

Anne Stephens
PO Box 3483
South Brisbane Q 4101

8 February, 2006

Project manager – Traveston Crossing
Dam Project
SEQ Infrastructure (Water)
The Coordinator-General
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 (TOR) for an Environmental Impact Statement (EIS) dated December 2006 regarding the proposed Traveston Crossing Dam.

The impact of climate change has not been included in the draft TORs 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 TORs. Specifically an estimate of the greenhouse gas contributions, and details of the methodology chosen to undertake these estimates, of both the building and ongoing maintenance of water ponded within the proposed Traveston Crossing dam must be included in any realistic EIS. If this is not possible, I would like to know particular details of why this cannot be done at this stage.

The Environmentally Sustainable Development (ESD) Charter should be referred to in the TORs, in particular, the need to adopt the “precautionary principle” where the environmental impact of actions is not fully known. Environmental impacts are achieved by design and these must be accounted for at the design stage.

The Intergovernmental Agreement on the Environment (IGAE) and the National Action Plan for Salinity and Water Quality should be referenced in the TORs. The Mary Basin Catchment is a priority under NAP for salinity and consideration must be given to this in the TORs. In particular the EIS needs to address the affect of the evaporation, warm water pooling and seepage of ponded dam water into the Cooloola and Fraser Island Aquifers. It will be embarrassing if megalitres of toxic water, from algal blooms, chemical residues, and other sources, is fed into ground water under two National Parks, a Ramsar wetland and World Heritage area.

The TORs should refer to a comprehensive Health Impact Assessment of public health risks associated with the project such as mosquito borne disease, water borne diseases, blue green algal toxins, manganese and other heavy metals, and the potential impact of the transfer of toxins and pathogens between catchments.

The TORs make no reference to the risk of extinction to rare and threatened species of flora and fauna. The onus of proof is on the proponent to demonstrate that species will not be affected. This will require a proper population viability analysis and detailed modeling 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. We are especially concerned with the TORs lack of account for the Traveston's role in the water grid and its affect on endangered and threatened species. Will pumping water from different parts of the state carry disease, pests, residues and so on that will further impact on the fragile physiologies of endangered species, for example the Bard Frog.

Given the disconnectedness of the flows of the Mary River from Tiaro downstream to Maryborough, the EIS needs to take account of all factors affecting water flow all the way along the length of the Mary River, including appropriate, transparent and ongoing outcome measures above and below the tidal barrage. Statements that flow will be maintained at the river mouth are unacceptable. Simply achieving the outcomes listed in the Water Resource Plan will not provide for environmentally sustainable flows at crucial locations in the river. The EIS should be based on the flows which are required to ensure the continued viability of threatened species and habitats. Current modeling uses long term historical rainfalls and streamflow data. This is inappropriate. Modeling that uses data to reflect the uncertainty of climate change impacts must be used.

In conclusion, I believe the integrity of QWI is so compromised by their membership and history, that the EIS process needs to be managed by a completely independent and suitably qualified consultant.

I expect to be fully informed of the outcomes of this submission and would like an opportunity to review the final draft TORs before they are finalized and sent to QWI.

Yours sincerely

Anne Stephens