

Manjimup Water Security Group Inc.

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Chairman Environmental Protection Authority
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Referral of proposed dam developments by Red Moon Property Holdings Pty Ltd and property lessee Alterra Ltd at the Carpenters property, at Beedelup WA.

We wish to refer the existing and proposed dam developments by Red Moon Property Holdings Pty Ltd and property lessee Alterra Ltd at the Carpenters property, at Beedelup WA to the EPA under section 38 of the Environmental Protection Act.

We believe that in addition to the current dam approvals, proposed further dam constructions, enlarging of dams and their operation will have a significant environmental impact on the EPA's Environmental factor – Inland waters.

We believe the construction of proposed further dams and enlarging of dams on the property could impact the environment in the following ways:

1. The proposed water abstraction at this property will significantly affect the downstream hydrological regime, and will have an adverse impact on the aquatic and riparian ecosystems. We do not believe the development is ecologically sustainable.
 - a. Historical stream gauging of the watercourse above the property during the period 1979 to 1999 shows flows historically did not support dam developments of this magnitude even during periods of high forestry activity (~1990's) in the forested catchment above the property. Since then the South West of WA has experienced declining rainfall, falling water tables and significantly reduced stream flows especially in forested catchments such as above this property.
 - b. In 2021 the WA Minister for Agriculture commissioned a CSIRO review of the hydrological modelling underpinning the proposed Southern Forest Irrigation Scheme. This review found the Department of Water and Regulation (DWER) modelling for the scheme was not fit for purpose and vastly overestimated forest run off now and into the future drying climate. The \$60m development has now been scrapped as a result. Given the close proximity of this adjoining forested catchment, the similar forestry activity and timing of the assessment we fear the same errors may have been made in assessing this proposal. We fear if the proposal is not independently reviewed and the precautionary principle applied irreparable damage to the environment could occur.
2. Vegetation clearing and dam construction will lead to erosion, sedimentation and increased turbidity in the waterway below the property.

3. Property development of this magnitude for large scale irrigated agriculture could cause contamination of the water resource from pesticides, herbicides and other chemicals used by the agriculture proposal. This watercourse feeds into the existing Pemberton town water supply dam.

Manjimup Water Security Group
8th November 2022