

Submission on GD05 Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region Review from Shaun Lee, STET Limited.

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About STET

STET is a limited liability company formed in 2011 by Shaun Lee. The term 'stet' comes from the publishing industry and means undo changes. Stet is a social enterprise that supports restoration and conservation projects in New Zealand. Shaun Lee is involved in efforts to restore biogenic habitats in soft sediment ecosystems. Through STET he works on environmental protection, and advancing pollution prevention initiatives, with a particular focus on the Hauraki Gulf. As a dedicated diver and underwater photographer, Shaun brings hands-on experience downstream from development projects.



Selfie by Shaun Lee of his arm buried in mud up to his elbow near Ponui Island.

Summary

I have extensively surveyed much of the east coast of Auckland. I am deeply concerned about sediment impacts. Some areas are so impacted by sediment I think they are not restorable with today's technology¹.

All my feedback relates to Chapter A2.0 The principles of the Guide. My critiques and suggestions for the principles focus on potential improvements for clarity, consistency, and emphasis on environmental protection. Each principle's analysis is aimed at making the language more direct, emphasising accountability, and reinforcing environmental considerations.

Principle 1. Minimise disturbance

- Suggest emphasising that disturbance should actively "*avoid sensitive areas*" (such as steeper slopes, streams, and wetlands) you could make this more actionable.

Principle 2. Stage construction

- The phrase "*Earthworks staging...limits erosion*" is vague and might be strengthened by focusing on "*reduces erosion risk.*" Including that staged construction "*proactively manages risk to sensitive areas*" you could reinforce the ecological focus.

- Emphasising the need for continuous planning around temporary stockpiles and access paths would align with reducing inadvertent exposure to erosion.

Principle 3. Protect slopes

- This section could highlight the importance of pre-emptive planning and erosion prevention by incorporating stronger language around slope protection rather than "*requiring stabilisation.*"

Principle 4. Protect receiving environments

- The use of "*mapping*" could be expanded to clarify that maps should detail specific protective buffers and restrictions within sensitive environments, including any regulated distances from watercourses.

¹ <https://blog.sh aunlee.co.nz/brief-for-restoring-extremely-degraded-seafloor-ecosystems/>

Principle 5. Rapidly stabilise exposed areas

- No suggestions

Principle 6. Install perimeter controls and diversions

- A clearer mention of periodic inspections for diversions and perimeter controls could improve accountability and maintenance of this fundamental measure.

Principle 7. Employ sediment retention devices

- “*Sediment retention devices are needed...*” could be more assertive, perhaps by explicitly stating the expected outcomes, like “*to ensure sediment remains contained on-site.*”
- Emphasising maintenance frequency for these devices would improve adherence, particularly regarding flocculation requirements.

Principle 8. Get trained and develop experience

- The recommendation to “*encourage staff*” could be strengthened to advocate for mandatory training or certifications for key personnel responsible for ESC implementation.
- Mentioning potential penalties or consequences of untrained staff leading to environmental impacts could help underscore the necessity of experienced personnel.

Principle 9. Adjust the ESC Plan as needed

- To emphasise adaptability, consider suggesting that the ESC Plan should be regularly reviewed, not only in response to visible site changes but also in anticipation of extreme weather events, which are expected to increase in frequency and intensity due to climate change.
- Adding a reminder to log any modifications made to the ESC Plan could improve tracking, ensure regulatory compliance, and strengthen accountability.

Principle 10. Assess and adjust your ESC measures

- Rephrasing “*as soon as possible*” with a more specific timeframe could enhance the effectiveness of post-storm maintenance and reduce ambiguity.

- Highlighting that proactive maintenance maximises environmental protection would reinforce the need for ongoing diligence and underscore the importance of each maintenance measure in limiting environmental impact.

Each principle could be made more robust by ensuring language explicitly prioritises environmental protection and continuous accountability throughout project stages.

Thank you for considering my recommendations

Shaun Lee

Director

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