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Objection to MacQuarie River Pipeline

There are plenty of alternatives that should be investigated before this.
This is a waste of government money to create a "white elephant". D. Hume

KEY POINTS:

1. The pipeline is not justified because it has been designed to supply an artificially high water demand. The proposal is based on "unrestricted" average daily water use of 404 Litres/person/day that is much higher than recent year's usage in Orange (225L/p/day) and for comparable targets for other towns/cities.
2. The pipeline will provide an average of 1616 ML/yr to Suma Park Dam (at a pumping cost of some $800,000/yr). On average 1300 ML/yr of this spills from the Dam back into the Macquarie River upstream of the pump site. The pipeline only yields about a net 300 ML/yr to Orange's water supply.
3. There are viable, alternative water sources which can better provide for Orange's water security, at a lower cost and which are far less environmentally damaging. Orange Council has selectively and unfairly dismissed these options.
4. The upper Macquarie River to be impacted by the proposed pipeline is significant habitat for the nationally endangered Trout Cod. Other threatened fish species found in this river reach include Murray Cod, Silver Perch and Catfish. The Environmental Assessment for aquatic ecology is seriously deficient in addressing the impacts on these fish. For example it visually examined only 500m of the 27+ Km of river to be impacted. The Aquatic Ecology reports states "The survey undertaken was not intended to serve as a baseline for impact assessment."
5. Orange Council has selectively used out-of-date advice on protecting unregulated river environments from the NSW Office of Water to justify the project. Council has ignored other policy requirements which could significantly impact on the operation, yields and the viability of the pipeline.
6. The proposed extraction of water from upper Macquarie River at low flows will disrupt fish passage and degrade important habitat values.

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7. Despite the release of the EA, Orange Council has yet to confirm the pipeline route to the river with 4 different locations still being considered, each with differing impacts and costs. This invalidates this significant part of the EA.
8. The pipeline route will destroy good condition roadside vegetation that provides important wildlife corridors and habitat in a highly cleared landscape.
9. The pipeline route with associated access road and power line will cause disturbance to highly unstable soil structures in very steep terrain, threatening landslides into the river.
10. A regional water supply solution, which services more than the needs of Orange, needs to be developed using state and federal grant monies in an ecologically sustainable manner.

BACKGROUND:

Orange City Council (OCC) has proposed to construct a 37km pipeline from the upper Macquarie River to Orange to supply up to 12 million litres (ML) of water per day to Suma Park water storage dam.

The water to be provided by the pipeline is based on an average "unrestricted" use of 404 litres per person per day (L/p/d). Recent domestic water use in Orange has been around 225 L/p/d. A more realistic water demand, inclusive of business and industry use, is between 300-350 L/p/d. This target would be similar to comparable targets for Goulburn of 337L/p/d and Canberra (302L/p/d) which have 30% less rainfall than Orange.

The Federal Govt has granted $20m and the NSW Govt, $18.2m, towards the pipeline. This money would be better invested in a regional water supply project that can also service the water needs of other communities in the area and that is ecologically sustainable.

Alternative water supply options unfairly dismissed by Orange Council include increased use of its innovative stormwater harvesting scheme, re-use of any of the current 3000 ML/yr of wastewater for non-potable purposes for the next 50 years and significant groundwater resources to the south of Orange. These sources are viable, less costly and have less environmental impact.

Fish impacts

The proposal plans to pump from a waterhole in the upper Macquarie River. The final site has not yet been determined as Orange Council is still considering options. This reach of the river to be impacted consists of rock bars and large pools and covers some 27+ Km to Burrendong dam storage. This part of the river provides good condition habitat for a number of threatened fish species and other water dependent species such as platypus. The Aquatic Ecology study for the EA only visually examined 500 m of one water hole and was totally inadequate. In fact the study states "The survey undertaken was not intended to serve as a baseline for impact assessment."

The section of the Macquarie River just upstream of Burrendong Dam is very environmentally sensitive and deserves high levels of protection. Native fish populations are abundant and diverse and the section is known as an important native fish breeding nursery site for the upper Macquarie River system. This section of river is home to large numbers of Murray Cod (Vulnerable species), Trout Cod (Endangered

species), River Blackfish (Endangered population), Eel-tailed Catfish (Endangered population), Silver Perch (Vulnerable) and is a site for re-introduction of Macquarie Perch (Endangered). Golden Perch are also common in this section of River.

The upper Macquarie River is one of three areas left in Australia where Trout Cod populations are surviving and is a significant site for the success of the national Trout Cod recovery plan.
The proposal to extract water at low to very low of 38 ML/day to 26 ML/d flows of 38ML per day, particularly in drought periods, will impact on the habitat in the pools and likely result in water quality deterioration which will adversely impact on aquatic life. At these flows it is possible to walk across the rock bars of the river and not get your feet wet!

Orange Council claims these are not "low flows" based selective use of an out-of-date Office of Water policy advising from 2002. This Office of Water advising was superceded in 2011 and Council's assessment of "low flows" is seriously deficient in meeting the 2011 policy requirements.

Flora and Fauna impact
The proposed pipeline route is through the highly cleared central tablelands where all remnant vegetation is significant, particularly for declining woodland bird and mammal species.

The final route has not been determined. Therefore, the environmental assessment of the pipeline proposal is incomplete and should not be approved on the information provided.

Slope Instability
The final pipeline route will have to ascend very steep, unstable terrain directly above the river. There is a history of natural landslides in the area. The easement will include an access road and power line to supply electric pumps. The threat of landslide and increased sedimentation in the river has not been adequately assessed. Orange Council has ignored the priority site advice of its Geotechnical consultant.

Despite the release of the EA, Orange Council has yet to determine the pump site and pipeline route to the River. There are major cost implications associated with this location as it will impact on the electricity supply costs, maintenance road construction and costs, and potentially the size of the pump and pipeline.

Urban Water Planning
OCC has not met the National Urban Water Management Principles adopted in 2008.[1]

Particularly Principle 3: Adopt a partnership approach so that stakeholders are able to make an informed contribution to urban water planning, including consideration of the appropriate supply/demand balance.

There has not been appropriate community consultation in the development of an Integrated Water Cycle Management Strategy.

[1] http://www.environment.gov.au/water/policy-programs/urban-reform/nuw-planning-principles.html