronically to the **department** within 30 **business days** from the anniversary of the **commencement of the Action**, until the first anniversary of the completion of all **construction** except where otherwise specified in a **plan**.
- 6) The approval holder must ensure monitoring is able to:
 - a) detect any change in the **habitat quality** or site condition of the **avoided areas** of **NTGVVP**. The approval holder must ensure that from the **commencement of the action** until the first anniversary of the completion of all **construction**, the **habitat quality** of **NTGVVP** in the **avoided areas** does not decline, below the **baseline condition** of **NTGVVP** in the **avoided areas**.
- 7) Within 18 months from the **completion of the Action**, the approval holder must submit a Monitoring Report to the **department** which details the findings of the monitoring required by condition 4. The Monitoring Report must:

- a) Clearly demonstrate if there has been any change to the **habitat quality** or site condition of the **avoided areas** of **NTGVVP** during the 12 months following the **completion of the Action**,
- b) Compare the **habitat quality** or site condition of the **avoided areas** of **NTGVVP** 12 months following the **completion of the Action** against its **baseline condition**,
- c) Provide an analysis of the impacts of the Action on **avoided areas** of **NTGVVP**, and
- d) Present a conclusion based on the monitoring and analysis as to whether **avoided areas** of **NTGVVP** has recovered to **baseline condition**. The conclusion must be accompanied by a covering letter which draws attention to the requirements of condition 6 and summarises the results of the Monitoring Report.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- 8) The approval holder must comply with the **Construction Environmental Management Plan (CEMP)**.
- 9) The approval holder must commence implementing the **CEMP** no later than the **commencement of the Action** and continue to implement the approved **CEMP** until **completion of the Action**.
- 10) By implementing the **CEMP**, the approval holder must achieve the following environmental outcomes:
 - a) prevent any avoidable **harm** to **protected matters** and mitigate unavoidable and accidental **harm** to **protected matters**.

MANAGEMENT OF CONTAMINANT

- 11) The approval holder must comply with the **Melbourne Airport PFAS Management Framework**.
- 12) The approval holder must commence implementing the **Melbourne Airport PFAS Management Framework** no later than the **commencement of the Action** and continue to implement the approved **Melbourne Airport PFAS Management Framework** until **completion of the Action**.

CULTURAL HERITAGE

- 13) To avoid and mitigate **harm** to cultural heritage, if any unearthed **heritage material** is found during excavation, the approval holder must act in accordance with **CHMP 12774**, in regard to the discovery, removal, custody, curation and management of such materials.

ACTION MANAGEMENT PLANS

Offset Management Plan

- 14) Prior to the **commencement of the Action**, the approval holder must submit an **Offset Management Plan (OMP)** for the residual significant impacts of the Action on **NTGVVP** to the **department** for the **Minister's** approval.

- 15) To compensate for the residual significant impacts of the Action on **NTGVVP**, the approval holder must commence implementation of the **OMP** no later than 12 months from the **completion of the Action** and continue to implement the **OMP** at least until the expiry date of this approval.
- 16) The approval holder must, within 5 **business days** of commencing implementation of the **OMP**, notify the **department** of the date on which implementation of the **OMP** commenced.
- 17) The approval holder must achieve the **offset outcomes** at the **offset site** specified in the **OMP** by the time specified in the **OMP**. Once achieved, the approval holder must maintain or exceed the offset outcomes at least until the expiry date of this approval.

Part B – Administrative conditions

PLAN REVISION

Note: Section 143A of the **EPBC Act** entitles the approval holder to apply for the **Minister's** approval of a revised version of a **plan**.

- 18) The approval holder may choose to revise a **plan** required to be implemented without submitting it for approval under section 143A of the **EPBC Act**, if:
 - a) the taking of the Action in accordance with the revised **plan** would be consistent with the approved Action,
 - b) the taking of the Action in accordance with the revised **plan** would be consistent with the conditions attached to this approval,
 - c) the taking of the Action in accordance with the revised **plan** would not be likely to have a **new or increased impact**, and
 - d) the approval holder notifies the **department** electronically that it has prepared a revised version of the **plan** (the 'revised **plan**'). In notifying the **department**, the approval holder must specify each condition which references the **plan** and provide the **department** with:
 - i) an electronic copy of the revised **plan**,
 - ii) an electronic copy of the revised **plan** marked up with track changes to show the differences between the **plan** and the revised **plan**,
 - iii) a comprehensive explanation of all differences between the **plan** and the revised **plan**,
 - iv) a declaration that the approval holder has read and understands the *Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals*, Commonwealth of Australia 2017,
 - v) a comprehensive analysis and detailed discussion on the likelihood that taking the Action in accordance with the revised plan will not have, or will be not likely to have, a **new or increased impact**,

- vi) written notice of the date on which the approval holder will implement the revised **plan** (the 'revised **plan** implementation date'), being at least 30 **business days** after the date of providing notice of the revision of the **plan**, or a date agreed to in writing with the **department**, and
 - vii) a copy of the **compliance report** for the latest **ACR period** and a statement of any relevant history of compliance (including non-compliance) in relation to the **plan**.
- e) The approval holder must commence implementation of the revised **plan** from the revised **plan** implementation date unless otherwise notified in writing by the **Minister**.
- 19) If the **Minister** notifies the approval holder that the **Minister** is satisfied that the taking of the Action in accordance with a **plan** which has been revised without submitting it for the **Minister's** approval would be likely to have a **new or increased impact**, then:
- a) the approval holder's ability to revise a **plan** without submitting the **plan** for **Minister** approval does not apply, or ceases to apply, in relation to the revised **plan**,
 - b) the approval holder must implement the **plan** in force immediately prior to that revised **plan** or a version of the **plan** specified by the **Minister** in the notice, and
 - c) the **Minister** may also notify that, for a specified period, the approval holder's ability to revise a **plan** without submitting the **plan** for **Minister** approval does not apply for one or more specified **plans**.
- 20) The approval holder may, at any time by giving written notice to the **department**, revoke its choice to implement a **plan** which has been revised without submitting it for the **Minister's** approval. If the approval holder revokes the choice to implement a revised **plan**, the approval holder must implement the plan in force immediately prior to that revised **plan**.

Note: The above conditions are not intended to limit the operation of section 143A of the **EPBC Act**.

SUBMISSION AND PUBLICATION OF PLANS

- 21) Wherever these conditions require the approval holder to submit any **plan** to the **department**, all such **plans** must be submitted to the **department** electronically.
- 22) Unless otherwise agreed to in writing by the **Minister**, the approval holder must publish each **plan** on the **website** within 15 **business days** of the date:
- a) the **plan** is approved by the **Minister** in writing, if the **plan** requires the approval of the **Minister**.
- 23) The approval holder must keep all **plans** published on the **website**, in a format that is easily accessible and downloadable, from the first date which that **plan** must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of **plans**.
- 24) The approval holder is required to exclude or redact **sensitive biodiversity data** from any version of a **plan** before that **plan** is published on the **website** or otherwise provided to a

member of the public. If **sensitive biodiversity data** is excluded or redacted from a **plan**, the approval holder must notify the **department** in writing what exclusions and redactions have been made in the version published on the **website**.

COMMENCEMENT OF THE ACTION

- 25) The approval holder must notify the **department** electronically of the date of **commencement of the Action**, within 5 **business days** following **commencement of the Action**.
- 26) The approval holder must not **commence the Action** later than 5 years after the date of this approval decision.

COMPLIANCE RECORDS

- 27) The approval holder must maintain accurate and complete **compliance records** and document the procedure for recording and storing **compliance records**.
- 28) If the **department** makes a request in writing, the approval holder must provide electronic copies of **compliance records** to the **department** within the timeframe specified in the request.

Note: Compliance records may be subject to audit by the **department**, or by an **independent auditor** in accordance with section 458 of the **EPBC Act**, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the **department's** website or through the general media.

- 29) The approval holder must ensure that any **monitoring data**, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the *Guidelines for biological survey and mapped data*, Commonwealth of Australia 2018, or as otherwise specified by the **Minister** in writing.
- 30) The approval holder must ensure that any **monitoring data**, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the *Guide to providing maps and boundary data for EPBC Act projects*, Commonwealth of Australia 2021, or as otherwise specified by the **Minister** in writing.
- 31) The approval holder must submit all **monitoring data**, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the **department** within 30 **business days** of the next anniversary of the date of this approval decision except where otherwise specified in a **plan**.

ANNUAL COMPLIANCE REPORTING

- 32) The approval holder must prepare a **compliance report** for each **Annual Compliance Report period (ACR period)**.
- 33) The approval holder must ensure each **compliance report** includes:
 - a) accurate and complete details of compliance and any non-compliance with:
 - i) each condition attached to this approval decision, and
 - ii) all commitments made in each **plan**,

- b) a schedule of all **plans** in effect in relation to these conditions during the **ACR period**,
 - c) accurate and complete details of how each **plan** was implemented during the **ACR period**, and
 - d) if any **incident** occurred, accurate and complete details of each **incident**.
- 34) The approval holder must ensure each **compliance report** is consistent with the *Annual Compliance Report Guidelines*, Commonwealth of Australia 2023.
- 35) The approval holder must, within 20 **business days** following the end of each **ACR period**, in a format that is easily accessible and downloadable, publish on the **website**:
- a) each **compliance report**, and
 - b) a **shapefile** showing all **clearing of protected matters**, and their habitat, undertaken within the **ACR period**.
- 36) The approval holder must:
- a) Exclude or redact **sensitive biodiversity data** from each **compliance report** and **shapefile** published on the **website** or otherwise provided to a member of the public.
 - b) If **sensitive biodiversity data** is excluded or redacted from a version of a **compliance report** published or otherwise provided to a member of the public, submit the full **compliance report** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.
 - c) If **sensitive biodiversity data** is excluded or redacted from a version of a **shapefile** published or otherwise provided to a member of the public, submit the full **shapefile** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.
- 37) The approval holder must notify the **department** electronically, within 5 **business days** of each date of publication that the **compliance report** has been published on the **website**. In this notification, the approval holder must provide the **department** with the web address for where the **compliance report** and related **shapefile** are published on the **website**.
- 38) The approval holder must keep each **compliance report** and related **shapefile** published on the **website** from the first date which that **compliance report** must be published and until the expiry date of this approval.

Note: **Compliance reports** may be published on the **department's** website.

REPORTING NON-COMPLIANCE

- 39) The approval holder must notify the **department** electronically, within 2 **business days** of becoming aware of any **incident**. The approval holder must specify in each notification:

- a) any condition or commitment made in a **plan** which has not been, or may have not been, complied with,
 - b) a short description of the **incident**, and
 - c) the location (if applicable, including co-ordinates), date and time of the **incident**.
- 40) The approval holder must provide to the **department** in writing, within 12 **business days** of becoming aware of an **incident**, the details of that **incident**. The approval holder must specify:
- a) all corrective measures and investigations which the approval holder has already taken in respect of the **incident**,
 - b) the potential impacts of the **incident**,
 - c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the **incident**, and
 - d) any variation of these conditions or revision of a **plan** that will be required to prevent recurrence of the **incident** and/or to address its consequences.

INDEPENDENT AUDIT

- 41) The approval holder must ensure that an **independent audit** of compliance with the conditions is conducted for every **audit period**.
- 42) The approval holder must submit details of the proposed **independent auditor** and their qualifications to the **department** within 10 **business days** following the end of each **audit period**.
- 43) The approval holder must ensure the scope of each **independent audit** is sufficient to determine the compliance status for each condition of approval, and each commitment made in each **plan**.
- 44) The approval holder must ensure the criteria for each **independent audit** and the undertaking of each **independent audit** are consistent with the **Independent Audit and Audit Report Guidelines**.
- 45) The approval holder must submit an **audit report** to the **department** for written agreement from the **department** within 3 months following the end of each **audit period**, or as otherwise directed by the **Minister** in writing.
- 46) The approval holder must ensure each **audit report** is completed to the satisfaction of the **Minister** and is consistent with the **Independent Audit and Audit Report Guidelines** to the extent that the **Independent Audit and Audit Report Guidelines** are consistent with these conditions.
- 47) The approval holder must publish each **audit report** on the **website**, in a format that is easily accessible and downloadable, within 10 **business days** of the date the **department** agrees to that **audit report** in writing.

- 48) The approval holder must notify the **department** within 5 **business days** of the date the **audit report** is published on the **website**. In this notification, the approval holder must provide the **department** with the web address for where the **audit report** is published on the **website**.
- 49) The approval holder must keep each **audit report** published on the **website** from the first date which that **audit report** must be published and until the expiry date of this approval.

COMPLETION OF THE ACTION

- 50) Within 20 **business days** after the **completion of the Action**, and, in any event, at least 20 **business days** prior to the expiry date of this approval, the approval holder must notify the **department** electronically of the date of **completion of the Action** and provide **completion data**. The approval holder must submit any spatial data that comprises **completion data** as a **shapefile**.
- 51) The approval holder must notify the **department** electronically at least 60, but not more than 70, **business days** prior to the expiry date of this approval, that the approval is due to expire.

Note: Section 145C of the **EPBC Act** entitles the approval holder to request an extension to the period of effect of this approval.

Part C – Definitions

Words and terms appearing in **bold** (excluding headings) have the meaning assigned to them in the list below:

Action area means the location of the Action, represented in Attachment A, by the zone enclosed by the solid black line designated ‘MAPMP2 – Project Area [7.28 ha]’.

Annual Compliance Report period or **ACR period** means each subsequent 12-month period following the date of this approval decision until the expiry date of this approval, unless otherwise specified in writing by the **Minister**.

Audit period means each subsequent five year period following the **commencement of the Action** until the expiry date of this approval unless otherwise specified in writing by the **Minister**.

Audit report means a written report of an **independent audit**.

Avoided areas means areas of **NTGVVP** identified as of the date of this approval is represented Attachment B by the blue shaded zones designated, ‘NTGVVP Avoided’.

Baseline condition or **baseline quality** means a measure of the overall viability of the **action area**, at the time targeted surveys on **protected matters** were undertaken, and its capacity to support the relevant **protected matters**, with respect to site condition, site context and species stocking rate and/or composition.

Biodiversity data means ‘biodiversity data’ as described in the *Policy on Accessing and Sharing Biodiversity Data*, Commonwealth of Australia 2024.

Business day(s) means a day that is not a Saturday, a Sunday, or a public holiday in Victoria.

CHMP 12774 means the *Cultural Heritage Management Plan 12774, Biosis 2017* prepared for Australia Pacific Airports (Melbourne) Pty Ltd – APAM – ACN 076 999 114 or any successor organisation that acquires the airport head lease for Melbourne Airport.

Clear, cleared or clearing means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting, or burning of vegetation.

Commence the Action or commences the Action means the first instance of any on-site **clearing, construction** or other physical activity associated with the Action, but does not include minor physical disturbance necessary to:

- Undertake pre-clearance surveys or monitoring programs.
- Install signage and/or temporary fencing to prevent unapproved use of the **Action area**, so long as the signage and/or temporary fencing is located where it does not **harm** any **protected matter**.
- Protect environmental and property assets from fire, weeds, and feral animals, including use of existing surface access tracks.
- Install temporary site facilities for persons undertaking pre-commencement activities so long as these facilities are located where they do not **harm** any **protected matter**.

Commencement of the Action means the date on which the approval holder **commences the Action**.

Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met.

Completion of the Action means the date on which all activities associated with the approved Action, other than those which provide compensation for the impacts of the Action, have permanently ceased and/or been completed.

Compliance records means all documentation or other material in whatever form required to demonstrate compliance with these conditions of approval (including compliance with commitments made in **plans**) in the approval holder's possession, or that are within the approval holder's power to obtain lawfully.

Compliance report means a written report of compliance with, and fulfilment of, these conditions (including compliance with commitments made in **plans**).

Construction means:

- the alteration, maintenance, repair or demolition of any building or structure,
- any work which involves breaking of the ground (including pile driving) or bulk earthworks,

- the laying of pipes and other prefabricated materials in the ground, and
- any associated excavation work.

Construction does not include the installation of temporary fences or signage.

Construction Environmental Management Plan (CEMP) means the *Melbourne Airport Environmental Management Plan*, version 2, 14 September 2021

Department means the Australian Government agency responsible for administering the **EPBC Act**.

EPBC Act means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

Extent of disturbance means the area shaded light-red and designated in the legend at Attachment A as “extent of disturbance”.

Habitat quality means a measure of the overall viability of a site and its capacity to support **protected matters**, with respect to site condition, site context and species stocking rate and/or composition.

Harm means to cause any measurable direct or indirect disturbance or deleterious change as a result of any activity associated with the Action.

Heritage material means Aboriginal cultural heritage materials, places, remains or objects as defined in the relevant legislation at the time of when this notice was issued.

Incident means any:

- event which has the potential to, or does, **harm any protected matter**,
- potential non-compliance with these conditions, including the administrative requirements,
- actual non-compliance with these conditions, including the administrative requirements,
- potential non-compliance with one or more commitment made in a **plan**, and/or
- actual non-compliance with one or more commitment made in a **plan**.

Independent audit means an audit, conducted by an **independent auditor**, of compliance with and fulfilment of these conditions and the commitments made in **plans**, objectively evaluated against the audit criteria developed by the **independent auditor**, in accordance with the **Independent Audit and Audit Report Guidelines** to the extent that the **Independent Audit and Audit Report Guidelines** are consistent with these conditions.

Independent Audit and Audit Report Guidelines means the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines*, Commonwealth of Australia 2019.

Independent auditor means a person, or firm, who:

- does not have any individual, financial*, employment* or family affiliation or any conflicting interests with the Action, the approval holder or the approval holder's staff, representatives, or associated persons,
- has demonstrated experience in undertaking government-regulated environmental compliance audits, and
- holds relevant professional qualifications and accreditations.

*Other than for the purpose of undertaking the role for which the person, or firm, is required.

Laydown Area means the location used for temporarily storing materials, equipment, and vehicles as part of the **Construction** activities, represented at Attachment A, by the pink zone designated 'Laydown Area (including access) (0.01 Ha)'.

Melbourne Airport PFAS Management Framework means the *Melbourne Airport PFAS Management Framework*, version 3, 11 June 2025

Minister means the Australian Government Minister administering the **EPBC Act**, including any delegate thereof.

Monitoring data means the data required to be recorded under the conditions of this approval, including **sensitive biodiversity data**.

Natural Temperate Grassland of the Victorian Volcanic Plain or **NTGVVP** means the **EPBC Act** listed threatened ecological *community (Natural Temperate Grassland of the Victorian Volcanic Plain)*.

New or increased impact means any direct or indirect increase in the impacts of an Action, an increase to the likelihood of an impact occurring, a reduction to the monitoring or mitigation measures for a **protected matter**, and/or a change to the nature or management of an environmental offset as outlined in the *Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals*, Commonwealth of Australia 2017.

NTGVVP within the Action area means the location of **NTGVVP** identified as of the date of this approval as represented at Attachment B by the yellow, blue and pink shaded zones enclosed by a solid red line designated in the legend as 'NTGVVP Impacted', 'NTGVVP Avoided' and 'NTGVVP Indirect Loss'.

Offset Management Plan or **OMP** means the document titled *Offset Management Plan for Natural Temperate Grassland of the Victorian Volcanic Plain - Skipton*, version number 1, author Muller, B., and Woods, D., 2025, or the latest subsequent version approved in writing by the **Minister**.

Offset outcomes means the offset outcomes specified in section 3.2 in the **OMP**.

Offset site means the area represented in Attachment B by the zone enclosed by the purple dashed line, designated 'MAPMP offset area'.

Plan or plans means any action management plan or strategy that the approval holder is required by these conditions to implement.

Protected matter means a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect.

Sensitive biodiversity data means **biodiversity data** which, if released, published or otherwise exposed, may result in **harm** to the relevant **protected matter** as a result of the intentional or unintentional misuse of that **biodiversity data**.

Shapefile means location and attribute information about the Action provided in an Esri shapefile format containing:

- '.shp', '.shx', '.dbf' files,
- a '.prj' file which specifies the projection or geographic coordinate system used, and
- an '.xml' metadata file that describes the shapefile for discovery and identification purposes.

Temporary exclusion fencing means temporary fencing capable of excluding all vehicles marked with prominent signage reading 'Environment Protection Area' or 'No-go zone' at 10 metre intervals along the fence line.

Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

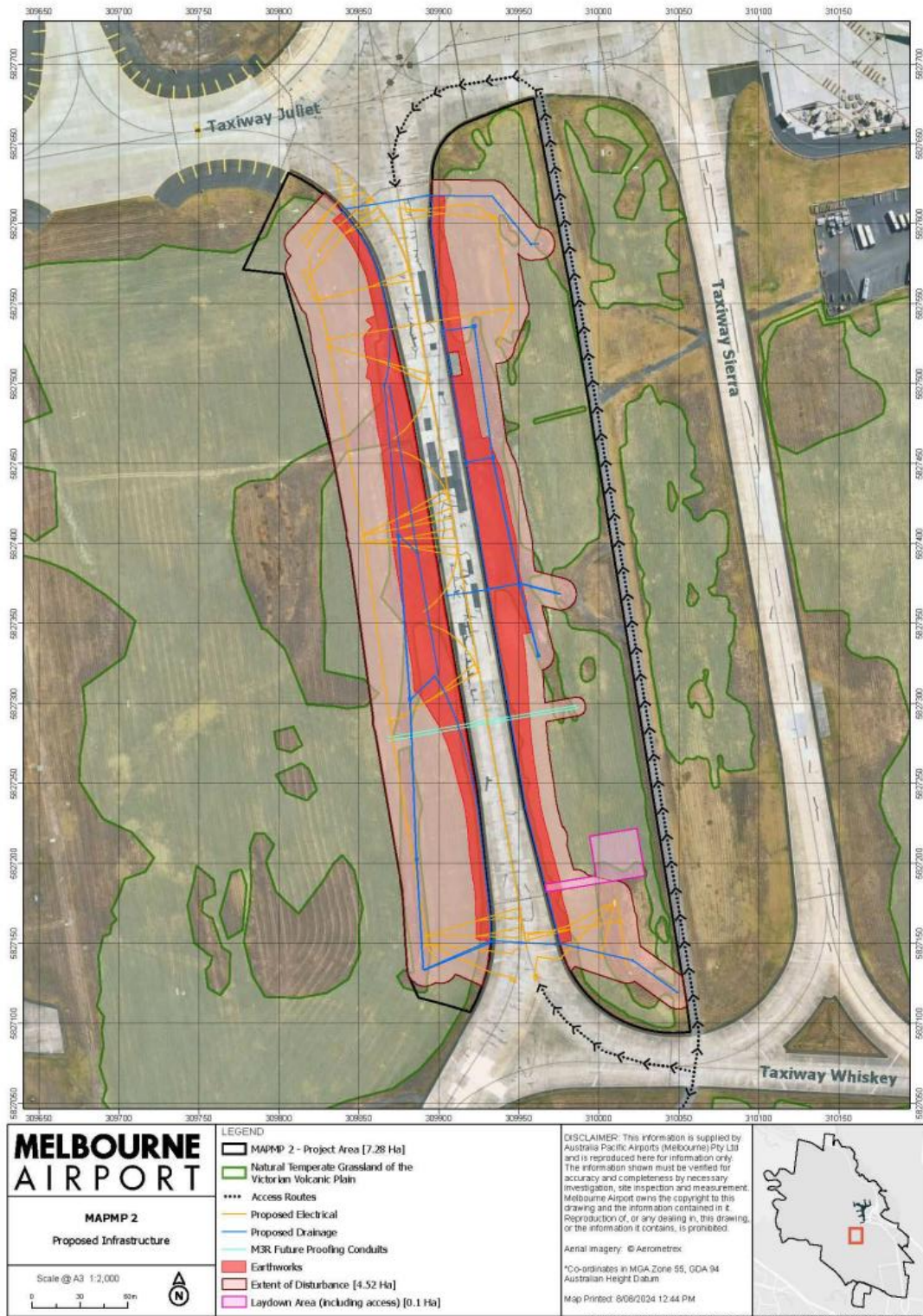
Attachments

Attachment A: Location and Features of Action

Attachment B: Project Impact Area

Attachment C: Location and Features of Offset site

Attachment A: Location and Features of Proposed Action



Attachment B: Project Impact Area



Attachment C: Location and Features of Proposed Offset site

