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GBM EXPANSION EIS - COUNCIL QUERY RE FISHERIES' RECOMMENDATION

Thank you for the email regarding Council's request for comment on the DPI Fisheries' recommendation that *"900mm clearance be provided from any sediment to the underside of the kayak pontoon. Clearance not required above concrete slipway"*.

General Comment:

I submit that the request from DPI Fisheries for a minimum 900mm between the kayak pontoon launching ramp and the natural seabed offshore from the concrete ramp at GBM is a misapplication of the NSW DPI Fisheries' 2013 Policy and Guidelines Document, and misunderstands the intent of the ramp usage.

Actual Design Depths:

In terms of anticipated actual depths at LAT, I refer to my previous two supplementary reports *MPRSupplWQ&SEDLab&ReportMay20* and *GBM Contamination EMP* (from August 20):

- The May 20 Report *MPRSupplWQ&SEDLab&ReportMay20* Figure 7 provides a seabed profile that indicates the natural seabed profile offshore from the concrete ramp.
- The August 20 *GBM Contamination EMP* report provides an engineered long-section of the proposed kayak launching ramp, and the report provides a description of the manner of its use.
- At LAT the whole kayak ramp will rest on the concrete ramp and the 2m lower overhang portion of the launching ramp would have a height distance between the bottom of the lower pontoon and the natural seabed from $\pm 300\text{mm}$ at the edge of the concrete ramp to around 600mm at the seaward end of the pontoon.

Actual Design Usage

As detailed in Section 3.2 of the August report, the kayak launching ramp has been proposed to overcome the problem of slip and trip falls associated with use of an intertidal concrete ramp. In actual use, the lower portion of the kayak launching ramp, including the 2m overhang beyond the concrete ramp, has been recommended so that kayakers can launch and retrieve safely at LAT by launching off or stepping up onto the last 2m pontoon section during low tides. Accordingly, safe usage is best achieved by retaining lower stepping depths between the seabed and the end pontoon at LAT.

Application of DPI Fisheries Guidelines:

- Section 5.1.6 clause (4) says that: *stub end jetties in or near Type 1 or 2 seagrass are not permitted unless there is 0.9m of water depth over the seagrass all times (sic).*
- Section 5.1.7 guideline (a) says that: *private pontoons for boat mooring should..have a minimum clearance of 0.9m between the base and the substrata at LAT.*
- Section 5.1.7 guideline (c) says that: *boat ramps should be designed to allow the movement of water and sand/sediment cross or under the structure.*

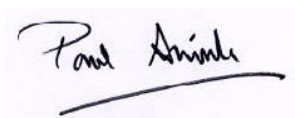
The proposed kayak pontoon ramp **is not** a private pontoon but a public-use facility, it **is not** a pontoon intended or designed for mooring of vessels, and it **is not** located over seagrass or algae marine vegetation i.e., not over Type 1 or 2 Key Fish Habitat).

The pontoon ramp is **a ramp structure** intended to sit on the concrete ramp and over the seabed at all tides, and it therefore comes more appropriately under the Clause 5.1.7(c) guideline. The submitted design meets the Clause 5.1.7(c) guideline recommendation.

Recommendation:

It is recommended that DPI Fisheries be requested to reconsider the 900mm clearance request in the light of the above, and if Fisheries decide that their Guidelines do in fact specify the 900mm clearance, contrary to my reasoning above, they be requested to re-consider approval of the lower clearance depths on the basis that the guidelines are recommendations rather than prohibitions (i.e., *should* instead of *must*), and on the basis that the lower depths are appropriate for the intended use to maximise the safety of persons using the kayak ramp launching facility.

Yours Sincerely,



Paul Anink

Managing Director

Marine Pollution Research Pty Ltd