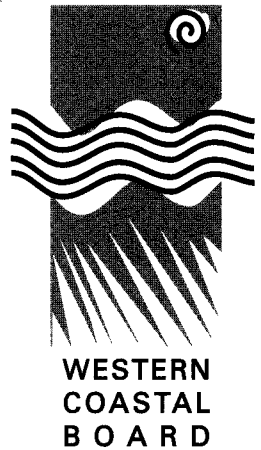


26



6 May 2002

Project Manager - VRHS
Catchment and Water Division
Department of Natural Resources and Environment
PO Box 500
East Melbourne, Victoria 3002

78 Henna Street
Warrnambool
Victoria, 3280
Ph (03) 5561 9900
Fax (03) 5561 9988

Dear Sir/Madam

RE: DRAFT VICTORIAN RIVER HEALTH STRATEGY

Thankyou for the opportunity for the Western Coastal Board to comment on the Healthy Rivers, Healthy Communities & Regional Growth - Victorian River Health Strategy Draft.

It should be recognised that both the Western Coastal Board and the Central Coastal Board collaborated together to construct a response to this strategy, and that some of the comments are site specific, thus may not be entirely relevant to the Western Victorian Region.

The Western Coastal Board would like to express its overall support for the development of the Victorian River Health Strategy.

However, the Board has a concern that the strategy lacks the required emphasis on estuary management and on the integration between catchments and the coast. Estuaries form an important part of the catchment system and although the Strategy acknowledges the challenges in covering all issues associated with management of estuaries it is imperative that these complex and important elements of the river system are considered more fully in the Strategy.

Further comments addressing specific sections of the Strategy are attached please call if you have any questions regarding our submission.

Yours sincerely


Fiona Chandler
Executive Officer

COMMENTS TO THE VICTORIAN RIVER HEALTH STRATEGY

General Comments:

RCB1 The Board supports the Scope and Objectives outlined within the Victorian River Health Strategy (VRHS).

RCB2 Estuaries are identified in the scope of the Strategy (P20) but beyond this the Board believes that their importance is not recognised and the need integrated management not acknowledged. Although the scope section suggests that detailed planning for estuaries and wetlands is dealt with under the Victorian Coastal Strategy, this marginalises them within the broader catchment management system. It is true that in some areas (eg Western Victorian and the Gippsland Lakes) the initiatives for estuarine planning and management have come from the regional coastal boards, but this should be expanded reflected upon in this broader river health strategy.

RCB3 In particular the VRHS does not adequately address the linkage between rivers, estuaries and the marine environment. Specific areas overlooked include:

- Absence of estuarine systems from the ecological model on P24;
- Absence of recognition that marine influences on rivers may be significant spatially (eg Glenelg River, Gippsland Lakes) physically (eg upstream flooding due to bar closure and or sea ingress during storm events) and ecologically (eg migration of fish and eels, nursery function of estuaries);
- Lack of recognition for the need to integrate planning and management of the river, estuary and marine environment in administrative structures.

RCB4 Overall, there is good reference to other important strategies throughout this document, including the Waters of Victoria SEPP, the Regional Catchment Strategies and the Victorian Coastal Strategy.

RCB5 The Board supports the triple bottom line approach outlined within the Strategy.

Introduction:

RCB6 Acknowledge that there are still a number of problems with the arrangements for managing rivers but question whether it will be necessary to have common objectives for rivers and river reaches (dot point 2). If the principles and goals are clear then the objectives should be determined based on the specific river system (or part thereof).

RCB7 It is important to note that the results of the problems with current arrangements include downstream effects and that these are not currently incorporated or recognised in management solutions.

RCB8 In addition to the demand for water coming from increased urban growth and increased export markets for irrigated agricultural produce there is a social demand for pristine (or at least natural) water areas for recreation and aesthetic values.

RCB9 It could be suggested that the RHS would provide the framework for implementing the 'catchment to coast' concept.

RCB10 Disagree that the scope of the RHS will not cover all issues associated with the management of estuaries. Although it is acknowledged that estuaries are quite different ecological systems they are intricately linked. The absence of estuarine issues in the RHS:

- 1) Detracts from the integration that is trying to be achieved;
- 2) Inadequately recognises the downstream effects of management practices on estuaries;
- 3) Does not recognise the impact of estuaries on upper reaches of rivers (eg estuarine management can affect fish migration, effects of tidal ingress upstream).

RCB11 The Port Phillip and Westernport Catchment and Land Protection Board (CALP) special circumstances are not mentioned until Pg. 121. This should perhaps be acknowledged earlier given their role in the most populous region of the State with significant rivers including the Yarra and Maribyrnong.

2.3 *The management drivers of river health:*

RCB12 Agreement that the poor condition of many Victorian rivers and streams is the accumulation of many management activities taken over time. It is not always one step but a combination of small actions often taken in isolation at different temporal and spatial scales that can lead to a deterioration of river health. This is often the case for the health of estuaries where individual actions taken in the upper reaches of the river, can accumulate and have a deleterious effect when combined on the lower reaches of the river and in the estuary.

RCB13 It is a very good point that 'the aim of management may be to prevent transition from one state to a less desirable one rather than to restore the system to its original condition'. As important as this point is it does not seem to be reflected throughout the rest of the RHS as emphasis is placed on 'restoration' rather than rehabilitation which implies a return to an original state (highly unlikely) rather than to a state that can be valued by the community even if not original (more probable).

3.1 *Characteristics of ecologically healthy rivers:*

RCB14 The characteristics of an ecologically healthy river could include the presence of native insects, reptiles and amphibians in the system (and linked systems).

RCB15 It should be noted that although an ecologically healthy river would have natural links with the sea there are instances where unnatural links are promoted and with careful management can still ensure a healthy river. Specifically in south west Victoria where the bars of estuaries are often unnaturally breached there can be effective ecological functioning – but only with careful management.

RCB16 It could be argued that the classification system described in Figure 2.3 is based solely on biophysical data and so does not reflect the social, cultural or economic values associated with rivers.

3.2 *Future Outlook:*

RCB17 Suggest that another factor to be considered would be the pressure from increased recreation on Victoria's rivers and estuaries. Tourism trends indicate that coastal stretches of rivers will experience significant pressure from increased visitation.

RCB18 Commend the inclusion of climate change into the future outlook.

4.1 *The vision for Victoria's rivers:*

RCB19 Suggest exercising caution in regards to focusing on protecting rivers that are of the greatest value to the community unless it is specified what is meant by 'value', and the criteria and prioritisation that is used to determine the greatest value are stated.

RCB20 Commend the principles for implementing the vision especially noting the inclusion of community involvement although it might be more inclusive to refer to community engagement as this implies something greater than just involvement.

4.2 *Implementing the Vision:*

RCB21 The statewide targets are generally supported but the link between these and targets to be set in the regional strategies are not clear. To be effective they still need direction on how progress against the statewide targets will be evaluated.

4.3 *Principles for Implementing the Vision:*

RCB22 The principles for implementing the vision are supported.

5.1 *Protection for rivers and streams of high community value:*

RCB23 Further to the comment made above in regards to the vision, caution should be exercised if the value is based on conservation, recreation and/or cultural values. This is not "triple bottom line" and unless economic values are included in the criteria for "high value" the RHS is not adhering to government policy.

RCB24 It should be pointed out that it is hard to attribute value consistently across a river system. In the case of estuaries there is often greater value associated with the ecological services, recreation opportunities etc. then can be attributed to the upper reaches of the same river.

RCB25 It is not clear how the representative rivers mentioned in section 5.1.2 relate to the heritage rivers noted in section 2.4.2. Furthermore how do the representative rivers listed in table 5.1 link to the classification system displayed in figure 2.3

RCB26 Whilst recognising the work done previously by the LCC, the concept of "community value" should be better defined. For example the Yarra is a highly modified river in terms of its natural values, but its community value is extremely high due to its place in the landscape and recreational value to the greater Melbourne community.

5.2 *Regional Targets:*

RCB27 Suggest that the regional targets are really more catchment targets as this reflects a more ecological approach (rather than administrative).

RCB28 Note that although the existing RCSs do not encompass estuaries, this is being rectified in the revised RCSs now being prepared. Also add that there are coastal strategies – namely the Regional Coastal Action Plans (done for South West and Central West Victoria) – that do consider river health.

RCB29 Completely concur with the limitations of the current arrangements and the need to reinforce the 'catchment to coast' concept.

RCB30 The Victorian Coastal Strategy provides relevant policy direction and should be included in section 5.2.2 State policy context.

RCB31 Note the action requiring that Regional RHSs will be completed for all major river catchments by December 2002. It would be useful to highlight the criteria for assessing what river catchments are 'major' – will it be size, importance to the community (based on which values), priority from other existing plans?

RCB32 Highly commend the review process but encourage suitable and appropriate resourcing of such activities.

RCB33 It is interesting to note that government endorsement will be required for the regional RHSs and for each of the specific issue action plans that are developed. Could there be some clarification on the process for this.

7. *Management of water quality:*

RCB34 A further key source of pollutants into river systems is waste and litter.

8.3.4 *Mechanisms for the protection and restoration of riparian land:*

RCB35 Trust for Nature covenants have proven to be successful mechanisms to protect existing vegetation, including in riparian land (example Surrey River).

9.3.5 *Undertaking works on waterways:*

RCB36 Included in the works and activities undertaken that can impact on waterways is estuary opening.

13.2 *Research:*

RCB37 Note that in addition to NRE, the CMAs, RCBs and Parks Victoria have a role in facilitating research in relation to rivers and estuaries.

Comments on tables and figures:

Table 2.1	<ul style="list-style-type: none">• Include litter/waste as a key impact of recreation- eg. camping.• Include litter/waste and infrastructure (eg boat jetties) as a key impact of recreation- eg. boating.• Include pollution from boat fuel and oil as a key impact of recreational boating in rivers.• Include fisheries (recreational and commercial) as a species-specific impact on biota in some areas.• Include illegal/inappropriate artificial estuary mouth opening as a key impact on river health.
Figure 2.3	This figure would be more informative if the numbers of the regions depicted in the map could be explained.
Figure 3.3	It is important to note that the NLWRA only looked at larger estuaries and that in the coastal region of western Victoria there are over 40 estuaries and coastal creeks that have significant regional and local value. The figure should explain some of the constraints of the NLWRA.

Table 5.2	Include Regional Coastal Action Plans as Strategies/Plan for determining the priority of river health within broader regional natural resource management issues. These are done at a regional scale under the responsibility of the Western Coastal Board.
Figure 5.1	<ul style="list-style-type: none"> • Include Estuary Management (Estuary Management Plans) as a further box in the third tier of the framework. • Regional Catchment Strategies (in conjunction with Coastal Action Plans as appropriate) will also impact heavily on priorities for management and planning in the lower reaches. Estuaries and coastal wetlands can not be treated as a separate system.
Box 5.1	It is not clear how 'ecologically healthy river recreation' (listed under Naturalness) differs from Recreation (under Social Assets).
Box 5.2	Focuses on outputs rather than outcomes (the results of the outputs and which have more meaning when assessing if the actions undertaken as part of the RHS have been successful).
Box 6.1	Tidal influences are another aspect of river hydrology effecting river ecology. In the case of the Glenelg River, the tidal influence is felt as far as 80 km from the estuary.
Table 6.2	Suggest including a further downstream impact of river diversions – the closing of estuaries with probable impact on river health including the loss of fish migration opportunities and changes in habitat.
Table 7.1	<ul style="list-style-type: none"> • Further systems at risk from high levels of nutrients are estuaries (Curdies Inlet has experienced an algal bloom). • Estuaries are systems at high risk from low dissolved oxygen levels with several instances of fish kills associated with BOD in estuaries in south west Victoria (Surrey River, Gellibrand River).
Table 7.2	Suggest including Estuary Coastal Action Plans (South West and Central West Victoria) as plans with a primary purpose in regards to estuary planning.
Table 10.1	The Estuaries section should list "Coastal Action Plans" under the "Complementary" Heading.
Box 11.1	<ul style="list-style-type: none"> • Another group with a role in river restoration and catchment management are Regional Resource Planners including the Regional Coastal Boards. • Committees of Management are a further group that have a role in the Institutional Arrangements. • Regional Coastal Boards and the Victorian Coastal Council should be included in this table for their regional and state policy coordination and development roles respectively. • Effective partnerships between catchment and coastal systems are essential for delivering the targets in the VRHS along the full length of river systems and this should be clearly enunciated in the Strategy.