



Submission: Proposed Bastion Point boat
ramp - Environment Effects Statement 16
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Organisation: Victorian National Parks Association
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1. Introduction

The Victorian National Parks Association wishes to table their objection to the proposed upgrade of the Bastion Point boat ramp as outlined in the Environment Effects Statement prepared by the East Gippsland Shire Council.

The Environmental Effects statement appears to be flawed in certain areas with the estimation of social benefit largely unsubstantiated.

Bastion Point is a natural icon of Victoria's Wilderness Coast with one of the few shallow reef habitats found in East Gippsland. To the east of the point is the Cape Howe Marine National Park with beaches that stretch as far as the eye can see. The point is surrounded by Croajingolong National Park, a world biosphere reserve.

Bastion Point is valued for its natural beauty and uninterrupted view of the wilderness coast. A breakwater and ongoing dredging would forever change this significant coastal environment and landscape. Impacts on the wider surrounding environment will also be felt. The terrestrial native vegetation is relatively intact and with low weed cover and no pest species. The area also contains several rare flora and fauna. The sandy beach and intertidal reefs provide habitat for a range of shorebirds.

According to the LCC 1994 the Victorian coastline consists of eight broad habitat types, six of which are recorded as having very high biodiversity. All eight habitat types are represented at Mallacoota, making Bastion Point of particular biological significance to the Victorian coastline. The consultants in the EES note that a comparative significance study of Bastion Point in the context of the broader coastal area was not undertaken. Such a study should be carried out as it would show both the health of this particular environment and its comparative ecological importance.

Bastion Point is a popular spot for surfing, swimming, beachcombing, rock pool rambling, scientific study, snorkeling, relaxing, angling and many other recreational and social activities throughout the year. The proposed development would greatly compromise most visitors' experience of East Gippsland's Wilderness Coast. The less intrusive options proposed by the community would be supported by VNPA and would protect Bastion Point's remarkable natural, social and cultural values, while improving safety and supporting the town's economy.

The present proposal will transform Bastion Point area into an industrial zone, with a 130 metre breakwater, lights along the structure, a large parking lot and ongoing dredging.

Mallacoota's tourism future depends on protecting the area's internationally renowned natural capital and Wilderness Coast values. These features and the area's low-key development are major drawcards for residents and visitors to Mallacoota. Over development of much of Victoria's coastline has left few Wilderness places such as Mallacoota. It will be a substantial loss to what Victoria offers in the form of coastal tourism if yet another area is inappropriately developed.

The Statutory Authority responsible for the management and ongoing capital and operating expenditure is not clearly identified, and the cost of dredging operations could become a burden for ratepayers, tourists and commercial boating users.

2. Economic analysis of Environmental Effects Statement

Victoria National Parks Association notes that the process to date has largely ignored community opinion and substantially underplayed potential environmental damage. An economist Simon O'Connor stated that the argument underpinning the economic benefits to the community, were generally overstated in the areas of projected increased expenditure on accommodation and food in Mallacoota.

He went on to say that the operational costs for the proposed facility, the additional infrastructure required, the mitigation measures recommended in the various Supplementary Reports, and the extra work and cost associated with Cultural Heritage investigations and monitoring were all underestimated, or not included.

3. Adverse outcomes associated with the Environmental Effects Statement proposed upgrade at Bastion Point

3.1 Tourism

The EES does not consider the potential losses from tourists who come to Mallacoota for its unspoilt beaches, beauty and surfing. Recent market research undertaken for the Victorian Coastal Council found that the natural environment resulted in high visitation satisfaction in comparison to areas with built or manmade structures.

The present proposal is also inconsistent with many existing Victorian government policies including the Victorian Coastal Strategy, Coastal Spaces and other planning documents. This proposal is moving away from a sustainable tourism model. A tourism model for Mallacoota should be focused on low-key development that does not compromise the unique natural values of the area and its spectacular wilderness coast.

The Shire should be investigating a less intrusive alternative that would invest and protect the areas internationally renowned natural capital and Wilderness coast values. This would add to the social and cultural values of the area, while improving safety and supporting the town's economy.

The Victorian Government should support responsible development in Mallacoota by appointing an independent body that genuinely and inclusively investigates the options for Bastion Point and recommends a sustainable and community-supported solution.

The assessment in the EES of the impact on recreation and visual values at the preferred site appear to be largely subjective. While the EES asserts in the Social, Economic & Infrastructure Impacts Report that the "ocean access boat ramp will provide an overall economic benefit to the local community" (EES p.111), this is not backed up by much empirical data.

Data gathered must look at the volume and frequency of various activities at Bastion Point. The present proposal focuses on boat users ignoring swimmers, surfers, beachcombing, rock pool rambling, scientific study, snorkeling and relaxing. While the EES acknowledges that surfers will be affected, there is nothing in the statement that quantifies the economic impact of this.

All 3 options, including the preferred option, do not give due recognition to the natural values of this landscape.

An investigation into the wider impacts of increased boating and fishing activity is also required. There are concerns that visitations to Gabo Island may become unsustainable and that there is no mechanism to ensure that the no landing policy at Tullaberga, where the white faced sea petrel is found, is enforced.

3.2 Environmental

There are likely to be substantial adverse effects in the marine environment as habitat will be permanently altered. There is also likelihood that pest species may be introduced.

3.2.1. Changed turbidity levels associated with dredging

The required ongoing dredging will contribute to noise, fumes and sand discharge pipelines into the swimming area.

Suspended sediment in the water column will block light, reducing benthic primary productivity and inhibit the ability of benthic plants to recover from impacts of dredging. Dredging exposes anaerobic layers of sediment. Dredge spoil needs to be deposited somewhere and can smother existing habitats¹.

The EES states that sand movement is associated with wave action. It is noted that the development will require ongoing dredging which will increase the suspended sediment load. What modelling has been done to investigate the increased movement of sand and its corresponding effect on ecological processes as a result of dredging?

Further modelling is required to understand what the associated impacts on wave action are likely to be as a result of the removal of 20 metres of significant reef. The modelling should take into account climate change predictions which assert that more storm surges are likely to occur along the coastline.

Scientific literature states that dredging results in the degradation of animals, vegetation and microbial communities that live in the dredged sediment. This can reduce the ecosystem's capacity for nutrient cycling, primary production and habitat provision with flow on effects up the food chain¹.

3.2.2 Removal of Large Section of Reef

Rocky reefs are known to have a high diversity of marine fauna and flora. The positioning of Bastion Point is also of possible relevance to species range being the first rocky shore after the iron prince and before ninety mile beach.

Considering the diversity of habitat at Bastion Point there is a strong likelihood that many significant species such as the Eastern Potbellied Seahorse are likely to occur. Further investigation must be carried out to list these species and ensure appropriate mitigation plans are developed.

While the consultants did not find an Eastern Potbelly Seahorse, the Seahorse is predicted to occur in the area. It is well documented in marine literature that habitat is a way of determining species location. It can therefore be argued that if the right habitat for the Seahorse exists there is a strong chance it will be found at Bastion Point. The Seahorse is listed as significant and will trigger the *Environment Protection and Biodiversity Conservation Act 1999* requiring the Shire to lodge a referral to determine whether the proposed action will need formal assessment and approval.

3.2.3 Impact on the Coastal Dune System

The building of a road and car park has the potential to interfere with natural coastal processes, disrupting the flow of sand and adding significantly to risk and operational and maintenance costs. As a result of vegetation removal and the construction of road works the stability of the dunes may be threatened.

3.2.4 Survey Methodology

There are issues associated with when and how the marine and terrestrial surveys were carried. It was recommended that hair tubing be undertaken to investigate whether the Southern Brown Bandicoot is found at Bastion Point and there was also a recommendation to survey for orchards neither of which were done. The surveying for marine species was only carried out over a couple of days and the conditions were not conducive to successfully locating and identifying species.

4. Impact on significant Cultural Heritage

According to the new cultural heritage legislation it would appear that the proposed upgrade at Bastion Point will necessitate the development of a cultural heritage management plan as the impact will be both a high level impact and the site is considered to be of significance.

5. Conclusion

The proposal for an upgrade to the present Bastion Point boat ramp is severely flawed. The proposal not only underestimates associated mitigation costs it also overestimates economic benefits. The proposal is neither socially or ecologically compatible with such a wilderness coastline and has the potential to lead to unsustainable access to surrounding national parks and islands.

The process needs to be altered to one driven by the community so that something that suits multiple user use is developed – not one orientated solely towards the boating industry. A properly formulated safety and environment management plan should investigate low-impact improvements to the existing small boat ramp.

The impacts on both the marine and terrestrial environment are likely to be significant and long term in nature. The impact associated with the removal of vegetation for the parking lots has been noted by consultants to have very high or high impact on rare coastal dune vegetation and warm tropical rainforest.

The Victorian Government should be supporting responsible development in Mallacoota by appointing an independent body that genuinely and inclusively investigates the options for Bastion Point and recommends a sustainable and community-supported solution.

5. References

¹ Coastal CRC, Some impacts of dredging,
<http://www.coastalzone.org.au/wetlands/dredging.html> viewed on July 3 2007.