

## Swan Bay Environment Association Inc.



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Dear Sara,

Please find attached a copy of a report on baseline nutrients in Lakers Cutting, an area which Swan Bay Environment Association has been concerned may be adversely impacted by nutrients released from 'The Point' housing development at Point Lonsdale. This work was undertaken by Marine Ecological Solutions and funded by Swan Bay Environment Association.

The water quality standards to be met by 'The Point' development are outlined in their Water Quality Management Plan (WQMP). While the WQMP was approved by the Commonwealth Department of Environment approximately 3 years ago, no one, including our association was able to read a copy of the WQMP until 18 months after the approval. Access was restricted by the unprecedented use of "copyright" by the author of the WQMP and the developer. The apparent attempt to keep the WQMP out of the public domain, causes us to doubt the objectivity of aspects of the WQMP. Consequently, we suggest that a minor change be made to the WQMP so that the proponent is required to monitor nutrients in Lakers Cutting as part of their long term monitoring. We find the rationale for not monitoring nutrients in Lakers Cutting in the WQMP unconvincing.

The rationale for not monitoring nutrients in Lakers Cutting or Swan Bay in the WQMP was that this monitoring "has no value for the project and because there are many factors beyond the control of this project that affect water quality at these locations" (WQMP, p15). That storm water from Ward and Nelson Roads, as well as from 'The Point', may contribute to a decline in water quality in Lakers Cutting increases its vulnerability, and should therefore **increase** the need to monitor this vulnerable water body. Should a decline in water quality be evident, its cause can be determined subsequently, and knowing the timing and extent of any decline will also be important for managing the water quality in the canal within 'The Point' development.

The WQMP proposes that instead of monitoring water quality in Lakers Cutting that the effect of 'The Point' on water quality can be judged by comparing concentrations at the intake and discharge points of the canal system. This approach is only adequate when there is no mixing of intake and discharge waters. As the intake and discharge are very close together the degree of mixing may be substantial making the approach in the WQMP problematic.

The marginal cost to the developers of 'The Point' of measuring nutrients in Lakers Cutting is negligible (~\$2500/year undertaken every 5 years, i.e. \$500/year).

Yours sincerely  
Roel Wasterval  
President  
Swan Bay Environment Association.