

Draft Upper Owens River Water Management Plan Form for responses to Prescriptions

#2953123

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The Upper Owens River Water Supply Protection Area (WSPA) Consultative Committee would like to receive your response to the management rules (Prescriptions) contained in the Draft Plan. This form can be used for responses or alternatively you may wish to write your own letter.

You can comment on the groups of prescriptions for each section of the Draft Plan, such as Restrictions on Taking Water as a whole, or against individual prescriptions. You may also wish to rate your opinion of the prescription using the rating options below. Additional recommendations may also be included for consideration by the Committee.

Rating Options

1. I support the proposal
2. I support the proposal but suggest changes
3. Neutral
4. Not sure and need more information
5. I do not support

Please add further comments if required by simply attaching them to this form.

Prescriptions - Management Zones (Page 30) Rating 1 2 3 4 5

Comments:

Prescriptions - Restrictions on Taking Water in Management Zone 1 (Page 34) Rating 1 2 3 4 5

Comments:

This constitutes that 9 out of 10 summers irrigators would be on level 2 restrictions

Prescriptions - Transitional arrangements for Zone 1 Groundwater (Page 38) Rating 1 2 3 4 5

Comments:

Prescriptions - Restrictions and prohibitions on issuing take and use licences (Page 41) Rating 1 2 3 4 5

Comments:

Prescriptions - Restrictions and prohibitions on issuing works licences (Page 43) Rating ① 2 3 4 5

Comments:.....
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Prescriptions - Transfers within Management Zone 1 (Page 46) Rating 1 2 3 4 ⑤

Comments:.....
This is discriminatory to upper valley water users, it leads to a bias market in favour of downstream users. The market is thus regulated to not allow free trade of water to all potential and efficient users of this resource.

Prescriptions - Transfers between Management Zone 1 and 2 (Page 47) Rating ① 2 3 4 5

Comments:.....
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Prescriptions - Domestic and Stock Transfers (Page 47) Rating ① 2 3 4 5

Comments:.....
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Prescriptions - Licence Transfers into the Protection Area (Page 48) Rating ① 2 3 4 5

Comments:.....
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Prescriptions - On-Property Licence Transfers (Page 48) Rating ① 2 3 4 5

Comments:.....
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Prescriptions - Off Property Licence Conversions (Page 50) Rating 1 2 3 4 ⑤

Comments:.....
Again this plan fails in protecting ground water licence holder. The plan agreed that connectivity is very strong between surface and ground water. Yet does not allow the licence to be transferred or converted to the same.
Upper valley land holders are again disadvantaged.

Prescriptions - On-Property Licence Conversions (Page 50) Rating 1 2 3 4 5

P3

Comments: Discriminatory to upms valley land users - 20% loss if transferred down stream. 100% loss moving a licence up stream within the Management Zone 2. Zone 2 is under state gov't control how can a licence be transferred there?

Prescriptions - Meter Installation (Page 52) Rating 1 2 3 4 5

Comments:

Prescriptions - Meter Reading and Accounting for Use (Page 53) Rating 1 2 3 4 5

Comments: Estimation made by the corporation is arbitrary and can lead to disputes, what rights does a licence holder have in respect to volumes estimated by an officer of the corp. if a dispute arises?

Prescriptions - Monitoring (Page 56) Rating 1 2 3 4 5

Comments: No monitoring sites between Bright and Harrietteville? Why is this so as it is an important stretch of waterway.

Prescriptions - Revocation of the Permissible Consumptive Volume (Page 57) Rating 1 2 3 4 5

Comments: Enterprises have been developed along side their groundwater extraction licences, at a cost to the business. This plan will severely effect the enterprise's return on investment, divalve their property, and loss of income.

Prescriptions - Review of the Plan (Page 58) Rating 1 2 3 4 5

Comments:

Additional Comments - Additional comments can be attached

As a long term irrigator, 40+ years, I have observed the relationship with river flow and groundwater level. The valley in my location SMOHO is consolidated sedimentary rock, most dragline holes sites a well above the river and the small spring water entering these holes come from deep fractured rock, above the valley floor.