



**Chairman**

John Green, Phone 07 362 4204

**Secretary**

Ann Green, Phone 07 362 4204

53 Te Akau Road, RD4, Rotorua 3074

**Treasurer**

Marcel van Leeuwen, Phone 0274 542098

313B Millar Rd, R D 5, Rotorua 3076

**Website**

[www.lakeswaterquality.co.nz](http://www.lakeswaterquality.co.nz)

21 April 2013

The Chief Executive  
Bay of Plenty Regional Council  
P O Box 364  
WHAKATANE 3158

**SUBMISSION DRAFT ANNUAL PLAN 2014/15**

The Lake Water Quality Society wishes the following submissions be taken into account before adopting your Annual Plan.

We wish to be heard in support of this submission.

**Sustainable Land Management Activity:**

**Okataina**

The activation of your Action Plan will assist in achieving the desired TLI and our ability to monitor progress. We are supportive but submit that some of your actions are inadequate.

We support your proposal to carry out trials for a new wallaby bait.

The wallaby issue and the destruction of the understorey we believe to be the fundamental driver for the degradation of Lake Okataina and other lake environs. We submit that you should provide more funding so that a full wallaby eradication programme can be started as soon as the trial has been concluded. The wallaby issue of course is far wider than just Lake Okataina.

We note that you are proposing to manage hornwort in Lakes Okataina and Okareka. This is a disappointing position when you should be attempting to eradicate it. We have requested on a number of occasions that the chemical Endothall is used in an eradication trial, we understand there has been some success in the South Island. We submit you should be eliminating hornwort in these lakes.

**Rotorua Lakes Programme**

We are supportive of the "*operative P-locking plant in Puarenga and Utuhina Streams in the Lake Rotorua catchment, and at Soda Springs in the Lake Rotoehu catchment.*" The clarity of Lake Rotorua has been outstanding this year. The P limited state of the lake is believed to be the fundamental driver. Our concern is that whilst this is a possible short to medium term intervention, we have been unable to understand if this is a possible long term remedial action. We urge Council to do some basic research on this.

We support all four key objectives for 2014/15 year on Page 46.

- Lake Okareka Action Plan
- Tikitere de-nitrification
- Alum Dosing of four priority lakes
- Renew Lake Okareka outlet structure

### StAG

We support the allocation of adequate resources to allow the conclusion of this work and the implementation of a scheme under a CCO.

### OSET

The Society supports the general proposal of allowing the purchase of nutrients in return for the granting of a consent to retain existing septic tanks. We are confused in what the financial contribution is and when it is applicable. There are conflicting statements which will potentially undermine its credibility and are misleading. Your Draft Annual Plan provides a very simplistic overview and does not identify the range of contributions possible.

The letter to Ratepayers dated 28<sup>th</sup> March 2014 from Eddy Grogan, Deputy CE & GM Environmental Management, is contrary to some of our understanding. In the first three bullet points –

- *“Connection to reticulation where it is available, or*
- *Upgrade their septic tank system, or*
- *Keep their existing septic tank system and make a one-off payment to the Regional Council who will use the payment to reduce an equivalent amount of nutrients getting into Lake Rotorua.”*

All three of the above are options. It is our understanding that if reticulation is available, or proposed, it is **“a must”** and there is no other choice. If our understanding is correct, you urgently need to inform the community properly, alternatively we submit that it would undermine any proposed reticulation for sewerage and strongly oppose it.

The contributions which range from \$524 to \$10,512 per household is based on \$400 per kilogram of N and there is no consideration of P. The following points are made -

- The \$400 per kilogram for N is inadequate. All the low value N is likely to be absorbed within the 100 tonne nitrogen purchase programme for the Rotorua Lakes. Once these “low hanging fruit” have been bought, the realistic cost is likely to be substantially greater and we would submit that this should be at least \$600 per kilogram.
- Where septic tanks are in close proximity to the lakes or there is a high water table, P is unlikely to be attached to soil particles and will enter the lake. In establishing the value, there has been no consideration of P. If the Lake Rotoma Sewerage System does not proceed, that lake is P limited and it is inappropriate to allow the retention of the septic tanks and not set a system that disregards the value of the element you wish to restrict.

### GORSE

We urge Council to expand the gorse programme from Rotorua to include the other 3 priority lakes being Rotoiti, Rotoehu and Okareka.

### DIVERSION WALL

There is ongoing debate about reflux and we request Council consider the installation of a simple monitoring station on the wall end to identify if it is occurring. This will greatly assist in confirming the benefit of the wall and allow a better understanding of the speed at which lake levels can be lifted.

**John Green**  
**CHAIRMAN**