Orange Ratepayers' Association Inc

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Orange Ratepayers' Association Inc 9894091
Submission on the Macquarie River to Orange pipeline project/
Orange Drought Relief Connection
Ref. No: 10_0235

Summary of the Ratepayers Submission

- The Orange Ratepayers' Association maintains that there was no "emergency" to justify this project. The use of the 404 litres per person per day (l/p/d) is not valid in establishing a shortfall in water demand for Orange.
- Water Security issues should be considered with a Regional Integrated Water Management Plan outlining a more purposeful approach.
- The Orange Ratepayers Association feels that this project is not feasible on environmental and economical grounds.
- OCC should proceed to use the current available sourced water more efficient. OCC should take immediate action to utilise the award winning Stormwater Harvesting Scheme and the dual water system in securing water for Orange.
- Suma Park Dam requires an urgent safety upgrade to secure the main storage dam for Orange
- Concerns regarding the quality of the water extracted from the Macquarie River
- The central issue for water in Orange is associated with the water balance between Cadia Valley Operations, Summer Hill Creek water users and the dual water system in Orange.
- The loss of existing habitats for threatened flora and fauna can't be justified by the implementation of this project. The Association can't comprehend how any proposed offsets could replace the existing habitats that are destined to be destroyed by this project.
- The Association believes that it is inconceivable that OCC would contemplate the project knowing that there are numerous Fish Recovery Plans in progress along this section of the Macquarie River.
- The proposed EA doesn't satisfy the Commonwealth's additional requirements for a "Controlled Action". The use of annual water flows in the EA for Macquarie River is not valid.
- Orange could satisfy water demand by better management and agreements.
- The project requires a firm updated cost analysis before adopting to proceed with the project.
- The Association would strongly suggest that the State appoint an independent manager for the project.
- The Association asks the State to limit Orange City Council's liability to 12 million dollars because the ratepayers could not afford to meet major cost overruns.
- Starting a long term Regional Solution would be a better use of available funds.
- The State and Orange Council should adopt a better drought relief measure to ensure water supply during dry periods.

Orange Ratepayers' Association Inc
Submission on the Macquarie River to Orange Pipeline Project
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OBJECTION TO THE PROPOSAL

Background

Orange Ratepayers' Association is fully supportive of securing water for Orange. The Association extends this support to the Region in the endeavour to achieve a much better outcome, using the limited available water.

Every region in Australia experience extended dry periods and Council should have been prepared with their planning for these periods. The Association expressed their concerns to OCC and the Taskforce in regard to the fact that OCC didn't have an Integrated Water Cycle Management (IWCM) Plan established before proceeding with proposed project. This made it difficult to assess the usefulness of the project. Council adopted the project," business as usual", into their developing IWCM and thus didn't allow for any discussion on this important project. It appears that the project was justified by this adoption after being earlier proposed by OCC. The Ratepayers' Association maintains that there was no "emergency" to justify this project.

The Murray-Darling Basin Plan in conjunction with Water Sharing Plans give a clear indication that "Water Issues" have wide spread implications and considerations. These implications and considerations should be under review with this proposed pipeline project.

Centroc Water Security Study, Component 2: Options Paper Final A11600801 29th Oct 2009 gives a good deal of worthwhile information on which the Association utilised in forming a critical assessment of the proposed pipeline project. "The construction of the pipeline connection between Orange and the Macquarie River" is listed as such under "Contingency actions for Emergency Situations" (p9). This amounts to a very brief mention of the project in a creditable report. The Association will question the criteria by which the emergency solution became a viable long term solution to the perceived problem.

It is difficult to understand that Orange was in an emergency water situation at the time of announcing this project in (about) July 2010. The Orange water storage levels were approx. 23%, nearly 2 years supply. The Orange situation was very different to Goulburn that had only a few weeks supply in the early 80's drought. Unfortunately for Goulburn, their situation continued for decades. Goulburn benefits because it has secured water from a dam storage system. Yes, we do see a need to be prepared for a long dry period. How to prepare for a drought involves some further investigations.

In 2007, the then Orange Mayor assured Orange residents that the Storm Water Harvesting scheme could produce 200 days/year water supply for Orange. If this project had been completed and fully utilised at the time (2009/2010) the water storage levels for Orange could have remained at more than 50%. After substantial investment in the Storm Water Harvesting scheme, it is not fully functional due to a number of reasons.

In this period (2009/2010) there was a great deal of publicity regarding water restrictions in Orange.

This publicity did create a deal of anxiety in the Orange community, unwarranted in the Association's opinion, to a level where Universities were conducting surveys in regard to community stress levels. It was perceived, unduly, by the community that there was a disastrous water problem in Orange. Everyone desires water security but was this publicity campaign a means to gain political and financial support for the project?

August 2010, saw the Orange water storage fill to capacity and remained at near capacity to date. A 2 year period when Orange would not have required any water supplied via the proposed pipeline. Orange currently has approximately 5 years of water in storage making a total period of at least 7 years without a need for water via the proposed pipeline. The operational costs for the pipeline for this 7 year would approximate $10 million for the rate payers of Orange.

Orange currently has substantial infrastructure in place with the stormwater harvesting scheme and the dual water supply system. This investment by Council would be approximately $20 million. This infrastructure is sitting idle. How much does the State and Commonwealth desire to invest in underutilised infrastructure?

The Orange Ratepayers' Association feels that this proposed pipeline project would be damaging both environmentally and financially to the community. The association will establish that Orange is water secure for the foreseeable future with a few changes in the management of existing water sources. There are better options available for securing water for Orange that the proponents have not fully explored.

For many years developers have been required to install dual water supply infrastructure in new development areas by OCC. Developers have invested substantially in this dual water system. This system, although in place for approximately 15 years, has not been used for the purpose of saving drinking quality water by using wastewater in the system. The "gap" could be reduced substantially if the dual water system were used for its designed purpose.

Mining Water Shortfall

Cadia Valley Operations (Newcrest) are substantial users of water. Cadia currently consumes approximately 125 megalitres (Ml) per day, while Orange City consumes approx. 9 to 10 Ml per day. Cadia sources approx. 9 Ml of waste water from Orange Treatment Plant when required by the mining operations. Cadia does have numerous water sources and recycles a deal of water but still requires some 50 Ml of new water daily. This is approximately equivalent to the combined amount of water consumed by Orange, Bathurst, Dubbo, towns in the Cabonne Council LGA, Blayney and Cowra daily. Cadia in taking the wastewater from Orange does impact on Orange's water supply because the wastewater can't be used in the dual water system.

The water demands of Cadia and any other future mining operations can't be secured by this proposed 12Ml daily pipeline operating 153 or up to 340 days per year. The installation of this pipeline may, in fact, hinder more worthwhile water projects for the region by diverting funds to a questionable project.

Proposed Operation of the pipeline

Most reasonable thinking people would suggest that when water is required from the Macquarie River in drier times is the very time when there are low flows in the river. At a recent open forum, one person suggested increasing the size of the pumps in order that more water could be extracted in times of higher flows. Apparently this is not feasible within the current budget for the pipeline, because it would involve substantial increase power costs. The cost of supplying power and the level of power (11KVA) appears to be marginal at best.

The proponents, in the EA, state that the landholders will not be able to take advantage of the proposed update power supply. This may further indicate that the power supply is marginal on the 11 KVA supply. The cost of installing additional regulators or upgrading the power supply to 22KVA would introduce a substantial increase in the coast of supplying power to the pump site.

The Ratepayers' Association is concerned with the continuing usage charges for power. The Association, beliefs that electricity costs could exceed the Council's suggested $750 000 annually (on average?). This will impact on the cost to ratepayers for any water delivered.

Pumping water from the Macquarie River to Suma Park Dam, Orange's major water storage dam, will introduce further complications. One existing problem relates to the safety requirements of Suma Park Dam. The NSW Dam Safety committee requirement is one in one million (1 in 1 million) year event whilst Suma Park meets a one in two hundred event (1 in 200). If we were to compare the existing safety level to the required safety level: Suma Park Dam meets the current safety level requirement to one in five thousand (1/5000). This is less than 1%, actually 0.02% of the current safety requirements. The Association would like to see the safety upgrade to Suma Park Dam proceed before entertaining the proposed pipeline. This safety upgrade of Suma Park dam would be a better means of securing Orange's water supply, it may ensure that the supply remains in existence.

It is proposed to deliver water to Suma Park when its water level is at 90% full. The proponents admit that this action will result in more spills from Suma Park Dam to Summer Hill creek and eventually back to the Macquarie River pump site. This will further alter the flow regime in Summer Hill Creek. More important, it will have an impact on Orange's water allocation entitlement because the water already pumped from the Macquarie would be counted against the allocation and eventually not required. The induced spills will effectively reduce the current water allocation for Orange. Clearly, the opposite result to that the proponents were trying to achieve by pumping water from the Macquarie River. Orange Ratepayers' do not want to see water recycled in this manner.

Maintaining the water level at 90% plus could indicate that OCC do have concerns in regard to the quality of water coming from the Macquarie River. The Association shares this view because approximately 9Ml of the 38Ml flow would be wastewater from the Bathurst treatment plant. (see D.M letter). A report from the NSW Health Department could be beneficial in this matter.

The proposed trigger point, 38 Ml, for commencing pumping from the Macquarie River is far too low in the Association's thinking because of the detrimental affect it would have on the aquatic ecology of the River. The Association would suggest a trigger point to be 300 Ml daily plus minimum flow before commencing pumping. This measure will offer greater security of survival and breeding for the fish in the river.

It must be noted that if Suma Park Dam is 90% full, Orange would have approximately 4 years water supply in storage. It is difficult to see the need to pump addition water into the Dam under this

condition. If this additional water then spills it would make any water supplied via the pipeline very expensive.

This strategy of maintaining Suma Park Dam at or above 90% full will negate the ability of OCC to use the Blackmans Swamp Creek stormwater harvesting scheme. The operating condition that the scheme can't be used until Suma Park Dam is less than 50% full. The two projects are currently at odds with each other. This situation is due to the complication surrounding the transfer of wastewater to Cadia and the effect that has on environment and irrigation water in Summer Hill Creek.

The Association could anticipate that groundwater could be seriously impacted on due to the construction of the pipeline. This would be the case on the steep slopes and basalt plateau adjacent to the pump site. The existing shallow aquifers and wetlands could be impacted upon (if not destroyed).

Matters relating to groundwater should require further investigations to determine the exact impacts on groundwater.

Terrestrial ecology

"The main potential impacts of the project on terrestrial ecology would occur during the construction phase as a result of clearing of vegetation and direct habitat loss and modification" page xiii EA Executive summary

The Association deplores the anticipated loss and fragmentation of threatened Box Gum Woodland by this project. The loss of potential habitats for threatened flora and fauna can't be justified by this possibly dubious project.

The proposed pipeline is 37 Km in length, the 1m wide trench would cover an area of 37000 sq. m (3.7 hectares) and the 6m wide pipeline corridor would cover an area of 22.2 hectares. How can the proponents justify the "permanent removal of 19.5 hectares of native vegetation"?...summary p xiii

The Association can't comprehend how any proposed offsets could replace the existing habitats that are destined to be destroyed by this project.

Aquatic ecology

The Aquatic Study and investigations into the impacts of the project appears to be inadequate. This is self evident in the EA summary p xiv, "three threatened fish species listed under the EPBC Act…….. were identified as potentially occurring within the study area." This statement not only appears to be inadequate but inaccurate as well because local anglers have reported catching (and releasing) Murray Cod and Trout Cod at the take off point.

The reports being inadequate were fully expected because the Cardno consultant said as much at a meeting at OCC on the 17th November 2011. She stated that the study would only be a "snapshot" and not in the" detail required" because of the "timeframe" constraint. The aquatic life of this section of the Macquarie River deserves some serious well documented studies before considering this project. This is clearly indicated in the Commonwealth's "Controlled Action" and the additional DA requirements set to be met before approval of this project. OCC, it would appear, fails to meet these requirements in their EA. There is no history of studies of the ecology of this river section over time. There is no basis on which to judge any impacts or changes.

There is the potential that the construction at the pump site and coffer dam could do serious damage to Gardiners Hole and downstream by introducing silt and sediment to the river. The Association would suggest that the chance of this is too great and a precautionary approach should be evoked to protect the river environment.

There has been a recent Government assisted program to re-snag the Macquarie River near Dubbo to improve the river habitat for native fish. The proposed take off pipe would act as a snag and encourage native fish to congregate near it, possibly endangering their existence.

The Ratepayers' Association believes that it is inconceivable that OCC would contemplate the project knowing that there are numerous Fish Recovery Plans in progress along this section of River.(Refer to Orange and Region Water Security Alliance Position Paper)

Further REVIEW OF THE ENVIRONMENT ASSESSMENT

In reviewing the information set out in the proponent's Environment Assessment, the Association has numerous concerns. These concerns are in regard to (but not limited to) the construction costs, operating costs, the need for the pipeline, the impact on the aquatic ecology and other environmental issues, Orange City council's ability to project manage the project.

Need for the Pipeline

1. Shortfall in water

   Orange City Council (OCC) maintains there is a serious shortage in the water supply for Orange. The Association would question the accuracy of this "gap" because of the methodology used to obtain the suggested shortfall. Council used a daily water consumption rate of 404 l/p/d (litres per person per day), which is at odds with current water consumption figures that equate to approximately 250 L/P/D. (see……) The 404 is based "on the maximum consumption with unrestricted water use". This does not reflect the current water situation in Orange.

The community has benefitted from water conservations measures adopted by Council and residents. The measures include showerhead replacement, water restrictions/ demand management and leak detection. The community have adopted a more conservative approach to water consumption only to suffer increase water availability charges by OCC. It must be noted that in some instances this increase amounted to an increase of approx. 67% on the availability charges in the years 2009 to 2011. The Council should be congratulated on the efforts to conserve water but shouldn't assume that residents would immediate resume their "unrestricted" water use to create the "gap" if given the chance.

Orange is currently on level 2 water restrictions whilst the water storage levels remain at approx. 100%. This is a worthwhile demand strategy by OCC, which will have implications on the "gap" in the water supply. Orange has been on water restrictions for a number of years and the Council informs the community that they will be "permanent" in the EA. The Association questions the validity of using any of the rules 5/10/10 or 5/10/20 to establish the "gap". Council's information in the EA doesn't reflect accurately the water situation current experienced in Orange. The Association feels that the stated shortfall cannot be substantiated by the facts. This inflated shortfall gives reason to question the entire pipeline proposal.

Hydrology and Water Security

The use of average annual flows is misleading because the "mean" or average can be easily skewed by high flows. A case in point, when Burrendong Dam filled within a few days (3 or 4) in the mid 80's after the dam was near empty. A better measure for evaluating the daily flow rate would be the "median" daily flow rate. The condition that OCC could pump from the Macquarie River when flows were above the median daily flow could be considered. This condition would limit the affects of the extremes in flow rates. A report on the median daily Macquarie River flows for the years 2000 to 2010 would be a helpful guide, in the Association's opinion. It would be of interest to know the time of year and the number of days when the actual flow is below the median.

The use of average annual flow rates by the proponents does not satisfy the concerns of the Commonwealth in regard to flow rates. The Commonwealth and the Association desire to establish the impacts of extracting water on the actual flow in the River at the time of extraction. (refer to Controlled Action additional DA requirements)

OCC has taken into account the expected decrease in "secure water yield " by allowing a 26% decrease for climate change. Is it possible that Climate Change and other factors could decrease the future flow in the Macquarie River by a greater percentage? This may impact on the viability of the project.

The proponents by using data relating to River flows for the past 118 years maybe presenting a distorted impression of the current flows in the Macquarie River. In adopting this period for investigation lessens the affects of recent additional demands on water from the Macquarie River due to population increase, irrigation/agriculture use, industrial use and diversions of water to other catchments. It would not correctly reflect the diversion of approximately 9Ml daily of water from Orange to Cadia via the treatment plant. The flow rate of the Macquarie River has been decreased (approx.) by this amount for the past 14 years. Summer Hill Creek is affected directly by this diversion.

The purchase of an option on an upstream (of the proposed take off point) irrigation licence may require some further investigation because of the possibility that it may be a "sleeper" licence. If OCC were to activate a "sleeper" licence it amounts to taking additional water from the existing flow in the Macquarie River. The Murray/Darling Basin Plan may make it difficult for OCC to activate a "sleeper" licence, if that is the case.

Alternatives and enhancing existing Water Sources

The Stormwater Harvesting Scheme presents the most encouraging means to support the demand for water in Orange. The scheme fits nicely into Modern Urban Design principles. The system recognises that the "hard Surfaces" of cities do generate a substantial amount of runoff that have the potential to make cities self sufficient in water. The Orange experience demonstrates that "quality controls" are achievable in order to satisfy health requirements of obtaining water via harvesting.

Other advantages of extending the Harvesting Scheme include not requiring the pumping of water back from the Macquarie River (as suggested by this project) and saving the streams from the unnatural flash peaks in the local streams and the ensuring damage caused in streams by these extreme sudden flows.

The Stormwater Harvesting Scheme is not fully functional due to a number of reasons. The most important being the lack of agreement between the Summer Hill Creek water users, Cadia Valley Operations, Orange City Council and the NSW Office of Water, on water issues affecting the Summer Hill Creek. This problem has existed for the past 14 years, since the time the wastewater from Orange was diverted to Cadia. The diversion has affected the flow regime of the creek in that when Cadia requires water during dry periods the creek receives none of the wastewater that it had received since about 1918. To add to the problem the creek receives this wastewater when Cadia has sufficient water storage in wetter periods and so the creek is over loaded with water during this period.

Any "Study" or report into the condition of the ecology of Summer Hill Creek would confirm the environmental damage the transfer of the wastewater has on the Summer Hill Creek. It appears to the Association that the conditions applying to this transfer of wastewater have not been met for the past 14 years by Orange City Council.
(Proposed Effluent Re-Use Transfer System –Orange Sewage Treatment Works to Cadia Mine Review of Environmental Factors Part 5 Oct. 1996 Orange Library ref. LCKD 333.714 PRO Pages 25, 27, 28 "a minimum of 4 Ml per day….. to be released….for environmental and riparian requirements in Summer Hill Creek to Ophir Reserve", 29, 38 and 40 to mention some of the relevant pages)

The Ratepayers are of the opinion that this is the major issue that requires to be settled before considering the perceived need for the pipeline project. It is the central issue for the local Orange water supply. It is clearly demonstrated that the water harvesting can produce sufficient quantities of water for the medium to long term demand for Orange.

Stormwater along with other sources of water such as Brown's Creek could supply up to 5000Ml per year. This is a substantial increase on the expected yield from the proposed pipeline project (eventually and possibly 2700 Ml). Refer to the Orange and Region Water Security Alliance submission for further details.

The Stormwater Harvesting Scheme may require some addition temporary water storage volume to allow for further harvesting before the transfer to Suma Park Dam.

Increasing Orange's storage capacity would be helpful in securing the water supply. The raising of the wall at Suma Park Dam should proceed immediately in order to gain some additional storage capacity. OCC, with support from Andrew Stoner, were in the process of doing this improvement in 2006 but it didn't eventuate. A safety upgrade of the Suma Park Dam wall and spillway could be undertaken concurrently.

The safety upgrade is urgent and necessary to secure Orange's water supply. This should be completed, in the opinion of the Ratepayers, before any construction of the pipeline project.

The use of rainwater tanks should not be discarded as a means of support the water supply of Orange. It must be remembered that the roof area of a member's house roof can produce 20 000 litres of water from 60mm of rainfall. A possible 200 Ml capture from the 10 000 buildings (quoted in the EA) in Orange from a 60mm rain shower. Rainwater tank installation is worthy of consideration for the modern urban environment. The capture of water for storage in tanks should be considered as part of the Stormwater Harvesting Scheme and so requires to be considered in the EA.

Emergency Drought Relief

There are other means to provide water for Orange, if and when an emergency water supply situation occurs in the future. This can be achieved without the costly proposed project.
Refer to attached article by Cyril Smith

Consulting the Community

The Orange Ratepayers' Association considered joining the OCC Community Consultative Committee but decided not to be involved. This was because of the condition set by Council in that any member must be positive towards the Pipeline Project. The Association was interested in investigating the perceived problem of water security issue for Orange and the region and not one narrow possible solution.
Some community members of the Macquarie Pipeline community consultative committee have resigned and others are reported dis-satisfied by the functioning of the committee. In recent months the committee could not meet because a quorum could not be established.

On numerous occasions members of the committee would not accept any information that may indicate that there were alternatives to the pipeline project or information that may question the feasibility / justification for the project.

This shows, to the Association, that OCC has a closed mind to seeking genuine solutions to water security. It is further indicated by the need for Orange City Council to hold "closed meetings" on issues regarding the pipeline. Commercial considerations should not have been a concern because of the public available Evans & Peck financial report on the costs associated with the pipeline project.

The Association was totally dismayed at the manner in which OCC's spoke person, Nick Redmond, referred to the Orange and Region Water Security Alliance's Position Paper in regard to environmental matters on its released. The frivolous misinformation exchanged between Nick Redmond, Steve Price and Andrew Bolt on 2GB, mocks the serious nature of water security issues and the respectful concern for the environment that OCC should have when proposing this project. (attached is a transcript)

Project management

The recent past performance of OCC in project management is a serious concern for the Ratepayers' Association. We have noted many quality issues and cost blowouts in projects under the management of OCC. We would strongly suggest that the State consider appointing an independent manager for the proposed project.

To mention a few:

- Duck ponds in Cook Park: Renovation in progress for a number of years with substantial cost increase.
- Wade Park upgrade: A basic playing surface upgrade with a shortfall of 240 truckloads of topsoil and approximately twice the budget
- The new indoor Aquatic Centre: A 9 month project that has taken approximately 2 years to construct a 25 m pool. The final cost is still not determined but substantial additional costs will be realised by OCC and accordingly by the ratepayers. After 20 years of planning for this indoor pool, we witnessed a major redesign a few days after construction commenced and associated cost increase of nearly a million dollars on a Council budget of 3.2 million dollars. The Association is led to believe that there were some 260 variations during the construction period. (See attached articles)
- The Northern Distributor Road: The earlier sections of the Distributor have required continuous repair work to be undertaken since construction. The latest section, opened in early September, was being repaired before opening. The Association was concerned with the final road seal being undertaken by the contractor (under Council's supervision) in very

cold weather. A recipe for disaster. This road will continue to cost Council and Ratepayers for a long time into the future because of the quality of construction.

- Money… An oversight, by not allowing for it in the budget, saw a $450 000 shortfall for lighting at the intersection of the Northern distributor and Bathurst Road. An agreement between "Swimfit" (community group) and OCC for "Swimfit" to support the construction cost of the new Aquatic Centre to the value of $500 000. To date Orange City Council haven't received one cent from "Swimfit". The Association is concerned with OCC's management of finances, particularly if the project proceeds.

The Association has a deal of in trepidation in regard to OCC managing the pipeline project. We are of the opinion that OCC can't complete the project within the budget of $47 million plus allowing for a 10% increase. OCC has a budget of $8.8 million but has put aside up to $12 million for the project, approximately a 36% increase. If we were to apply this increase to the $47 million, we would arrive at approximately $75 million for the project. This appears to be a more realistic figure and not to different to $70 million suggested by Cr. Gavin Priestly in a media release. (he may have inadvertently released a figure that was mentioned in a closed meeting of Council) The Association would ask that the viability of the project be considered using this figure.

To obtain a fair indication on the costing of the pipeline project, it should be easy to ask for fixed price contracts to be submitted to OCC's expression of interest in constructing the Macquarie River to Orange Pipeline Project. The date for the contract could be set for the 15th October 2012 and allowing for inflation increases to the time of commencement.

The Ratepayers' are concerned with Council transferring $8.8 million by a loan arrangement (possibly $12 million plus?) from the Sewer Fund for this project then combining the Sewer and Water Fund and later forgiving the loan. Allan Reeder, for OCC, has expressed concerns about transferring funds from one source to another area and stating in shouldn't happen. The Association is very worried that ratepayers (Council) will be required to meet any shortfall in funding from the State and Commonwealth Governments, along with the proposed increase of approx. $70 in water rates if the project proceeds. Note that Council have recently introduced an additional $80 increase in rates for organic waste. This service doesn't come into existence for about a year. The community suffers from high rates and further increases would be unacceptable in our opinion.

A recent review of the Douglas Partners' Geological Report (for MWH Aust. Project 72151.00 Nov. 2010) has raised sufficient concern for OCC to back track and now are considering 4 more alternate pipeline routes for the last few kilometres to the Macquarie River. The standard of construction for the access road and the associated building cost may be substantially more than initially expected. There is the possibility that the additional cost may be in the millions and thereby putting the project in financial jeopardy, in our opinion.

Conclusion

The investigation of this project, Macquarie River to Orange Pipeline, has proceeding on a false premise. The Project has been governed by the instruction to "implement" the project and this has lead to skewing ensuing reports to that conclusion.

This project is not the best use of funds under the "National Partnership Agreement on Water for the Future", in the Orange Ratepayers' Association's opinion because of the reasons stated in the above submission.

There are better options to the project.

We trust that your review will concur with our conclusion.

Yours Truly
in the interest in water security

Colin Young

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