

Our Ref: C19/475

14 August 2019

Steven Lawler  
Northern Beaches Council  
c/o: steven.lawler@northernbeaches.nsw.gov.au

Dear Steve,

**Re: DPI Fisheries comments on the Review of Environmental Factors (Cardno, May 2019) for a dog off-leash trial at Station Beach.**

Thank you for your referral of 22/7/2019 seeking comment on REF for the proposed dog off-leash trial at Station Beach, prepared by Cardno in May 2019.

DPI Fisheries has reviewed the REF and has no objections to the trial proceeding, subject to the following conditions:

1. Markers (pole or buoy) must be installed 3m east (shoreward) of the seagrass beds. If buoys are used, floating rope is preferred to chains in order to prevent seabed scouring and harm to benthic invertebrates. If a chain is used, it should be as short as functionally possible and be fitted with an inline float to raise the chain off the sea floor.
2. A different coloured marker should be installed at the northern and southern extent of the off-leash area as a visible reminder that dogs need to go back on leads at that point.
3. Off-leash dogs are to remain within the trial boundaries i.e. east (shoreward) of the markers and between the northern and southern extents.
4. DPI Fisheries does not object to the northern boundary extending 100m to the north, in line with the wharf.
5. The time restrictions (e.g. sunrise to sunset) and dates of the trial must clearly communicated to dog walkers and the broader community.
6. A Seagrass Monitoring Plan is to be prepared and submitted to DPI Fisheries for approval at least 2 weeks prior to the commencement of the trial. Council must implement the approved plans on site.
7. Council must install multiple signs, at the entry points to Station Beach and within the trial area (on the dune), advising the community of:
  - a. The physical extent of the trial area.
  - b. A clear diagram showing the trial area.
  - c. The times and dates that dogs are permitted off-leash.
  - d. The ecological importance of seagrass beds and the endangered status of *Posidonia australis*. Statements such as “1m<sup>2</sup> of seagrass produces 1 tonne of recreational fish per year” and “seagrass beds provide homes for threatened species of seahorse” are helpful in connecting with the community. DPI Fisheries can assist in providing wording and pictures for the sign.
  - e. Regular compliance patrols and on-the-spot fines for non-compliance with the trial conditions.
  - f. Dog faeces must be collected immediately by the owner and disposed of in bins at either end of the beach. (Doggy bags and bins should be provided by Council and maintained regularly.)
8. At the conclusion of the trial, DPI Fisheries would like to review the report that details the outcomes of the trial, including the findings of the seagrass monitoring program.
9. The REF states in Table 5.2 – Mitigation Measures:  
“Increased compliance patrols by Council officers to ensure compliance with permitted high tide swimming periods” and

“Increased compliance patrols by Council officers to ensure compliance with permitted dog access areas and times”.

Fisheries recommends that the findings/outcomes of any specific compliance program be reported as part of the trial monitoring program.

10. Prior to appointing a permanent dog off-leash area, DPI Fisheries recommends that Council reviews alternative locations. An environmental assessment should allow for the comparison of multiple locations in order to determine which site would incur the lowest environmental impact as a result of dog off-leash activity. This review of alternative locations may occur concurrently or subsequent to the Station Beach dog off-leash trial. DPI Fisheries has a strong preference for the use of ocean beaches for the dog off-leash area, rather than estuary beaches. DPI Fisheries recommends that Council consider Palm Beach (on the ocean side) amongst other ocean beach options. Ocean beaches do not support living marine vegetation or Syngnathids (such as the endangered Whites Seahorse that lives in seagrass beds in Pittwater), so the potential impact of dogs on marine life is considered to be far less on ocean beaches. Obviously, there will be other consideration on ocean beaches, such as shore birds, that will need to be assessed.

If you require any further information, please contact me on (02) 8437 4981.

Yours sincerely,



**Sarah Conacher**  
Fisheries Manager, Coastal Systems