

As you would be aware, Nicola Hoey of the City of Wanneroo attended the hearings session held on 8 December 2010 at Perth. During the discussion with Nicola, Dr Mundy asked Nicola about this City's concerns about the impacts associated with the taking of extra water from the Gnangara Mound, and that if the City wished to submit further comment on this matter, then it could do so via email to the Commission. I wish to submit the following further comments in response to that invitation.

Firstly, while Dr Mundy's comments on this matter refer to the City having concerns about the impacts of extra abstraction on the community, our submission actually relates more to impacts of the extra abstraction on the environment, and while such environmental impacts do also include community impacts (eg through impacts on areas of high social and amenity value such as lakes), the City's main concern is with impacts on the natural environment.

In this regard, I would refer to clause 7 of schedule 1 of the Rights in Water and Irrigation Act 1914 (the current application for extra abstraction from the Gnangara Mound is happening under section 5C of this Act). Clause 7(2) sets out the matters which the Minister for Water is to have regard to in deciding whether to grant a licence or not, and these include "... whether the proposed taking and use of water-

- (b) are ecologically sustainable;
- (c) are environmentally acceptable"

These are the matters (or impacts) which this City is most concerned about.

In respect to just what those impacts will be, given that additional abstraction will mean further decline in the storage of the superficial aquifer and further decline in water table levels, there must be impacts on groundwater dependent ecosystems. The thrust of our submission to the Department of Water (DOW) was that we wanted the Minister for Water to be fully informed of the nature of those impacts. We do not see how the Minister can have proper regard for the matters referred to in 7(2)(b) and (c) of the Act (see above) if he is not so fully informed. It was also noted in our submission that the Gnangara Groundwater Areas Allocation Plan (GGAAP) also requires that the Minister be advised of these impacts, as well as the public (the advertisement for public comment on this does not provide this information).

Please find attached for your Commission's information a copy of a response to the City's submission recently received from DOW. Of particular note is DOW's advice that it has ensured that the Water Corporation has adequately addressed each key action stated in the GGAAP. Some comments on this:

1. Regarding the key action "That efforts to secure alternative sources had been investigated and evaluated", it is important to note that there are two aspects to this City's concern that further water sources need to be developed as soon as possible to relieve the Gnangara Mound: firstly, so that even during normal seasons, less 'take' is required from the Mound, giving it greater opportunity for recovery; secondly, during dry years, it is not used as the contingency water supply. The discussions at the hearings of 8 December, in relation to augmentation of current supplies, appeared to focus mainly on the first aspect. The main thrust of the City's submission was in relation to the second 'contingency' aspect, and I do not see how DOW can say that it has ensured that efforts have been made to investigate and evaluate the securing of alternative contingency sources (note that the DOW letter omits 'contingency', but the relevant condition is clear that it relates to contingency supply) when there is no evidence that it has, and on the contrary, the evidence is that Water Corp and DOW see that the Mound will continue to be the contingency supply.

2. Regarding the third key action which refers to "... a considered response that balances the needs of the environment while meeting realistic economic and social expectations", this reference to the needs of the environment again highlights this City's view that the Minister will only be able to properly consider the needs of the environment if he is fully informed about the environmental impacts which will be associated with the additional abstraction.

Could you please convey these comments onto your relevant Commissioners.

Please let me know if you require any further information on this.

Regards
Phil Thompson
Special Projects Planner, City Growth
City of Wanneroo



Government of **Western Australia**
Department of **Water**

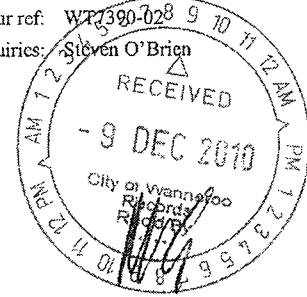


looking after all our water needs

Your ref: 2036 (10/61541)

Our ref: W27390-028

Enquiries: Steven O'Brien



Mr Len Kosova, Director of Planning & Sustainability
City of Wanneroo
Locked Bag 1
Wanneroo WA 6946

Dear Sir

Re: Submission on Water Corporation Application for Groundwater Licences for 2010-2011

Thank you for your letter of December 2, 2010 commenting on an application by the Water Corporation (Corporation) requesting an increase in their licensed groundwater allocation for the Integrated Water Supply Scheme (IWSS) for the 2010-2011 water year.

Following assessment of the application, the Department of Water (DoW) confirms that a licensed allocation of 165 GL will be authorised, this level of abstraction is necessary in order for the Corporation to meet its anticipated water demand for 2010-2011.

The 165 GL allocation has been determined by applying the Variable Groundwater Abstraction Rule (VGAR) as described in the "*Gnangara Groundwater Areas Allocation Plan – 2009*", copies of the plan have been readily available to the public and industry stakeholders at the DoW's website for the past year. The VGAR is a sliding scale that determines the IWSS annual licensed groundwater allocation based on peak water storage levels in IWSS dams each year.

In preparing the "*Gnangara Groundwater Areas Allocation Plan-2009*", the DoW used a combination of resource modelling techniques to establish a series of realistic resource management guidelines for the Gnangara Mound, the plan is scheduled for review in 2012. The review will afford the opportunity to reassess, and if appropriate, implement additional actions to manage the combined impacts from an ongoing pattern of reduced rainfall and abstraction demand.

In addition, to support its application the Corporation submitted a groundwater abstraction strategy for 2010-2011. The strategy identifies the total groundwater water allocation for the IWSS as well as identifying an allocation for each individual bore associated with the IWSS.

The abstraction strategy assists in minimising environmental impacts on the Gngangara Mound from additional abstraction, this year's strategy is structured to pump more groundwater from the deeper confined aquifer bores (ie. Leederville and Yarragadee aquifers) and Jandakot Mound bores to alleviate pressure on the Gngangara Mound. The supply of water will be individually distributed from bores located in the least environmentally sensitive areas on the Gngangara Mound. The agreed abstraction strategy is implemented by way of a condition placed on the groundwater licences issued to the Corporation for the water year.

It should also be noted that the proposed draw from the Gngangara Mound in 2010-2011 will be 11.8 GL less than that approved in 2006-2007 when Perth last experienced similar dry conditions.

The DoW has ensured the Corporation adequately address each key action as stated in the Gngangara Groundwater Areas Allocation Plan to support its request for a 165 GL groundwater allocation. The key actions addressed were as follows:

- That efforts to secure alternative sources had been investigated and evaluated
- that appropriate demand management measures are in place
- that approval of an additional abstraction for 2010-2011 is a considered response that balances the needs of the environment while meeting realistic economic and social expectations

The DoW values the City of Wanneroo's ongoing interest and commitment in the challenging area of water resource management and takes the opportunity to thank the City of Wanneroo for its submission.

Should you have any further enquires on this matter please contact Steve O'Brien at the DoW on phone number 08 6364 6865.

Matt Viskovich
A/ Program Manager IWSS Licensing
December 3, 2010