

PROJECT MANAGER – TRAVESTON CROSSING  
DAM PROJECT  
SEQ INFRASTRUCTURE (WATER)  
THE COORDINATOR-GENERAL  
PO BOX 15009  
CITY EAST QLD 4002

Dear Sir,

Re: Draft Terms of Reference for Environmental Impact Statement – Proposed  
Traveston  
Crossing Dam

The purpose of this letter is to provide feedback on the Draft Terms of Reference for an Environmental Impact Statement dated December 2006 regarding the proposed Traveston Crossing Dam.

I am greatly concerned at several aspects of the QWI referral, and hereby request that my concerns are registered and these matters are given the highest priority.

Firstly, I believe that QWI Pty Ltd has made an error in that only Stage 1 of the proposed Traveston Crossing Dam has been referred to the Federal Minister under the Environment Protection and Biodiversity Conservation Act (EPBC) yet the State Government is proposing to build the dam to full in Stage 1 and acquire all the properties for Stages 1 and 2 in Stage 1. This constitutes a Split referral under Section 78 of the EPBC Act. The State Government should assess the full impact of Traveston Stages 1 and 2 (including pipeline, distribution and water treatment) in the EIS, advise the Federal Minister that the referral was made in error and refer the full proposal for assessment under the EPBC Act. Surely if the dam wall is to be built to a height of 91.5m AHD, and the towns of Imbil, Kandanga, and Kenilworth are below this height, not to mention the surrounding areas, then the environmental and social impact of the proposal will be much more far reaching in Stage 1 than the proposed dam footprint. Much has been said of flood mitigation for the downstream (ie Gympie), but how can you mitigate flooding downstream without increasing flood risk upstream? The answer is, you can't! It is a deception that only the Stage 1 has been referred.

Secondly, I have grave concerns that this dam proposal will greatly increase salinity in the Mary Valley. The Intergovernmental Agreement on the Environment (IGAE) and the National Action Plan for Salinity and Water Quality should be referenced in the Terms of Reference (TOR), as The Mary Basin Catchment is a priority catchment under National Action Plan for salinity and consideration must be given to this in the TOR.

We cannot and I will not stand by and allow this project to go ahead if the risk

of increased salinity in the catchment is not addressed, as I have witnessed first hand the devastation that salinity has caused in north west Victoria and eastern Western Australia. We must learn from these lessons, and, as Co-ordinator General, it is *your responsibility* to take action.

Thirdly, I have seen no guarantees from the Queensland State Government or associated parties regarding potential extinction of endangered species. In fact, the original project manager, Scott Smith, openly said at a public meeting in June 2006 that no such guarantee would ever be given.

The TOR makes no reference to the risk of extinction to rare and threatened species. The onus of proof is on proponent to demonstrate that species will not be affected. This will require a proper population viability analysis and detailed modelling of the base case (no dam) and the disturbance regime (with dam). The impact on threatened species must consider loss of habitat, connectivity and fragmentation.

In light of this, I believe that six months is insufficient time for the completion of an appropriately documented and comprehensive EIS for a project with such a large and significant impact. If the public is to have confidence in the process and the Federal Minister is to make an appropriate assessment, then more time is required for the EIS process.

The EIS should also contain a demonstrated program of implementation of mitigation measures, with consequences for non-implementation, and fully documented performance criteria. It is evident that this was not put in place for the Paradise Dam and many of the proposed mitigation measures either do not work or have not been implemented.

The TOR should also include an assessment of the proponent on basis of track record of staff, directors and contractors. Key staff, directors and contractors associated with QWI were responsible for the Paradise Dam.

The environmental performance of that project should be assessed to determine whether the proponent is capable of performing in a satisfactory manner on this project. Under the EPBC, the Federal Minister can take into account a person's environmental history in determining whether to approve a controlled action.

My next concern is regarding the current drought. If the Traveston Crossing Dam was built in 1997 to Stage 1, it would have failed to deliver by 2002 on current rainfall figures.

If Stage 2 was built in 1997, it would have failed in 2005.

The community reference panel on the Draft Water Resource Plan for the Mary Basin were profoundly deceived when the original draft stated that there *will* be “minimal” (and should have been “optimal”) environmental flows, and at the last minute the wording was changed to *may* be minimal environmental flows, without the community having any say. The panel were also lead to believe that a 150,000ML “strategic reserve” meant that there would be flow from that

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reserve down the river, as occurs at Wivenhoe, not water being siphoned off to go elsewhere, to be lost to the downstream communities totally. In light of this deception, a repeat of the current drought would spell the death of the river, because the Dam operators would be under no obligation to provide minimal environmental flow. This deception is a *total disgrace*, and will be documented and studied by university students for years to come. You have an opportunity to undo this damage and restore some confidence in the process.

Another drought is inevitable - it is the natural cycle in this country, but appears to be moreso as climate change continues. The impact of climate change has not been considered Draft (TOR) and should be included as a matter of critical importance. Reference to the National Biodiversity and Climate Change Action Plan should be included in the TOR.

I would also like to point out my concerns over the fact that a private company, totally owned by the Government, which has been designated to build the dam and therefore save costs in doing so, is also responsible for offering compensation and assessing the social impact of the proposal. There must certainly be a conflict of interest.

There is no doubt that the Government has underestimated the social impact of the proposal, and in the TOR there has not been a wide enough scope or detail to fully assess the social impact of this proposal. There must be a more detailed study into social impacts.

I hope you have the courage and conviction to consider the truth and not media spin when considering your decisions on these matters

Yours Sincerely

Steve Dennis  
26 Callemonda Rd  
Brooloo