



NORTH EAST
CATCHMENT
MANAGEMENT
AUTHORITY

Your Reference:

Our Reference: 140 011 000

30 April 2002

Project Manager VRHS
Catchment & Water Division
Dept of Natural Resources & Environment
PO Box 500
East Melbourne Vic 3002

Dear Project Manager

Re : Comments on the draft VRHS

Thank you for the opportunity to comment on the draft Strategy. The document provides for the preparation of strategic regional strategies and direct for future management. This is to be commended.

We look forward to working with DNRE to determine options for the management of the Ovens River to present to the Minister.

Please find our comments outlined below.

Ecologically Healthy Rivers pg 8 & 9

The definition of ecologically healthy is a river which retains the major features and functioning of a river prior to European settlement and which would be able to sustain these characteristics into the future. We understand that this is an aspirational target/ or a vision but understand that not all rivers can achieve this status due to human intervention and use of the rivers.

It has been construed by members of the community that the Strategy is trying to make All RIVERS ecologically healthy and therefore attempting to take them back to pre European settlement. The vision for Victoria's rivers on pg 9 in the blue box states 'our rivers' will be ecologically healthy, managed within healthy catchments. In actual fact it is only the representative rivers listed in Table 5.1 that we are attempting to met the definition of ecologically healthy. This is mentioned in the document but needs to be up the front in the document.

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It is confusing to the reader when in other sections of the document talks about management and preventing transition from one state to a less desirable one rather than restoring the system to its original condition.

3 major planks of management approach

pg 10 & 41

- establishing policies for specific management activities aimed at preventing damage to river health from future (add) DELETERIOUS management activities.

Figure 2.3 Preliminary classification of river regions for Victoria pg 31 should be linked in the text to Table 5.1 Interim river regions and suggested representative rivers on pg 49.

Representative Rivers

Table 5.1 pg 49

RR3 and RR4 may not suitable. We need to understand the process for choosing these sections.

The area titles are also a bit misleading eg Ovens as North Central midlands & floodplain.

We support protecting the best however returning them to the pre European status can only occur where uncleared public land exists (ie land that hasn't been substantially impacted on already). Representative rivers can be used as benchmarks to measure the environmental improvement.

Regional River Health Strategy

Pg 54 The Regional River Health Strategy will:

Section 6 It is unclear from our waterway manager's session on the VRHS exactly what level of detail is required in the regional document as there was discussion about not including the 'actions plans' as part of the document, but having it as supporting information. This is contrary to the text in the box. This needs to be clarified.

It is also unclear how waterway management plans relate to the regional RH strategy.

Section 4 Cost/benefit

It is difficult to include quantified environmental aspects in a cost benefit analysis, as they are difficult to determine. Direction on this needs to be provided for statewide consistency.

It should be acknowledged that the cost benefit analysis is not giving a definitive answer to the prioritisation process but provides one element of it.

Stressed Rivers

Pg 75 Are stressed rivers known for the State? If they are they should be listed.

Recreational Plans

Pg 99 CMA's will develop recreational plans for riparian areas of high value with heavy recreational pressure.

This is not seen as core CMA business and not an activity the NECMA would be interested in doing.

Incentives for restoration of adjoining riparian lands

Pg 100 Blue box at bottom of the page

Incentives will be offered subject to funding.

Crown Frontage

Pg 101 Blue box at bottom of the page, transfer of management of Crown Frontage.

The CMAs collectively have said that they would not be prepared to sign off the relevant schedule of the Operating Agreement for the transfer of management of Crown Water Frontages (CWFs) from DNRE to the CMAs unless there is an adequate level of resourcing tied with that transfer. The Crown Water Frontage Working Group identified that through the regional reviews of CWFs an additional amount of between \$2.5M and \$3.0M would be required to manage CWFs.

Miscellaneous**DSS model**

This model should only be used as a tool to assist with decision making on where works would be advantageous. This alone should not be used as a means of allocating/justifying funding.

Floodplain Management

Floodplain management should not be funded from tariff replacement dollars it should be funded through floodplain initiative funding.

If you require further information please contact Ms Veronica Lanigan- Manager Water Programs on (02) 6055 6133.

Yours sincerely



John Riddiford
Chief Executive Officer