

CLAYTON UTZ

Sydney Melbourne Brisbane Perth Canberra Darwin Hong Kong

Ms Jane Moynihan
Executive Director
Queensland Floods Commission of Inquiry
Level 30
400 George Street
BRISBANE QLD 4001

19 October 2011

Our ref 12376/80117397

QFCI

Date:

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Dear Ms Moynihan

Exhibit Number: _____

Brisbane River Flood Frequency Analysis

We refer to the report by WMAwater titled "*Brisbane River 2011 Flood Event - Flood Frequency Analysis*" dated 18 September 2011 (**Report**), to the memorandum from WMAwater dated 7 October 2011 responding to Peer Reviews of the Report (**Response**), and to Mr Secker's statements sworn 13 & 17 October 2011.

Attachment "JDS-04" to Mr Secker's second statement is a table comparing various levels for each of the 9 locations in the Brisbane local government area which are the subject of the Report. In consultation with Council officers we have endeavoured to determine how, if at all, WMAwater's Q100 levels for the 9 Brisbane locations (columns E & F of "JDS-04") would alter given the revised profile for the 2011 Flood Event derived from Council's 2011 Flood Cell Profile (see paragraphs 22 & 23 of Mr Secker's first statement).

We have not been able to resolve that issue. It appears from paragraphs 27 to 29 of the Response and from sections 7.3.1 and 7.3.2 of the Report, according to the reasoning of those documents, that the Q100 levels can be determined by simply subtracting from a revised level of the 2011 actual level for a particular location, the amounts identified for that location in Table 2 of the Response. For example, for Long Street, Graceville (assuming the 2011 Flood Cell Profile is more accurate than the JFTF Profile), the actual level for this location will be revised to 9.2m (see column H in "JDS-04"). Based on our understanding, WMAwater's Q100 levels would then be revised to 8.47m (for the excluding 2011 case) and 8.86m (for the including 2011 case).

Would you please confirm whether we have understood WMAwater's position correctly and, if not, clarify the proper approach.

Yours faithfully

Scott Sharry, Partner

Mark Sammut, Partner

From: Susan Hedge [REDACTED]

Sent: Tuesday, October 25, 2011 10:02 PM

To: Sharry, Scott; Sammut, Mark; Jury, Bronwyn

Cc: Admin Flood Commission [REDACTED]

Subject: Mark Babister's answer to question

Dear Scott and Mark,

I refer to your letter to the Commission dated 19 October 2011.

Mark Babister provided the following answer this afternoon:

"Council's interpretation is essentially correct. Because our flow estimates were very close to the calculated flow for the 2011 event we decided that the best way to estimate levels was to calculate how far below the 2011 event these slightly lower flows would be using the SKM model to get relative differences. After this they were simple "snapped" at this relative difference below the 2011 event. This task was further complicated by the fact that we thought the joint task force 2011 levels (tagged as subject to validation) were observed levels when in fact they were estimated using a software interpolation process. Once we were alerted to this fact we acknowledged that they should be "snapped" the same amount below the actual 2011 flood levels."

Please give me a call if you have any questions.

Regards,

Susan Hedge

Lawyer

Queensland Floods Commission of Inquiry

P: [REDACTED]

E: [REDACTED]

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A	B	C	D	E	F	G	H	I	J	K	L
Location	Pre-event Q100 Profile	Pre -Event DFL Profile	Pre-event DFL + 500mm Profile	WMA's 1% AEP ex. 2011 ¹	WMA's 1% AEP incl. 2011 ²	WMA's Jan 2011 "actual" (JFTF Profile) ³	Council's Flood Cell Profile	SKM 2011 Profile	Difference between WMA's 2011 actual – Council's Flood Cell Profile (G – H)	Revised Column E (E-J) ⁴	Above or Below DFL + 500 mm (D)
Cnr Moggill Rd and Birkin Rd, Bellbowrie (off-bank)	11.5	13.2	13.7	14.08	14.63	15.04	14.6	14.66	0.44	13.64	Below
Cnr Thiesfield St and Sandringham Pl, Fig Tree Pocket	8.2	9.0	9.5	10.42	10.86	11.22	10.1	10.15	1.12	9.3	Below
312 Long St East, Graceville	7.1	8.0	8.5	9.37	9.76	10.10	9.2	8.49	1.08	8.29	Below
Brisbane Markets, Rocklea	7.1	8.0	8.5	9.12	9.51	9.84	9.2	8.11	0.64	8.48	Below
Softstone St, Tennyson (Tennyson Reach Apartments)	7.0	7.9	8.4	9.2	9.58	9.9	9.1	8.1	0.80	8.4	Equal

¹ Table C, Appendix C, WMAwater Report, 18 September 2011

² Table 13, page 38, WMAwater Report, 18 September 2011

³ Table 13, page 38, WMAwater Report, 18 September 2011

⁴ Calculation based on Mr Babister's instructions of 25 October 2011 read with Clayton Utz letter of 19 October 2011.

A	B	C	D	E	F	G	H	I	J	K	L
Location	Pre-event Q100 Profile	Pre-Event DFL Profile	Pre-event DFL + 500mm Profile	WMA's 1% AEP ex. 2011 ¹	WMA's 1% AEP incl. 2011 ²	WMA's Jan 2011 "actual" (JTF Profile) ³	Council's Flood Cell Profile	SKM 2011 Profile	Difference between WMA's 2011 actual - Council's Flood Cell Profile (G - H)	Revised Column E (E-J) ⁴	Above or Below DFL + 500 mm (D)
15 Cansdale St, Yeronga (off-bank)	5.9	6.7	7.2	8.24	8.58	8.85	7.8	6.97	1.05	7.19	Below
42 Ferry Rd, West End	4.6	5.4	5.9	6.26	6.55	6.75	6.5	5.79	0.25	6.01	Above (10cm)
81 Baroona Rd, Paddington (off-bank)	4.4	5.4	5.9	5.50	5.77	5.95	6.1	5.37	(0.15)	5.65	Below
Brisbane City Gauge	3.1	3.7	4.2	4.07	4.32	4.46	4.4	4.59	0.06	4.01	Below