

F2013/00157

28 March 2013

David White
Kurnell Ports and Berthing Facility Submissions
Infrastructure Projects
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr White,

RE: KURNELL PORTS AND BERTHING FACILITY PROJECT – SSD_5353

Thank you for the opportunity to comment on the Kurnell Ports and Berthing Facility Project. Council has reviewed the Environmental Impact Statement and provides the following comments.

Impacts on Botany Bay

The key issues that Council wishes to raise concerns the potential impacts on the marine ecology of Botany Bay; specifically in relation to cumulative impacts with other major developments and impact on sensitive marine environments resulting from disturbance to sediment.

Damage to sea grass

This proposal appears to have the potential to cause further loss of seagrass areas which are notoriously vulnerable to sea floor dredging and disturbance. From an environmental perspective a great amount of seagrass habitat has already been lost in Botany Bay and the conservation of remaining areas of sea grasses is critical to the ecological health of Botany Bay.

The impacts of the current proposal need to be considered in conjunction with other works in the Bay including the Port Botany terminal 3 expansion and ongoing maintenance dredging of shipping channels, to adequately address cumulative impacts of the combined works on the remaining sea grass beds and their dependent ecological communities within Botany Bay.

Botany Bay has a complex pattern of currents and sand movement. Dredging to allow for the reconfiguration of the Kurnell berthing facility has the potential to have a significant impact on endangered *Posidonia australis* seagrass communities.

As the predicted impact zone is 250-270m distance from the dredging zone and the NSW Department of Primary Industries have identified *Posidonia* beds less than 250m from the site Council recommends that monitoring strategies be required to be undertaken before, during and after dredging is completed to accurately assess any actual impact on the sensitive marine environment.

To ensure the accuracy of and a precautionary approach in relation to the predictive modelling and to ensure any impacts on nearby *Posidonia* beds are minimised Council recommends Caltex be required undertake monthly monitoring of sediment transport and deposition during dredging works, as has been completed under the Port Botany expansion terminal 3 construction project.

In addition pre and post sea grass bed distribution mapping should also be completed to ascertain actual impact on sea grasses. Council also suggests that due to the unpredictable nature of modelling impacts on sea grasses that compensatory strategies for damage to sea grass should to be developed prior to commencement of works in the instance that sea grasses are damaged as part of these works.

Potential Spread of *Caulerpa taxifolia* aquatic weed

Colonies of the aquatic seaweed *Caulerpa taxifolia* have been found to be located within Botany Bay and these populations have been greatly increasing over the last four years. *Caulerpa taxifolia* can potentially smother seagrass beds and it easily regenerates from pieces that break off existing plants, and is difficult to eradicate.

NSW Government in conjunction with local Councils have been working together to minimise the spread of the aquatic weed by boat users in Botany Bay in an effort to contain and control the weed within the existing areas.

The Environmental Impact Statement states that the dredging will be managed to avoid spreading of aquatic weeds. As *Caulerpa taxifolia* currently poses a significant threat to the remaining valuable sea grass habitat within Botany Bay, Council requests that details of the "proposed measures" to prevent spread be made publicly available.

Distribution and Dispersal of contaminated sediment

The disturbance of the seabed during the course of dredging will disturb and potentially cause the dispersal of contaminated sediment. This sedimentation will not only significantly affect the fragile seagrasses in the bay but also the suspended material may impact upon aquatic fauna species.

Council has noted that although most identified sediment contaminants are below waste classification levels there are a number which exceed ANZECC environmental protection levels as indicated in Appendix D2 and these include Arsenic, Lead, Zinc and Mercury.

These proposed works may cause dispersal of this contaminated sediment into other uncontaminated areas of Botany Bay. This proposal needs to identify appropriate management regimes to minimise sediments dispersal during the dredging works. Further consideration of a floating or fixed silt curtains should be made as these have been extensively used in Botany Bay for a number of other infrastructure projects. These could be installed around the dredging barge encompassing its operations to assist in containing any plume which will occur as a result of the dredging operations.

Impact on protected marine species

The 'Steps' dive site, located off Kamay Botany Bay National Park to the south of the project site is reported to contain most number of Weedy sea dragons (*Phyllopteryx taeniolatus*) ever surveyed from one location. As Appendix E7 indicates that the project is "highly likely" to have an impact on protected Weedy sea dragon, Council recommends that mitigation strategies similar to those proposed by other major infrastructure projects that have occurred within Botany Bay must be provided to minimise these impacts.

Public interest

Due to the level of community concern regarding this project and the technical nature to the proposal documentation Council suggests that some more user friendly information on this project be made publicly available for any approval/implementation stages.

Thank you once again for the opportunity to comment, should you require any further information regarding this submission please contact Karen Armstrong, Manager - Strategic Planning 1on 9399 0992.

Yours sincerely



Sima Truuvert
Director – City Planning