

From: [REDACTED]
Sent: [REDACTED]
To: DPIE W Regional Water Strategies Mailbox
Subject: Fw: SUBMISSION - FNC Water Strategy

[Sent from Yahoo Mail for iPhone](#)

Begin forwarded message:

On [REDACTED], Email Acknowledgment <do_not_reply_here@minister.nsw.gov.au> wrote:

Thank you for contacting the Office of the Minister for Water, Property and Housing. Your correspondence has been received and will be processed by the office. Please note, due to the large volume of correspondence received by this office, the Minister is unable to personally respond to every enquiry however please be assured that your correspondence will be actioned as appropriate.

If your correspondence is addressed to the Minister in her capacity as the Member for Oxley, it will be forwarded on to the electorate office which can be contacted on [REDACTED]

Kind Regards
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: [REDACTED]
To: regionalwater.strategies@dpi.nsw.gov.au
Cc: Public Pavey Office Email <Office@pavey.minister.nsw.gov.au>
Subject: SUBMISSION - FNC Water Strategy

SUBMISSION - FNC Water Strategy

Thank you for your time in reading this submission.

My partner [REDACTED] and I have lived at [REDACTED] for 17 years. When we purchased our property back in 2003, we were not made aware of any proposal to build a dam, let alone so close to our back boundary/ adjacent to our property.

As a landholder we will be directly, severely and adversely affected by the construction of the dam. Our concerns are for the constant and relentless industrial level noise, having reduced access to our section of Rocky Creek and the possibility of heavy vehicles utilising our property to access the build. I am sure you can appreciate our deepest concern at the direct impact and prolonged consequences that this will have on us mentally, physically, financially and emotionally. To endure constant construction over a prolonged period of time will indeed limit not only our wellbeing, but also our ability to sell or develop our property if we need/chose too. The financial loss to us, at this time of our lives, will be devastating. The damage to our wellbeing and quality of life will be extensive.

I would also like to draw your attention (which is outlined in the following detailed submission) to the irretrievable loss of flora, fauna and rare geological terrain, as well as the destruction of important indigenous cultural heritage (including burial sites). These factors also weigh heavily on our hearts and minds as we regard ourselves as caretakers of this land. We have raised our daughter here, and our grandchildren and this place, this land is also part of them. The animals, some endangered, rely on us to protect them at this time. The natural world has no less value than the manmade world and when there are alternatives to securing our waters future that do not involve such destruction and devastation of a rare and endangered place, then to go ahead and construct a dam is irresponsible and short sighted.

This part of my submission is passionate as it comes from the heart. Your decision and influence will have irreparable ramifications not only to myself, my partner and my family, but to the land and the life that relies on it.

I urge you to think deeply on this, it will be your legacy. Come and see the beauty for yourself, we welcome you. For if you see the beauty, hear and see the wildlife and connect to the magic of nature then surely you too will be moved to make a different choice.

We acknowledge the work done this far by the DPIE in developing the Far North Coast Water Strategy. It is a wide ranging strategy that does seek to address reliable water supply into the future. However the strategy must not rely too much on Rous' Future Water 2060 project, especially as this plan hinges on the contentious and objectionable Dunoon Dam and the Dunoon dam should no longer be an option.

The following is a bullet point summary of the points that we feel are essential to consider when looking overall at the future of our water supply.

There is widespread opposition to Dunoon Dam, and Rous has not been open with DPIE and government

• Rous and Lismore Council failed to provide the Department of Primary Industries and Environment with an accurate appraisal of Dunoon Dam. The dam is highly controversial, and resisted. There is widespread concern about the destructiveness of Dunoon Dam and also the failure of RCC to plan for water resilience using modern technologies.

• 91% of 1290 written and online submissions to RCC opposed the dam option. Over 300 of the written submissions are identified as individual and not pro-forma submissions, demonstrating a high level of engagement. Exhibition ran for 2 months "with strong promotion" (VAXA, *FWP2060 Outcomes from Public Exhibition - 2020*, 2020).

• Social rejection demonstrates the dam option fails the "triple bottom line" test [economic/environmental/social]. A broad suite of other effective options were preferred by respondents.

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Dunoon Dam will leave us vulnerable in a warming climate

• Water Services Association of Australia describes new dams as high-risk investments because they depend on rain. They recommend a mix of complementary water strategies. (WSAA, [All Options on the Table](#), 2020).

• Professor Stuart Khan (UNSW) has said a resilient water system would have 30-50% of supply from sources that don't depend on rain, such as Purified Recycled Water and desalination, both of which can be powered by renewable energy. (ABC North Coast Radio, 22/10/20)

• The NSW Productivity Greenpaper 2020 recommends water efficiencies, and the uptake of new sources such as purified recycled water. (NSW Treasury, *Productivity Commission Green Paper: continuing the productivity conversation*, 2020. Accessed at <http://productivity.nsw.gov.au/green-paper/water-energy>)

• Rous Future Water 2060 fails to mention system resilience as important, and seriously examined only groundwater and Dunoon Dam. (Rous County Council, [Future Water Project 2060](#), 2020.)

Rous County Council have failed to show leadership in contemporary water management

• All options need to be given serious attention including water efficiency, roof and stormwater harvesting (including tanks), and water sources that don't need rain such as purified recycled water and desalination.

• RCC failed to provide leadership in increasing knowledge of innovative water management. There is a lack of familiarity with options showcased by WSAA in [All Options on the Table](#) (WSAA) and on the Cooperative Research Centre Water Sensitive Cities website. The narrow focus on Dunoon Dam has stunted water literacy in the region.

This is a deficit that DPIE needs to rectify in the Regional Strategy.

YII • New housing developments can build in innovative water systems from the ground up, the cost of which can be borne by developers.

YII • Because of this failure of leadership and governance, *Rous Future Water 2060* is a flawed plan that reflects an outdated, stunted approach to water system planning, and must not be used to underpin the Regional Strategy.

RCC has ignored system-wide water efficiency which is cheap and recommended

YII • Water efficiency is cheap and effective (*All Options on the Table* p3). It is also recommended by the 2020 NSW Productivity Commission Green Paper. (NSW Treasury, *Productivity Commission Green Paper: continuing the productivity conversation*, 2020. Accessed at <http://productivity.nsw.gov.au/green-paper/water-energy>)

YII • Rous County Council omitted water efficiency from its 2020 Integrated Water Cycle Management Development options for increasing supply and undertook no specialist studies on it. (<https://rous.nsw.gov.au/page.asp?F=RES-HOV-71-65-36>)

YII • Professor Stuart White identified significant potential increase in Rous supply through efficiency measures neglected by Rous.

(<https://water.north.nsw.gov.au/w-p-content/uploads/2020/11/Prof-Stuart-White-Brief-Review-Rous-Water-augmentation-20200904-1.pdf>)

YII • The lack of attention to water efficiency is evident from the fact that during the past 2 years there was a significant amount of time in which RCC did not employ a Demand Management officer. The position is now filled part-time, reflecting the low priority that RCC still attaches to water efficiency.

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The destructive impacts of Dunoon Dam have been noted in numerous reports

YII • In 2010 Terrestrial Ecology, Aquatic Ecology, and Cultural Heritage reports all found serious impacts from a dam in this location on Rocky Creek. Members of a Public Reference Group voiced their concerns and opposition. (SMEC, *Dunoon Dam Terrestrial Ecology Impact Assessment* , 2011)

YII • In 2013 a Technical Report noted that the dam was constrained by significant environmental and social impacts, high capital cost, and the fact that it was 'highly climate influenced' (p52).

YII • An Integrated Water Planning report in 2014 noted that although the dam was 'technically viable', it had 'significant environmental and social constraints associated with threatened and endangered terrestrial ecology and culturally significant Aboriginal heritage'.

The destruction of Aboriginal Heritage by Dunoon Dam is unacceptable

YII • The 2011 Cultural Heritage Impact Assessment states "Aboriginal stakeholders are of the opinion that the sites should remain undisturbed and that no level of disturbance is considered acceptable to them". This heritage would be destroyed by any dam.

YII • In 2013, Rous County Council commissioned another Cultural Heritage Impact Assessment (CHIA 2013) to supersede the 2011 CHIA. It seems that very few Wujabal Wia-bal stakeholders have seen the 2011 or the 2013 CHIAs, or have been aware of their existence. Rous are now asking the Wujabal Wia-bal to repeat the CHIA process yet again, apparently until they get the result they want.

YII • When RCC promotes the dam as the 'cheapest option' it must be noted that destruction of the Juukan Rock Shelters was also thought the 'cheapest option' by Rio Tinto, at the time.

The ecological impacts of Dunoon Dam are unacceptable. See [website for more information](#). "Offsets" are unacceptable when set against these potential extinction pressures.

Destruction of Big Scrub Rainforest and its threatened species

YII • There are 62 ha of Lowland Rainforest Endangered Ecological Community (EEC) on the site. Only 1% of the Big Scrub Rainforest remains. This rainforest is of global significance.

YII • The Channon Gorge contains warm-temperate rainforest on sandstone, a rare occurrence. The dam wall construction would destroy 92% of it..

YII • Nine threatened flora species would be severely impacted by Dunoon Dam. (2013 Terrestrial Ecology Impact Assessment Report). The destruction of these plants and an increase in the threats against them is a very serious matter with international scientific consequences.

YII • 17 fauna species have been identified that are listed as threatened under the TSC Act NSW (the koala, one fruit bat, six microbats and eight birds and one frog).

Extinction pressure on koalas

YII • Koalas were under extinction pressure even before 70% of koalas in North Coast firegrounds were killed in the 2019 summer fires. <https://www.wwf.org.au/news/new/s/2020/new-wwf-report-koalas-suffer-decline-across-fire-grounds>

YII • The 2011 *Terrestrial Ecology Impact Assessment* (TEIA), identified 72 ha of Tallowwood and Flooded Gum koala habitat.

https://water.north.nsw.gov.au/w-p-content/uploads/2020/11/Dunoon_Dam_Terrestrial_Ecology_Impact_Assessment.pdf

Error! Filename not specified. • Koala corridors would be severed by the Dunoon Dam (TEIA 2011). Habitat fragmentation contributes to the decline in koala populations, will worsen the stress-disease problem and lead to more deaths.

YII • Koalas are commonly seen and heard in the area of the proposed dam wall and The Channon.

YII • Whian Whian Landcare has planted almost 3000 koala food trees to rebuild corridors in the proposed dam area - linking to tracts of forest to the north. This southern corridor would be destroyed

Extinction pressure on platypus

YII • Platypus is facing extinction because of habitat destruction, dams and weirs (Bino et al, *A stitch in time – Synergistic impacts to platypus metapopulation extinction risk* , Biological Conservation, Feb 2020)

YII • There are breeding platypus on Rocky Creek. The Dunoon Dam would hasten the decline of this species.

YII • Construction of the dam will reduce platypus habitat downstream, due to sediment load smothering

(The 2012 Aquatic Ecology Assessment p.61) https://water.north.nsw.gov.au/wp-content/uploads/2020/11/Aquatic_Ecology_Assessment_Final_Report-1.pdf

Extinction Pressure on Native Fish

YII • A Dunoon dam would extinguish nearly all of the endangered Eastern Freshwater Cod's Rocky Creek habitat due to cold water pollution downstream (NSW Fisheries, *Eastern (Freshwater) Cod (Maccullochella ikei) Recovery Plan* , 2004). The existing NSW DPI Eastern Freshwater Cod Recovery Plan aims to restore this species to the Rocky Creek and Richmond River systems. It depends on quality habitat and natural flows. (<https://www.dpi.nsw.gov.au/fishing/fish-species/endangered-species/eastern-freshwater-cod>)

YII • Another 16 native fish species are also threatened by a significant and permanent loss of this 17.5 kms of habitat, including Oxleyan Pygmy Perch and Purple Spotted Gudgeon (2011 Rous Aquatic Survey)

Having lived here for 17 years and regarding ourselves as guardians of our parcel of land including that of 1.5km of Rocky Creek, we can say first hand that the destruction of this rare and unique place will be irreparable regardless of the attempts made by Rous to replant/regenerate that land. The wildlife will be lost forever. The mini eco-systems that have existed in this gorge, that are seen NOWHERE ELSE in Australia and perhaps the entire planet cannot be replaced or replicated.

Surely in a time of planetary crisis, where extinction is a daily occurrence, we have an obligation to NOT ONLY make in-roads towards utilising other methods of ensuring water security into our future, but is it not our responsibility and legacy to ensure the survival of such rare, unique and bio-diverse places?

I am speaking to you, human to human. A person who has their own life, family, responsibilities and who shares this time, with me and others, on our planet. Our time here is precious and short. We all have the incredible privilege of being the guardians of these sacred places and environments that have been largely untouched by humans. I cannot stand by and witness more destruction, loss and extinction when **there are other viable water options** that are being utilised in other communities, that can work here. We do not need another hole in the ground, left to the mercy of Mother Nature's rainfall to get us through tough times of drought. Water is a closed cycle/system, and we need to reuse what we have. Human beings have a tendency to take much of the natural world for granted, we turn on a tap and water comes out. It is time that we all reevaluated our water supply. Living on tank water for 17 years has taught us the importance of smart water options and water conservation. We have NEVER had to buy water. We have never linked into mains water. It can be done.

I implore you to consider the points raised here in this email and also in that of many others that you will be reading. The Channon is an environmentally aware and pro-active community so I am sure that your reading could be extensive, so I thank you deeply for getting this far, and reading my submission. All my husband and I are asking for is a fair, informed and considered assessment of our community's situation. Human being to human being.

Many thanks

Warm Regards,

[REDACTED]

[REDACTED]

[REDACTED]