

Your ref: 006784

25 April, 2003

Hon. Nick Griffiths, LLB, MLC
Minister for Government Enterprises
10th Floor, London House
216 St. George's Terrace
Perth WA 6000

Re: Mundaring Water Treatment Plant and the Sawyers Valley Tank:

Dear Mr. Griffiths

Thank you for your letter of 16 April, 2003. We are grateful for your willingness to look at these proposed developments and the problems associated with them. The consultation with the developer that you have initiated is very promising and we are grateful that you are trying to find a solution acceptable to all parties.

We feel it is imperative that we also correct and/or address some of the preliminary information in your letter as we feel that you have not always been properly advised regarding the processes and history of this problem.

We note that you are aware that the water quality can be 'affected byland use practices in the catchment.' However, your letter only addresses 'the management of the declining water quality in the Helena Reservoir (the Lower Helena Pumpback...)' by the planned construction of a water treatment plant. This appears to be a very shortsighted method of dealing with water quality as it was previously admitted that land use practices affect the water quality. It is difficult to understand why land use management/practice was not also addressed as a two-pronged approach to the water quality problem in the Lower Helena and other Hills catchments.

Project Cost

We note the estimated total cost for the Mundaring Water Treatment Plant project (\$55 million) and wonder why this amount of money should be spent since we believe that with proper land management the quality of water would actually rise. Would it not be cheaper to upgrade the existing plant located at Mundaring Weir, thus saving at least half of that amount and probably more?

You seem very confident that the first stage of this proposed plant will go ahead this year even though the viability of this project is being scrutinised by the Office of Appeals Convenor. Does

this mean that the process of evaluating public submissions is merely a charade to placate the general public and make it appear that the democratic process is being employed?

Planning and Current Status

We note that 'planning and investigation for works at the proposed site at Sawyers Valley is almost completed [and] the cost for the work so far is approaching \$2 million.' We cannot understand where these costs arise because the proposed site plans are the exact plans that were submitted for placement of the new water treatment plant at the Mundaring Weir site, not the Sawyers Valley site. Could you please provide us with a breakdown showing how this \$2 million was arrived at.

We are aware that nineteen alternative sites for the works were considered but, according to Keith Lynch, only three or four were actually assessed. We believe that the one of the reasons that the plant was not kept at Mundaring Weir was because of pressure put on the State Government by the local Shire and tourism groups to remove the plant from the Weir because of the Golden Pipeline project celebrating the centenary of the Mundaring Weir and pipeline to Kalgoorlie.

We also are aware that the reason for the citing of this proposed plant at Sawyers Valley is being done to facilitate the proposed developments at Parkerville/Stoneville and O'Brien Road, Gidgegannup.

The National Trust has withdrawn their support for the proposed Sawyers Valley site and recognised that there was not proper community consultation (see enclosed letter).

You have been advised that 'criteria such as public health and safety, environmental impact, Aboriginal and other heritage issues, visual impact, buffer zones, energy requirements, engineering feasibility and cost were addressed'. We agree that all of these issues have been 'addressed', but we question the lack of rigour employed when these issues were addressed.

Some examples of the inadequacy of the investigation are:

public health and safety - the plant is located within 600 metres of farm houses and a light industrial area. While this meets exactly the criteria for placement, it neglects to take into account the prevailing easterly winds that blow towards the Mundaring townsite and residential area, schools, senior citizens' residences, etc. We are aware of several other accidents or 'near misses' at the existing Water Treatment Plant at the Mundaring Weir and this, being downhill, required road closures all the way up to the Mundaring residential area (six kilometres from the site).

We are aware that chlorine is heavier than air and that the Water Corporation is relying on the plant being higher than the townsite for dispersal. However, the reasoning is flawed because if the townsite is located both downhill and downwind from the plant they are given a double exposure possibility.

We are very concerned about the idea of 'risk minimisation'. It would appear that this basis for development so near a townsite with weather patterns that are not experienced in other areas is a cynical method of making it impossible for those residents who might suffer from the results of an accident to prove any illness or injury derived from an accident. This does not mean that risk is minimised but only that the ability to prove illness or injury is minimised. This was the process used in the Bellevue toxic fire and we have seen it applied by the Water Corporation in the projected use of effluent sprays in the Mundaring Shire.

The traffic issue is another problem. The exit/entrance to the plant is located on Great Eastern Highway on the crest of a hill and a curve. As you are probably aware, Great Eastern Highway is the main heavy truck route to and from the eastern states. The only consideration in the plan is to widen the highway at this point. Not only will this degrade further flora but it will make no difference to the visibility of oncoming heavy haulage and fast moving vehicles.

To date FESA and the Mundaring Fire Brigade (who are responsible for chemical spills and fires in the Eastern Corridor and Hills Region) have not been notified and/or consulted regarding this plant and the chemicals it will be handling.

One of the health aspects that we feel has not been adequately addressed, or in fact not addressed at all, is the reasons for the bad quality of water in the Mundaring Weir, which brings us to the next point,

environmental impact -

There are many studies available that prove that land clearance has a detrimental effect on water quality. What does not seem to be understood is that when there is heavy clearance the biodiversity required to maintain a healthy environment, including a healthy water supply, is destroyed. More and more chemicals, desalination plants, filtration systems, etc. will be required over time to compensate for the declining water qualities. Eventually, as outlined by Keith Lynch, desalination plants will have to take over the processing of water in the Mundaring Weir unless we call a halt to clearance.

The clearance of 20.6 ha on its own, it could be argued, is insignificant. However, when you take into account the fact that this clearance will aid the dense urban development on the Priority 3 Catchments of the Hills and that clearance of Helena Coupe (Helena Catchment) and Hackett Gully Coupe (Lower Helena Catchment) (1 000 ha in total) and the clearance by BGC of 85 ha, the proposed logging of WellBucket and the urban sprawl that is seeing sales of pristine bush reserves in the hills and dense developments on rivers, wetlands and flood plains, you get an idea that 20.6 ha is actually not 'insignificant' but an incredibly important thread in the tapestry of our waterways.

Not only will the 20.6 ha of beautiful regenerated bush adjacent (or even part of?) a proposed National Park be scarified, but there is also a plan to demolish 180 000 cu. metres of latterite outcrop, the highest hill in Mundaring. Latterite bases are very important in the maintenance/filtration/flow of water, thus this destruction will further denigrate the water supply.

As we mentioned, the biodiversity of this 20.6 ha will be destroyed. Lip service has been paid to cockatoo habitat but what is not mentioned is the habitat(s) of endangered and/or vulnerable species such as bandicoots, chuditches, cockatoos, phascogales, etc. What also is not noted is the incredibly diverse species of insects, plants, fungi, etc. that are required to maintain the named animals and many more.

What also is not realised is how all of these plants and animals maintain the soil in a healthy condition so that the water can be properly filtered and maintain a proper pH, saline neutral, balanced nutrient and non turbid release into the Weir. This is what a catchment is all about. By trying to get more run-off by clearing or by indiscriminate clearing (which is what is being done), the imbalance produces turbid, saline, bacteria-ridden water. We should be regenerating, not clearing in catchment areas.

For too long, European practices have been used in the management of our bush and we are reaping the disasters in our water quality. With one good rainfall people will see a full Weir and will think they no longer have to worry. However, you should know that, while a Weir may be full, it is the quality of the water that will become more and more degraded if current practices are allowed to continue.

Aboriginals - We are aware that the Aboriginals who belong to that land were consulted. However, we understand that they were advised that water tanks only were proposed for the Sawyers Valley site. We are not certain that they were advised that the whole area was to be cleared and they certainly were not aware that the latterite caprock was to be removed. We do not feel that there was full and proper consultation with the Nyungah Circle of Elders and the Native Title Claimants.

Heritage Issues - while we are in disagreement with Tom Perrigo that his 'priority was to get the damn thing out of the very significant cultural heritage precinct of Mundaring Weir', as we cannot understand why the National Trust would want to remove the *raison d'etre* from the Weir, thus removing what can be a very exciting working plant and merely making the Weir a museum piece, we can understand his statement that 'in my opinion has been severely compromised,' which leads us to:

Visual impacts -

It is our belief that it would be more cost effective to upgrade the existing plant in an architecturally, culturally sensitive and environmentally sensitive manner. This would mean less interference with Sacred Sites of the Nyungah and also less interference with the existing healthy bush environment.

The initial plant design for the Mundaring Weir was aesthetically pleasing and could be modified to fit in at the existing plant site at Mundaring Weir.

Since the Lower Helena is proving too saline and since the majority of the water is being pumped up from Wanneroo, until such time as the water quality in the Mundaring Catchment Area can be

improved (by regeneration, etc.), perhaps the main water treatment should take place at Wanneroo and the Mundaring plant should be used as a secondary pumping station. This is just one recommendation that would prove cost saving. Once the water quality in Mundaring catchment shows a marked improvement, then the infrastructure would be in place to handle water treatment and much less treatment would be required.

This could result in a proper upgrade, in stages, of the existing plant and would not further impact on other areas while at the same time secondary treatment could continue.

Energy requirements - if this proposed development is approved and implemented, we will see an increase in energy use as well as chemical use over time. This is a vicious circle - water quality reduced, more technology required, water quality reduced further. While in the short term the argument is that less greenhouse gases will be emitted, within ten years we will be seeing pollution from more and more chemicals and more energy required for de-salination plants, transport of materials, etc.

We must realise that the water quality must be improved for future generations. This will not be achieved by clearing more and more land in catchments and pouring in more and more chemicals.

Cost - We have yet to see a cost comparison analysis. It would appear that this plant proposal was mooted by vested interests who just wanted the plant out of Mundaring Weir so they could have a 'beautiful' venue for the Golden Pipeline celebration and didn't have to show the workings required for water supply.

Also, the feasibility of providing water to the proposed dense urban developments in Parkerville/Stoneville/O'Brien Road subdivisions was not addressed. It has been made pretty clear that there is not enough water now to supply the existing users and yet the reason for installing the tanks on the highest hill in Mundaring are to cut costs to the developers of these proposed subdivisions. All sorts of excuses have been put forward for the choice of this location but if height was the problem there is a higher hill or a hill of equal height in Merredin. It would also make more sense to place it there as it would be closer to the proposed Esperance de-salination plant.

We note the EPA decision but we point out to you that their decision was made on misinformation provided by the Water Corporation. The Waters & Rivers Preliminary draft Plan on the management of the Catchment was submitted as a final draft to the EPA as part of the argument in favour of the proposed Sawyers Valley Plan. However, that plan was an internal document still in preliminary drafting stage and was not meant for public release. Obviously, the Water Corporation was basing their management on a document that hasn't been finalised.

We also note that, to our knowledge, the EPA is notorious for not doing formal environmental impact assessments anywhere in the Mundaring Shire and they, once again, did not do one for this proposed development.

One of the conditions for approval of this proposed development was that a spring flora and fauna study be done before development. To date, this survey has not been done. How can the EPA approve a development without knowledge of the ecological requirements of the development area?

The water treatment processes for the plant have been partially addressed previously. It should be noted that there will be no one on-site for the majority of the time. It has also been noted that the 'fail-safe' conditions for the unloading of chlorine gas and (we suppose) ammonia are only as good as the operators and we have been informed that standard procedure is to leave the safety doors open during delivery so that workers can make a quick escape should there be a spill. The human element has not been taken into account.

Also we note that 'new' technology' microfiltration with poly-aluminium chloride flocculation and coagulation is probably to be used. This requires residual beds for accumulation of aluminium waste and has been opposed by Peter Ryan, Programme Manager, Water Quality Protection Branch of Waters and Rivers Commission. And, as you are aware, Waters & Rivers is responsible for protecting Western Australia's water resources. As this is a Priority I Source Protection Area, which is meant to insure that there is no degradation of a water source, to enable the highest quality drinking water, is the prime beneficial land use. Peter Ryan has contacted Elisabeth Morgan of the EPA and said residual beds should never be placed in any Priority I catchments.

Proposed Development at Stoneville and Parkerville:

The Water Corporation informed us during the initial appeal stages that they would have nothing to do with the design, construction or management of waste water treatment plants in the proposed developments. This would be the responsibility of the developers and private companies.

They did this because they were aware that no waste water treatment plant has been designed yet that could fulfill the requirements in the environmentally fragile catchment area. The trial plant at Mundaring, which the Water Corporation has now been forced to manage, has not met the conditions assigned when it was approved. 'Temporary' emergency measures have been employed to release the treated effluent into Jarrah Brook, a subsidiary waterway feeder to Jane Brook, a Priority 3 Catchment (future water supply for Perth) and, to date, no solution has been found to this problem. The brook, which is naturally dry in summer and running in winter, is now suffering from summer water load, nutrient load, bacterial/viral load and weed encroachment. This will eventually result in degradation of future catchment water supplies.

We are very worried about the 'resolution of effluent disposal issues'. Past practices have resulted in agreement to conditions that cannot and are never met.

You have been advised that 'it is technically feasible to construct wastewater treatment plants in the area, they would require large holding ponds for winter storage and would be expensive to construct.' What you have not been advised is that anything is 'technically feasible' (building a

ladder to the moon is 'technically feasible'), but it is not possible at this time (see above experience with Mundaring Waste Water Treatment Plant). Also, it is disheartening to see that the only argument against building large holding ponds for winter storage is cost. The environmental considerations have been ignored yet they were addressed and taken on board from the submissions. The holding ponds and/or dams would leak. There was no question about that and no one denied that fact. The problem is that they would leak into pristine waterways (e.g. Willowbrook) and underground streams/springs (which are in abundance on those sites). The farmers who use Willowbrook (and other waterways) are organic farmers who would lose their livelihoods if this happened and the pristine quality of another water supply would be destroyed.

Also, the holding ponds' excess would go into woodlots, thus further destroying native bush that cannot tolerate the excess nutrient loads.

We are perplexed about your advice that the Corporation had met with some local residents during the advertising period. We do not see how that can be seen as proper community consultation as the general community never knew of any such meeting.

We would hope that if the Water Corporation was approaching any infrastructure provision on a commercial basis that that 'commercial basis' would include triple bottom line accounting, thus taking into account the cost to the environment, thus reflecting the true cost of the infrastructure. It is impossible to make a viable decision without incorporating future costs required if the water quality is degraded and this must be built into the equation.

It is our understanding that the Stoneville development is in the Susannah Brook Catchment and partially within the Jane Brook Catchment. However, it is misleading to only discuss the Stoneville Development as the proposed development incorporates Parkerville and Stoneville developments as a mega development with future plans to incorporate the O'Brien Road, Gidgegannup, development into that urban environment, encompassing even further feeder brooks/waterways.

These three sub-divisions affect the Wooroloo, Jane, Susannah and Brockman surface water catchments which are designated as Priority 3 catchments and as such you, as Minister, should question the rigour of research employed by your advisors.

You do not seem to have been advised that the developments will abut, or be in proximity to, the Avon Valley National Park, the Walyunga National Park, the Paruna Sanctuary and the John Forrest National Park.

While the conclusion seems to be that the 'Jane Brook catchment ...would require extensive treatment before it could be included', it would prove to be more viable to regenerate the area, thus guaranteeing a future water supply for Perth and diminishing the need for 'treatment'. Rather than further degrading a waterway it would be advisable that these future water supplies be brought to their maximum potential.

Current Situation:

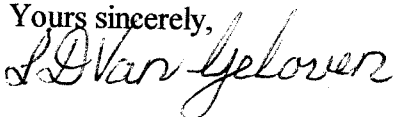
We wish to congratulate you on entering into negotiations with the developer's consultants for the Parkerville Development who are now considering lot sizes above 2 000 m² to avoid the need to provide reticulated sewer services. We query if existing approved broad acre blocks are to remain and the proposed new blocks of over 2 000 m² are going to replace the smaller blocks only. In other words, we do not want to see the larger broadacre blocks reduced to make up for loss of population density. Could you please send us a break down of the proposed block sizes and their location.

We also hope that the question of proper septic tanks will be included in the negotiations as both of these developments are located in areas of numerous feeder brooks, springs and surface water. It would be advisable that one of the conditions put on builders and/or developers should be that ecologically correct septic systems be installed (e.g. envirocycles) to guarantee maintenance of the biodiversity.

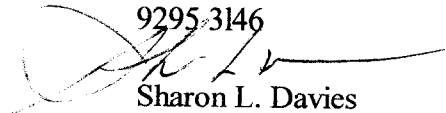
As we have been informed by both the developers for the Hidden Valley block and the Anglican Church (Roland Road Development), they never wanted to do dense developments on their respective blocks (see enclosed letter). They only ever wanted to develop a few five to ten acre blocks for sale and keep the rest of their property. They claim that they were originally approached in 1985 by the Shire President and informed that they had to submit for dense urban development. Please note that this was approximately seven years before the Town Planning Scheme-3 was formulated.

We wish to thank you for your comprehensive response and hope you will take on board some of the clarifications we have made in this letter. We are worried that you are not being fully informed by your advisors and we trust that you will check further as we can back up everything we have written with documentation which we will be happy to provide if you so wish.

Yours sincerely,



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