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Subject: submission -FNC water strategy

Submission - FNC Water Strategy

My name is [REDACTED]. I am a resident at The Channon, NSW. I have a private business and live on a rural farm where I help run a dairy and grow lots of vegetables. I am a mum of a 9 year old boy. I am very busy with my private practice, the farm and my family, and as you can imagine, have very little spare time to attend to such matters. I would appreciate you reading my submission in the context of my commitment to providing feedback to your organisation and to Rous County Council about my concerns, with awareness of the expense to my business and family that this commitment and the associated time it takes to communicate with you and inform myself and you about issues and variables involved. To provide you with more context: -Last year our community was faced with fires, evacuations, and fire fighting. In 2017 we faced Cyclone Tracey, clearing landslips, removing and reestablishing infrastructure, helping those in the towns who were made homeless and witnessing the utter waste of materials that resulted. This year it was COVID. These weather extremes and the pandemic put us all under a lot of pressure. Right now we have had over 250 mm of rain in the last 2 days. This is our reality and we have chosen to live here. Today, instead of going out with the hoe and ensuring the rain doesn't wash away my road so that I can get my son to school and get to work to see my clients, I have been working on this submission. I'd like it to go on record somehow that I have never chosen to spend time researching dam building, water management, my local council or state govt, and that this requirement from me comes at a cost which I know will never be repaid.

Thanks so much for supporting our community to cope with the increasing droughts and monsoons we are experiencing, and coming up with the Regional Water Strategy. Its great to have the state Govt support, we need it!

Also thanks for the opportunity to have my say on the Regional Water Strategy. I took time off work to attend the workshop last month with [REDACTED]. It was interesting to hear about the mapping you have used, the feedback from others in the region and to also hear [REDACTED] responses and commitment to edit the draft Regional Water Strategy. It was fairly disappointing to see the lack of information you have in the plan, and your reliance on our community to engage in more unpaid work to assist you with your work.

I applaud many of the options you have suggested, the interconnection between systems is a great concept, and as I understand part of the council MOU already for the region. I particularly applaud the idea of connecting the coastal regions like Ballina and Byron to the East Queensland water grid, as I understand they have a desalination plant which requires investment and use.

I have significant concern about the proposed Option 14 - the extension of Rocky Creek into The Channon - "The Dunoon dam" for a number of reasons which I will outline here.

1. Your department has shown unfortunate reliance on Rous County Council's information and their "Future Waters Project 2060" in your assessment of the proposal. Their research, statistics and community consultation has been poor, and my sense is they are fast tracking the dam because they have fallen behind in their long term plans for water provision in the region. Rous' reliance on their now outdated plans from 1989, means they have failed to consider current technologies for drought resilient systems such as purified recycled water or the desalination plant on the Gold Coast in their work ups for the FWS. They show poor understanding of the known risks in dam building and the crucial value of the Big Scrub rainforest, relying only on rehabing the 1989 proposed groundwater and dam concepts. The dam risks being an expensive white dinosaur, diverting expenditure away from more sustainable, flexible and effective solutions. Rous are out of touch with what the people who live here value. I would urge the Government to take a leading role here and not to follow Rous, but educate them about current best practice.

2. Funding enticement : Perhaps Rous are making an attempt to engage in funding options via Water NSW in the current push for more dams, which I understand is part of an enquiry. In the meeting I was told Water NSW has been already engaged in looking at the proposed dam. I have concerns about the partnering of Rous with KBR (as Water NSW), who have a terrible record when it comes to corruption, ecology and human rights. Rous have not been transparent about their engaging in funds like the National Water Infrastructure Fund.

3. Cultural sites: As you are aware this proposal has been visited before, and rejected on many grounds, including cultural significance. In the context of your workshop theme of consultation with local elders and the Dept's clear desire to show respect to indigenous ties to country, it is a disservice to you to rely on Rous for information about the cultural relevance of the proposed dunoon dam site. Your draft is quite remiss in noting that the dam (p 131) is supported and NOT noting that , as you do with regards to Byrill Creek dam, it is highly contentious, due to the potential impacts on cultural sites. An Elder who was at the workshop, has publicly expressed the Budjalong opposition to this dam, as his father did when it was proposed in 1989. It is very concerning that the Govt seems to be off track with local elder sentiment, while Andrew McMahon insists there has been extensive cultural consultation. The dam will desecrate Indigenous culture: The Channon/Dunoon has an extensive and rich cultural landscape belonging to the Widjabal-Wiyabal People of the Bundjalung nation. The unique geology of "Basalt Meets Sandstone" at this site lends itself to a meeting place for tool building, rich fertile land and sanctuary. The waterholes, trees and rocks of the Rocky Creek landscape tell one of an intact and well documented Australian dream-time story in the epic battle of goanna (Ngumarhl) and snake (Ngoonjbear) which formed the Northern Rivers waterways and headlands. Local Preschools, schools and Councilors alike pay their respects to the Bundjalung People and Ancestors' safe custodianship of our lands and waterways over tens-of-thousands of years. The dam involves Aboriginal women's ceremonial pools. Should the dam proceed, important Indigenous archeological sites, burial grounds, creation waterholes and artefacts would be destroyed. [Cultural Heritage Impact Assessment, 2011] Widjabal/Wiyabal representatives position on this project remains a clear "NO DAM!" and serious concerns as to the failures in engagement since 1989 are to be tabled. I fully support their position on strongly rejecting this dam issue.

4. Ecology: your document is remiss in not acknowledging the proposed dam site will involve the destruction of beautiful Whian Whian Gorge, the second largest remnant of the 99% cleared Gondwana Sub-Tropical Rainforest. At more than 60ha this represents over 10% of this precious habitat and is 40% the size of the World Heritage recognised Big Scrub Flora Reserve to which it connects geographically, 7 kms downstream from the Rocky Creek Dam. The big scrub remnant includes the beautiful Channon Gorge and its endangered ecological community of lowland rainforest (including regionally rare warm temperate rainforest on sandstone), and its threatened flora and fauna species [Terrestrial Ecology Impact Assessment, 2011]. The dam involves the flooding of half of the popular Whian Whian Falls recreational area and in high rainfall periods the dam would make the main Falls unusable. I believe that Rous is planning to offset the loss of rainforest on sandstone with regeneration of degraded land in the buffer zone. I dont agree that "Offsetting" with similar plantings will replace the pristine ecosystem on Rocky Creek. The dam will accelerate extinction of a multitude of vulnerable species. Extinction level pressures on 3 vulnerable fish species due to destruction of 6kms and genetic islanding of over 18 kms of migratory native fish habitat. Extinction pressure on 19 threatened plant species, and 24 threatened fauna species. [As recorded within the 2011 Rous Ecological Surveys]. Koala habitat and important "corridors" connecting Whian Whian, Dunoon and The Channon populations will be destroyed.

I understand from the RFS that this region's river systems are under threat from increased salinity. This would then require us to protect our inland waterways as much as possible to preserve the naturally existing biodiverse systems.

The plan is at odds with the State planning regulations to: "Focus development to areas of least biodiversity sensitivity in the region and implement the 'avoid, minimise, offset' hierarchy to biodiversity, including areas of high environmental value." [NSW Department of Planning, Industry and Environment 2019, 'Delivering the plan', Sydney, viewed 03August2020 <https://www.planning.nsw.gov.au/Plans-for-your-area/Regional-Plans/North-Coast/Delivering-the-plan>], and to Enhance biodiversity coastal and aquatic habitats and water catchments.

5. Cyclone activity and monsoonal rain: I see that your mapping relates to drout and rainfall alone and that you have not mapped predicted increased occasions of cyclonic and monsoonal weather in this region. I wonder how the dam stands in relation to these climactic predictions. Risks, such as cold water pollution need to be considered with these weather conditions. As a resident of The Channon, I am concerned about the geotechnical considerations: basalt soil landslides and sandstone leakage with potential dam failure & massive cost blowouts. [Interview with Michael Mackenzie, Rous Engineer on 20.08.20]. What will the effect of flooding be downstream once the dam is built? How will we cope with the catastrophic flooding downstream in worse floods, particularly for the first 3 kilometres below. (Environmental Flows Assessment 2011).

6. Rainwater tanks: These build much needed community resilience, as the recent extreme bushfire season has shown. The cost of a 22,000L rainwater tank is a mere \$2,500. If this were spread over each new 2 person house hold area (est 12,000 pop by 2060) the cost would be a mere \$15,000, and combined with automatic-mains top-up, can provide 100% reduction in mains water use! The Australian government advises that: "Depending on tank size and climate, mains water use can be reduced by up to 100%. This in turn can help: reduce the need for new dams or desalination plants; protect remaining environmental flows in rivers; reduce infrastructure operating costs." Rainwater harvesting also decreases stormwater runoff, thereby helping to reduce local flooding and scouring of creeks. Current law prevents urban use of rainwater in the Ballina Shire. This relates to their water reuse program where the 'purple pipes' are not yet paid off in terms of council investment, and will not be paid off if people use rainwater. I would urge the govt to support the council to pay this and support homes in that rapidly growing area to access affordable tanks. Our school is currently exploring a plan to support 2 large rainwater tanks on their property for the RFS and community to access. Currently those homes not linked in to Rous water system i.e. idnepdhannt water sources, are not given rebates for tanks. When they run out of water in a drought those homes tank in water deliveries from Rous.

5. Population: the projections in Rous FWS are not correct or in line with other projections. This needs review in your RWS please. I wonder if things like COVID have been taken into account in projections, sea level rising predictions etc which will directly impact on the population which needs to be provided water. The small population increase predicted for the four Rous-supplied councils of 12,720 between 2020-2060 does not justify such a large and destructive dam.

I understand that the Federal and NSW State Governments are pushing towards a population growth in this area. I have read that the Government expects/plans the immigration of 400,000 people in this region and beyond 30 million in Australia by 2060. [NSW Future Blueprint 2040] Developers in this blueprint are called on to invest in our "Rous, runs as a Corporate Entity" through the surcharges on developments, with expected returns on investments. Are you proposing the dam for 12750 extra people, or are you motivated by plans to increase the population by 400000?

Thanks again for taking the time to listen to my concerns,

