Mr Jack Murphy

Ms Megan Glaister

Department of Planning and Environment

21 Riversdale Ave

NSW Government

Kiama Downs NSW 2533

## Dear Mr Murphy

I am writing to you to lodge my opposition to the Dunmore Lakes Extraction Project -Modification 2. I believe that the department of Planning and Environment should reject this application by Boral for the following reasons.

I believe the Boral Dunmore Lakes sand extraction proposal -Modification 2 will have significant environmental impacts to the Minnamurra River catchment due to the proximity of the extraction sites; 5A but particularly 5B.

The areas proposed in Modification 2 are in a separate catchment from the original application this being Minnamurra River and not Rocklow Creek catchment. Minnamurra River is a highly stressed river system as evidenced by the Minnamurra River Coastal Zone Management plan 2015 due to the array of pressures currently impacting on this ecosystem, this proposal will undoubtedly impact this already stressed river system particularly wetlands, river quality and flora and fauna of the area.

Coastal Wetlands such as Mangrove Forest and Salt Marsh, Bangalay Sand Forest and Littoral Rainforest are the communities most likely to be impacted by this proposal in addition to impacts on tourism and the scenic amenity that is of very high value to the Kiama Community.

Area 5A which is located proximally to Kiama Councils Waste and Recycling Depot, sand extraction in this location will potentially mobilise contaminated groundwater impacting Minnamurra River which lies adjacent to the waste depot. Boral's environmental assessment I believe has not sufficiently evaluated the risk of this hydrological impact to the surrounding ecosystem.

Area 5B is very low-lying; less than 0 AHD, hence potentially the extraction will impact on natural groundwater and surface water flows in the event of flooding, this will result in impacts on the surrounding coastal wetland ecosystems of Minnamurra River.

The potential impacts on Flora and Fauna has not been evaluated sufficiently and is almost certainly to be significant. Area 5B is surrounded on three sides by the Minnamurra River and coastal wetland containing mangrove forests and salt marsh, Littoral Rainforest and Bangalay Sand Forest. These are all Endangered Ecological Communities and according to the Objectives in Part 2 Section 6 of the Coastal Management Act 2016 (and the former SEPP 71) these communities should be protected and enhanced, in particular Littoral and Bangalay Forests as they are severely fragmentated and under threat from coastal development.

According to the supporting documentation, 56% of Area 5B is made up of Bangalay Sand Forest vegetation that is classified to be in either moderate or good condition and the proposal outlines the removal of 4.53 hectares of this ecologically endangered forest. Twelve hollow bearing Bangalay trees will be removed in addition to significant dead logs potentially containing wildlife habitat. With the loss of coastal vegetation up and down the East Coast, hollow bearing trees are becoming scarcer, and the need to protect what is left is becoming more significant due to the many impacts

facing our wildlife. The environmental assessment of this proposal is wholly inadequate and a full EIS should be conducted prior to any approval of this application.

I implore the Department of Planning to reject the current assessment process and consider this a new proposal. It is undeniably evident that Areas 5A and 5B are distant from the current approved extraction areas and will have a range of different impacts that have not been adequately assessed in this application.

**Yours Sincerely** 

Megan Glaister