

Suzette Graham
Environment Officer – Transport for NSW Western Sydney Project Office
suzette.graham@transport.nsw.gov.au
28/06/2021

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M12 CoA E8: Additional surveys of *Pimelea spicata*

Dear Suzette,

The M12 Motorway project (SSI 9364; EPBC 2018/8286) was approved under Section 5.19 of the NSW *Environmental Planning and Assessment Act 1979* on 23 April 2021. The project received approval under sections 130(1) and 133(1) of the *Cwth Environment Protection Biodiversity Conservation Act 1999* (EPBC Act) on 03 June 2021. NSW Condition of Approval (CoA) E8 states:

Additional Surveys of *Pimelea spicata*

E8 *The Proponent must undertake additional surveys of *Pimelea spicata* (Spiked Rice-flower) in potential habitat for this species within the refined construction footprint to the north of Elizabeth Drive and west of the existing Wallgrove Road as identified in Figure 6-5 of the M12 Motorway Amendment Report – Submissions Report (December, 2020). The surveys must be undertaken during optimal conditions as defined by the NSW Bionet Threatened Biodiversity Profile Data Collection (DPIE) or as agreed by the Planning Secretary. The surveys must be undertaken in consultation with EES and DAWE and the results of the surveys provided to the Planning Secretary, EES and DAWE for information within one (1) month of completion of the surveys.*

In addition Federal Condition of Approval 1 states:

1. *The approval holder must not clear in the locations identified in condition E8 of the State Infrastructure approval, until it has completed the additional surveys and provided the results to the Department as required by condition E8 of the State Infrastructure approval.*

This letter documents the results of targeted surveys for *Pimelea spicata* conducted in March, April and June 2021 in accordance with NSW CoA E8 and Federal CoA 1.

Methodology

The methodology for surveys was developed based upon the current survey requirements for *Pimelea spicata* as specified in the NSW Bionet Threatened Biodiversity Profile Data Collection (maintained in the NSW Bionet database <http://www.bionet.nsw.gov.au/> accessed 24 February 2021):

Survey: Use flowers to locate and identify as species is inconspicuous. Flowering is unpredictable and rain dependent. Survey 4 weeks after at least a 30 mm rainfall event. In drier times plants are often not visible above ground unless soils remain moist. Multiple surveys may be required. Survey at least 3 times, each at least a month apart unless found.

Targeted surveys were conducted within the refined construction footprint to the north of Elizabeth Drive and west of the existing Wallgrove Road as identified in Figure 6-5 of the *M12 Motorway Amendment Report – Submissions Report* (December, 2020). This area is identified in Figure 1. The surveys were undertaken between four and five weeks after ≥30mm rainfall events recorded at Badgerys Creek AWS (station 067108) (<http://www.bom.gov.au> accessed 19 June 2021) in February, March and May 2021 (Table 1).

The surveys were conducted by Jane Rodd (Principal Ecologist) and Meredith Leal (Ecologist) with assistance from Thea Kane (Graduate Ecologist) and Kristen Branks (Graduate Environmental Consultant) (Table 1).

Table 1 Timing of surveys in relation to recorded rainfall at Badgerys Creek AWS

Survey round	Date of >30mm rainfall event	Rainfall (mm) at Badgerys Creek AWS prior to survey	Date of survey	Time between rainfall date and survey event	Survey personnel
1	2 February 2021	34.6	3 March 2021	4 weeks, 1 day	Jane Rodd, Thea Kane
2	23 March 2021	48.0	27 April 2021	5 weeks	Jane Rodd, Kristen Branks
3	7 May 2021	28.0*	8 June 2021	4 weeks, 3 days	Meredith Leal, Kristen Branks

*The 28.0 mm of rainfall on 7 May 2021 was preceded by 14.8 mm of rainfall on 6 May 2021 and 15mm on 5 May 2021. It is noted that both the Environment, Energy and Science Group (EESG) and Commonwealth Department of Agriculture, Water and Environment (DAWE) were consulted to determine whether this rainfall would be sufficient to trigger the final survey to be undertaken; they responded and indicated that this was a suitable rainfall event (see Attachment 1).

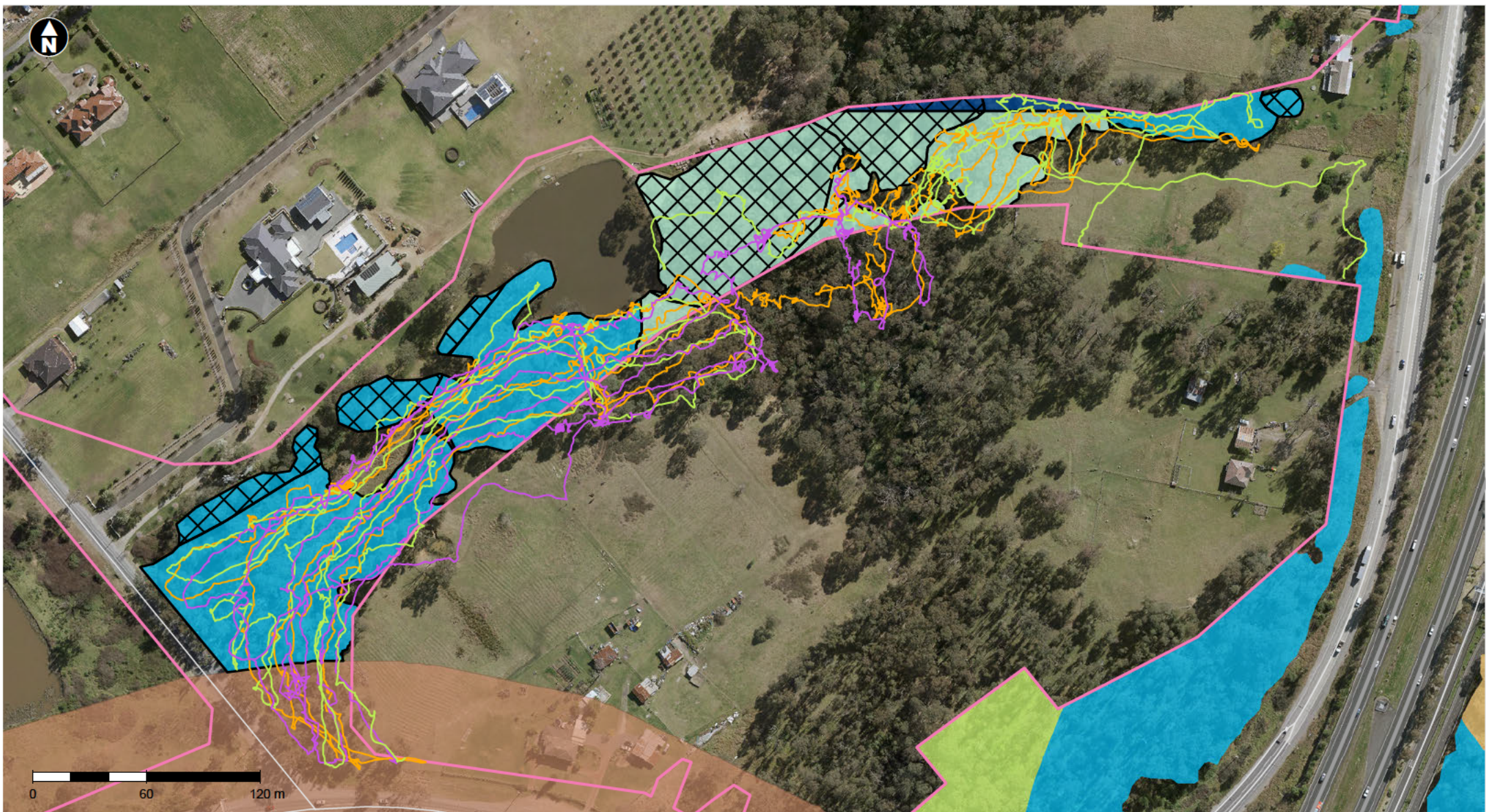
Surveys consisted of searches along approximately five-metre spaced parallel transects, within all areas of potential habitat for the species within the area of survey. GPS tracks across the surveyed area were recorded (Figure 1).

A reference population of *Pimelea spicata* located near Lizard Log car park in Abbotsbury, about 3.3 kilometres north-west of the surveyed area, was also checked on each day of site survey. Absence of flowering at the reference site was not considered to invalidate the surveys.

Consultation

Consultation with EESG, Department of Planning, Industry and Environment (DPIE), and DAWE was undertaken prior to the survey, in accordance with CoA E8. Transport for NSW provided the proposed survey methodology to EESG and DAWE with a request for feedback prior to the commencement of surveys in early March 2021. Comments from EESG resulted in a revision to the survey methodology. Correspondence between Transport for NSW and EESG/DAWE can be found in Attachment A of this letter.

This survey report will be provided to DPIE, DAWE and EESG within one month of the completion of the surveys i.e. by 8 July 2021 to fulfil the requirements of E8.



Legend

- The refined project construction footprint (Amendment Report RTS Dec, 2020)
- Biodiversity certified land

Vegetation zones

- 830 - Moderate/Good_Poor
- 849 - Moderate/Good_Medium
- 850 - Moderate/Good_High
- 850 - Moderate/Good_Medium
- 850 - Moderate/Good_Poor

Pimelea spicata habitat

- Habitat absent
- Habitat present

GPS tracks*

- 3 March 2021
- 27 April 2021
- 8 June 2021

Figure 1 *Pimelea spicata* surveys

*Note that GPS tracks were only recorded by one of the two personnel conducting each survey. The survey on 3 March 2021 does not include tracks in the north-east of the survey area due to GPS failure.



Results

No plants of *Pimelea spicata* were recorded during targeted surveys.

The areas in the south-west and north-east of the surveyed area included patches of relatively good quality habitat for *Pimelea spicata*, including areas dominated by native grasses such as *Microlaena stipoides*, *Aristida* spp. and *Themeda triandra* and some native shrub and herb cover (Figure 2). Targeted surveys focused on these areas.

Figure 2 Areas of suitable habitat in the survey area



Area of suitable habitat in the south-west of the survey area

Area of suitable habitat in the north-east of the survey area

A large area of mapped vegetation in the northern section of the surveyed area was not subject to targeted survey as it does not represent suitable habitat for *Pimelea spicata*. This vegetation, shown as a hatched area on Figure 1, is mapped within the vegetation zone 850_Moderate_Poor and consists of areas with a dense midstorey of *Olea europaea* subsp. *cuspidata* (African Olive) and a sparse groundcover; deeply eroded gullies; and areas with a ground layer dominated by exotic creepers, mainly *Lonicera japonica* (Japanese Honeysuckle) (Figure 3).

Figure 3 Areas of unsuitable habitat in the north of the survey area



Area dominated by *Olea europaea* subsp. *cuspidata*

Area dominated by *Lonicera japonica*

Some other areas mapped as vegetation zone 850_Moderate along the north-western edge of the surveyed area was also observed to have poor habitat values for *Pimelea spicata*. The strip of vegetation close to the boundary fence included large patches of dense exotic grasses and some large stands of the priority weed *Rubus fruticosus* (Blackberry).

Reference population

Flowering plants of *Pimelea spicata* were detected at the reference population near Lizard Log car park during the March and April surveys, but not during June surveys (Figure 4). Non-flowering plants were detected at the reference site in June 2021.

Figure 4 *Pimelea spicata* recorded at the reference site (near Lizard Log car park)



3 March 2021

27 April 2021

8 June 2021

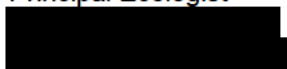
Conclusion

Targeted surveys for *Pimelea spicata* were conducted in March, April and June 2021 in accordance with CoA E8 and Federal CoA 1. No plants of *Pimelea spicata* were detected within the area surveyed and therefore NSW CoA E9 is not triggered.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jane Rodd'.

Jane Rodd
Principal Ecologist



Attachment 1

Correspondence with EES and DAWE

Initial correspondence regarding proposed methodology

February 2021 – May 2021

From: [Suzette Graham](#)
To: [Janne Grose](#); [Sarah Dent](#); mike.pereira@dpie.nsw.gov.au; [Alex McGuirk](#)
Cc: [M12 Detailed Design](#); [Foster Walker](#); [Katie Lowe](#); [Shannon Schofield](#)
Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]
Date: Friday, 7 May 2021 6:59:00 PM

Hi All,

Re: M12 Motorway CoA E8 and E9 – *Pimelea Spicata* survey update

As previously agreed with DAWE and EES, I am writing to provide an update on our most recent round of *Pimelea Spicata* surveys for the M12 Motorway project in the vicinity of Wallgrove road.

The survey was conducted on 27/04/2021, 4 weeks after heavy rainfall (>30mm) at the site as required by the assessment guidelines.

The project ecologists did not find evidence of *Pimelea Spicata* at site. The nominated reference site was visited and the species was seen to be in flower there.

We will conduct one more survey in optimal conditions as required by the assessment guidelines to fulfil this condition under the NSW project approval.

Please feel free to get in touch if you have any questions.

Kind regards,

Suzette Graham
Senior Environment Officer
Sydney Infrastructure Development | Safety, Environment and Regulation
M 0476 828 524 E suzette.graham@transport.nsw.gov.au
Transport for NSW
27 Argyle Street, Parramatta NSW 2150

From: Suzette Graham
Sent: Monday, 8 March 2021 3:15 PM
To: Sarah Fieg <Sarah.Fieg@awe.gov.au>; Janne Grose <Janne.Grose@environment.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>
Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; Katie Lowe <Katie.lowe@environment.gov.au>; Mary Garland <Mary.Garland@planning.nsw.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>
Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Hi Sarah, Janne, Lauren,

Just an update on the *Pimelea Spicata* surveys conducted on 03/03/2021 for the M12 Motorway project.

The species was not detected at the project site during surveys. The reference site was however in flower.

TfNSW will head back to site as per the methodology to survey again in optimal conditions.

We will keep you updated as we progress.

Thanks,

Kind regards,

Suzette Graham
Senior Environment Officer
Sydney Infrastructure Development | Safety, Environment and Regulation
M 0476 828 524 E suzette.graham@transport.nsw.gov.au
Transport for NSW
27 Argyle Street, Parramatta NSW 2150


From: Sarah Fieg [<mailto:Sarah.Fieg@awe.gov.au>]
Sent: Tuesday, 2 March 2021 11:01 AM
To: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>; Janne Grose <Janne.Grose@environment.nsw.gov.au>
Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; Katie Lowe <Katie.lowe@environment.gov.au>; Sarah.Fieg@awe.gov.au
Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Hi Suzette

Thank you for providing DAWE the opportunity to review the revised proposed survey methodology for detecting *Pimelea spicata*.

DAWE notes that the revised proposed methodology provides a greater level of assurance for detecting the presence of *P. spicata*. DAWE has no concerns with the revised proposed methodology but as stressed previously this is dependent on whether it satisfies BAM and ESS requirements. Many thanks.

Kind regards
Sarah

NSW (South) and ACT Assessments Section | Environment Approvals Division
Department of Agriculture, Water and the Environment
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E| sarah.fieg@awe.gov.au W| www.awe.gov.au

From: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>
Sent: Monday, 1 March 2021 11:09 AM
To: Janne Grose <Janne.Grose@environment.nsw.gov.au>; Sarah.Fieg@awe.gov.au
Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>
Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Hi Janne and Sarah,

Please find attached an updated methodology for TfNSW M12 *pimelea spicata* surveys to address EES comments outlined in Janne's email below.

Ecologists won't use the reference site to determine if a second or third survey is required. If the species isn't detected at the project site, additional surveys will be conducted as per the guidelines.

Thanks,

Kind regards,

Suzette Graham
Senior Environment Officer
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Transport for NSW
27 Argyle Street, Parramatta NSW 2150

From: Janne Grose [<mailto:Janne.Grose@environment.nsw.gov.au>]
Sent: Tuesday, 23 February 2021 1:24 PM
To: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>
Cc: Sarah Fieg <Sarah.Fieg@awe.gov.au>
Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Dear Suzette

Thank you for your email of 16 February 2021 seeking feedback from the Environment, Energy and Science group (EES) of DPIE in relation to the proposed survey methodology for the M12 *Pimelea Spicata* surveys

The letter from Arcadis has correctly quoted the survey guidelines from Bionet. The guidelines require at least three surveys, one month apart, in suitable conditions (unless the species is found in the 1st or 2nd survey). The guidelines specify surveys after a rainfall event as suitable conditions.

The proposal, however, also intends to use flowering at a reference population as an indication that no 2nd (or 3rd) survey is required. That is not consistent with the guidelines.

There are other factors which may influence the above-ground presence of *P. spicata* (e.g., grazing may reduce plant material so that stressed plants do not flower). Therefore, the modification to the guidelines is not supported.

Please note, EES has also CCd this email to Sarah Fieg at the Department of Agriculture, Water and the Environment.

kind regards from

Janne

23/2/2021

Janne Grose
Senior Conservation Planning Officer

Climate Change & Sustainability | Department of Planning, Industry and Environment

██████████ | E janne.grose@environment.nsw.gov.au

Level 10, 12 Darcy Street, 4 Parramatta Square, Parramatta NSW 2150 | Locked Bag 5022

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Planning,
Industry &
Environment

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>

Sent: Monday, 22 February 2021 4:49 PM

To: Sarah Fieg <Sarah.Fieg@awe.gov.au>; Katie Lowe <katie.lowe@environment.gov.au>; Janne Grose <Janne.Grose@environment.nsw.gov.au>

Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; Sophie Worthing <Sophie.Worthing@transport.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>

Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Hi Sarah,

Thanks for the email, much appreciated.

Kind regards,

Suzette Graham
Senior Environment Officer
Sydney Infrastructure Development | Safety, Environment and Regulation
M 0476 828 524 E suzette.graham@transport.nsw.gov.au
Transport for NSW
27 Argyle Street, Parramatta NSW 2150

From: Sarah Fieg [<mailto:Sarah.Fieg@awe.gov.au>]

Sent: Monday, 22 February 2021 4:40 PM

To: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>; Katie Lowe <Katie.lowe@environment.gov.au>; Janne Grose <Janne.Grose@environment.nsw.gov.au>

Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; Sophie Worthing <Sophie.Worthing@transport.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>

Subject: RE: M12 Motorway - Proposed Pimelea Spicata Surveys [SEC=OFFICIAL]

Hi Suzette

Thank you for providing DAWE the opportunity to review the proposed survey methodology for the M12 *Pimelea spicata* surveys.

At this stage, and without having yet seen the draft conditions, DAWE has no concerns with the methodology and process of reporting as proposed, provided they satisfy BAM and ESS requirements. We expected to liaise with DPIE in the near future regarding the draft conditions and are happy to engage further on the conditions at that time. Many thanks.

Kind regards
Sarah

NSW (South) and ACT Assessments Section | Environment Approvals Division
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John Gorton Building | GPO Box 858 Canberra ACT, 2601

E | sarah.fieg@awe.gov.au W | www.awe.gov.au

From: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>
Sent: Tuesday, 16 February 2021 1:24 PM
To: Katie Lowe <Katie.lowe@environment.gov.au>; Sarah Fieg <Sarah.Fieg@environment.gov.au>; Janne Grose <Janne.Grose@environment.nsw.gov.au>
Cc: M12 Detailed Design <M12.design@transport.nsw.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; Sophie Worthing <Sophie.Worthing@transport.nsw.gov.au>; Lauren Rose <Lauren.Rose@planning.nsw.gov.au>
Subject: M12 Motorway - Proposed Pimelea Spicata Surveys

Hi all,

As discussed with Janne and Katie, please see attached the proposed survey methodology for the M12 *Pimelea Spicata* surveys.

The surveys are required to:

- Address the submission made by EES on the M12 Amendment Report (see attached with highlighted issue)
- Meet a TfNSW management measure in the Amendment Report Submissions Report
- Address a draft CoA on additional survey for this species

We are keen to complete the surveys in early March as there was over 30mm of rainfall recorded in early February in Sydney.

To ensure we can get out into the field in time, we would appreciate feedback by **Monday 22 February** is possible.

Please note, that if *Pimelea spicata* is found within the Construction footprint of the project, a letter report will be prepared outlining the survey findings, an updated impact assessment and associated offset requirements.

This letter report will also be sent to EES and DAWE for review.

Happy to discuss further.
Kind regards,

Suzette Graham
Senior Environment Officer
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M 0476 828 524 E suzette.graham@transport.nsw.gov.au
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Additional correspondence regarding proposed departure from methodology

May 2021

From: [Sarah Dent](#)
To: [Suzette Graham](#); [Janne Grose](#)
Cc: [Katie Lowe](#); [Shannon Schofield](#); [Foster Walker](#); [M12 Detailed Design](#); [Mike Pereira](#)
Subject: RE: M12 Motorway - NSW CoA E8 Pimelea Spicata survey - consultation [SEC=OFFICIAL]
Date: Monday, 24 May 2021 9:44:13 AM

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Hi Suzette

Thank you for providing DAWE with these updates on the recent rainfall event in relation to M12 *Pimelea spicata* surveys.

DAWE will take the advice of EES on whether the recent rainfall is sufficient to trigger the requirement to survey for *P. spicata*, as set out in the agreed M12 methodology.

Kind regards

Sarah

NSW (South) and ACT Assessments Section | Environment Approvals Division
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[REDACTED]
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From: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>
Sent: Friday, 21 May 2021 8:24 PM
To: Janne Grose <Janne.Grose@environment.nsw.gov.au>; Sarah Dent <Sarah.Dent@awe.gov.au>
Cc: Katie Lowe <Katie.lowe@environment.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; M12 Detailed Design <M12.design@transport.nsw.gov.au>; Mike Pereira <mike.pereira@dpie.nsw.gov.au>
Subject: M12 Motorway - NSW CoA E8 Pimelea Spicata survey - consultation

Hi Janne and Sarah,

Re: M12 Motorway *Pimelea Spicata* survey methodology – consultation under NSW CoA E8

I am writing to ask whether EES and DAWE would consider a proposed departure from the agreed M12 Motorway survey methodology in regards to the rainfall trigger (agreed methodology is attached for reference).

As previously discussed, the guidelines for the species requires surveys (three in total) to be completed four weeks after a 30mm rainfall event at the site.

While the guidelines for the species doesn't define a rainfall event, for the purposes of the M12 methodology TfNSW/Arcadis assumed the following:

"it has been assumed that an event is the depth of rainfall within a 24 hour period. Therefore, a survey would occur four weeks after the site has received greater than 30mm within a 24 hour period."

There was a recent rain event in Western Sydney (Badgerys Creek Weather station) where >30mm of rain fell over two days.

Recorded rainfall:

- 14.5mm on 06/05/2021
- 28mm on 07/05/2021.

TfNSW would like EES and DAWE to consider whether this rainfall event would be a substantial enough trigger to adequately complete the third and final survey?

Our thoughts are that is reasonable especially considering the second day had 28mm.

I am happy to discuss further. Some feedback by 26/05/2021 would be good if possible so we can start to progress the site access arrangements if we do go ahead.

Thank you,

Kind regards

Suzette Graham
Senior Environment Officer
Sydney Infrastructure Development | Safety, Environment and Regulation
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27 Argyle Street, Parramatta NSW 2150

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From: [Janne Grose](#)
To: [Suzette Graham](#); [Sarah Dent](#)
Cc: [Katie Lowe](#); [Shannon Schofield](#); [Foster Walker](#); [M12 Detailed Design](#); [Mike Pereira](#); [Ray Giddins](#)
Subject: RE: HPE CM: M12 Motorway - NSW CoA E8 Pimelea Spicata survey - consultation
Date: Tuesday, 25 May 2021 5:03:04 PM

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Hi Suzette

Thank you for your email on Friday asking whether EES and DAWE would consider a proposed departure from the agreed M12 Motorway survey methodology in regards to the rainfall trigger to survey for Pimelea spicata.

Your email notes there was a recent rain event in Western Sydney (Badgerys Creek Weather station) where >30mm of rain fell over two days.

Recorded rainfall:

- 14.5mm on 06/05/2021
- 28mm on 07/05/2021.

and requests that EES and DAWE consider whether this rainfall event would be a substantial enough trigger to adequately complete the third and final survey for Pimelea spicata.

EES considers that given that Badgerys Creek also received 15 mm on the 5 May, EES can accept this as a suitable rainfall event for these purposes.

kind regards from

Janne

25/5/2021

Janne Grose

Senior Conservation Planning Officer

Greater Sydney

Biodiversity & Conservation | Environment, Energy and Science

Department of Planning, Industry and Environment

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The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Suzette Graham <Suzette.GRAHAM@transport.nsw.gov.au>

Sent: Friday, 21 May 2021 8:24 PM

To: Janne Grose <Janne.Grose@environment.nsw.gov.au>; Sarah Dent <Sarah.Dent@awe.gov.au>

Cc: Katie Lowe <katie.lowe@environment.gov.au>; Shannon Schofield <Shannon.Schofield@transport.nsw.gov.au>; Foster Walker <Foster.Walker@transport.nsw.gov.au>; M12 Detailed Design <M12.design@transport.nsw.gov.au>; Mike Pereira <mike.pereira@dpie.nsw.gov.au>

Subject: HPE CM: M12 Motorway - NSW CoA E8 Pimelea Spicata survey - consultation

Hi Janne and Sarah,

Re: M12 Motorway *Pimelea Spicata* survey methodology – consultation under NSW CoA E8

I am writing to ask whether EES and DAWE would consider a proposed departure from the agreed M12 Motorway survey methodology in regards to the rainfall trigger (agreed methodology is attached for reference).

As previously discussed, the guidelines for the species requires surveys (three in total) to be completed four weeks after a 30mm rainfall event at the site.

While the guidelines for the species doesn't define a rainfall event, for the purposes of the M12 methodology TfNSW/Arcadis assumed the following:

"it has been assumed that an event is the depth of rainfall within a 24 hour period. Therefore, a survey would occur four weeks after the site has received greater than 30mm within a 24 hour period."

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Thank you,

Kind regards

Suzette Graham
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