

Our Ref: TW/2002239/WRS09E
Contact: Trent Wallis

3 May 2002

Jane Doolan,
Project Manager VRHS
Catchment and Water Division
Department of Natural Resources and Environment
PO Box 500
East Melbourne



Dear Jane,

Re: VICTORIAN RIVER HEALTH STRATEGY

The Mallee Catchment Management Authority (CMA) would like to thank the Department of Natural Resources and Environment (NRE) for the opportunity to comment on the draft Victorian River Health Strategy (VRHS).

Please find enclosed the Mallee CMA's comment on the draft document.

If you have any queries regarding this correspondence please contact our Waterway/ Floodplain Manager, Trent Wallis, on 5022 4373.

Yours sincerely,

Joan Burns
Chair

Attachments:

- 1. *Mallee CMA Comments on Draft VRHS*
- 2. *Plan of Mallee Waterways*

COMMENT ON DRAFT VICTORIAN RIVER HEALTH STRATEGY

General comments

1. The Mallee CMA commends the Department of Natural Resources and Environment (NRE) for the development of the Victorian River Health Strategy. The Mallee CMA also applauds the continued progress towards a truly strategic and co-ordinated approach to maintain and improve the health of rivers and other waterbodies in Victoria.
2. The Mallee CMA acknowledges the discussion on community education, however, it may be appropriate to further expand and emphasise this aspect of the document as community education is a key tool in promoting river health, and can be relatively cost effective.
3. The document should be clearer on how it relates to the management of wetlands. Page 8 of the document states that the definition of a river used throughout the Strategy includes 'any associated floodplain wetlands and the estuary or terminal lake'. Page 19 states that 'the objective for the VHRS is to achieve: healthy rivers, streams and floodplains, which meet the environmental, economic, recreational and cultural needs of current and future generations'. Wetlands are not mentioned in the objective for the Strategy, however, it appears that floodplain wetlands are encompassed within the definition of rivers under the 'scope' of the VRHS on pages 8 and 20 of the document. It is important to note that not all wetlands are located on river floodplains and would therefore not currently fall under the umbrella of the Victorian River Health Strategy, eg groundwater discharge sites and drainage basins.

If it is not the intention of this strategy to include the management of wetlands, the Mallee CMA recommends that separate regional wetland strategies would need to be developed in order to manage wetlands appropriately. It does not appear that the development of a River Health Strategy will inform managers on how to prioritise investment in wetland management.

In the Mallee CMA region there are nearly one thousand wetlands of varying type, size, quality and regional, national and international significance. It is therefore important that NRE develops a statewide policy on how to approach the management of these wetlands in a regional as well as a statewide context.

4. Under direction from the State Government, the Mallee CMA has recently completed the development of the Mallee Waterway and Floodplain Management Strategies (Mallee CMA, 2001). This integrated strategy was developed in accordance with a statewide brief provided in 1998 by NRE for the development of Regional Waterway, Floodplain and Rural Drainage Strategies and was endorsed by Government in 2001. The development of this integrated strategy involved significant community consultation and provides the strategic direction for integrated floodplain and waterway management in the Mallee CMA region. It is therefore critically important that the Victorian River Health Strategy acknowledges the role of existing Regional Waterway and Floodplain Strategies and how the proposed development of Regional River Health Strategies will relate to existing Regional Waterway Strategies. This is important to avoid duplication, as well as, confusion and strategy fatigue by the community.
5. The Victorian CMAs have collectively indicated that they would not be prepared to sign off the relevant schedule of the Operating Agreement for the transfer of management of Crown Water Frontages (CWFs) from NRE to the CMAs unless there is an adequate level of resourcing tied with that transfer. The Crown Water Frontage Working Group has identified that through the regional reviews of CWFs that an additional amount of between \$2.5M and \$3.0M would be required to manage CWFs.

6. Greater emphasis should be made in the document of the ecological, cultural, scenic, recreational and economic importance of the Murray River and its associated floodplains, wetlands and anabranches.

Under the 1991 Land Conservation Council Rivers and Streams Special Investigation Final Recommendations, it has been recommended that:

- a) the areas of Victoria's public land abutting the Murray River continue to be used for the purposes previously approved by the government for the Alpine Area – Special Investigation, North-eastern Area (Benalla-Upper Murray) Review, Murray Valley Area, and the Mallee Area Review;
- b) for the purposes of establishing priorities for management, the Murray River be considered as if it were a Victorian heritage river; and that
- c) initiatives that promote and enhance the protection of its values, through co-ordination with interstate and Commonwealth agencies, the Murray-Darling Basin Commission in particular, be supported by the State government with a view to protecting the scenic, recreational, cultural, and ecological values of the Murray River corridor.

It is therefore important that the Victorian River Health Strategy acknowledge these government endorsed recommendations, for prioritising management of the Murray River, particularly the riparian zone, floodplains and wetlands on the Victorian side of the River. The Murray River Frontage Action Plan project is an example of a regional CMA initiative developed to address the management priorities of the Murray River.

This is a key issue in our region as the Murray River and its associated wetlands are the primary freshwater resource in the Mallee CMA region.

7. It is noted that in figure 2.3 on Page 31 of the document that a preliminary classification of River Regions of Victoria has been undertaken to determine the major types of rivers in the State. It is important that the Mallee CMA region is not omitted from such studies. Although the Murray River channel is a New South Wales waterway, this study does not acknowledge Victorian waterways that are located within the Mallee CMA region. A map of Mallee waterways is attached for your reference.
8. The Mallee CMA supports the management framework for the management of riparian land under Section 8, particularly, the priorities for riparian protection. However, the Mallee CMA would recommend that the Frontage Action Plan concept being developed by the Mallee CMA region for the Murray River, be used as a model for integrating the various management requirements of the Riparian Zone. The Frontage Action Plan approach uses a holistic approach to riparian protection, management and community awareness that integrates the management of threats to the riparian zone (ie weeds, grazing pressures, recreational pressures, developmental pressures etc) within a single planning document. The Frontage Action Plan approach also takes an integrated partnership approach to managing the riparian zone, recognising the various stakeholders involved in riparian or frontage management, including Public Land Managers (ie NRE, Parks Victoria, Water Authorities and Councils), as well as, licensees, private land holders and community groups.

The Victorian River Health Strategy recognises the role of Crown Frontage Plans under the Proposed Regional Management Framework on page 55 and within Table 5.2, and should therefore also be mentioned under Section 8 Management of Riparian Land.

9. Greater emphasis should be placed on the Victorian Planning Provisions and local municipal planning schemes as a key mechanism for protecting river, riparian and floodplain health, by preventing inappropriate development and use. A good example is the Murray River Corridor

Policy currently being developed by the Department of Infrastructure for the protection of the Murray River and its floodplain from Yarrawonga to the SA Border. This policy will be incorporated into the schemes of all municipalities bordering the Murray River within Victoria and will compliment the 1994 NSW Murray River Regional Environmental Plan (REP No. 2).

The policy will address water quality, wetland protection, access, bank disturbance, building setbacks and signage, earthworks, effluent disposal, heritage protection, land degradation, landscape protection, native vegetation removal, subdivision and river related use and development as they relate to the protection of the Murray River and its floodplain.

Similar approaches could be adopted for other major river systems in Victoria and should be outlined in the Victorian River Health Strategy as a key mechanism for the protection of river health, aligning with the adopted philosophy of the strategy on page 9 of the document that states “prevention is better than cure”.

10. It is suggested that the document include a diagrammatic representation of the policy context of the VRHS. The reference list on page 152 provides a useful starting point for the development of such a diagram.
11. The Mallee CMA seeks comment as to whether NRE has considered the concept of excluding selected activities (i.e. recreational pursuits) from high value streams or reaches with the aim of ensuring the long-term protection of these high value areas.

Specific comments

Chapter 2

Page 31 – Figure 2.3: This figure requires a description of the classification (numbering system) as a key to the figure.

Chapter 3

Page 37 – Section 3.2: It would be useful to include some comments on long term climatic cycles (see Rivers as Ecological Systems, pp 145-150) and climatic variability (long term) and variation (short term) across the State.

Chapter 5

Page 49 - Table 5.1: The Mallee CMA requests that NRE consider Murray River anabranches in the north-west of the state for inclusion in this table. Please refer to the attached map that depicts these waterways.

Chapter 6

Page 73 - Box 6.2: Does this refer to the ~27 GL environmental water allocation?

Page 76 – It is stated that ‘roughly two-thirds of the flow in the River Murray is now diverted’. It is suggested that this figure is approximately 80-85%. Please refer to Review of the Operation of the Cap, Murray Darling Basin Ministerial Council 2000.

Chapter 7

Page 93 – It is suggested that NRE liaise closely with the Murray Darling Basin Commission on the issue of thermal pollution research and monitoring.

Chapter 8

Page 99 – Section 8.3.4 Mechanisms for the Protection and Restoration of Riparian Land: Bottom box – the Mallee CMA would consider that the development of holistic integrated Frontage Action Plans that tackle a range of riparian issues (ie weeds, grazing pressures, recreational pressures etc.) would be a more appropriate mechanism to address recreational pressures than to develop individual recreation plans. (Refer also comment 8 under general comments above).