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2 November 2011

Sally Dodds
Contaminated Sites Branch
Department of Environment and Conservation
Locked Bag 104
Bentley Delivery Centre WA 6983

By email: ass@dec.wa.gov.au

Dear Sally

Proposed update to 'Identification and investigation of acid sulfate soils and acidic landscapes (DEC, May 2009)'

The Urban Development Institute of Australia (WA) is pleased to provide this comment to the West Australian Department of Environment and Conservation.

UDIA (WA) is the peak body representing the urban development industry in Western Australia. UDIA is a membership organisation with members drawn from the development, planning, valuation, engineering, environmental, market research and urban design professions. Our membership also includes a number of key State Government agencies and Local Government Authorities from across the state. Nationally, UDIA represents the interests of thousands of members and includes all the major land development companies, both public and private, and specialist consultancy firms.

From discussions with Stephen Wong (DEC) and yourself, we understand that the proposed updates to this much referenced guideline will include: latest scientific research findings into WA soils; changes in laboratory reporting limits; and new mapping resources. This would specifically include:

1. Latest scientific findings on Bassendean Sands and coffee rock type units, currently described in Section 3.3.1 of the May 2009 guideline.
2. Lowered laboratory limits of reporting for acidity.
3. Advice regarding the Landgate Atlas, and superseding of the former ASS risk mapping dataset, now with only two ASS risk classifications.
4. Updated advice on excavation methods.

UDIA recognises that the existing guideline provides an important reference for all soil practitioners and consultants, and would require only selective revision. For the most part these updates would simply act to bring the guideline up to date with current advice and learning, and for that reason it is timely to revise the document.

Significantly, we understand DEC is not proposing to revise the action criteria for Bassendean Sands to a lower trigger level of 0.01%S. This previously proposed change was identified as a significant concern for the industry in our response on the 21st February 2011 (regarding the


earlier DEC discussion paper on action criteria). At that time UDIA identified the need for additional scientific studies to support a change from the currently adopted standard of 0.03%S. It is understood that DEC has adopted this position, and that further scientific studies into these poorly buffered sands are ongoing, ahead of any future revisions to the guidelines.

A recent change to the guideline *Treatment and Management of Soils and Water in Acid Sulfate Soils Landscapes* (DEC, version July 2011), refer page 5, has identified that for Bassendean Sands, where the pH_{Fox} results drop below 3, that the soil should be limed. It is recognised that this change in effect seeks to capture the problem soils, without reviewing the action criteria. We note that the application of this approach should provide for the consultant to present a holistic interpretation of the data, including but not limited to, a statistical assessment of the soils data, current water quality conditions, extent of proposed disturbance, and proposed management controls. In doing so the risk assessment would provide a basis for lime treatment or otherwise. This may be particularly significant for larger sites where bulk earthworks are occurring.

We reiterate our desire for our members to be actively consulted by DEC regarding decisions with significance to on-ground management of ASS.

We trust that you will give these comments due consideration.

Yours sincerely



Debra Goostrey
Chief Executive Officer

