

Submission to Parliament of Victoria

PAEC Inquiry into Auditor-General's report No. 202: Meeting Obligations to Protect Ramsar Wetlands (2016)

From: Downs Estate Community Project

1 December 2019

Dear Committee,

We write to raise some concerns regarding the future of the Seaford Wetlands and the adjoining Council land known as Down's Estate.

The Down's Estate Community Project has been working to support community engagement on the Down's site since 2017. We have had a licence to a minor portion of the site to develop a community project. It is a project committed to a positive environmental alignment with the wetlands and to public education on environmental issues.

In October this year Frankston Council released a Management Plan proposed for the Down's site, covering the area not in our licence. It proposed substantial intervention works for the site with an underlying premise that in time the site may be suitable to include in the Ramsar declared area.

The DECP Committee has considered the Management Plan proposed for the Down's site and responded expressing a number of concerns about gaps in the document and we were unable to support the plan. We made a number of recommendations to cover the gaps: Our report is attached.

Some of the issues we raise in our report that we consider have relevance to the wider reflections on the Seaford wetlands system are:

- ➔ The difficulty in knowing the original ecology of the site. We suggest the painting 'Lagoon in the Carrum Carrum Swamp- evening 1872', by James W Curtis (copied below), be considered a legitimate indication of the ecology prior to white settlement. We are concerned the ecology currently being presented as the original ecology for Seaford and Edithvale bears no tree cover like this.
- ➔ The prominence of bird counts as the monitoring indicator of site ecological health, and the dependence on external resources for sustaining the ecology rather than seeking an ecology, with the capacity to sustain itself and at the same time can support a range of flora and fauna,
- ➔ The lack of reference to any integration with the many other wetlands in the district i.e. the wider network of local Carrum Lowland Wetlands which includes those not included in the Ramsar classification.
- ➔ The lack of Climate Adaptation planning for the site considering the ecological transitions predicted with the inundation and salt intrusion anticipated in coming decades.

Yours sincerely,

John McKenzie - Chair, Down's Estate Community Project,  
Seaford email: , ph:

'Lagoon in the Carrum Carrum Swamp- evening 1872', by James W Curtis, held at NGA Canberra



Above image taken from <https://cs.nga.gov.au/detail.cfm?IRN=182511>

## **Response to the Down's Estate Management Plan – consultants final report Oct. 2019**

prepared by Down's Estate Community Project (DECP) Nov. 2019

### **Introduction**

DECP supports the community engagement that is being included in the drafting process of the management plan and we offer the following as our feedback on the consultant's Final Report.

The report's preferred long-term ecology for the 15 ha site is the continuation of the wetland that has been established on the site over the past two years with the trial of pumping water in from Wadsley drain some 3 km away. The trial has transformed the minor ephemeral wetland that existed there for the past 100 years into an extensive year-round system. The proposal seeks to keep the pumped water coming as a permanent element of the site management. The wetland will cover 1/3rd of the site, another 1/3rd is marked as a riparian zone with reeds and final 1/3rd will be maintained as a slashed grassland.

This new landscape will establish the Down's as another water site in the Seaford wetlands, and one with reliable water supply. If drought emerges (and if the pumping is maintained) the Down's wetland will likely be the last site to dry on the Seaford Wetlands. Implementation of this proposal will require a long term commitment from FCC and MW.

The DECP feedback is grouped here into two sections. A brief listing of what we see as gaps in the Management Plan document and a longer section covering the ecological choices being made.

### **Gaps in the Document**

This is a major project being proposed and DECP is concerned that the document is lacking sections that need to be addressed before a commitment can be fairly considered:

- Time span – what is the lifetime of the proposal? How many years is the pumping expected to continue for? Is there an 'Exit Strategy' for when the project funding finishes?
- Cost estimates – some indication of budget needed for implementation and annual operations
- Risk Assessment - what are the major risks entailed in this and how will they be mitigated?
- Climate Adaptation - how will the predicted climate changes affect the proposal?

### **Ecological Choices**

**a. Is the water supply reliable?** The wetland proposed will be based near 100% on external inputs of pumped water from Wadsley drain. If drought or other problems causes the supply of water to dry up what risks would that pose to the Down's wetland?

If the water supply is not available the wetland ecology would be near assured of collapse within a short period of months or years. No data or discussion is provided on the volumes of water that have been delivered over the trial period or the volumes predicted to be needed over the coming years. Is there reliability of supply for the water over an extended period of potentially decades? DECP would like to see the document include data on the water volumes and discussion on risks of dry times.

**b. Is the Down's wetland being created at the expense of the main ponds?** DECP understands the water coming into the Down's was originally intended for the main Seaford ponds. Does diverting it to the Down's put the main ponds at a greater risk of drying out? Is maintaining water in the main ponds becoming a problem? Is the Down's system being created to provide a year round guarantee of a wetland in the Seaford system, is it a fall-back plan if an extended drought dries all the other ponds?

What is the strategic reasoning for this wetland plan and why were the trial inflows of water undertaken? DECP is concerned the consultant's document does not explain the strategic thinking and modelling of supply for future years.

**c. Is Down's about to become a sanctuary for threatened species?**

The three zones proposed for the site – water ponds, riparian fringe of tall reeds and slashed grasslands all appear to be premised on attracting and protecting bird visits, particularly endangered and threatened species.

With a dependence on externally sourced water and regular slashing of the grasslands the proposal is looking like more like a managed sanctuary refuge for endangered species than re-establishing a local ecology. It may be justified but there is little in the document that presents the case and DECP recommends this question be clarified. If a bird refuge is the key motivation for the Plan then referencing to threatened species management and the wider context of support for that species in Frankston and the local region should be included. Is Down's the best place to commit these funds for this purpose? Have other sites been considered for their sanctuary capability? Other sites may be more sustainable and need less external inputs.

**d. Do all the other wetlands around the Carrum Lowland get management attention?**

There are 15 or so other significant wetlands across the local Carrum Lowlands, covering a total area of 900ha. Owned by various private and public bodies and managed to varying capacities, they provide habitat and wetland services similar to the Seaford Wetland. Has consideration been given to improving this wider group of existing wetlands instead of creating a new wetland at Down's Estate? Would this be better use of management funds? A number of people associated with FESWI have expressed interest in supporting a review of the wider collection of wetlands and work on improving the condition and environmental services of these. A working party could be set up to do this task and could include some excellent community stakeholders associated with FESWI.

Carrum Wetlands. Area 900 Ha. This is an Important Bird Area (IBA). It consists of a number of isolated wetlands that formerly made up the once extensive Carrum Wetlands alongside the eastern shore of Port Phillip Bay, south of Melbourne. The significant remaining fragments of the original wetlands are the ephemeral wetlands of Edithvale, Seaford, Peninsula Aeronautical Remote Control Society (PARCS), Braeside and Woodland Estate Wetlands, Boundary Road Swamp and the Eastern Treatment Plant. (also They are all considered part of the same IBA because some key bird species, notably Sharp-tailed Sandpiper, move between the wetlands, depending on their state of flood. The Eastern Treatment Plant is a working water treatment plant serving south and east Melbourne, and consists of a series of artificial wetland ponds of varying depth, and a modified lake. Edithvale, Seaford and Braeside are ephemeral shallow lakes fringed by reeds and sedges. PARCS Wetland and Boundary Road Swamp are grazed and lack tall fringing vegetation, whereas Woodland Estate Wetlands are a series of deeper permanent wetlands. All are managed partly for bird conservation and recreation in this urban environment, and Edithvale and Seaford are part of the Port Phillip Bay Ramsar site.  
(from Birdlife International <http://datazone.birdlife.org/site/factsheet/carrum-wetlands-iba-australia>)

**e. Alternative ecologies for the site?**

The site is in the midst of a 300-year arc of ecological change. It's about half way through. From the rich, complex, diverse, productive freshwater and redgum ecology prior to white settlement in the 1800's to the post climate change inundation and salt intrusion predicted for later this century and next. The Management Plan seems focused only on establishing the wetland. DECP considers it would have been valuable to have included some exploration of other ecological options and why they were rejected.

Here are a few alternatives that DECP has considered.

**i. Mass plantings with community participation.** One interesting local ecology is the planted landscape that has been established on the block immediately to the west of the Down's site. The plantings there are now 20 years old and appear well established. That block presents as an extremely rich ecology. It has an extensive tree canopy supporting diverse populations. It would appear to be a successful re-establishment of a robust ecology. DECP understands this was achieved using locally

grown tube stock, from local provenance seed. These were mostly planted as a FESWI activity. This was a practical approach and on a low budget. DECP considers there are many similarities between this block and the Down's site and there are valuable lessons to be learned from this block.

**ii. The original ecology - as it was prior to white settlement.** Paintings and written records from the early settler time are scarce and valuable sources of information. DECP understands the Carrum Carrum Swamp at that time was a rich and diverse ecology and is concerned the discussion of EVCs in the report fails to capture an accurate view of how it was. The early settler writings tell of the wetlands full of many varieties of birds, eels and other wildlife. The painting by James Curtis done in 1857 now hanging in the National Gallery in Canberra depicts the wetlands with towering redgums over ponds. It can be seen online with a google search. DECP is unsure what EVC that would be but believes that the painting is the best record available of the likely original ecology at Down's.

**iii. Redgum forest regrowth.** The redgum thicket growing between the freeways just 200m east of Downs is another option. Covering around 10ha it looks like the natural regeneration that emerges after an inundation episode in similar areas across SE Australia.

**iv. Climate Change Adaptation.** What ecology will best meet the climate changes coming later this century and next? There is a lack of discussion in the document on preparation for approaching climate change. The proposal lists the predicted impacts on the Down's site: higher temperatures, reduced rainfall, increased salination, increasing inundation of the Seaford Wetlands until "almost total inundation by 2100" (p26)... "The impact of climate change is the pre-eminent issue for these wetlands." (p 27). Despite this strong statement, the climate change issue is not developed into a discussion of a strategic approach for climate adaptation for the Down's site or in the wider context of the whole Ramsar site. The document does not discuss the preferred ecological strategy for meeting the changes predicted in the site's climate over the next 20, 50, 100 and 200 years. DECP expects there is much work going on in local governments to develop Climate Adaptation plans and that there are funding opportunities for planners and land managers to assist with this. DECP recommends that this be included in this current planning process.

**v. Ramsar nomination ecology -** Keeping the site as it was when the Ramsar nomination was awarded in 2001. The migratory birds visiting were a key element in the Ramsar nomination. They were visiting the treeless expanses of open water that were the result of a century of clearing and farming, the original ecology being long gone. The Ramsar listing seeks the ecology remain the same as at the time of listing to keep the birds visiting. This sets a management constraint between keeping the site according to the Ramsar nomination or seeking to re-establish the original or re-emergent replacement ecology.

DECP is concerned the Ramsar requirement for the adjacent Seaford Wetlands is restricting consideration of any other management strategies or development of alternative ecologies for the Down's Estate site. It sets the KPI of keeping the ecology in a treeless state. It discourages consideration of tree planting even if that was the original ecology.

**g. Budget:** The proposal looks as though it would require a significant and ongoing budget. The lack of budget information means there's no capacity to derive a cost-benefit analysis, or consider if the money would be better spent elsewhere. DECP recommends some disclosure of the budget expectations be included in the document.

**h. Risk Assessment and Risk Mitigation:** The proposal does not identify the risks associated with implementing the plan. Significant risks that should be addressed include: failure in the water supply, failure in budget supply, salination of the system via groundwater and local inflows, poor water quality from Wadsley Creek. DECP recommends risk planning be included in the document.

## Conclusion

The proposal appears to have a number of serious risks and the gaps in the information provided make it difficult to judge how significant they are. It is also difficult to consider offering support for the long term commitment that is required.

## Recommendations

Update of the consultant's paper to offer clarification on the gaps as identified in this feedback:

- \* What is the lifetime of the proposal and is there an Exit Strategy?
- \* Provide data on the past water use and modelling of future water use and potential negative impact on the main ponds,
- \* Provide cost estimates that give an indication of budget for implementation and annual operations,
- \* Include Risk Assessment and risk mitigation,
- \* Include Climate Adaptation strategy for the site,
- \* Include an acknowledgement of the multiple other wetlands in the surrounding Carrum lowlands and an explanation how these sites relate to this proposal.
- \* Acknowledge the profound difficulty in knowing the EVCs on the site before white settlement and consider the Curtis painting as primary evidence of the pre-settler ecology.
- \* Include consideration of alternative ecologies that could be sustained on the site.
- \* Clarify the proposal purpose in regard to Down's Estate being a sanctuary for threatened species and how this relates to threatened species management across the Ramsar site and wider Carrum lowlands.

End of Submission by Down's Estate Community Project Management Committee