

SUBMISSION ON
ORANGE DROUGHT RELIEF CONNECTION
MACQUARIE RIVER TO ORANGE PIPELINE PROJECT

Application Number 10_0235

Attention: Belinda Scott
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SUBMISSION:

I object to the Project.

I OBJECT TO THE PROPOSED PIPELINE FOR THE FOLLOWING REASONS:-

- The Project seems to be driven by the availability of Government funding, not by its merits.
- Water is available from aquifers (basalt and limestone) to the South of Orange. Their altitude (approx.950m and 830m respectively), distance from

Orange's water storage (approx.15km and 30km respectively), the quality of the water and the existing infrastructure (power, bores) mean the capital and operational costs would make this water more economically feasible and environmentally sustainable than the Macquarie River Pipeline.

- The Pipeline will increase the spill from Suma Park Dam by 1300ML/year on average (p.81/139 4.3.7.3). It is not economically or environmentally sensible to pump water from the River then let it flow back to the River.
- Orange needs more water storage. Suma Park Dam was built in the 1960's when the population of Orange was in the 20,000's. The population is now approximately 40,000.
- In times of drought, Burrendong Dam would offer more reliable water storage than the River. A Pipeline from the Dam would have regional benefits for surrounding villages.
- The Orange Stormwater Harvesting infrastructure is not being fully utilised.
- The soil at the Northern section of the Pipeline Project is shallow and fragile, and the terrain very steep. If disturbed by trenching, blasting and heavy machinery, erosion would be a big concern.

VOLUME 2. APP D

HYDROLOGY and WATER SECURITY (Geolyse)

My concerns are for the River at times of low flow

- The EA states that the Geolyse model (Scenario B) used flow data for the years 2000 to 2009 only. This results in an 80th percentile flow of 22 ML/day (p 51/139 3.3.2.2 Figure 26).
If Geolyse had based their model on all the historical flow data (Scenario A) the 80th percentile flow would have been 90ML/day (p 51/139 3.3.2.1 Figure 25).
The advantage for the proponent is that by basing the operating rules on Scenario B pumping can continue until the flow is 22ML/day.
Based on Scenario A, pumping would have to stop at a flow of 90ML/day.
- Based on the 80th percentile flow pumping criteria for the years 2001-2009:-
 - Use of the Scenario B model would allow 30,480ML to be extracted

- Use of the Scenario A model would allow 19,488ML to be extracted
 - An average of 1221ML/year extra water extracted using Scenario B model
 - Using Scenario B model means more water is allowed to be extracted although the River is in a more stressed state (2001-2009)
 - In drought times this may be good for the proponent (more water for Orange), but it is the exact opposite of what is good for the River (no flow reduction in times of low flow stress).
 - Using the 80th percentile flow to determine the pumping criteria does not adequately take care of the River. There should also be a daily maximum limit of river flow (as measured at the upstream gauge station) that can be extracted. This daily extraction limit should not be 31.5% (p.59/139 4.3.2) but more like 7.5%.
- To justify their use of Scenario B, Geolyse state that run-off has decreased post 2000 as a result of a permanent change in land use.
 - I acknowledge that land use has permanently changed in some areas of Australia. Is there documented evidence that change in land use has been the cause of decreased run-off in this Upper Macquarie catchment since the year 2000.
 - Geolyse have used only 10 years of flow data on which to base their Scenario B model – these years included extensive drought conditions.
Is 10 years of data enough to be certain that the decrease in run-off was caused by permanent change in land use, not temporary climate conditions?
 - I am concerned that the unvalidated Scenario B model may be used as a basis for setting the pump operating rules, before it has been tested in all weather and watertable conditions.
- To ensure that pumping stops at the flow rate stated in the issued Licence, a continuous real-time flow monitor would be needed immediately below the off-take pump. The proponent has verbally assured me the flow rate of the River will be checked every 15 minutes, however I cannot see any mention of this in the EA.
- Have environmental (ecological) flows been determined for each month of the year for this section of the River to ensure that the 12/38 trigger (constant throughout the year) will not adversely affect the habitat and river passage requirements of each fish species and other river biota. The Low Flows set by the State Government may not be adequate for Environmental Flows.

- Will there be on-going biological monitoring programs to provide information on changes in the aquatic environment to ensure the water extraction is not adversely affecting the River species?
- The EA talks a lot about the water requirements of Orange, but very little about the water requirements of the River.
The River is a living entity, not a resource to be exploited.

VOLUME 4. APP I
NOISE and VIBRATION

My concerns are regarding Operational Noise.

The obligation of the proponent is to follow the guidelines of the NSW Industrial Noise Policy, however I feel this is not appropriate in this River location for the following reasons:-

- Currently there is virtually no industrial noise in this area except for the occasional overhead plane.
- The industrial noise from the pump is compared with the natural sounds of the environment (p.41/139 4.1). Those of us who live here find the natural sounds very pleasant regardless of how loud they are, however any noise at all from the pumps would be intolerable.
- The pump noise would be continuous, the environmental sounds are intermittent with silence in-between. These sounds are averaged over 15 minutes to arrive at a figure which is compared with the continuous noise from the pumps – this is unrealistic.
- The focus was on determining the noise level at the nearby dwellings. We do not want to hear the pump noise anywhere on our properties, not just near our houses.
The section of the River between the Fishing Hut and the Boshes Creek off-take point (1.6kms) is regularly used for recreation – fishing, bushwalking, canoeing, camping, swimming, relaxing, etc.
These activities would be ruined if the pumps can be heard.

- I live on the plateau above the River – normally I cannot hear the rapids in the River. However, in winter when there is a fog over the River (as is often the case), I can hear the rapids quite clearly.
Your noise monitoring occurred in November/December - did you adjust your results for the effect of winter fog?
- It is absolutely essential for those of us who value this remote area for its isolation and silence, that we hear no industrial noise from the pumps.
Given this, I believe it would be appropriate to use soundproofing insulation in the pump enclosures to ensure 100% that there is no noise emitted.
It is my understanding that this technology is inexpensive and readily available.

POLITICAL DONATIONS: Nil