

The Honourable Lisa Neville
Minister for Water
Level 17, 8 Nicholson Street
East Melbourne, VIC 3002

4 May 2017

Dear Minister Neville,
(cc Premier Daniel Andrews,
Minister for Energy, Environment and Climate Change, Lily D'Ambrosio
Parliamentary Secretary, Anthony Carbines
Friends of Hoddles Creek Inc., Laurence Gaffney (on behalf of >30 community groups)
Environment Victoria, Juliet Lefeuvre
Environmental Justice Australia, Sarah Brugler)

**Re: 10-metre maximum width riparian revegetation rule in the
Yellingbo Conservation Area**

We recently wrote to Minister for Energy, Environment and Climate Change, Lily D'Ambrosio, expressing our deep concerns about the Victorian Government's policy change regarding the north-east corner of the Yellingbo Conservation Area (YCA). The policy of concern stipulated that revegetation be limited to a maximum of 10 metres on each side of a waterway in streamside areas. The response we received from Kelly Crosthwaite (Regional Director Port Phillip) on behalf of Minister D'Ambrosio did not suggest any genuine consideration of our concerns.

As a group of applied researchers who focus on evidence-based protection and restoration of waterway ecosystems, we have two major objections. Firstly, the 10-metre maximum revegetation restriction has a high likelihood of undermining the long-term conservation benefits of revegetation efforts, and there is no evidence that this will reduce fire risk. Secondly, such a decision, taken *before* the investigations and findings of the YCA bushfire planning process¹, is contrary to the Government's track record of evidence-based policy development.

Our letter of 15th March 2017 (appended) explains why a 10-metre maximum riparian revegetation width is manifestly inadequate for the effective management of environmental values. We summarised the lack of evidence for the link between riparian vegetation width of 10 metres and "more manageable bushfire risk", and noted that fire spread to adjacent land without tree cover depends strongly on wind speed, which can be mitigated by tree corridors—provided they are sufficiently wide. We also emphasised the importance of the YCA Bushfire Risk Assessment and Management Project as the appropriate process to develop rigorous, evidence-based recommendations on riparian revegetation widths that optimise conservation and bushfire risk outcomes.

¹ <http://ycaccyellingbo.com/wp-content/uploads/2016/12/Agencies-Fire-risk-Reduction-Activities-Around-YCA.pdf>

Considering the clear inadequacy of a 10-metre riparian revegetation width from an environmental perspective, and the lack of evidence that such a width restriction reduces bushfire risk, we respectfully requested that the existing evidence for the 10-metre riparian revegetation limit policy be re-evaluated, and the decision reconsidered.

Unfortunately, *none* of the substantive points of concern we raised in our letter were addressed in the response letter from Kelly Crosthwaite on behalf of Minister D'Ambrosio (Ref: MIN028375; appended).

We understand that you have undertaken to respond to a submission on this policy made by Mr Laurence Gaffney (on behalf of some 30+ community groups). We are writing again because we are serious and sincere in our concerns about this policy decision. We trust that you appreciate this, and we reiterate our offer to assist in any way possible including:

- meeting with you and/or Minister D'Ambrosio to discuss the evidence-base of riparian vegetation width impacts on geomorphology, riparian habitat and stream health benefits; and
- helping to design bushfire risk and conservation scenarios that will maximise the information value of the detailed scenario modelling that is being planned as part of the YCA Bushfire Risk Assessment and Management Project

Thank you for your time and consideration, and we look forward to your response.

Yours sincerely,

DR YUNG EN CHEE

DR JOE GREET

PROF. TIM FLETCHER

ASSOC. PROF. CHRIS WALSH

DR FIONA EDE

DR GEOFF VIETZ

Waterway Ecosystem Research Group

School of Ecosystem and Forest Sciences

The University of Melbourne, Burnley, VIC 3121

The Honourable Lily D'Ambrosio
Minister for Energy, Environment and Climate Change
Level 17, 8 Nicholson Street
East Melbourne, VIC 3002

15 March 2017

Dear Minister,
(cc Parliamentary Secretary, Mr Anthony Carbines)

**Re: 10-metre maximum width riparian revegetation rule in the
Yellingbo Conservation Area**

On 19th January 2017, the Victorian Government announced four policy changes to its implementation of the north-east corner of the Yellingbo Conservation Area (YCA) stipulating that¹:

- revegetation will only occur to a maximum of 10 metres on each side of a waterway, in the streamside areas
- no revegetation will occur within the north-east corner of the conservation area until the bushfire planning process is complete
- riparian management licences will be issued on an individual basis for a maximum ten years to replace grazing licences
- on-ground works to support bushfire and pest management will be prioritised.

The stated intent of these changes was to “give greater surety to local landholders that bushfire risk and environmental values will be managed effectively”.

As a group of applied researchers whose focus is primarily on the protection and restoration of waterway ecosystems, we are puzzled by, and deeply concerned about the decision to limit streamside revegetation to a maximum width of 10 metres². Our concern is twofold. Firstly, this has a high likelihood of undermining the conservation benefits of revegetation efforts, and there is no evidence that this will reduce fire risk. Secondly, we are concerned that such a decision, taken *before* the outcome of the YCA bushfire planning process³, is inconsistent with the Government’s track record of evidence-based policy development. We elaborate on these concerns below.

Based on our understanding of stream ecosystem functioning, we believe that a 10-metre maximum riparian revegetation width is manifestly inadequate for the effective management of environmental values.

¹ Addressing Yellingbo Conservation Area Concerns: <http://www.premier.vic.gov.au/addressing-yellingbo-conservation-area-concerns/>

² Smith, Bridie (27 February 2017) State’s controversial vegetation policy bad news for environment, scientists say. *The Age*: <https://tinyurl.com/joyf2f3>

³ <http://ycaccyellingbo.com/wp-content/uploads/2016/12/Agencies-Fire-risk-Reduction-Activities-Around-YCA.pdf>

The importance of vegetated buffers along waterways for water quality, stream health, and wildlife habitat is well established⁴. A strong evidence-base underpins the widespread environmental benefits of riparian revegetation, and this was recognised by the extra \$10 million in the 2015-2016 Victorian state budget that was committed to accelerating riparian works in regional Victoria⁵.

In the context of the Yellingbo Conservation Area, the restoration of riparian and floodplain vegetation is crucial to achieving the desired outcomes of the Government's \$3.2 million investment in conserving Victoria's last remaining populations of the critically endangered lowland Leadbeater's Possum and Helmeted Honeyeater, and other ecological values in the area.

The stream health benefits of riparian vegetation increase with increasing widths⁶, particularly for large floodplain rivers like the Yarra. Riparian vegetation provides natural protection for stream banks and floodplains⁷, and thus for adjacent farmland and constructed assets. However, rivers can (and *do*) naturally migrate within their riparian zone over distances much greater than 10 metres, and therefore restricting the maximum riparian revegetation width to a mere 10 metres risks the loss of productive land (and built assets) if rivers migrate beyond vegetated buffers. Loss of the vegetated buffers also means a loss of the initial investment in revegetation and expected future benefits with respect to habitat provision, water quality and stream health.

In contrast to the well-documented value of striving for wider vegetated riparian widths, the link between a riparian vegetation width of 10 metres and "more manageable" bushfire risk (19 Jan Govt Media Release) is much less clear. Indeed, our understanding of the relevant research is that fire spread in adjacent crop/pasture/grasslands depends strongly on wind speed, which can be mitigated by tree corridors, provided they are of adequate width.

Furthermore, as the Country Fire Authority⁸ has stressed:

- fire history records indicate that fire is less likely to start in riparian areas than in other parts of the landscape⁹;
- under low to moderate fire danger conditions, well-managed riparian vegetation with limited grass and weed growth and low slopes, may be difficult to ignite and may only burn slowly, and at low intensity¹⁰;
- riparian areas do *not* generally act as a 'wick' or 'fuse' for bushfires¹¹;
- the amount of riparian land is typically small compared with other land uses—a fire burning through crop or pasture is more likely to contribute to fire spread at the landscape scale, than riparian land¹²

⁴ Regional Riparian Action Plan: http://delwp.vic.gov.au/_data/assets/pdf_file/0014/321026/RRAP-FINAL-web-version-15Dec15.pdf

⁵ *ibid.*, Minister's Foreword, page 3

⁶ <http://link.springer.com/article/10.1007/s10980-014-0050-y>

⁷ <http://www.sciencedirect.com/science/article/pii/S0012825207000682>

⁸ http://www.cfa.vic.gov.au/fm_files/attachments/Publications/riparian-land-and-fire-resource-document-2014.pdf

⁹ *ibid.*, page 27

¹⁰ *ibid.*, page 28

¹¹ *ibid.*, page 28

We understand that a government-led, multi-agency, YCA Bushfire Risk Assessment and Management Project is currently underway¹³. In addition to community consultation, we understand that detailed modelling of bushfire risk scenarios is planned (Prof. K.Tolhurst *pers. comm.*). This would seem to be the appropriate process to develop rigorous evidence-based recommendations on riparian revegetation widths that optimise conservation and bushfire risk outcomes.

To support evidence-based policy-making it is also crucial that existing evidence about the links between riparian vegetation and bushfire risk, as well as new findings of the modelling investigations of the YCA Bushfire Risk and Management Project, are appropriately communicated to the community. This will be vital to fostering informed discussion about relevant tradeoffs and the appropriate balance between conservation and bushfire risk mitigation aspirations of the broader community.

Considering the clear inadequacy of a 10-metre riparian revegetation width from an environmental perspective, and the undemonstrated value of a 10-metre riparian vegetation width restriction with respect to bushfire risk, we respectfully request that the Minister reevaluate the existing evidence for the 10-metre riparian revegetation limit policy, and revisit the decision.

We would be pleased to assist in any way possible including:

- meeting with the Minister to discuss the evidence-base of riparian vegetation width impacts on geomorphology, riparian habitat and stream health benefits; and
- helping with the development of bushfire risk and conservation outcome scenario modelling.

Thank you for your time and consideration, and we look forward to your response.

Yours sincerely,

DR YUNG EN CHEE

DR JOE GREET

PROF. TIM FLETCHER

ASSOC. PROF. CHRIS WALSH

DR FIONA EDE

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¹² *ibid.*, page 28

¹³ <http://ycaccyellingbo.com/wp-content/uploads/2016/12/Agencies-Fire-risk-Reduction-Activities-Around-YCA.pdf>



Department of Environment,
Land, Water & Planning

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Dr Yung En Chee

Ref: MIN028375



yechee@unimelb.edu.au

Dear Dr En Chee

RIPARIAN REVEGETATION RULE - YELLINGBO CONSERVATION AREA

Thank you for your email of 15 March 2017 to the Hon Lily D'Ambrosio MP, Minister for Energy, Environment and Climate Change about recent changes to the implementation of the Yellingbo Conservation Area. As this matter is in my area of responsibility, the Minister has asked that I respond on her behalf.

The Andrews Labor Government has committed to establishing the Yellingbo Conservation Area in accordance with the *Victoria Government Response to Victorian Environmental Assessment Council's Yellingbo Investigation Final Report*. The purpose of the Yellingbo Conservation Area is to help protect significant biodiversity and ecological values through the rehabilitation of stream frontages and the creation of vital habitat links. It is also aimed at protecting water quality and improving the health of our rivers and creeks.

The Minister received a request from Yarra Ranges Council to reduce the size of the Yellingbo Investigation Area to what was detailed in the proposed terms of reference for the Yellingbo Investigation, released for public comment on 22 June 2011. Yarra Ranges Council raised concerns about government resourcing, the impact on adjoining landowners and fire management planning associated with the current scale of the area. The Minister did not support this request, and the size of the Yellingbo Investigation Area will remain as per the *Victorian Government Response to the Victorian Environment Assessment Council's Yellingbo Investigation Final Report March 2014*.

In response to the concerns raised by Yarra Ranges Council and the local community in the Upper Yarra Valley about the potential for bushfire risk to increase, the government will not be undertaking any re-vegetation within this area until the bushfire management planning process has been finalised.

In the longer term, given the existing bushfire risk, the higher populations and generally lower conservation values in the Upper Yarra Valley area, the Minister decided to limit the amount of re-vegetation that can occur on Crown land in this area. In the Upper Yarra Valley, including sections of the communities of Woori Yallock, Don Valley, Launching Place, Yarra Junction, Millgrove, Wesburn and Gladysdale, re-vegetation of Crown land will be restricted to a maximum of 10 meters from either side of the Yarra River and tributaries in the streamside areas. A lesser area will be re-vegetated if determined through bushfire management planning, to ensure that there is no material increase in bushfire risk and that priority is given to the protection of human life and private property.

I appreciate your concerns for the populations of two of our state emblems, the Helmeted Honeyeater and Lowland Leadbeaters Possum. The ongoing protection of these species is one of the goals of the new Yellingbo Conservation Area.

If you would like more information about this matter, please call Victoria Purdue, Project Manager, Yellingbo Conservation Area on 0419 115 636 or email Victoria.purdue@delwp.vic.gov.au.

Thank you for raising this matter with the Minister.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kelly Crosthwaite', with a stylized flourish at the end.

Kelly Crosthwaite
Regional Director Port Phillip
21/4/2017