

Re: FPH - final modelling results for Border Rivers and consultation approvals process

From: Dan Connor
To: Richard Beecham
Cc: Peter Hyde; Vanessa O'Keefe; Emma Solomon; Kristanne Andersen; Beth Overton; Frances Guest; Aaron Walker; Linda Holz; Danielle Baker; Kaia Hodge
Date: Thu, 03 Sep 2020 09:04:19 +0000

Hi Richard,

I suspect that any apparent underuse in GS and supplementary in the Macquarie valley will quickly disappear when we restrict FPH back to its component of the plan limit. In this context ANY Infrastructure proposal that increases reliability will likely result in growth that will then need to be controlled by reducing allocations i.e. giving with one hand and taking with the other. Not a good look in my opinion. The space for consideration of these matters is RWS and this needs to be kept separate from the FPH licensing process or we will never finish it!

To the key question, there are two options for Border Rivers:

1. A 12% impact on FPH to control growth in FPH and get total diversions well within WSP plan limit tolerances (1% when trigger is 3%) - proposed option
2. A 20% impact on FPH such that total diversions are restricted to the Plan Limit (zero growth) - this would mean that FPH is bearing the full brunt of growth across all licence categories.

I'm happy to test this with the MO but am pretty sure I know what answer we will get.

Thanks

Dan

Sent from my iPhone

On 3 Sep 2020, at 6:18 pm, Richard Beecham wrote:

Hi Dan

I know we talked about this earlier today with Linda, interested in the interpretation of the policy. This was still not clear to me when I drafted first version of scenario report, but the actual results are starting to crystallize this.

LTAEL compliance rules

Floodplain harvesting licence share components and water account rules in water sharing plans will be determined so that over the long term total water extractions comply with the LTAEL.

New rules for assessing compliance with the LTAEL will be included in water sharing plans to ensure that if there is growth in floodplain harvesting, it does not impact on other categories of licence and vice versa. In other words, growth above the LTAEL that is attributable to floodplain harvesting will result in reductions to floodplain harvesting licences only, and vice versa."

Standalone, the first sentence implies that the FPH entitlements will take the total diversions to Plan Limit, but the second part provides for a different response. I can see the sense in the second part, but this goes to broader LTAAEL compliance, which is still a body of work we need to get set up to do right. Noting the amount of work Linda has indicated we still need to do.

This has come up in discussions of WaterNSW's Macquarie River Re-Reg weir proposal, which they were looking to take advantage of underuse where current < BDL. If growth in FPH is allowed to be offset against this underuse, then this diminishes the value of their proposal. So, decision to reduce FPH only to FPH Plan Limit levels, or to total diversions to Plan limit levels – we need to think about this carefully.

Regards
Richard
Richard Beecham
Manager Water Modelling

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From: Peter Hyde
Sent: Thursday, 3 September 2020 3:42 PM
To: Dan Connor; Vanessa O'Keefe
Emma Solomon
Cc: Kaia Hodge; Richard Beecham
Kristanne Andersen
Beth Overton
Danielle Baker; Frances Guest
Aaron Walker
Subject: RE: FPH - final modelling results for Border Rivers and consultation approvals process

Dan

Thanks for that. How do we sit with demonstrating to the MDBA that the SDL is met using the same plan limit condition of 38.7GL? Has that modelling been undertaken? We will need to be able to demonstrate this and I assume it will be a question asked by more informed stakeholders.

Regards

Peter Hyde
Director Inland Water Planning

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From: Dan Connor
Sent: Thursday, 3 September 2020 3:24 PM
To: Vanessa O'Keefe; Emma Solomon
Cc: Kaia Hodge; Richard Beecham
Kristanne Andersen
Beth Overton

Peter Hyde

; Danielle Baker

Frances Guest

Aaron Walker

Subject: FPH - final modelling results for Border Rivers and consultation approvals process

Hi Vanessa/Emma,

I wanted to give you a heads up on how the final modelling results for the Border Rivers are landing, in summary:

- * Total LTA annual diversions under current conditions (206.1GL) are 3.1% above the Plan Limit (200GL)
- * Floodplain harvesting LTA annual diversions under current conditions (43.6GL) are 13% above those under the Plan Limit conditions (38.7GL)
- * We will be imposing a 12% impact on individual FPH properties to offset the growth in floodplain harvesting (reduce it from 43.6GL to 38.7GL)
- * The restriction in floodplain harvesting will cause some compensatory growth in GS and supplementary take over the long term (increase from 161.3GL to 164.2GL)
- * The nett result post FPH licensing is that total LTA annual diversions under current conditions will still exceed the Plan Limit by 1% (202.2GL instead of 200GL) - however this will not trigger a growth-in-use for supplementary licences under the WSP provisions (needs to above 3%)

Let me know if you would like to unpack these results further and I will tee up a briefing. Please note that the final peer reviewed model reports for the Border will be completed by COB Friday 11 Sept.

For broader context, we are anticipating public consultation on draft Border Rivers WSP rules supported by modelling and other technical reports to commence on 20 October.

RWSOG will consider the Border FPH WSP rules on 11 Sept with the formal approval process of the complete package (including technical reports) commencing shortly after. Can you please confirm whether you would like to be included in the workflow for endorsement?

Note that we are in the process of teeing up pre-briefings with Jim and the Minister between 17 Sept - 25 Sept to assist in the approvals process.

Thanks

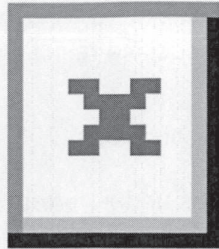
Dan Connor

Director, Healthy Floodplains Project Delivery

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