

Before the Independent Commissioner Hearing Panel

Under the Resource Management Act 1991 (**RMA**)

In the matter of an application by **Dunedin City Council** to develop a landfill at Smooth Hill, Dunedin.

Statement of evidence of Samantha Jane King

29 April 2022

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Qualifications and experience

- 1 My name is Samantha Jane King.
- 2 I am employed by Wildland Consultants Limited as a Senior Herpetologist (lizard expert).
- 3 My qualifications are a Bachelor of Science from Victoria University of Wellington, a Post Graduate Diploma in Environmental Management from Auckland University and a Master of Science in Conservation Biology from Massey University.
- 4 I am a Certified Environmental Practitioner through the Environment Institute of Australia and New Zealand.
- 5 I am a member of the Society for Research on Amphibians and Reptiles in New Zealand, and have presented my research at the World Congress for Herpetology. I am the Nelson Tasman representative for the New Zealand Herpetological Society. I am considered a suitably qualified herpetologist under the guidelines set out by the Department of Conservation (DOC).
- 6 I have ten years' experience as an ecologist and have been working as a herpetologist for the past eight years. In the field of herpetology, I have contributed to, written, or peer reviewed over twenty Lizard Management Plans. I have implemented several of these plans. These plans have involved numerous management techniques ranging from avoidance, to mitigation and salvage, to compensation.
- 7 Examples of Lizard Management Plans I have written which have been peer reviewed and accepted by the Department of Conservation (the governing body overseeing the Wildlife Act 1953 (Wildlife Act)) include the McCallums Mill Road Lizard Management Plan for the Oparara Arches Upgrade, and the Kawatiri Coastal Trail Lizard Management Plan.
- 8 Previously I was employed as a consultant ecologist at Boffa Miskell Ltd (from 2018-2021). At Boffa Miskell I specialised in providing ecological advice predominantly for lizards but also in relation to frogs, birds and vegetation. I became involved with the Smooth Hill landfill project during this time.

Project involvement

- 9 I have been involved in Dunedin City Council's proposed Smooth Hill landfill project since 2019. I was engaged to undertake an ecological impact assessment of the proposed landfill development and road upgrades (the landfill project) on effects pertaining to lizards and their habitats.

- 10 I visited the site on October 8 2019, to assess the quality and availability of lizard habitat within the landfill designation. I also set out lizard survey tools comprising of Artificial Cover Objects (ACOs) during this time. Due to COVID-19 restrictions and Wildlife Act Authority constraints I was unable to take part in lizard surveys within the project footprint, but have visited the project area on a separate occasion (in 2021) in order to assess lizard values alongside McLaren Gully Rd and Big Stone Rd (the road upgrades area).
- 11 I authored the lizard (herpetofauna) significance assessment sections of the “Smooth Hill Landfill Ecological Impact Assessment” (the EclA), dated 19 August 2020, which supported an initial application that included a larger landfill footprint than that now proposed. I made relevant changes to the same section of the subsequent track-changed assessment, dated 28 May 2021, in response to the reduced landfill extent to which this current application relates. The overall EclA examines the existing terrestrial vegetation, wetland, avifauna, herpetofauna, and freshwater ecological values of the landfill site, downstream receiving environment, and road upgrades area, and assesses the effects of the landfill project on these ecological values.
- 12 I was also the author of the “Smooth Hill Landfill – Draft Lizard Management Plan”, dated 4 June 2021 (the draft LiMP), which forms Appendix 2 to the draft Landfill Management Plan (the LMP). The LMP was submitted as part of the Assessment of Environmental Effects lodged with the application; it outlines ecological mitigation to be undertaken in relation to the landfill project.
- 13 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

- 14 I have been asked to prepare evidence in relation to potential effects to lizards at the proposed Smooth Hill landfill. This includes:
 - (a) Lizards and their habitats likely to be present within the footprint;
 - (b) Potential effects on lizards present;
 - (c) Proposed management to reduce or eliminate these effects;
 - (d) Response to ORC and DCC section 95 reports;

- (e) Response to ORC and DCC section 42A reports; and
 - (f) Response to matters raised in relevant submissions.
- 15 For this statement of evidence I reviewed the draft LiMP, the DOC guidelines for Lizard Salvage and Transfer in New Zealand, and undertook a review of the desktop information available on lizards within the Smooth Hill area (20 km radius).

Executive summary

- 16 There are possibly five species of lizards within the proposed Smooth Hill designation (with a conservation threat status from Hitchmough et al, 2021). Of these, only two are likely, given habitat requirements and availability. These are:
- (a) Southern grass skink (*Oligosoma* aff. *polychroma* Clade 5; At Risk Declining); and
 - (b) McCann's skink (*Oligosoma maccanni*; Not Threatened).
- 17 Southern grass skink is the species most likely to be present, but persisting at low densities within rank grassland habitats, along grass margins and in wood and debris piles scattered throughout the site, as well as in grasslands along McLaren Gully and Big Stone Roads.
- 18 Potential effects of the landfill and associated road widening on lizards include any direct and indirect effects including injury/death, disturbance, habitat loss and displacement, habitat fragmentation, increased predation and habitat quality reduction through indirect operational effects, as well as the effects of translocation to lizards.
- 19 The proposed management for reducing and mitigating these effects following the effects management hierarchy includes remediation (buffer planting) salvage as a mitigation tool, if required and habitat restoration and predator control within West Gully 3, if lizards are detected. This management will be reviewed following the finalisation of the LiMP, to ensure all effects are correctly managed to achieve no net loss of lizards within the Smooth Hill designation. Following the ORC section 95 report and additional questions, I have considered that the Biodiversity Offset Accounting Model and Biodiversity compensation model is not required to address residual effects from the proposed landfill to lizard fauna as the effects are likely to have a negligible level of ecological effect on lizards following implementation of the proposed management measures. The draft LiMP provides scope for any offsetting that may be required through

the habitat enhancement of West Gully 3. All enhancement should sufficiently increase the population of southern grass skink over the life of the landfill.

- 20 I agree with the section 42A report draft consent conditions in principle pertaining to lizards, with some revisions including the inclusion of the condition of management of effects following the effects management hierarchy and best practice guidelines.
- 21 I have addressed the matters raised in submissions relevant to lizards, including monitoring, which is required if a lizard salvage is triggered, which will inform success (gain) of ecological outcomes. The Director-General of Conservation requested that consent conditions are consistent with the Wildlife Act authorisation obtained for the project. The final LiMP will be submitted as an addendum to the Wildlife Act Authority application. Further concerns by submitters addressed the EIANZ EclA method, which is a widely accepted assessment method. A final submission is concerned that there is no way to know the impact the landfill will have on the local lizard population. There are likely already predation impacts on the existing populations and all high-quality lizard habitats will remain undisturbed (West Gully 3).

Background to indigenous lizards and their habitats within the Dunedin region and Smooth Hill Landfill

- 22 New Zealand is home to over 135 species of indigenous lizard and is considered the most diverse temperate region for lizards in the world. Much of the lizard fauna has been reduced to areas of intact indigenous vegetation and alpine areas.
- 23 Within the Dunedin region, there are likely to be seven species of indigenous lizard persisting. Species presence and abundance is likely dependent on habitat availability, predator densities and the species themselves. These species are southern grass skink (*Oligosoma* aff. *polychroma* Clade 5), McCann's skink (*Oligosoma macanni*), cryptic skink (*Oligosoma inconspicuum*)¹, Otago green skink (*Oligosoma* aff. *chloronoton* "eastern Otago"), korero gecko (*Woodworthia* "Otago/Southland large"), jewelled gecko (*Naultinus gemmeus*) and a forest-type gecko (*Mokopirirakau* spp.).

¹Throughout this evidence statement, and draft Lizard Management Plan, the cryptic skink will be referred to as *Oligosoma inconspicuum*, although there is preliminary findings of a species complex and if present, is likely to be *Oligosoma* aff. *inconspicuum* "herbfield" at this site (Hitchmough et al, 2021).

- 24 The number of indigenous lizard species likely to be persisting within the Smooth Hill landfill site are likely to be fewer than seven, given habitat availability and quality, as well as likely predator abundance. Species that may potentially be present (including in indigenous vegetation) are southern grass skink and McCann's skink. I consider that, given habitat requirements of cryptic skink and korero gecko, these species are highly unlikely to be present within the landfill site. Cryptic skink specialises in damper herb fields or rocky cobbled beaches and korero gecko has a preference for loose rocky areas and woody shrubs. Jewelled gecko are also unlikely but may be present in a remnant population of one or two individuals, confined to the indigenous vegetation on site.
- 25 Lizard habitat assessments and installation of ACOs were undertaken in October 2019. The habitat assessment provided information around habitat availability for lizards and where we would most likely observe lizards during subsequent surveys. ACOs require at least 6 weeks to bed-in to their surrounding environment.
- 26 Checks of the ACOs were undertaken between 24-25 March 2020. The ACOs were checked and collected by herpetologist, Mandy Tocher (NZ Lizard Expert), Dr Tanya Blakely and Dr Jaz Morris. At the time, New Zealand was in COVID-19 Alert Level 3 restrictions and about to move to Level 4 restrictions, which meant that inter-regional travel was not allowed, and I was unable to undertake surveys.
- 27 Lizard habitats observed as present within the Smooth Hill (including Big Stone Road margin) area at the time of these assessments included rank grassland areas², cutover pine³ and macrocarpa forest margins (rank grass margins) as well as Kanuka forest and surrounding regenerating scrub and treeland in West Gully 1, 2, 3 and 4⁴. These have been described by Dr Jaz Morris in his brief of evidence and are detailed in the EclA and Vegetation Restoration Management Plan.
- 28 Surveys in March 2020 identified the likely presence of indigenous skinks at locations adjacent to tree land in West Gully 3 through observations of their scat (faeces) within ACOs. These observations were well outside of the landfill footprint. The specific species present was not determined but

² (Yorkshire fog) – cocksfoot grassland

³ Radiata pine – gorse / cocksfoot -Yorkshire fog Shrubland /Treeland

⁴ Kanuka forest, [Large-leaved pohuehue] / [kōtukutuku – makomako] /Himalayan honeysuckle Treeland

considered most likely to be southern grass skink, based on the habitats available.

- 29 Further assessments of potential lizard habitat were made in May 2021, as the site had become significantly overgrown with gorse, broom and pine trees, altering lizard habitat availability within the site. The assessments also included any marginal grass strips along Big Stone Road.

Lizard habitats on site

- 30 Southern grass skink may be persisting at low numbers within the designation site, particularly in rank grassland habitats, along grass margins and in wood and debris piles scattered throughout the site, as well as in grasslands along McLaren Gully and Big Stone Roads. The habitat types of particular interest for this species are Yorkshire fog - cocksfoot grassland (within the designation site, and along roads), large leaved pohuehue / Himalayan honeysuckle – gorse scrub and kānuka forest habitats found within West Gully 2 and 3 outside of the landfill footprint. All other species are less likely to be encountered on site and are therefore referred back to the Lizard Management Plan for more detail.
- 31 Southern grass skink are considered At Risk - Declining by Hitchmough et al, 2021. Southern grass skink is a species within a cryptic species complex of other grass skink found throughout New Zealand. Whilst considered At Risk – Declining, the species is locally abundant in more favourable habitats and may reach very high population densities (> 3000 per hectare; Lettink et al. 2011⁵), however they are typically found in much lower numbers in less suitable habitats, such as those found at Smooth Hill.
- 32 High density southern grass skink populations are often associated with intact habitats comprising, indigenous grasslands, shrubland and tussockland. At a local scale, southern grass skink is considered common and widespread. Within the Smooth Hill designation, these habitats are limited to the indigenous vegetation in West Gully 2 and 3 outside of the landfill footprint.

⁵ Lettink, M., O'Donnell, C.F. and Hoare, J.M., 2011. Accuracy and precision of skink counts from artificial retreats. *New Zealand Journal of Ecology*, pp.236-246.

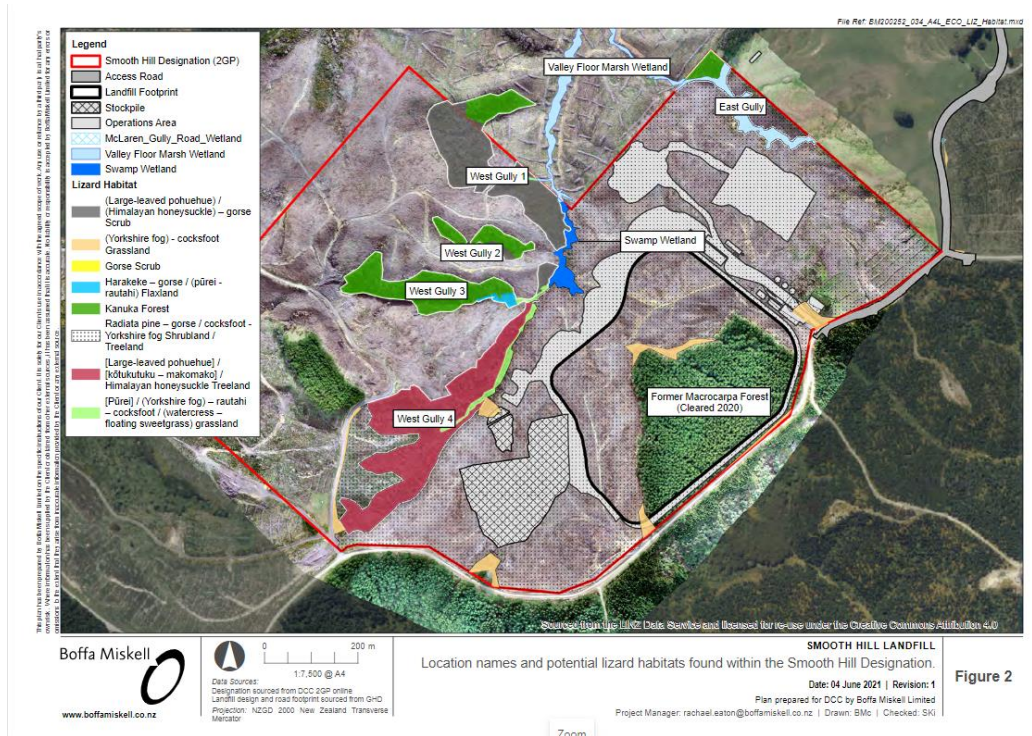


Figure 2

Background to Lizard Management Plans and mitigation

- 33 Effects of any development on lizards can be complex and difficult to quantify. DOC has set out guidelines (The key Principles for Lizard Salvage and Transfer in New Zealand, DOC, 2019) in order to assist suitably qualified herpetologists with the requirements of lizard management and understanding effects on lizards.
- 34 I assessed the likely effects on indigenous lizards at this site at a local population scale, in consideration of the distribution and extent of lizard species of concern. The assessment of effects considered both direct and indirect effects including injury/death, disturbance, habitat loss and displacement, habitat fragmentation, increased predation and habitat quality reduction through indirect operational effects, as well as the effects of translocation of lizards from the impact site to their proposed receiving site (release site). For this assessment I considered effects only to the most likely species present: southern grass skink and McCann’s skink.
- 35 The draft LiMP has followed the DOC guidelines in order to adhere to best practice and adequately take into account the management of all effects on lizards within the project area.
- 36 Mitigation is unique to each project and considers both residual and potential effects to lizards. This LiMP is at draft stage and will be revised closer to landfill and road widening operations commencing. The draft LiMP was written based on the state of habitats observed at the time and the

outcome of surveys. The plan will require further surveys in order to finalise it.

The proposed activity and associated ecological mitigation

- 37 A full description of the landfill project is provided in the application and in the evidence of Mr Coombe and Mr Dale. Briefly, the main points relevant to terrestrial vegetation and wetlands, and therefore directly relevant to lizards, are:
- (a) Progressive earthworks and vegetation clearance would occur over c.33.2 ha of the landfill site (the landfill itself would occupy c.18.6 ha), and road upgrades would occur across c.4.9 ha (excluding the existing road surface area). This would involve direct clearance of 33.2 ha of the cutover plantation forestry area (of low ecological value to lizards depending on growth stage) and clearance of c.4.9 ha of roadside grassland (of high ecological value as lizard habitat). The c.18.6 ha landfill area would be gradually filled, capped, and vegetated in exotic grass. Outside the 33.2 ha, remaining areas of the site would generally retain their existing cover of either plantation forestry or regenerating native bush.
- 38 The main ecological mitigation steps for indigenous lizards and their habitats are outlined in the draft LiMP, LMP and Vegetation Restoration Management Plan (VRMP). As drafted, these documents outline the management of potential lizard populations on site including, mitigation through buffer planting of retained indigenous vegetation (VRMP), landscape scale predator control (LMP) and lizard salvage as a mitigation tool.
- 39 The DCC Landfill Concept Design Report states that landfill perimeter tree planting is proposed to provide visual screening along the exterior of the landfill footprint and will also intercept dust generated from site operations. A minimum 10 m wide vegetation buffer strip has been proposed, including a mixture of exotic and indigenous tree species along the site boundary with Big Stone Road and along the north eastern ridge within the site (VRMP). All sections of the proposed vegetation screen will be planted in accordance with the *Landscape Mitigation Plan 29 April 2022* in Mr Rhys Girvan's evidence. These plantings will assist in the reduction of dust deposition for indigenous lizards that may be inhabiting this grassland corridor and assist with habitat enhancement for the rank grassland corridors that are present along the edge of Big Stone Road and McLaren Gully Road.

- 40 For a site that is as complex as this with timeframes that are not currently known, management needs to be adaptive in order to accurately determine any affected lizard populations prior to disturbance.
- 41 The LiMP will be reviewed and finalised if it is determined that more lizards or their habitats are present closer to the time of commencement of operations. This allows for these sites to be reviewed at such a time when habitats and populations can be adequately identified.
- 42 Lizard salvage as a mitigation tool is covered in the LiMP and described briefly in the following methods:
- (a) Tracking tunnel monitoring for skinks will be undertaken along Big Stone Road and McLaren Gully Road to determine the extent of lizard populations present. Tracking tunnels for lizards are a tool increasingly used to determine presence or absence of lizards within a site, especially at sites with low densities or that have the inability to detect lizards via standard methods such as trapping;
 - (b) Monitoring will determine where lizards are present and therefore where salvage is required along the roads and this will be split into stages for simplicity and timing of works; and
 - (c) If lizards are detected as present in 20% of tracking tunnels, or more than two species of lizard are detected within any stage of works, I have proposed that trapping will be undertaken to capture and relocate any potentially affected lizards.
- 43 I do not consider that salvage and relocation will be required within the 33.2ha landfill site itself, mainly due to the following:
- (a) Afforestation is currently occurring at this site. Afforestation leads to shading and reduction of high quality lizard habitat; thus the afforestation of the site will lead to the loss of any lizard populations present over time; and
 - (b) It is highly likely that any lizard populations have been reduced significantly over time by the cyclical nature of forestry practice at Smooth Hill. Therefore, lizard populations are unlikely to be present in significant numbers that would trigger a salvage.
- 44 If any lizards are detected, this will trigger West Gully 3 to be enhanced, based on Section 5 in the LiMP. It is impractical to consider salvage for only one or two individuals where there is greater positive benefit to be gained

from offsetting the cost and time of the salvage onto a site where signs of lizard presence have previously been observed.

- 45 Lizard release sites have been considered at two locations: Smooth Hill Reserve (West Gully 3 – within the designation) and Brighton Beach (Brighton / Taieri Mouth Marginal Strip). This is because there is greater risk that sites may become unsuitable during a lengthy time period between assessments and commencement of works. I believe that the release site at West Gully 3 is more favourable as it is within the designation, meeting the most preferred option for the DOC guidelines release site criteria.
- 46 These criteria include but are not limited to: the site being a low density occupied release area with habitat enhancement, and the site being protected from future human disturbance, which is not guaranteed within the Brighton Beach release area. The West Gully 3 release site will most likely have the greatest positive benefit post enhancement to resident and transferred lizards by increasing carrying capacity, offering protective habitat enhancement and providing connective corridors within the local landscape for these lizard populations over time.
- 47 I accept that proposed lizard release sites are likely currently at carrying capacity for southern grass skink and other non-target indigenous lizards under current conditions, however, with appropriate predator control, habitat enhancement and extensions of habitats that have previously been fragmented, I consider that over time, there will be a net-gain to lizard populations within the West Gully 3 (release area), which will offset the potential loss of lizards at the Big Stone Road and McLaren Gully Road habitats.
- 48 The VRMP describes the restoration required at West Gully 3 and the surrounding area. The LMP describes the predator control required for lizards at Smooth Hill, however I have outlined that mouse control is also required within any release area that may be required.
- 49 As per the DOC guidelines, contingencies are required if something goes wrong during salvage, such as any accidental discoveries, or if lizards salvaged exceed numbers estimated to be translocated. The LiMP describes appropriate contingencies and actions if something does go wrong. These contingency actions ensure that the objectives of the management plan are met and any other risks are taken into account to enable positive effects to occur. The contingency actions for salvaging more than 150 southern grass skink have been incorporated into the draft VRMP.

- 50 The LiMP contains a section on reporting of results of lizard management. The LiMP also contains a requirement to review the predator control proposed at the release site and any requirements from DOC prior to implementation. It is standard to expect that DOC will require results of predator control and release site monitoring to be reported annually, as part of the process required under the Wildlife Act. Predator control management will therefore be refined prior to the acceptance of the LiMP by DOC.

Response to ORC section 95 report and additional questions on ecology matters raised by ORC

- 51 The Tonkin & Taylor assessment of the EclA determined that Biodiversity Offset Accounting Model (BOAM) and Biodiversity Compensation Modelling (BCM) would be required to address residual effects from the landfill to lizard fauna. The EclA assessment for indigenous lizards and their habitats concluded a negligible level of ecological effect following implementation of the proposed impact management measures. Following the Environment Institute of Australia and New Zealand (EIANZ) EclA method, residual effects to lizards therefore do not require offsetting.
- 52 The LiMP I have provided provides scope for any offsetting of residual effects through the enhancement of West Gully 3, where lizard sign has previously been observed. This site is triggered for enhancement if one lizard print is discovered during pre-clearance monitoring at the identified habitats along McLaren Gully Road and Big Stone Road. This is more than sufficient to provide for the unlikely event that southern grass skinks are discovered within the affected identified lizard habitats.
- 53 Adaptive management is however more appropriate with a site that changes consistently overtime. This has been addressed in the draft LiMP. In the case that more than one lizard species, or more than one southern grass skink, is detected, this would trigger further enhancement of the site. This further enhancement should sufficiently increase the population of southern grass skink over the life of the landfill to over and above any loss of southern grass skinks that may be present along the roadside previously mentioned.
- 54 In addition, I would consider that any lizards present along the roadside are in fact currently marginalised through ongoing disturbance, habitat fragmentation, and predation events and are likely severely reduced in numbers which may have limits on their population viability long-term.
- 55 In consideration of the BOAM, this model has been developed by Tonkin & Taylor and has not been subject to thorough peer review or outcome

monitoring in order to determine its success. Methods are constantly being refined in cases where biodiversity offsetting is required, modelling may change.

Response to any issues in section 42A report

56 Following the section 42A report and draft consent conditions provided by ORC, I agree in principle with the consent conditions pertaining to lizards. However, I believe these consent conditions need to be revised.

(a) Avoid, remedy and mitigation methodologies shall only be required if there are likely to be any residual effects. The draft LiMP states that the level of effect is negligible after the implementation of appropriate management following the effects management hierarchy. Therefore there should not be any residual effects if appropriately addressed through the draft LiMP.

(b) The consent condition should therefore be revised to include wording involving following the affects management hierarchy “an assessment of actual and potential effects to lizards based on the affects management hierarchy, including offsetting and compensation, if residual effects cannot be addressed” following best practice guidelines.

Response to matters raised in submissions

57 A submission by Big Stone Forest Ltd, S & A Ramsey states that it is impossible to conclude whether the application will result in a net ecological loss or gain. Additionally, they state that no ecological monitoring is proposed to ensure that the actual effects will be as low as predicted. Given there was only sign detected within the designation, it is likely that any lizard population is at a very low density. Monitoring lizards with low densities can be difficult and time consuming with low success rates. However, lizard monitoring is proposed if a lizard salvage is triggered, as more lizards are likely to be relocated. In addition predator control undertaken requires monitoring in order to determine if the predator control regime is successful or requires adaptive management. Although in part this will tell us if the actual effects will be as low as predicted, it will likely inform management and enhance ecological practice for the life of the landfill.

58 The submission on behalf of the Director-General of Conservation requested that the consent conditions imposed will need to be consistent with the existing Wildlife Act authorisation for lizard survey. A further authorisation is likely to be required for the actual landfill development and operation. The LiMP will also need to be consistent with any Wildlife Act

authorisations. As part of the general Wildlife Act Authority process, the Final Smooth Hill LIMP will be submitted to the Department of Conservation in advance of operations commencing on site. The LiMP will be submitted as supplementary information to a Wildlife Act Authority application which enables lizards to be killed or disturbed under the Wildlife Act. The Wildlife Act Authority will outline specific conditions that follow the LiMP, which legally binds the applicant to carry out the conditions as they are outlined in the LiMP, upon agreement with DOC. The LiMP will therefore be consistent with any Wildlife Act Authorisations.

- 59 A submission by the Otokia Creek and Marsh Habitat Trust states that it is critical of EIANZ EclA method used in EclA preparation (including vegetation and wetlands assessment) but does not suggest an alternative method. The EIANZ EclA method is an industry best-practice method first published in 2015, with substantive review of the method last undertaken in 2018. It has been widely applied in consenting processes since that time and is also the accepted assessment method of ORC's EclA technical peer reviewers from Tonkin & Taylor.
- 60 The submission by A Hutchinson suggests that there will only be some habitat enhancement if lizards are moved. This is incorrect. If any lizards are detected during tracking tunnel monitoring, this will trigger the enhancement of West Gully 3 under the VRMP. The submitter also suggests that predator control will be insufficient. It is hoped that the final LiMP and predator control plan will enable lizard habitats to be adequately protected either by habitat enhancement which excludes predators, predator control which targets mice (already prescribed in the LiMP), or a combination or both. I note that any predator control and the lizard management plan must be accepted by DOC prior to implementation, which will enable the LiMP and predator control plan to have sufficient technical input and review.
- 61 The submission by South Coast Neighbourhood Society addressed the concern that there is no way to know what impact the landfill will have on the local lizard population. It is important to note that the local lizard population is likely under some form of predation pressure already due to no predator control management occurring at the site, and is likely severely reduced. The draft LiMP seeks to enhance high quality lizard habitats that will remain undisturbed. Further, we seek in the draft LiMP to understand the status of lizards and their habitats (as the habitats onsite may increase or reduce in size) prior to any commencement of operations in order to provide more detail within the final Lizard Management Plan.

Conclusion

- 62 There is likely to be a low density population of southern grass skink present within the proposed Smooth Hill designation, of which the landfill will likely have direct and indirect effects on indigenous lizards.
- 63 The draft LiMP, with reference to the Vegetation Restoration Management Plan and Landfill Management Plan (proposed predator control), seeks to address these effects through appropriate effects management including remediation, mitigation and habitat restoration. Before the operations of the proposed landfill and road widening commence, the draft LiMP will be reviewed to address any changes to the site and to revise lizard values and any effects that may be required to address.
- 64 As it currently stands the draft LiMP has considered the level of effect to be Negligible with appropriate management tools in place. The level of effect is therefore not considered to require a residual effects assessment and offsetting or compensation through the BOAM or BCM.



Samantha Jane King

29 April 2022