Sydney Metropolitan
CATCHMENT MANAGEMENT AUTHORITY

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Dr John Williams
Commissioner
NSW Natural Resources Commission
GPO Box 4206
Sydney NSW 2001

Dear Dr Williams

Sydney Metropolitan Catchment Management Authority Comments on Proposed Amendments to the Environmental Outcomes Assessment Methodology

Sydney Metropolitan Catchment Management Authority has reviewed the proposed amendments to the Environmental Outcomes Assessment Methodology and identified a few points requiring clarification.

It is understood that the main use for the Methodology is property assessment and preparation of Property Vegetation Plans in relation to the Native Vegetation Act, which is not applicable in the Sydney Metropolitan region, and therefore Sydney Metro CMA has not had occasion to utilise the Methodology in the past. However, the Methodology also has implications for Biobanking assessment which does have the potential to affect decision-making in the Sydney Metro region. Furthermore Sydney Metro CMA would like to see remnant native vegetation in the urban environment afforded the same protection as that in rural areas, either through amendment of the Native Vegetation Act or adoption of the Assessment Methodology within the Environmental Planning and Assessment Act. Therefore, Sydney Metro CMA has a keen interest in ensuring the Assessment Methodology provides the best outcomes for biodiversity protection.

Sydney Metropolitan Catchment Management Authority comments are as follows:

- Please note underlined text specifies text of concern as it appears within the Methodology document, while italicised text specifies the Sydney Metropolitan Catchment Management Authority comments in relation to the text of concern.

Chapter 2

2.4.1 Databases containing environmental information
"These databases are available from the web sites of the Catchment Management Authorities and the Department of Environment and Climate Change."

This statement is inaccurate. As the Native Vegetation Act is not in force within the urban environment, Sydney Metro CMA does not administer Property Vegetation Plans and thus public demand for this information is not likely to be high in this CMA. However, Sydney Metro CMA would like to see urban vegetation provided the same protection as rural vegetation, and would be happy to provide a link to these databases on DECC's website to facilitate this. Furthermore, a search of a number of other CMA websites also failed to find any link to these databases.

2.4.3 Using more appropriate local data
"In certifying that data is available that more accurately reflects local environmental conditions (compared to the data in the approved databases), and accredited expert must:"

'and' should read 'an'

Chapter 5

5.1 (paragraph 4) "Prior to assessment of impact, the area to be cleared must be divided into zones comprising each vegetation type and relatively homogenous condition categories. Vegetation that is in low condition must always form a separate zone from vegetation that is not in low condition. If the area to be cleared comprises more than one zone, separate assessments must be undertaken for each zone."

Conflicts with

5.2.2 (paragraph 5) "Only patches of vegetation greater than 0.25ha are assessed separately (as distinct zones) from surrounding vegetation (e.g. a patch of vegetation with benchmark over-storey cover that is 0.25ha or less is not assessed separately from surrounding vegetation with sparser over-storey cover)."

Furthermore, moderate-good condition vegetation patches, although less than 0.25ha, may act as 'stepping stone' refuges in corridor movement, and therefore ought to be afforded separate assessment in the landscape context.

5.4.2 (paragraph 2) "Stem densities must be assessed in each vegetation zone. In each vegetation zone, 0.1ha plots must be randomly placed every two hectares, with a minimum of one plot and a maximum of 10 plots per vegetation zone."

For sites greater than 20ha, this criteria, as written, could result in inaccurate representation of site variability. i.e. in a 100ha site this would

only represent 1/5 of the site and could be located in the poorest quality vegetation.

5.4.2 (paragraph 3) Benchmark data for stem densities may be obtained from reference sites. Reference sites must:

- Comprise the same vegetation type and be located in the same region as the vegetation zone being assessed; and
- Contain vegetation in relatively unmodified condition.

Relative to what? Does 80% modified classify as 'unmodified' when compared to 90% modified, or should the benchmark reflect what natural densities would be expected to be for that vegetation type in a 0-10% (or other defined low percentage) modified landscape? This statement requires clearer definition.

Glossary

"Reference Site: Relatively unmodified *(See comment for 5.4.2 (paragraph 3))* sites used to obtain benchmark information when benchmarks in the vegetation benchmark databases are too broad or otherwise not relevant for the particular vegetation type and/or local situation. Benchmarks can also be obtained from scientific literature."

What defines "relevant" and ensures consistent assessment? This statement requires clearer definition.

Thank you for the opportunity to make a submission. Please feel free to contact the writer should you would wish to discuss any of these comments further.

Kind Regards,

Robin Anderson
Catchment Officer (Biodiversity)