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Comments on Guide to Proposed Basin Plan
Supplementary Comments - 11th February 2011

I would be pleased if the below comments were accepted, which are additional to my comments dated and emailed 20/12/10.

RIVERS : FUNCTIONING SYSTEMS

I have noted further recent public comments, that propose that environmental flows facilitated by infrastructure, are a complete alternative to wide- spread over bank flows.

This proposition is wrong.

Ours rivers need regular over bank flows to facilitate riverine health, including recruitment of fauna and flora.

Infrastructure flows alone, will not provide the sufficient area of inundation required to generate riverine health along our river systems.

The area of floodplain inundated is very important. The volume of water available for environmental water is also very important. It is these two elements that can produce sufficient volume of recruitment and maintenance of fauna and flora.

Environmental flows can be effective if they are timed to piggyback onto naturally occurring flow events, a practise already proven.

Different reaches of our rivers will have differing opportunities to benefit from environmental, a feature which should be included in environmental flow plans. Regional knowledge and participation should also be included in plans.

We must use this opportunity to improve the health of our rivers, for all stakeholders.

Infrastructure induced flows will serve to maintain pockets of riverine health, to attempt to ensure that those defined areas survive until the next over bank flow. They best attempt to defensively maintain those areas as small refuges for fauna and flora. The late Peter Cullen commented that total focus on icon type sites will result in a few museum pieces along rivers.

Infrastructure induced flows are an excellent part of environmental flows, but are only a part and are not a complete alternative.

Both are needed.

Barrie Mac Millan
11th February 2011