

23 November 1999

Development Assessment and Coordination
Attention: Terry Loos
Environmental Protection Agency
PO Box 155
BRISBANE QLD 4002.

Dear Mr Loos,

RE: NORTH TOOLBURRA WEIR IMPACT ASSESSMENT STUDY

The Condamine Catchment Management Association Inc. (CCMA) would like to submit the following comments in relation to the North Toolburra Weir Impact Assessment Study (IAS).

The key goals of the CCMA are:

- The Condamine Catchment community managing the natural resources of the Catchment in an economically and environmentally sustainable manner; and
- Natural resource management issues, identified by the Catchment community, being addressed and managed appropriately.

General Comments:

SCOPE OF THE STUDY

Additional studies the report should consider include: The National Strategy for Ecologically Sustainable Development and the Murray Darling Basin Salinity Audit Report. In addition, the report should take due consideration of the precautionary principle.

The study area outlined within the document, appears to only extend 5 km downstream of the proposed weir site. Additional information may be required to satisfy the concerns of downstream users.

OTHER STUDIES

The CCMA strongly supports the Water Allocation and Management Planning (WAMP) process to determine environmental flow requirements for the Condamine River System. It is the WAMP process that is to determine if any further development opportunities exist within the system. It would appear premature to go ahead with this proposal before any outcome from the WAMP is made.

The WAMP technical report refers to the adverse impacts of weirs and suggests 'the number and scale of these structures' be minimised to satisfy environmental concerns. This proposal is completely in conflict with that recommendation.

EQUITY

Page 19 of the report recommends that in the event of DanPork being terminated, consideration should be given to removal of the weir. The CCMA is concerned about the equity of this proposal and the ecological sustainability of more instream infrastructure in an already highly regulated and stressed riverine ecosystem.

The comments outlined below are presented showing linkages with the current edition of the Condamine Catchment Strategic Plan (draft June 1999) with additional more general points raised relating to each issue presented.

WATER ACCESS, USE AND MANAGEMENT STRATEGIES

- Gain extensive knowledge of the water resources of the catchment and the relationships between them.
- Determine long-term sustainable ground and surface water access and quantity.
- Determine flow sharing requirements for the Condamine Catchment
- Implement appropriate plans and actions to achieve long term sustainable surface and ground water use.

As highlighted above, the Condamine Balonne WAMP process is currently in the process of determining principles relating to long-term sustainable access and quantity of the water resources in the Basin and flow sharing requirements. To date this process has not been completed.

Low Flows

Based on the calculations within the report it appeared that low flows would not be a requirement of the weir operation. There appears to be no requirement for small flows to pass through instream structures relatively unhindered – the WAMP Environment Technical Report makes special mention of this requirement for all existing and new licences. Further information is required detailing what component of flow may result in low flows during the operation of the proposed weir.

LAND USE AND MANAGEMENT STRATEGIES

- To reduce erosion by increasing vegetation cover
- To reduce the effects of salinity

Soils

The soil types in the study area include solodic soils which may be exposed by proposed land management practices. The potential impact of these salts being mobilised and impacting on the quality of water within the river need to be quantified. The CCMA considers that any activity increasing the risk of salinisation is unacceptable, particularly in light of recent reports showing potential salinisation of the Upper Condamine Catchment.

WATER QUALITY GOALS

- To maintain and where possible improve the water quality in the catchment.
- To identify and protect water quality for agricultural, urban, industrial and environmental uses, including the protection of ecosystems.
- To establish a balance between land uses within the catchment and maintaining water quality.

The IAS warns of the potential for increases in blue-green algal outbreaks (exec summary, piii), consequent on the proposed use. More work is required to determine whether the soils will be able to absorb the effluent that will be produced – this may be aggravated by the significant rain and flooding events that occur in this area. Water logging is a feature of the soil types and location.

Water Table

In many instances, a weir results in the raising of nearby water tables, particularly during wet seasons. Concern is expressed as to whether during periods of high rainfall ground water levels will rise, potentially resulting in changes to surface and ground water qualities. Regular and continuous monitoring needs to be established of ground water levels to ensure that this does not occur.

NATURE CONSERVATION STRATEGY

- To maintain and enhance existing natural ecosystems

RIPARIAN ZONE MANAGEMENT STRATEGY

- Reduce the negative impacts of land management on the riparian zone.

FLOODPLAIN MANAGEMENT STRATEGY

- Develop and promote cost effective methods to minimise channel and bank erosion on floodplain waterways and streams.

WASTE MANAGEMENT STRATEGIES

- Encourage rehabilitation and appropriate management of riparian zones and wetland areas to minimise wastes reaching streams.

Erosion and Sedimentation

The Warwick and Clifton River Improvement Trusts' Strategic Plan noted that sediment loads along the upper Condamine would have implications for the life of any weir constructed along this section of the river. Erosion and sediment deposition into the weir pool need to be quantified if these impacts are to be clearly understood.

The potential for erosion, in particular bank slumping is significant due to raised water levels. The report is unclear about how 'management of the weir' is to minimise this impact and that of sedimentation in the weir pool. What regulation or accountability processes will be implemented to ensure there is minimal or no impact?

Flora

The riparian corridor along this stretch of the river is rated as 'poor' – the lowest rating in the technical report of the WAMP – and this is confirmed in the IAS document. Given the concern to retain a healthy riparian zone (including habitat value) and imminent clearing restrictions (vegetation management reforms), loss of any river vegetation whether by inundation due to the weir or destruction due to the weir construction is unsupportable.

Fishway

There is a need to ensure that the structure is suitable for the movement of local native fish.

WASTE MANAGEMENT STRATEGIES

- Improve the location of waste producing/processing enterprises to minimise adverse environmental impacts.
- Establish ground and surface water quality benchmarks as indicators of best waste management practice.

Effluent Disposal

There is potential for significant nutrient pollution of the river from the effluent ponds. The report does not clarify that the area allocated for effluent disposal is adequate (particularly in a wet season) where there may be prolonged periods of inundation and water logging. More information is sought on the actual potential for discharge from the effluent ponds during different seasonal influences.

The entire drainage area that may flow into the weir pool also needs to be examined to ensure that pollution through nutrient contamination does not occur. This includes the areas where the effluent ponds are to be constructed as well as any potential impacts resulting from the proposed irrigation area.

The Department of Primary Industries has indicated their statement of position with regards to effluent disposal. This information is obtainable from Mr Hayden Counsell phone: 4688 1113.

We believe that the points raised above require additional consideration prior to a final impact assessment being made on the North Toolburra Weir proposal. For further information contact the Condamine Catchment Coordinator, Catherine Potter on phone 4688 1157, or by post at Landcare and Catchment Management, DNR, PO Box 318, Toowoomba Qld 4350.

Yours sincerely

Catherine Potter (Coordinator)
for Condamine Catchment Management Association Inc.