



6 January 2011

Lisa Mitchell Major Development Assessments Department of Planning GPO Box 39 SYDNEY NSW 2001

Attention: Swati Sharma

c: Tim Baker

t: 02 6841 7403

f: 02 6884 0096

: Tim.Baker@water.nsw.gov.au

Our ref: ER20439

Your ref:

Dear Swati

EXHIBITION OF ENVIRONMENTAL ASSESSMENT – GOOGONG WATER CYCLE PROJECT (MP08_0236)

I refer to your letter dated 10 November 2010 requesting a review of the exhibited environmental assessment (EA) for the Googong Water Cycle Project. The NSW Office of Water (the Office) appreciates the opportunity to comment and has identified the requirement for additional information to assist in a comprehensive assessment of the project. The key matters requiring additional information include the following with further detail provided in Attachment 1:

- Inadequate assessment of the ecological impacts of flow modifications to Googong Creek and the Queanbeyan River.
- Identification and assessment of impacts of flow modifications to water users within Googong Creek and/or the Queanbeyan River.

Should further information be required in relation to this submission please do not hesitate to contact Tim Baker on (02) 6841 7403.

Yours sincerely

Mark Mignanelli

Manager Major Projects and Assessment

ATTACHMENT 1 - NOW DETAILED COMMENTS

ECOLOGICAL ASSESSMENT

Googong Creek

- Section 11.2 of Volume 1 of the environmental assessment indicates no aquatic values can be assessed in Googong Creek. The Office does not consider this statement to be adequately supported and requests the following:
 - Assessment of the existing ecological value of Googong Creek and its supporting riparian zone within the project site and downstream to the confluence with the Queanbeyan River,
 - Assessment of the ecological impacts due to the proposed modification to flows in Googong Creek. This is to examine both the proposed increases and reductions in flow.
 - Adequate mitigating measures and monitoring requirements for identified impacts.
- The additional assessment requirements for Googong Creek are highlighted due to the significant modifications proposed to the flow regime. These modifications are characterised by the complete loss of flows in summer and a significant increase in flows in winter/spring. Table 1 details the modelled impact from current modelled flows based on the information in Table 7.8 of Volume 1 of the EA.

Table 1.

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% Flows	Summer	Autumn	Winter	Spring
50 th percentile	100% reduction	61% reduction	36% increase	45% reduction
80 th percentile		51% reduction	52% increase	82% increase
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Queanbeyan River

- Due to the proposed modifications to flows within Googong Creek it is critical to assess the potential impact on the Queanbeyan River in terms of both the flow regime and the ecological response. Table 7.9 of the EA provides a broad indication of potential flow impacts for 50th percentile flows however the Office requests an assessment of the impacts for a range of percentile flows and the associated ecological impact.
- Where an impact has been identified, appropriate mitigating, monitoring and contingency measures will need to be outlined.

Montgomery Creek

 Consideration of the impacts to the flow regime and ecology of Montgomery Creek have not been addressed within the EA. Confirmation is requested as to why this is the case in consideration of the concept plan status and overall proposed assessment of the Googong Township development.

WATER LICENSING

- The environmental assessment has not considered the existence of and potential impact to any water users who may extract water from Googong Creek or the Queanbeyan River. The Office requests the proponent identify and assess the impact of the proposed flow modifications to any licensed water users and users with basic rights access to Googong Creek or the Queanbeyan River.
- Where an impact has been identified to an existing water user it will be necessary to outline appropriate mitigating, monitoring and contingency measures.

GROUNDWATER ASSESSMENT

• The Office recognises that the groundwater assessment has identified the project will result in a significant lowering of the watertable beneath the site due to reduced recharge potential and resultant impacts to baseflow discharges and groundwater users. These impacts have not been quantified in the EA and are proposed to be considered further through additional assessment. The Office supports the recommendations in Table E1 of Appendix E however would like to highlight the risk associated with delaying this assessment to after a determination by Department of Planning. The risk is associated with unconfirmed impacts to groundwater users and baseflow supplies hence it is yet to be determined whether these impacts are acceptable and whether they can be adequately mitigated.

End of Attachment 6 January 2011