

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,

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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>