

9.3 Coastal Zone Management Plan - Richmond River Estuary

Attachment 1



Richmond River Estuary Management Study and Coastal Zone Management Plan Submissions Report

No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
1	Stephen Bamier Group Manager, Strategic and Community Services Ballina Shire Council PO Box 450, Ballina 2478	Support for draft EMS and CZMP.  Governance and administration for management of the estuary is determined as a matter of priority to ensure effective implementation of the plan.  EMC to consider an appropriate funding model to implement priority actions.  Monitoring program should provide robust scientific data whilst considering limited human and financial resources. Development of program to involve Council and agency staff.  CMA and Office of Environment and Heritage (OEH, formerly DECCW) (rather than Councils) to be lead organisation responsible for Action 7.1 – Retain, rehabilitate and conserve existing native floodplain vegetation, as Standard Instrument LEP removes Council from any significant role in the regulation and policing of removal of native vegetation in areas where Native Vegetation Act applies.  Regulatory and land manager branches of OEH to be listed separately as responsible organisations (NPWS).  Refer to feral animal eradication programs in contributing to protection and conservation of existing native floodplain vegetation (action 7.1).  Refer to riparian weeds as an issue and targeted programs to be included in Action 6.1 – Identify priority riparian areas and rehabilitate.  Extend KPI for Action 10.2 – Ongoing on-site sewerage management inspections and improvements from 2015 to 2020 to allow adequate resourcing.  Include migratory shorebird issues as a focus of community education programs (Strategy 8: Education).	Noted  Add statement in Exec Summary and Strategy 1.  Included in Strategy 1. No change.  Add statements to strategy 3 introduction. Also note comments regarding monitoring requirements (#4 and 5).  Responsibility is with Councils (urban areas) and NRCMA.  Update all references in documents to OEH etc and list separate organisations.  Add statement in Action 7.1.  Add statement in Action 6.1.  Agreed.  Add to strategy 8 and refer to Shorebirds report as the key management strategy for shorebirds.

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2	Adam Gosling Regional Coordinator WetlandCare Australia adamgosling@wetlandcare.com.au	<p>Supports key issues identified. Follow-on management plans and policies are required to specifically address issues.</p> <p>Level of funding is insufficient to achieve management actions. \$5m out of the total \$16.4m allocated to on-ground works is inadequate. Recommends increased funding.</p> <p>Concerned with level of consultation and engagement of community groups and organisations that have been or are actively involved with works in the estuary area.</p> <p>Fauna management to be included as an issue with information on threatened species, impacts (feral pest species etc.) and remediation actions.</p>	<p>Noted.</p> <p>Budget for each strategy is considered to be a realistic target given the available grants, Council resources and very low level of existing funding committed to these projects. No change.</p> <p>Noted. The current scope of work did not include additional liaison with community groups apart from public meeting. Strengthen text in Section 2.7, CZMP – Community Involvement to highlight interest and commitment of local groups.</p> <p>This is a common concern in the submissions. Terrestrial fauna management was not originally identified as an issue affecting estuary health. While it is acknowledged that native fauna are important to the area and estuary health can impact on some species, this was not identified as a management issue for the estuary (there was no identified linkage to estuary health). Threatened species are discussed in the EMS (Values, zone descriptions, vegetation management, waterway usage etc). A fauna management strategy will not appreciably contribute to estuary health. Significant habitat areas will be considered in the development of actions (e.g. riparian veg. waterway usage etc).</p> <p>Terrestrial weed management is covered in Action 6.1 – riparian (Strategy 7: vegetation management). No change.</p> <p>Habitat modification to be included as sea level rise and storm impact (133 and 134).</p>

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		<p>Values and issues for Zone 1 – North Creek to be included:</p> <ul style="list-style-type: none"> <li>• 5 EECs present</li> <li>• Important roosting site for shorebirds</li> <li>• High fauna biodiversity</li> <li>• Feral animals posing threats to native fauna</li> <li>• Weed infestations</li> <li>• Illegal dumping site in eastern corner of reserve</li> <li>• Stormwater drains</li> </ul> <p>Values and issues for Zone 4 – South Ballina/Empire Vale to be included:</p> <ul style="list-style-type: none"> <li>• Roosting sites as South Ballina Beach</li> <li>• Largest breeding population of endangered Pied Oyster Catcher in NSW at South Ballina</li> <li>• Weed infestations – Bitou Bush</li> </ul> <p>Values and issues for Zone 10 – Tuckean to be included:</p> <ul style="list-style-type: none"> <li>• Extensive cane and grazing in upper catchment compromise water quality</li> <li>• Groundwater and surface waters are source of acid export</li> <li>• Proposed quarry and road development.</li> </ul>	<p>All available information on zone characteristics has been incorporated (from EPS, technical team information, Australian Wetlands draft reports and research). Where the identified values and issues can be confirmed, additional information will be provided.</p> <p>As above.</p> <p>As above.</p>

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		<p>Social and ecological values are undervalued and economic values are emphasised.</p> <ul style="list-style-type: none"> <li>• Cultural Values should be listed separately.</li> <li>• Additional social values e.g. education, spiritual and religious, ecotourism, sense of place.</li> <li>• Additional ecological values e.g. high biodiversity, wetlands (flood mitigation, climate change, pollution control, breeding and feeding grounds).</li> <li>• Dynamic ecosystem services provided by the river</li> <li>• Fresh water necessary for recreation, hygiene and agriculture.</li> </ul> <p>CZMP, Section 2.5: Concurrent/Parallel Programs – other projects would be identified through consultation with community groups and NGOs.</p> <p>Strategy 2: Climate Change Adaptation – should recognise carbon sequestration and allocate budget to enhance resilience of identified ecosystems.</p> <p>Strategy 3: Monitoring and Evaluation – available information should be sourced and collated. Monitoring to be undertaken before and after implementation of on-ground works, and be able to detect changes resulting from works.</p> <p>Action 3.1: EcoHealth Monitoring Program – community groups to be involved in monitoring.</p> <p>Action 3.2: Develop catchment/water quality modelling tool to support decision making. Clearer explanation required.</p>	<p>Suggest S6.2.2. EMS to be changed to Cultural and Social Values. Most values already included but new values will be included as they are supported in submissions (reflect community values) – ecotourism and education.</p> <p>Statement to be added that community groups also undertake some projects (e.g. land care).</p> <p>Carbon sequestration to be identified in Section 7.2. EMS. All strategies in CZMP are intended to enhance resilience of ecosystems. No change.</p> <p>The available information from the EPS and Australian Wetlands work was collated and discussed. The intention of the Strategy/Action is to develop an appropriate monitoring approach that would include the collection of baseline data where appropriate. Emphasis establishment of baseline and assessment of change in Action 3.1. Refer S3.3, CZMP.</p> <p>May be appropriate for some components if groups had suitable expertise. Already identified in Section 2.7, CZMP. No change.</p> <p>Description of tasks is adequate. No change.</p>

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		<p>Action 5.1: Scientific investigations: strategies for retention of water on backswamp areas. Include task to investigate and implement trials of constructed wetlands and/or WSUD for improvements to agricultural land.</p> <p>Strategy 6: Riparian Zone Management and Erosion – should be higher priority.</p> <p>Action 6.1: Identify priority riparian areas and rehabilitate – data exists e.g. Australian Wetlands Riparian Zone Assessment and WetlandCare mapping of wetlands.</p> <p>Action 6.1 – 5ha p.a. target is insufficient, funding is underestimated, add funding for continuation of biocontrol programs.</p> <p>Action 7.1: Retain, rehabilitate and conserve existing native floodplain vegetation – include on-ground regeneration works for threatened and EECs, funding is underestimated, 2ha p.a. target is insufficient.</p> <p>Action 7.2: Aquatic weed management – add a study to develop a strategy including research and utilisation of bio-control agents, does not refer to marine and estuarine vegetation communities, include on-ground regeneration works.</p> <p>Add new actions for Terrestrial weed management and Threatened Species and EECs.</p>	<p>Strategy 5: Farm management and Strategy 7: Vegetation management cover these tasks. No change.</p> <p>Prioritisation is based on Options assessment process, EMS, Appendix 3. No change.</p> <p>Refer Section 7.6.1, EMS – “work carried out by Australian Wetlands (2010, attached in Appendix 2) assessed the riparian vegetation of the Richmond River, however the assessment was limited to written descriptions of the study areas based on on-ground rapid assessment and broad mapping of riparian widths across the catchment”.</p> <p>WetlandCare work has not been identified previously. Action 6.1 to include dot point “Compile existing prioritisation work (e.g. RRCC, WetlandCare).</p> <p>Target is considered realistic for resources available. Assumptions for budget estimate were detailed in Action 6.1. Estimates include an allowance for weed and stock control. No change.</p> <p>This is already included in Action 7.1. Target is considered realistic for resources available. Assumptions for budget estimate were detailed in Action 7.1. No change.</p> <p>Mechanical harvesting is suggested as this is consistent with current RRCC practices and aims. The use of bio-controls would require extensive research prior to a recommendation which is outside the scope of a single coastal zone management plan.</p> <p>Marine and estuarine vegetation and on-ground regeneration works are included in Strategies 6 and 7. No change.</p> <p>Terrestrial weed management, threatened species and EECs are addressed in Strategy 7. No change.</p>

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		<p>Strategy 8 – Education. Community groups should be listed as support organisations. Possibly include education and training for indigenous green teams.</p>	<p>Community groups are not listed as support organisations as they do not have responsibility for implementation of the actions. Their involvement is recognised in Section 2.7 – Community Involvement. This can be emphasised in S2.7.</p>
		<p>Action 8.1: Estuary-wide community education and consultation program – provide information on who and how this will be delivered.</p>	<p>Organisations and Tasks are discussed in Action table. First step is design of program. No change.</p>
		<p>Strategy 9: Waterway Usage – include industry and community groups such as Recreational Commercial Fishers (sic) and Australian Seabird Rescue as support organisations.</p>	<p>Refer above.</p>
		<p>Action 9.1: Develop strategic plan for estuary usage - consolidate plans and undertake erosion works in impacted areas.</p>	<p>Erosion is addressed in Strategy 6. It is intended that the strategic plan will consolidate all relevant information. No change.</p>
		<p>Strategy 11: Urban Runoff – include community education as a task to achieve a reduction in urban runoff.</p>	<p>Add to Action 11.1 and cross-reference Strategy 8.1.</p>

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		<p>Strategy 12: Cultural Heritage – should be much higher priority, identify specific indigenous organisations, record traditional knowledge and practices, include education and training for indigenous green teams, engage indigenous green teams in on-ground works.</p>	<p>The prioritisation of the strategies for management is not a reflection of the level of importance of these factors, but rather an indication of the role of the actions contained in these strategies to achieve the defined objectives in terms of overall estuary health. Priorities were assigned based on actions achieving objectives and level of issue addressed. Actions that identify and manage cultural sites will enhance cultural values but will not necessarily improve estuary health. The plan acknowledges that cultural heritage is important, however the mechanism for proper protection is not solely through the estuary management planning process – hence low priority in the CZMP.</p> <p>It is not considered necessary to identify specific indigenous organisations in the CZMP. Recording of traditional knowledge and practices can be culturally sensitive (examples of misuse in other areas were provided at the public meeting). Indigenous involvement is recognised as a Support Organisations, and in Strategy 8: Education. No change.</p>
	<p>Action 12.1: Identification and recording of cultural sites available to council planners – implement on-ground works to restore and protect cultural heritage sites.</p>		<p>This is the aim of Action 12.2 Cultural Site Management Plans. No change.</p>
	<p>Strategy 13: Fishery Management - should be much higher priority.</p>		<p>The key strategies to manage commercial, recreational and indigenous fisheries are managed at a State level. The fishery management strategy in this plan includes actions which are specific to fishery management but won't have a substantial impact on estuary health – they are more to address specific issues that can be improved at a local level. Other strategies which have a higher priority e.g. farm management and floodplain infrastructure management will also substantially improve the fisheries. This acknowledges the strong link between fishery health, land use and water quality. No change.</p>

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3	Susan Thurlow ECOfishers NSW PO Box 200, Byron Bay 2481	<p>Action 13.1: Ensure key research findings in the fishing and aquaculture sector are communicated to the public - planning to identify key fish habitat areas, implement on-ground works to restore and protect key fish habitat areas.</p> <p>A single management authority is essential. Current regime not adequate. Suggest Rous Water.</p> <p>Intrinsic value of recreational fishing should be acknowledged in the report.</p>	<p>Identifying fish habitat areas is not identified as a task as key habitat areas are already known and mapped e.g. mangrove, saltmarsh, seagrass. Waterway usage aims to protect sensitive areas such as seagrass and mangroves. No change.</p> <p>Noted. Rous Water does not have administrative or legislative responsibility for estuary management. Action 1.1 addresses this. No change.</p> <p>Identified in EMS Section 6.2.1 – economic values and 7.3.1 Fisheries issues. The intention of the study and plan was to acknowledge this as an important value. Suggest s6.2.1, dot point 2 is modified to:</p> <ul style="list-style-type: none"> <li>• Commercial fishing and oyster aquaculture contribute to the local and regional economy. <ul style="list-style-type: none"> <li>o Commercial catch comprises mostly sea mullet and school prawns, Crab, eel and finfish (including sand whiting, bream, flathead and mullet) are also significant commercial species in the estuary (WBM, 2006). Recent economic modelling of the direct and indirect benefits of the Ballina commercial fishing industry estimated total flow-on effects of \$16.9 million derived from output, \$2.9 million in generated income and the generation of 75 employment positions (Harrison, 2009).</li> <li>o There are 10 current oyster leases in the lower Richmond estuary. These are shown in the zone maps provided in Section 3.</li> <li>o Add point about recreational fishing and related industries – boat supplies, bait/tackle shops, lifestyle choice for residents, tourism etc and impact of fish kills.</li> </ul> </li> </ul>

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		Need to monitor for pollutants from agri-chemicals and endocrine inhibitors.	Design of the monitoring program is a key task of Action 3.1: Eco-Health monitoring program and will consider key parameters of concern, aims of monitoring program and available resources. Concerns can be mentioned in the study as parameters to be investigated.
		Economic value of recreational fishing is undervalued. Local economy severely affected by 2001 and 2008 fish kills.	Information is on economic value of recreational fishing is not presented (and therefore is not undervalued). Value is identified in Section 6.2.1 – economic values and 7.3.1 Fisheries issues. No change.
		Management authority should be more proactive and vigilant in monitoring and managing the impacts on estuarine resources.	Noted. This is the intended outcome of Action 1.1: Review estuary governance and administration. No change.
		"Good water quality" is inadequate as a value.	This statement was put forward as a value resulting from the community consultation undertaken by Australian Wetlands. Water quality can be described in many different ways and the description will vary according to the intended use of the water. The use of the term 'Good water quality' is intended to represent the desired state of the river for all concerned. No change.
		Floodplain drainage infrastructure is obsolete and dilapidated. Maintenance is inadequate.	Strategy 4: Floodplain Infrastructure Management includes investigation of this issue. No change.
		EcoFishers provided a \$30,000 grant to RRCC for installation of 6 drum gates on priority drains within 12 months. Only 2 were fitted and one at North Creek was tied shut. Balance of \$20,000 was withdrawn.	The partnership between RRCC and EcoFishers achieved the installation of 3 gates and is considered successful. Agreement was not reached on opportunities for expenditure of remaining funds. No change.
		Drum gates provide more effective tidal flushing and fish passage than fixed gates preferred by RRCC. Also weed removal is not required as tidal flushing achieves this.	Strategy 4: Floodplain Infrastructure Management, Action 4.2 includes optimisation of flood gates. No change.

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		<p>Riparian zone of 50m from water mark is recommended.</p> <p>Seagrass beds must become "no go zones" for motorised watercraft. ECOfishers would be willing to contribute to cost and maintenance of signage.</p> <p>Dredging of bar for safety and navigation is required.</p> <p>Constant monitoring of pollutants especially sewage/septics is vital.</p>	<p>A standard riparian width is not appropriate. Requirement is dependent on vegetation, land use, erosion risk, habitat etc. Riparian management is discussed in Strategy 6, CZMP. No change.</p> <p>This is the intention of Action 9.1: Develop strategic plan for estuary usage. No change.</p> <p>This is discussed in Action 9.2. No change.</p> <p>This is discussed in Action 3.1: EcoHealth monitoring program and is also an existing requirement of Environment Protection Licences for STPs. No change.</p>
4	<p>Matt Landos Director Future Fisheries Veterinary Service Pty Ltd mattv.landos@gmail.com</p>	<p>Part 1: Discusses decline of health and functionality of river, loss of fishery production, effect on coastal fisheries, decimation of wild oysters, socio-economic impacts, value of recreational fishing.</p> <p>Drivers of fishery decline considered to be:</p> <ul style="list-style-type: none"> <li>• dysfunctional management structure for catchment and floodplain,</li> <li>• expansion of macadamia plantation agriculture, sugar cane industry and increased sediment export and pesticide pollution,</li> <li>• endocrine disruption and immunosuppression in oysters, fisheries,</li> <li>• increased nutrient loads from fertilisers and sewage discharges,</li> <li>• acid and heavy metal discharge from floodplain drains,</li> <li>• loss of aquatic animal passage due to floodgated drains,</li> <li>• loss of wetland ecosystems leading to deoxygenation events,</li> <li>• lack of native riparian vegetation.</li> </ul>	<p>Noted.</p> <p>All discussed in EMS and CZMP, apart from "endocrine disruption and immunosuppression in oysters, fisheries". While substantial literature has been cited in the submission, this has not been reviewed as part of this study. However, it is considered that research on this topic is still in early stages and is not yet conclusive. We believe the proposed management actions (e.g. farm management) will address the issue of chemical runoff as far as possible within the scope of the Plan. Pesticides/chemicals was not previously raised as an issue and was only briefly mentioned in the EPS as a very minor potential cause of fish kills and not discussed further. In line with the CZMP adaptive management approach, new research will be reviewed and incorporated in the Plan as it becomes available. No change.</p>

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		<p>Substantial investment is required in:</p> <ul style="list-style-type: none"> <li>• Re-establishing wetlands in low lying areas, removal of drains,</li> <li>• Modification of drainage including constructed wetlands,</li> <li>• Improved sewage treatment including constructed wetlands to minimise discharge of xenobiotic pollutants and nutrients,</li> <li>• Assist farmers to transition from synthetic pesticides and fertilisers e.g. organic industries,</li> <li>• Monitoring diffuse source pollution using passive samplers and SPEAR analysis and respond to exceedances,</li> <li>• Riparian buffer and boundary guidelines for spray application, incentives to farmers, prosecuting breaches.</li> </ul> <p>Management structure and funding should be improved. Recommends a new structure with legislative and financial backing to restore water quality and health of ecosystem.</p>	<p>All discussed in EMS and CZMP apart from "discharge of xenobiotic pollutants and nutrients". Strategy 10: Wastewater Management requires DECCW (OEH) to determine risks related to sewerage systems. Monitoring methods will be developed as part of Strategy 3: Monitoring and Evaluation. No change.</p> <p>This is the aim of Action 1.1. No change.</p>

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		<p>Discusses pollutants requiring management including:</p> <ul style="list-style-type: none"> <li>• Nitrate – toxic for aquatic ecosystems. Eutrophication associated with seagrass loss, loss of wetlands contributes to nutrient export,</li> <li>• Sediment flux – evidenced by plumes following rain events, including pesticides and surfactants, deleterious effects on water column and benthic organisms, shallowed reaches of river less suitable for juvenile mullet recruitment,</li> <li>• Herbicides affect plankton and seagrass, cause immunosuppression in fish,</li> <li>• Insecticides lethal to zooplankton and survival of fish larvae and fish, known or suspected endocrine disruptors, effect on oysters, damage fishes sense of smell,</li> <li>• Fungicides can affect viability of zooplankton,</li> <li>• Surfactant (alkylphenols) effects on crustaceans, endocrine disrupting affecting reproduction, accumulate in algae, affect moulting cycle of crustaceans,</li> <li>• Some STPs do not remove bioactive endocrine disruptors.</li> </ul>	<p>General discussion is already provided in EMS and EPS. Refer comment above regarding endocrine disruption and immunosuppression. No change.</p>

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5	<p>Matt Landos Director Future Fisheries Veterinary Service Pty Ltd <a href="mailto:mattv.landos@gmail.com">mattv.landos@gmail.com</a></p>	<p>Baseline for monitoring:</p> <ul style="list-style-type: none"> <li>• Need for monitoring and implementation of strategies to reduce use and remove dangerous pesticide products from registration,</li> <li>• SE Queensland Healthy Waterways program is inadequate, fails to monitor fishery productivity or organic pollutant/zenobiotic loads. Recommends historical commercial fishery analysis (update the analysis done by NSW Fisheries 1940-1995), commercial fishermen to monitor performance of improvements, similar analysis required for oyster production with survivorship of Sydney Rock Oysters as a monitor of water quality improvement.</li> </ul> <p>EMS, Page 1, para 2 – flushing capacity of river is not poor but can be extremely good but variable with rainfall.</p> <p>Agricultural impacts should be mentioned in Background.</p> <p>Part 2: Discusses Governance:</p> <ul style="list-style-type: none"> <li>• Complete restructure warranted to delineate clear lines of responsibility/accountability,</li> <li>• Development of private investment trust foundations,</li> <li>• Restoration strategy should encourage volunteerism,</li> <li>• Large amounts of council rates paid to upkeep floodgates lacks financial and social equity, remove floodgates and support affected landholders and install wetlands.</li> <li>• Councils should seek legislative change to permit greater powers to control diffuse source pollution from agriculture/urban areas,</li> <li>• Council should lobby state and commonwealth government to change industrial and agricultural regulation.</li> </ul>	<p>The registration and use of pesticide products is not the role of the CZMP. This is a federal government responsibility (Australian Pesticides and Veterinary Medicines Authority) and also Industry and Investment, NSW.</p> <p>Monitoring is discussed in Action 3.1: EcoHealth monitoring program. Design of the monitoring program is a key task of Action 3.1 and will consider key parameters of concern, aims of monitoring program and available resources. Monitoring needs to be targeted to evaluating overall health of the estuary. As stated in the public meeting, there are a large range of factors affecting commercial fisheries statistics (e.g. effort, effectiveness) and SRO survivorship (e.g. East Australian Current, etc.). The need for historical commercial fishery analysis will be considered in the design of the monitoring program.</p> <p>Statement was sourced from the EPS but can be reviewed and reworded.</p> <p>Covered by "the system is under pressure from past and existing development". No change.</p> <p>Covered by Action 1.1: Review estuary governance and administration. No change.</p>

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		<p>Organic pollutants:</p> <ul style="list-style-type: none"> <li>• Richmond River likely to be affected by organic pollutants, requires state-wide monitoring program and support from Councils,</li> <li>• Organic pollutants not covered in EMS or CZMP,</li> <li>• Engage commercial and recreational fishermen as monitors.</li> <li>• Ecosystem monitoring program is inadequate, fails to assess recruitment of aquatic animals or monitoring of organic pollutants and sediments.</li> <li>• Needs to target first flush events,</li> <li>• Incorporate pesticide monitoring,</li> <li>• Monitoring is a waste of time and money if there is no commitment to take action.</li> </ul>	<p>It is unclear what is meant by the term "organic pollutants" as this term is used in a range of environmental disciplines. This discussion is assumed to focus on pesticides, etc. Design of the monitoring program is a key task of Action 3.1: EcoHealth monitoring program and will consider key parameters of concern, aims of monitoring program and available resources. No change.</p>
		<p>Main issue for oyster industry is not e-coli or closures but keeping oysters alive in the river; influx of organic pollutants should be addressed (Action 13.2: Identify and manage contamination sources in the estuary to minimise oyster closures.)</p>	<p>Slightly inconsistent with submission from Oyster Industry (#15). This is addressed by Actions 3.1 and 13.2. No change.</p>
		<p>North Creek study supported, should determine loads of organic pollutants and hydrocarbons.</p>	<p>Addressed in Action 13.2. No change.</p>
		<p>Areas such as Tuckean Swamp should be returned to natural state.</p>	<p>Addressed in Strategies 4 and 7. No change.</p>

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		<p>Role of Richmond River in seafood production for &gt;1,000km of coastline is understated, true extent of loss should be represented. Fishery recruitment and productivity should be an objective, with proxy measures of oysters grown, fish and prawns caught.</p>	<p>Related objectives included in EMS are:                      O4 - To increase knowledge of the impact of existing practices on estuary values and facilitate continuous improvement                      O5 - To reduce pollutant loads to the estuary                      O7 - To minimise the frequency and severity of environmental events such as fish kills                      O8 - To optimise flood mitigation works and flow control structures to improve estuarine water quality                      O11 - To provide for increased use of the estuary whilst minimising environmental impact and conflict between users                      O14 - To enhance sustainable commercial return from industries relying on the estuary and the floodplain.                      We will add statement about Richmond River as a significant contributor to the Australian east coast fishery through a range of mechanisms including direct contribution to catches, provision of nursery habitats and spawning stock, nutrient for offshore fisheries, etc.                      Suggested proxy measures would be dependent on effort, licensing and resources as well as recruitment and productivity. Design of the monitoring program is a key task of Action 3.1: EcoHealth monitoring program and will consider key parameters of concern, aims of monitoring program and available resources. No change.</p>
		<p>Tidal flushing (p90, EMS) is ineffective in preventing fish kills. More substantial measures such as reinstatement of wetlands is required.                      Commercial and recreational fishermen should be included in consultative support organisation for Actions 4.1, 4.2 (Floodplain Infrastructure Management).</p>	<p>Preventing fish kills is a key objective of the CZMP. All strategies will contribute to this aim. No change.                      Fishing groups are not listed as support organisations as they do not have responsibility for implementation of the actions. Their involvement is recognised in Section 2.7 – Community Involvement. This can be emphasised in S2.7.</p>
		<p>Vast majority of drains have not adopted best-practice management. Status of activities in Table 61, pg 81, EMS) is overly generous.</p>	<p>Information in Table was provided by RRCC for use in the study. No change.</p>

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		<p>EMS incorrectly assumes a reducing risk from agrichemicals, fails to acknowledge increased volumes of use. Current regulation is inadequate in preventing offsite movement and harm, substantial literature on organic pollution exists.</p> <p>Dead cows in river is inconsequential to diffuse nutrient loads from agricultural lands. No proof that dead cows attract bull sharks (P94, EMS).</p> <p>P96, EMS – Benefits from Riparian revegetation is slow but should not be disincentive.</p> <p>Where farming activities contribute to river degradation, changed land use should be considered.</p> <p>Aquatic weed issue will be resolved by water quality improvements (i.e. addressing nutrient influxes).</p> <p>Chemical weed control should be avoided.</p> <p>Contribution of xenobiotics is not recognised in Wastewater management (p113). STPs need to be upgraded to remove these compounds (e.g. wetlands). Refers to surfactants, pharmaceuticals, disinfectants.</p> <p>Contribution of organic pollutants from household use should be recognised (Urban Runoff, p116).</p> <p>Effects of EDCs and immunosuppression are underestimated in the EMS.</p> <p>Decline in fish catch is associated with land management changes not overfishing. Causes of decline (p122) fails to mention organic chemicals.</p>	<p>The registration and use of agrichemicals is not the role of the CZMP. This is a federal government responsibility (Australian Pesticides and Veterinary Medicines Authority) and Industry and Investment, NSW. Farm management practices are addressed in Strategy 5. No change.</p> <p>This was identified by the Technical Team for discussion in the EMS. It is not intended to be a statement regarding nutrient loads, rather an aesthetic/potential health issue. Reference to bull sharks can be removed.</p> <p>Noted.</p> <p>Farm management practices are addressed in Strategy 5. No change.</p> <p>Noted.</p> <p>Noted.</p> <p>Wastewater management and a review of treatment requirements are addressed by Strategy 10. No change.</p> <p>Stormwater management is addressed by Action 11.1. No change.</p> <p>While substantial literature has been cited in the submission, this has not been reviewed as part of this study. This was not previously raised as an issue. No change.</p> <p>Habitat availability, land use and water quality issues are considered to be adequately addressed in the EMS. No change.</p>

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
		<p>Exposure to agrichemicals and organic pollutants is one plausible mechanism for immunosuppression of oysters and QX disease (p125).</p> <p>Budget is about \$100m short of what is required. Community trusts are expected to bring funds.</p>	<p>The causes of QX disease have not been extensively researched for this study and is the subject of on-going research by State government agencies. The discussion included in S7.13.1 is considered to address this issue adequately. No change.</p> <p>The level of funding suggested in the comment is unrealistic, particularly from "community trusts". Determining appropriate levels and sources of funding is a key aim of Action 1.1. No change.</p>
6	<p>Kath Southwell Senior Shorebird Warden and Admin Officer Australian Seabird Rescue Inc. WildlifeLink Sanctuary 264 North Creek Road, Ballina 2478</p>	<p>Supports and agrees with submission from Byron Bird Buddies (no. 10).</p>	<p>Refer response to submission 10.</p>
7	<p>Dr Lyn Walker</p>	<p>Discusses administrative, geographic and sectoral boundaries as barrier to action to restore ecological health of the river.</p>	<p>This is addressed by Action 1.1. No change.</p>

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
	<p>President Ballina Environment Society PO Box 166, Ballina 2478</p>	<p>The \$16.4m budget is inadequate and more funding is required to move beyond current management status quo. BES supports the CZMP's "conciliatory" approach to encouraging change but believes a "prescriptive" approach (e.g. regulatory change) may be required if no significant change is observed.</p> <p>Budget allocated in CZMP to advisory extension services to primary producers (&gt;\$5m) are already provided by agricultural agencies. BES believes that farm managers who are willing to change their practices are already doing so using existing resources. Economic incentive also needed. The CZMP budget is duplicating the available advisory services.</p> <p>Management zones follow administrative boundaries indicates desire to continue compartmentalised approach to management. This fragmented and compartmentalised approach is reflected in the state of the river.</p> <p>Figure showing Relative Priority of Management Strategies (Figure 2, EMS) indicates the likelihood of the CZMP being able to influence decision-making and the willingness of the agencies to include the strategies in their individual decision-making processes.</p> <p>Want to see stronger language in the CZMP demanding agencies and interest groups set aside "territorial" disputes and take responsibility for whole river system. CZMP should be given higher regulatory authority so that content and implementation of the CZMP is included in decision-making processes. Management committee should be given status of approval authority for certain planning decisions.</p>	<p>Budget for each strategy is considered to be a realistic target given the available grants. Council resources and very low level of existing funding committed to these projects and the timeframe of the plan. Implementation costs will be reviewed progressively throughout the implementation period. No change.</p> <p>The budget estimate includes incentive payments, buy-back and on-ground works discussed in Action 5.2 as well as additional extension services. The Technical Team indicated that current resources are inadequate. Refer response above.</p> <p>The majority of the CZMP actions are estuary-wide and are not influenced by management zone boundaries. This is addressed by Action 1.1. No change.</p> <p>This is incorrect. The prioritisation reflects the expected role of the strategy in addressing the identified management issues, and is based on the importance of the issue (issue ranking) and the benefits and costs of implementing each strategy (triple bottom line assessment). This was discussed at the public meeting on 28 March 2011. Refer Appendix 3 of EMS. No change.</p> <p>This is addressed by Action 1.1. No change.</p>

**Richmond River Estuary Management Study and Coastal Zone Management Plan  
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		<p>As matters of national environmental significance are identified, the need to gain approval under the EPBC Act, 1999 should be investigated.</p>	<p>An "action" is defined broadly in the EPBC Act and includes: a project, a development, an undertaking, an activity or a series of activities; or an alteration of any of these things. A lawful continuation of an existing use is not an action. A decision by a government body to grant an authorisation (for example, a permit or licence) or to provide funding is not an action. Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities; storage or transport of hazardous materials; waste disposal; earthworks; impoundment; extraction and diversion of water; research activities; vegetation clearance; military exercises and use of military equipment; and sale or lease of land.</p> <p>Although the CZMP proposes that actions such as these are implemented, the CZMP is not considered to be, in itself, an action. The CZMP is a strategic management plan. Approval requirements for individual projects would be identified on a case-by-case basis.</p> <p>No change.</p>
		<p>Principles of Ecologically Sustainable Development (ESD) are not addressed in the CZMP. Primary goals of the CZMP should be stated as application of principles of ESD to uses and development planning, maintenance of ecological integrity and restoration of biodiversity.</p>	<p>While ESD is not specifically referenced, the principles are considered to be addressed adequately. No change.</p>
		<p>Focus on climate change impacts and mitigation in the CZMP is commended. Stronger statements regarding the need to control development on the floodplain and planning for "upslope migration" is required.</p>	<p>This is considered to be adequately addressed by Strategy 2. No change.</p>
		<p>Concerned that EMS, CZMP and the public meeting stated that harvesting of fish is already "highly regulated" inappropriately inferring "over regulated". Many local groups believe regulation should be reduced or removed and this may fuel this opinion.</p>	<p>This was not the intention. The word "highly" can be removed. For instance, EMS p122, last dot point last sentence should be changed to: "To protect against overfishing, commercial and recreation fishing is regulated in NSW through the use of....."</p>

**Richmond River Estuary Management Study and Coastal Zone Management Plan  
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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
8	<p>Graeme Wilson Corporate Compliance Coordinator Lismore City Council PO Box 23A, Lismore 2480</p>	<p>Catch restrictions should be imposed to protect fish populations, even though decline is not due to over fishing. Illegal, unregulated and unlicensed drains exist in the floodplain. CZMP should allow relevant authorities to direct land owners to remove these structures and undertake restoration. STPs should not discharge into the river, all effluent should be reused. Chlorine not identified as a chemical pollutant (from STP discharges). Consideration should be given to subdivision of working farms into "lifestyle" blocks to enable habitat restoration. Investment required in incentives. Report to Council 10 May 2011 stating support for CZMP and suggesting amendments. References to EMC as lead organisation responsible for some actions should be replaced by "CZMP Implementation Committee (to be formed)", as the EMC has fulfilled its function and a new implementation committee will need to be formed.</p>	<p>Catch restrictions are imposed by NSW I&amp;I. This is not the role of the CZMP. No change. Strategy 4: Floodplain Infrastructure Management includes investigation of this issue. No change. This is addressed by Action 10.1: Sewerage system risk assessment and prioritisation study. See also Section 7.10, EMS. No change. This is addressed by Action 10.1: Sewerage system risk assessment and prioritisation study. No change. Farm management planning is addressed in Action 5.2. No change. Noted. The implementation model (administration and governance) is to be determined by Action 1.1: Review estuary and governance and administration. Agreed a new action is required – Form a CZMP Implementation Committee – this committee will replace EMC in action responsibilities. As above.</p>

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
9	<p>Malcolm &amp; Judy Johnson  <a href="mailto:judy.male@yahoo.com.au">judy.male@yahoo.com.au</a></p>	<p>Council also adopted to:</p> <ul style="list-style-type: none"> <li>• Include a project entitled 'Implementation of the Coastal Zone Management Plan for the Richmond River Estuary' into the 2010-2014 Delivery Plan to acknowledge contributions already made by Council to estuary management.</li> <li>• Prior to considering the inclusion of future funding commitments for this project into the 2010-2014 Delivery Plan, Richmond River County Council be requested to develop a detailed financial plan that shows the timing and funding amount required to implement the CZMP that is acceptable to Council.</li> </ul> <p>Urge Councils to adopt the CZMP. Implementation will only be successful if administered and coordinated with a more holistic approach under control of a single supervisory body (e.g. EIMC).                      Keys to success considered to be:</p> <ul style="list-style-type: none"> <li>• continuous and effective monitoring and reporting,</li> <li>• adequate funding of research,</li> <li>• water quality monitoring to detect minute levels of EDCs.</li> </ul> <p>\$17m funding is inadequate but will be extended by council resources, volunteers and in-kind contributions.</p> <p>Reliance on grants is frustrating as funding sources fluctuate annually.</p> <p>Remediation of Tuckean Swamp should be high priority. Powers must be in place to persuade landowners to conform to remedial actions.</p>	<p>Noted.</p> <p>Addressed by Strategies 1 and 3. No change.</p> <p>Budget for each strategy is considered to be a realistic target given the available grants, Council resources and very low level of existing funding committed to these projects. No change.</p> <p>Determining appropriate levels and sources of funding is a key aim of Action 1.1. No change.</p> <p>Addressed in Strategies 4 and 7. No change.</p>

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
10	<p>Jan Olley Northern Rivers Bird Groups (Byron Bird Buddies, Brunswick Valley Bird Watchers, Tweed Bird Observers, Ballina BA Shorebird 2020 Monitoring Team) PO Box 6, Brunswick Heads 2483</p>	<p>Supports whole of government, integrated and proactive approach to sustainable planning.</p> <p>Management Plan does not recognise or adequately provide strategies for protection of shorebirds and terrestrial species.</p>	<p>Noted.</p> <p>Discussed in zone descriptions and ecological values. Terrestrial fauna management was not originally identified as an issue affecting estuary health. While it is acknowledged that native fauna are important to the area and estuary health can impact on some species, this is not an issue that is a key driver in the health of the estuary. Threatened species are discussed in the EMS (values, zone descriptions, vegetation management, waterway usage etc). It is not considered appropriate for a shorebird management strategy to be developed as it will not directly contribute to restoration of estuary health. This is also covered by DECCW management planning for shorebirds.</p> <p>Objectives of CZMP – overall estuary health, focus on improving resilience etc and links with other management strategies to be highlighted in CZMP.</p> <p>Values are not ranked or listed in order of priority. A statement to this effect can be included.</p> <p>Suggest S6.2.2, EMS to be changed to Cultural and Social Values.</p> <p>Can be added to Tourism value in S 6.2.1, EMS.</p> <p>A short paragraph can be included in S6, EMS.</p> <p>Refer response above.</p>

Richmond River Estuary Management Study and Coastal Zone Management Plan  
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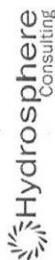
No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
		<p>Strongly support:</p> <ul style="list-style-type: none"> <li>• Planning for sea level rise and climate change adaptation.</li> <li>• Vegetation management and riparian restoration</li> <li>• Weed management</li> <li>• Establishment of wildlife corridors</li> </ul>	Noted.
11	<p>Joan Dawes Conservation Officer Australasian Wader Studies Group jdawes1@bigpond.net.au</p>	<p>Planning for shorebird management is not sufficiently considered in the CZMP. Recommends development of a comprehensive Shorebird Management Plan inclusive of Ballina and Evans Head.</p> <p>Increased focus on requirements of migratory waders is required, given responsibility under Federal and State legislation to maintain integrity of Richmond River habitat.</p>	<p>Refer response above.</p> <p>Discussed in zone descriptions and ecological values. This was not originally identified as an issue affecting estuary health. While it is acknowledged that migratory waders are important to the area (and internationally) and estuary health can impact on some species, this is not a management issue for health of the estuary. Threatened species are discussed in the EMS (values, zone descriptions, vegetation management, waterway usage etc). It is not considered appropriate for an additional strategy to be developed in the CZMP as it will not directly contribute to estuary health. This is also covered by DECCW management planning for shorebirds.</p> <p>Shorebird (and other threatened species) habitat will be included as a consideration in the waterway use strategies (Actions 9.1, 9.2) and Riparian management actions (Actions, 6.1, 6.2).</p>

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
12	Lorraine Vass Friends of the Koala, Inc. PO Box 5034 East Lismore, 2480	<ul style="list-style-type: none"> <li>EMS and CZMP provide worthy framework for commencing programmed recovery.</li> <li>Priorities are realistic.</li> <li>Funding is lacking and sourcing the \$16.4m budget is yet to occur. Urge constituent councils to increase funding to RRCC to implement the plan.</li> <li>Interested in being involved during implementation and review process.</li> </ul>	Noted. Determining appropriate levels and sources of funding and the governance arrangements for the estuary is a key aim of Action 1.1. No change.
13	Dan Webber <a href="mailto:dan@webber.net.au">dan@webber.net.au</a>	Consider whether feasible to dredge sand from within river to pump it to surf zone on either side of river mouth to better define the surf breaks. Improved wave quality would result in improved tourism and property values.	This is addressed by Strategy 9. Point 4 of Action 9.2 could be modified to include "An investigation of the potential commercial return or social benefit that could be gained...."
14	Katrina Williams 88 Mollys Grass Road Tregeagle, 2480	Actions are all land focussed. Suggests "no fish zones", no motorised boating zones, reduced trawler numbers to reduce impact on fish.	Waterway usage is addressed by Strategy 9. No change.
15	Dennis McCarthy Coordinator, Richmond River Shellfish Programme (Oyster Industry) <a href="mailto:sueanddennis@bigpoond.com">sueanddennis@bigpoond.com</a>	Concerned about pollution of river due to sewerage and allied events, resulting in closure of harvest area. Points out that river is also closed with rainfall >50mm. North Creek will not be accepted by NSW Food Authority as a harvest area due to concerns of sewerage pollution. Disgraceful condition of river has resulted in demise of oyster industry.	Noted. The EMS and CZMP are considered to address these concerns. No change.

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No.	Contact Details	Summary of Submission	Suggested Response/ Document Edits
16	<p>Derek MacKenzie Sustainability Officer Richmond Valley Council <a href="mailto:Derek.MacKenzie@richmondvalley.nsw.gov.au">Derek.MacKenzie@richmondvalley.nsw.gov.au</a></p>	<p>Summary Document, Page 6 - 5.2 states 1.0cm/year. Should be 1.0mm/year. It may be worth mentioning that the Feds have a sea level planning policy of 1.1m by 2100.</p>	<p>NSW Government Sea Level Rise Policy Statement states "The best national and international projections of sea level rise along the NSW coast are for a rise relative to 1990 mean sea levels of 40 cm by 2050 and 90 cm by 2100". This equates to 0.67-0.81 cm/year. This will be corrected.</p>
17	<p>Matt Landos Director Future Fisheries Veterinary Service Pty Ltd <a href="mailto:matt.landos@gmail.com">matt.landos@gmail.com</a></p>	<p>Part 3: Hormone disruption in fish in Victoria. Provides copies of papers discussing endocrine (hormone) disruption of fish. The problem is widespread in Australia and requires urgent review of product registrations, reform of currently permissive regulatory risk assessment process, upgrade of sewage treatment plants and increased support for agriculture to develop alternative farming methods.</p>	<p>Comments in the submission have been reviewed. Refer response to Submissions 4 and 5.</p>
18	<p>Ben Fitzgibbon, Senior Natural Resource Officer (Coast and Estuaries), Office of Environment and Heritage, Department of Premier and Cabinet, PO Box 856, Alstonville NSW 2477, <a href="mailto:ben.fitzgibbon@environment.nsw.gov.au">ben.fitzgibbon@environment.nsw.gov.au</a></p>	<p>Refer attached submission which details requirements of new CZMP Guidelines (DECCW, 2010).</p>	<p>Documents to be amended to comply with minimum requirements of CZMP guidelines.</p>



Our Ref: MW/NS (1181/11) (39606)

10 August 2011

General Manager  
Ballina Shire Council  
PO Box 450  
BALLINA NSW 2478

Dear Paul

**Coastal Zone Management Plan (CZMP) for the Richmond River Estuary**

In accordance with the State Government's requirements, coastal Councils are required to prepare a Coastal Zone Management Plan (CZMP) that sets the scope for future sustainable management of this important natural asset. The funding and implementation of these Plans also resides with the State Government and multi-purpose Councils. In the context of the Richmond, the County Council will still provide support and implementation within available resources.

Throughout the development of the CZMP, Richmond River County Council (RRCC) worked in partnership with a technical committee comprised of constituent Council officers and the Office of Environment and Heritage (OEH), formerly the Department of Environment, Climate Change and Water. Richmond River County Council may also continue in the coordinating role for the implementation of the CZMP if Councils see this as a practical option.

It should be acknowledged that the planning process which began in 2001 has been arduous with many delays including funding gaps, the sheer size of the project, the fact that the estuary traverses three local government areas, the need for significant community engagement and consideration of stakeholders' concerns.

I can now advise that the full draft CZMP is complete and the technical team is now recommending its adoption. This is a significant step forward for the Richmond with a long-term blue print for the estuary now at hand.

It is considered necessary by the Technical Committee that Councils, in this case Ballina, Lismore City and Richmond Valley Council and RRCC, formally adopt the draft CZMP prior to it being submitted to the Minister for certification under the *Coastal Protection Act, 1979*. This will ensure submission of a Plan which has the endorsement (via adoption) of the constituent Councils responsible for its implementation.

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Richmond River County Council, Rous Water Centre, 218-232 Molesworth Street, Lismore NSW 2480  
P: (02) 6621 8314 • F: (02) 6622 1181 • E: floodplain@rrcc.nsw.gov.au • W: www.rrcc.nsw.gov.au  
PO Box 230, Lismore NSW 2480 (DX 7652) • ABN: 60 591 934 541

At its meeting 1<sup>st</sup> August 2011, Richmond River County Council resolved to:

1. Adopt the CZMP acknowledging that the County is not financially positioned for the implementation costs.
2. Write to constituent Councils seeking their written endorsement of the draft CZMP.
3. Upon receipt of written endorsement from constituent Councils, Richmond River County Council submit the draft CZMP to the Minister for Environment and Heritage for certification.

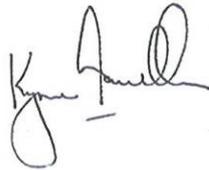
When each Council has responded, RRCC will submit on behalf of the constituent Councils, the draft CZMP to the Minister together with written confirmation from primary implementation organisations of their acceptance or not to the actions assigned to them.

I would like to take the opportunity to thank your Council officers for the support and professional and cooperative approach provided to the project. Indeed the success of the project now and into the future relies on this kind of productive partnerships and resource sharing.

Copies of the CZMP and supporting documents are available on Council's website, [www.rrcc.nsw.gov.au](http://www.rrcc.nsw.gov.au) by following the links: Services – Environmental Management – Richmond River Estuary Management Study and Coastal Zone Management Plan Public Exhibition.

Electronic and hard copies will be also sent to each Council in due course.

Yours faithfully



Kyme Lavelle  
General Manager

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**Richmond River County Council**, Rous Water Centre, 218-232 Molesworth Street, Lismore NSW 2480  
P: (02) 6621 8314 • F: (02) 6622 1181 • E: [floodplain@rrcc.nsw.gov.au](mailto:floodplain@rrcc.nsw.gov.au) • W: [www.rrcc.nsw.gov.au](http://www.rrcc.nsw.gov.au)  
PO Box 230, Lismore NSW 2480 (DX 7652) • ABN: 60 591 934 541