

Eyre Peninsula Roadside Vegetation Management Plan
Comments on Final Draft

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| Page # | Section # | Comments |
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| 8 | Table 1 | NCSSA is concerned that the proposed variances to the NV Guidelines summarised in this Table, in terms of clearance envelope dimensions and the use of high impact clearance methods, will lead to a loss and degradation of native vegetation over time, particularly: <ul style="list-style-type: none"> • incremental loss over a series of clearance events, and • in reducing the strip width that will increase edge effects, resulting in less functional habitat values and greater exposure to threats from weed invasion. |
| 8 | Table 1 | We are also concerned that the collection of firewood could negatively impact on fauna since cut branches and fallen timber provide important habitat for native ground dwelling fauna. How will each council ensure that overcollection does not occur? |
| 8 | Note under Table 1 | This is a key point that should be made up front rather than as a footnote to the table. It should also acknowledge state-rated species of conservation significance as listed under the <i>National Parks and Wildlife Act 1972</i> (NPW Act). |
| 8 | Sentence following Note | This language should be tightened rather than leaving it up to individuals to decide if they need to consult about their actions concerning clearance/firewood collection. |
| 10 | 1.1 | Although it is good that relevant Council managers, staff and contractors will be trained to ensure they can appropriate interpret this plan and act in accordance with it, all these stakeholders also require training in basic plant identification so they know if they are dealing with a native plant species, a weed or a rated species. We do note, however, the action in the Action Plan regarding contractor and staff plant identification training. |
| 13 | The Principles of Clearance | It should be stated that the Principles of Clearance also apply to the Regulations. |
| 15 | Figure 3 | We recommend that the features represented by the red and white cross and star symbols are also described. |
| 16 | Top paragraph | Is there any information about traffic accidents where native vegetation could have been a factor? E.g. how many of the 'fixed objects' were trees? This could be useful context in terms of the argument for the removal of native vegetation for safety reasons. |
| 16 | 2.3 | Can you provide any indication of how the information gathered through the YourSAy process was incorporated into the plan? |
| Suggested new section | Suggested new section – possibly after 4.4? | The plan should acknowledge the existing Roadside Significant Sites (RSS) that occur across the Eyre Peninsula and refer to the Rail and Roadside Significant Sites Environmental Instruction 21.5 published by the Department of Planning Transport and Infrastructure (DPTI) in 2017, in particular 'Sections 5. Protection of Rail and Roadside Significant Sites, 5.1 General Guidelines' and 'APPENDIX A: Guidelines for protection of Rail |

and Roadside Significant Sites for specific activities’.

We recommend that the plan acknowledge that the RSS System was developed by the Department of Planning, Transport and Infrastructure (DPTI) to assist in the identification and protection of important cultural and natural heritage sites along rail corridors and roads that it maintains. We also recommend that plan acknowledge that the Rail and Roadside Significant Sites Databases (RSSD) provides detailed information on the RSS including the location, species of conservation significance and management to avoid degradation of the site and adjacent areas.

We recommend that the plan notes the RSS and RSSD data is publically accessible on the following websites:

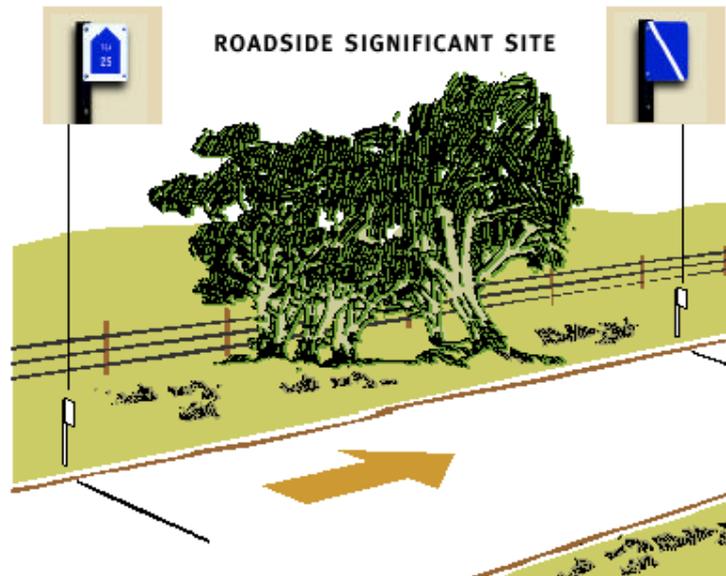
- (a) Data.SA: Data can be viewed spatially and downloaded as a dataset in different formats (i.e. shp, kml, geojson).
<https://data.sa.gov.au/data/dataset/roadside-significant-sites>
<https://data.sa.gov.au/data/dataset/railside-significant-sites>
- (b) Location SA Map Viewer: Data can be viewed spatially, with links to the downloadable datasets on Data.SA. Find the Railside Significant Sites and Roadside Significant Sites datasets under ‘Environment & Climate / Environment’.
<http://location.sa.gov.au/viewer/>
- (c) DEWNR NatureMaps: Data can be viewed spatially, but not downloaded. Find the Railside Significant Sites and Roadside Significant Sites layers under ‘Protected Areas / Land / Areas Providing Protection / Road/RailSide Significant Sites’.
<https://data.environment.sa.gov.au/NatureMaps/Pages/default.aspx>
- (d) DPTI RSSD Webpage: RSSD reports can be generated by Road Name, and RSSD site reports and photos can be accessed through a search form. Data is not available to be viewed spatially on this webpage. Note that due to confidentiality requirements, selected data such as that relating to Aboriginal heritage sites is not available publically and can only be accessed internally by DPTI staff via this webpage when using the DPTI computer network.
<http://www.dpti.sa.gov.au/standards/rssd>

We strongly recommend that the plan acknowledge that the RSSD is supported by a roadside marker system that is intended to be a discreet form of signage to assist rail and road authorities, utilities, council staff and contractors in the recognition of significant sites that are particularly vulnerable to disturbance or damage.

We also recommend that the plan provide a description of the roadside markers as outlined below and a diagram showing their placement in relation to the RSS:

“Site markers consist of a small plate mounted on a steel dropper post. The front of each marker plate displays a blue pointer with a number identifying the Rail or Roadside Significant Site (i.e. the record number for

the site in the database) and the agency code (i.e. DPTI or DTEI or TSA). This is seen when approaching the site. The reverse side of each marker plate is a diagonal white bar against a blue background. This is seen when leaving the site.



Roadside Marker System showing location of markers in relation to Roadside Significant Site and roadway”

We recommend the plan acknowledge the following information from Section 5 of the DPTI Instructions:

“All work in rail corridors and road reserves must be undertaken with due care, irrespective of the presence of Significant Sites, however individual sites may have specific protection requirements due to their unique features. These requirements are identified in the RSS and RSSD and may be reflected in contract specifications or service agreements for works to be undertaken within rail and road reserves. This enables field staff to be aware of the areas and any specific restrictions that may apply before they arrive at the site, as well as identify the sites that are marked in the field.”

We also recommend that the plan incorporate the following General Guidelines from Section 5.1 of the DPTI Instructions in relation to RSS:

- Staff must be aware of the location of any significant sites and the requirements for their protection. This information must be included or referenced in the contract documentation, Contractor’s Environmental Management Plan and/or work instructions. Awareness of significant sites, their location and management requirements must be included in the induction of all field staff.
- If a marker is encountered in the field without prior knowledge of its location and requirements for protection, work must not proceed at this location until the information relating to this site

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| | | <p>has been obtained from the database and reviewed.</p> <ul style="list-style-type: none"> Existing activities (e.g. stockpiling) at significant sites may continue if confined to the area already disturbed. Any activity must not intrude into the site feature unless specific approval is obtained. Any proposed change to the existing use of a significant site which may adversely affect the site feature requires the approval of the Senior Environmental Management Officer. The DPTI Senior Environmental Management Officer must be notified of any unauthorised disturbance to a significant site. <p>We recommend that the plan incorporate the following information from the APPENDIX A of the DPTI document:</p> <p>“GENERAL PRINCIPLES</p> <p>The following general principles must be followed:</p> <ul style="list-style-type: none"> Prior to commencing works in the vicinity, the Site must be assessed to determine whether the Feature will be disturbed, or how disturbance to the Feature can be avoided. Contact DPTI Environment Group, the local Council, or Department of Environment and Natural Resources for further advice if necessary. Wherever possible, confine activities to the road/rail formation or other formed areas such as existing tracks or stockpile sites. Avoid disturbance to the soil surface and native plant cover. Avoid working off formed areas in wet conditions. Weed spraying is a high-risk activity and must be strictly controlled. Avoid the spread of weeds with machinery, vehicles or equipment – clean before moving from weed infested sites. Always arrive at the Site with clean equipment. In all cases, consider native grasses and shrubs, as well as trees.” <p>Appendix A also includes Guidelines for Specific Activities such as stockpiling and lay-down, shoulder grading, vegetation control for sight distance, pest plant control and other activities in relation to RSS that should be incorporated into the relevant sections of the plan.</p> |
| 19 - 21 | 3.2, 3.3, 3.4, 3.5, 3.7, 3.8, 3.9, 3.10, 3.11 | <p>The statement ‘no formal surveys conducted’ for these areas is at odds with the information NCSSA provided during earlier consultation on this plan and attached again to this submission (Attachment A). This information should be referenced, together with additional from the RSSD.</p> <p>Similarly, the statement that there is no information available on the vegetation types of the Lower Eyre Peninsula is incorrect since such information is available online, including the map in Nature Maps mentioned on page 25.</p> |
| 22 | 4.2 | It should be ‘Environment’ rather than ‘Environmental’ in the <i>Environment Protection and Biodiversity Conservation Act 1999</i> |
| 22 | Table 2 | We suggest checking if the Regionally or Locally Threatened Ecological Communities are listed under State legislation – our understanding is that |

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| | | <p>a provisional list has been developed but it is not technically listed under the NPW Act as there is no provision to do so.</p> <p>We suggest using the information on page 23 from Gillam and Urban 2009 to complete the figure of the Regionally or Locally Threatened Species currently missing from Table 2.</p> <p>We strongly support the inclusion of mapping of threatened flora hotspots (Figure 5) and priority conservation areas (Figure 6) based on studies by Gillam and Urban (2009) and Gillanders <i>et al.</i> (2016). We recommend that the information supporting these maps is also included in Section 3 of the plan.</p> <p>We suggest appending a list of the EPBC-listed matters that were identified through the search tool.</p> |
| 23 | Last paragraph | The information about species richness and endemism in different council areas should be included in the individual council summaries in Section 3. |
| 27 | Second to last paragraph | Even though it is included in Appendix E, we suggest that for clarity, a diagram of the primary and secondary clearance zones be included following the text description on page 27. |
| 28 | Principles | This plan could incorporate the DPTI principles (listed on the previous page of this submission) into this list, for example adding that a site assessment should take place before work commences. |
| 28 | 'Retain native vegetation' dotpoint | The sentence "Particular care will be taken to preserve and enhance areas of native grasses, which can be difficult to distinguish from exotic grasses" highlights our concern regarding whether staff and contractors will be able to identify native species. |
| 29 | 5.1 | <p>NCSSA is concerned that the proposed variances to the NV Guidelines (as described in Appendix E) proposed in this section will lead to a loss and degradation of native vegetation over time.</p> <p>We understand that the schedule of works may result in a longer interval than 5 years between clearance events, however, we are concerned that the consistent use of high-impact clearance methods has the potential to impact on areas immediately adjacent to the secondary clearance envelope over time and lead to incremental clearance of remnants.</p> <p>If the aim is to treat vegetation 15cm above the ground, then the cutting level for any equipment should be a minimum 150mm.</p> |
| 30 | Table 4 | <p>We do not support larger clearance envelopes than are currently specified in the NV Guidelines (as described in Appendix E).</p> <p>We are concerned about the increased width of the secondary clearance envelope for larger road types and the impacts this will have on existing areas of remnant native vegetation in terms of reducing the strip width that will increase edge effects, result in less functional habitat values and greater exposure to threats from weed invasion.</p> |
| New inclusion | | It would be useful for the plan to explain/define high impact clearance methods (examples of low impact clearance methods are given). |
| 31 | Third dot point | We do not support Council budgetary constraints being used as a justification for larger clearance envelopes. |

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| 34 | Table 5 | The existing mapping of roadside native vegetation should be acknowledged, in addition the RSSD. |
| 35-36 | Figure 7 and text | <p>NCSSA generally supports the proposed Annual Works Risk Management Program. However, given that only 'significant' clearance will be assessed, such as where plants of conservation significance are likely to occur within 2 metres of the verge, it is imperative that <u>all</u> currently available information on the conservation value of roadside native vegetation be included in this plan. Additionally, the plan should acknowledge the significant gaps in mapping of roadside vegetation and make a commitment to allocate adequate resources to complete this mapping.</p> <p>NREP could also consider seeking the views and expertise of other stakeholders in the management of areas of conservation significance, for example interested parties that have participated in the YourSAy process.</p> |
| 37 | Council contract management | <p>We suggest this section reference the relevant part of the DPTI Instruction 21.5 mentioned earlier in this submission.</p> <p>As mentioned earlier, if the aim is to treat vegetation 15cm above the ground, then the cutting level for any equipment should be a minimum 150mm.</p> <p>We note that it is not always beneficial to spread chipped material in secondary clearance envelope, as this can have adverse impacts on some native vegetation communities.</p> <p>We are concerned with the use of the phrase 'common sense', since what is common sense to one person may not be so to another. The aim should be to minimise clearance heights and widths.</p> |
| 38 | 5.3 – Action Plan | <p>We support the action of contractor and staff plant identification training, notwithstanding the difficulties in identification for some species noted earlier in the plan.</p> <p>We support the action "Eyre Peninsula wide assessment of likely locations of listed species and communities or other plants of conservation significance", however we note this should build on existing information, including the RSSD.</p> <p>Similarly, the action regarding "develop and extend a blue marker scheme..." should acknowledge the existing RSS and seek to build on it.</p> <p>We support the action for developing a process for incorporating community inputs into risk management.</p> <p>We also support the action for seeking support for research into management of roadside vegetation, but suggest that the Action Plan should also explicitly acknowledge the significant gaps in mapping of roadside vegetation and make a commitment to allocate adequate resources to complete this mapping.</p> |
| 41 | 6.1 – New Roads (paragraph | The mitigation hierarchy requires that avoidance measures be applied, therefore the wording needs to be strengthened from "may be possible" to "all possible efforts will be made to reduce or avoid critical impact". |

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| | above boxed text) | |
| 44 | 6.3 Bushfire Protection | The correct name for these plans is the Upper Eyre Peninsula and Lower Eyre Peninsula Bushfire Management <u>Area</u> Plans (BMAP). The same sentence should clarify that the asset categories include areas of human settlement; industrial and business areas; assets of cultural significance to local communities and environmental assets. |
| 48 | 6.5 | <p>A dot point should be added under “Avoiding unnecessary clearance” as follows:</p> <ul style="list-style-type: none"> • A suitably qualified person should conduct an inspection to assess options for minimising impact on species/communities of conservation significance <p>All sections (6.1 -6.11) should refer to the relevant NV Guidelines.</p> |