**Objection Submission to Dungowan Dam EIS** SSI-10046

**from Phil Spark 35 Golf Street Tamworth 2340 – 0427642245**

**9th Dec 2022**

**General Comments**

The major failing of the EIS is that it has been written to justify a political decision to build Dungowan Dam. That decision was made four years ago by state and federal governments wanting to be seen to be doing something to solve the water crisis during the drought. That political decision has been rammed through the planning and assessment process by claiming it is of state significance on the basis that there are no other alternative options to provide for Tamworth’s water security.

Independent departments and a Senate Inquiry found the Dungowan Dam proposal to be economically unviable at $1.3 billion and that it is an inappropriate development. [Infrastructure](https://www.theguardian.com/business/infrastructure) Australia delivered a scathing assessment, finding that the dams costs far outweighed the benefits. The productivity commission described the project as a dud that would cost the equivalent of $162,000/ML, compared with a current market rate of $1,500/ML, if cost recovery was pursued. The upper house parliamentary inquiry concluded the decision to proceed with the Dungowan Dam project "was not sufficiently evidence-based."

Given those circumstances, if the Dam progresses it will likely be the subject of an investigation in the future. Those politicians pushing it can expect to have to answer to taxpayers.

It’s very high cost to provide water to Tamworth residents and irrigators will result in much higher water levies and rates for users. Drought and heat extremes are predicted to become more severe and more frequent in the future. A new dam will not provide reliable water security under those circumstances. Whereas continued recycling of the same water will be reliable and guarantee water security.

The EIS and its business case fail to consider the range of alternatives that could provide water security for Tamworth. There are cheaper solutions that provide higher security that have not been considered, like recycling to create new water without needing more storage or more rain. Consideration of all options must be compared for cost and the water security provided.

The Dungowan Dam proposal fails to consider that all the water that runs inland from the Great Dividing Range is already allocated to existing users and the environment in the Murray Darling Basin Plan, and that plan already has a massive shortfall of water to provide for environmental needs. The plan to retain water in the dam for drier times will require significant changes to average stream flows below the dam, such changes will modify the stream structure and habitats.

The new Dam will result in further extraction and regulation of water flows in the Namoi River catchment. Such regulation is listed as a key threatening process to the streams and aquatic life in the Murray Darling catchment. All the streams and the floodplain are listed as a threatened ecological community in the Fisheries Management Act. Increased extraction and regulation will be at the expense of existing user entitlements and for some it will be an economic loss.

The EIS claims to be consistent with the principles of Ecologically Sustainable Development, yet the new dam will destroy 185 ha of native vegetation including 57ha of critically endangered ecological community and the riparian zone of several creeks. It will impact 34km of fish habitat and the new dam will be a barrier to fish passage.

Those vegetation impacts are proposed to be offset through regeneration of similar habitat in the future. The use of offsets is now known to be seriously flawed, as the two consecutive dry and hot years since 2018 has clearly proven that Climate Change kills regeneration. It is now a fallacy that something can be destroying based on an assumption that someday it will be recreated. The new Dungowan Dam would also be very vulnerable to ash and erosion deposits from severe bush fires and timber harvesting in its forested catchment

The offset measures proposed lack the detail needed to consider how effective they would mitigate and compensate for the impact the dam will cause. The offset proposed for the impact to the streams talks about benefits that will result from modifying four weirs along the Namoi River between Wee Waa and Dungowan Dam to remove barriers. However one of those weirs at Wee Waa is to be increased in size to service the irrigation industry, not removed, and the aquatic community found in floodplain rivers is very different to the headwater streams, for instance there are no platypus in floodplain streams.

Assessment against Significant Impact Guidelines 1.1 - Matters of National Environmental Significance (DoE 2013) concluded that the project will result in a significant impact to Matter of National Environmental Significance (MNES) particularly the Critically Endangered Community of Box Gum Woodland, with 41.64 ha of the community to be cleared as a result of the project.

The vegetation on the slopes surrounding the new dam is proposed as offsets for the loss of the riparian zone and creek and native vegetation flooded by the new dam. The steep shrubby slopes vegetation community has a very different species mix to the communities that would be flooded, hence cannot be considered as like for like offsets.

EIS Biodiversity Development Assessment Report

The EIS has not considered the impact of the dam construction and management on the diversity of threatened and migratory species known and likely to occur. See attached list compiled by a local ecologist.

Table 8.1 Threatened plants likely to be impacted – considers *Thesium austr*ale (Austral toadflax) and *Haloragis exalata subsp. velutina* (Tall Velvet Seaberry). The EIS should also consider the other three plant species in the attached list.

Table 8.2 Threatened animals likely to occur in the subject land and offsets – considers four bird species, one gecko, three bat species, and two larger mammal species (Quoll and Koala). That section omitted the Squirrel Glider and the other threatened birds, frog and mammal species on the attached list.

Happy to have submission made public on website

I have made no political donations in the last 10 years.

****Philip Spark 35 Golf Street Tamworth 2340

***ADDITIONAL THREATENED SPECIES TO CONSIDER***

| **Scientific Name** | **Common Name** | **NSW status** | **Comm. status** | **Regional Records** | **Likelihood Dungowan dam** | **Additional Species to consider** |
| --- | --- | --- | --- | --- | --- | --- |
| *Ninox strenua* | Powerful Owl | V,P,3 |  | 11 | Known in catchment | NOT CONSIDERED |
| *Tyto novaehollandiae* | Masked Owl | V,P,3 |  | 4 | Known in catchment | NOT CONSIDERED |
| *Tyto tenebricosa* | Sooty Owl | V,P,3 |  | 5 | Known in catchment | NOT CONSIDERED |
| *Calyptorhynchus lathami* | Glossy Black-Cockatoo | V,P,2 |  | 28 | Known in catchment | NOT CONSIDERED |
| *Neophema pulchella* | Turquoise Parrot | V,P,3 |  | 148 | likely | NOT CONSIDERED |
| *Ninox connivens* | Barking Owl | V,P,3 |  | 10 | likely | NOT CONSIDERED |
| *Climacteris picumnus victoriae* | Brown Treecreeper (eastern subspecies) | V,P |  | 321 | likely | NOT CONSIDERED |
| *Melithreptus gularis gularis* | Black-chinned Honeyeater (eastern subspecies) | V,P |  | 67 | likely | NOT CONSIDERED |
| *Petroica phoenicea* | Flame Robin | V,P |  | 15 | likely | NOT CONSIDERED |
| *Petauroides volans* | Greater Glider | P | E | 423 | Known in catchment | NOT CONSIDERED |
| *Saccolaimus flaviventris* | Yellow-bellied Sheathtail-bat | V,P |  | 33 | Known in catchment | NOT CONSIDERED |
| *Scoteanax rueppellii* | Greater Broad-nosed Bat | V,P |  | 14 | Known in catchment | NOT CONSIDERED |
| *Oxyura australis* | Blue-billed Duck | V,P |  | K | possible in dam | NOT CONSIDERED |
| *Petrogale penicillata* | Brush-tailed Rock-wallaby | E1,P | V | 1 | possibly | NOT CONSIDERED |
| *Lophoictinia isura* | Square-tailed Kite | V,P,3 |  | 7 | possibly | NOT CONSIDERED |
| *Melanodryas cucullata cucullata* | Hooded Robin (south-eastern form) | V,P |  | 62 | possibly | NOT CONSIDERED |
| *Petaurus australis* | Yellow-bellied Glider | V,P | V | 14 | possibly | NOT CONSIDERED |
| *Euphrasia arguta* |  | E4A | CE | 99 | possibly | NOT CONSIDERED |
| *Dichanthium setosum* | Bluegrass | V | V | 50 | possibly | NOT CONSIDERED |
| *Asterolasia beckersii* | Dungowan Starbush | E4A | CE | 14 | possibly | NOT CONSIDERED |

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**Excerpts from the Dungowan Dam EIS Summary referred to in this submission**

Biodiversity offset strategy

It is likely that a combination of payment into the Biodiversity Conservation Fund, purchase of credits from existing offset sites and creation of new offset (stewardship) sites will be the most efficient way of meeting offset requirements. Water Infrastructure NSW would target direct offsets based on the priority of exploring the protection of land owned by Tamworth Regional Council in areas of native vegetation adjacent to the project as well as seeking stewardship agreements with private landowners. Staging of offsets is proposed to meet the project’s offset liability as shown in the table.

In discussions with DPI Fisheries, an offsets pathway has been established to offset loss of connectivity to upstream aquatic habitat whereby Water Infrastructure NSW will facilitate the removal, upgrade or bypassing of four existing barriers to fish passage on the Peel River downstream of the new Dungowan Dam. This will facilitate increased connectivity and free movement of fish and platypus between Gunidgera weir and the new Dungowan Dam wall. Whilst details have not been finalised, a draft Fishways Workplan has been prepared and is included in the EIS.

## The Dungowan Dam project is unrelated to the Gunidgera Weir

WaterNSW is raising Gunidgera Weir to improve water delivery in the Gunidgera-Pian system in the Namoi valley at Wee Waa.

Located on the Namoi River, the Gunidgera Weir is approximately six kilometres west of Wee Waa. The Gunidgera Weir and upstream regulator enable water flows to be stored, controlled and released from the weir pool into Namoi River and Gunidgera - Pian Creek.

Constructed in 1976, the Gunidgera Weir allows for control and regulation of water. The Project will increase the maximum diversion capacity from the Gunidgera Weir pool into the Gunidgera - Pian Creek system from 1230 megalitres per day (ML/day) to 1650 ML/day. This will increase WaterNSW’s ability to meet customers’ water needs in times of peak demand.

**The proposed upgrade works will occur in two stages:**

**Stage 1** - Raising of the Gunidgera Weir by 0.47m and minor works at the Gunidgera Regulator and erosion control/protection works at Cotton Lane and Cudgewa Lane, within the first 12 km downstream of the Gunidgera Regulator.

**Stage 2** - Monitoring, and where necessary, rectification works on the Gunidgera – Pian Creek System to manage the additional flows.

Stage 1 works will occur on land owned by WaterNSW, Council and Crown Lands. Access for construction will be through Cotton Lane and Cudgewa Lane.

Construction works will be postponed to 2023, after the peak irrigation season, due to the continued rainfall and high river flows in the Namoi river.

The Project will have a range of benefits that include:

* Increasing capability for on-time delivery to customers
* Improving water delivery to Gunidgera-Pian customers during peak demand periods
* Limiting environmental impacts by maintaining the existing channel width (a previous option considered was widening the channel).