

To whom it may concern,

**The NSW Government has released a revised Environmental Impact Statement (EIS) for raising the Warragamba Dam wall by at least 14 metres and I make a formal submission to this proposal.** The additional height would be used to catch flood waters, mitigating the impact of **some** floods on Western Sydney. The dam was never built for mitigating floods but rather as water storage serving 80% of Sydney's water requirements.

**Premier Perrottet has declared the raising of the dam wall with this revised EIS this time as 'Critical State Significant Infrastructure' as a means to limit legal intervention and further planning processes, stopping any community scrutiny of the proposal through the courts.**

**Despite the premier's statement that he is protecting people on the floodplains, there are still inadequacies in the revised EIS which must be considered to provide a fair and honest assessment of this project.** NSW Planning Minister Anthony Roberts released the Preferred Infrastructure Report (PIR) into the raising of the Warragamba Dam. Rather than addressing the deep flaws the EIS contained, this report instead **clears the way for the NSW Planning Minister to approve the project next year.**

**I am fiercely opposed to this proposal.**

I live in Sydney and appreciate this beautiful unique area -no wonder it has a listing of a world heritage site, and it is on our doorstep! But raising the dam wall will cause damage to the area. I strongly urge you to stop and reconsider whether this project is needed at all. With the overdevelopment of urban sprawl in western Sydney preserving these remaining natural environments should be important to everyone. This area is an internationally famous tourist area that offers overseas visitors and Australians something natural, uniquely Australian, and awe-inspiring close to Sydney.

1. The report dismisses previous community and organisation concerns

-The report has all but **dismissed** the concerns raised in 2,500 community and government agency submissions to the initial EIS in 2021, and in some cases expert submissions were not even addressed

-The report has announced the NSW Government intentions to **ignore the advice of the UNESCO World Heritage Committee by changing the boundaries of the Blue Mountains National Park World Heritage Area.**

-The serious concerns held by Sydney Water and Health NSW about the effects the dam project would have on Sydney's **drinking water quality** have been dismissed in the report.

- The National Parks and Wildlife Service has said that the EIS had failed to address impacts on species and ecological communities affected by the catastrophic bushfires, that ripped through this area.

- Heritage NSW said the EIS failed to properly consider cultural heritage values or adequately consult Traditional Owners.

- Local government criticism from Wollondilly Shire Council and the immediate community has condemned the inadequacies of the EIS for the Warragamba Dam Wall raising project

- A submission by NSW Department of Planning Industry and Environment echoed serious concerns and said: "Notably, the EIS makes incorrect assumptions about how to determine World Heritage values, and therefore how to evaluate impacts on those values."

- The Australian branch of UNESCO's official cultural advisers, the International Council on Monuments and Sites (ICOMOS), wrote that the EIS was "fundamentally deficient" and the "very nature of the project is at odds with obligations that arise from the World Heritage Convention."

- The Australian Department of Energy and Environment have said they believe ***"the impact of increased flood water levels within the dam is likely to have extensive and significant impacts on listed threatened species and communities and world and national heritage values of the Greater Blue Mountains World Heritage Area (GBMWH)."***

- NSW Government's own leaks on crucial information has revealed that raising the dam walls would be largely ***ineffective at mitigating severe floods*** anyway in the Hawkesbury Nepean Valley. The leaked graphs show the anticipated billion-dollar dam project only offers a ***very small reduction for the probable maximum flood***. Billions of dollars of taxpayer money for minimal results to reduce ***some*** flooding in low-lying residential areas, but massive destruction to a World listed heritage site and their ecological communities.

## 2. Negative Impacts to environmental values

- The report has attempted to downplay the destruction of World Heritage and National Parks. An estimated **65 kilometres of wilderness rivers, and 5,700 hectares of National Parks**, 1,300 hectares of which is within the Greater Blue Mountains World Heritage Area, would be inundated by the Dam project. This includes:

- The **Kowmung River** - declared a 'Wild River', protected for its pristine condition under the National Parks and Wildlife Act 1974;
- An Environmental Impact Statement (EIS) confirms that this proposal would have a significant impact on numerous threatened species, identifying up to 76 threatened plant species and 16 threatened species of birds and other animals that could be impacted.
- The Blue Mountains area is the home of many species ranging from ground and tree frogs, bush birds, swallows, swifts, kingfishers, parrots, waterway birds, birds of prey, nocturnal birds, the Spotted-tailed Quoll, Koala, Yellow-bellied Glider, Long-nosed Potoroo, Green and Golden Bell frog, the Blue Mountains Water Skink geckoes, turtles, bandicoots, kangaroos, brush-tailed wallaby, possums, gliders, monotremes, wedge tailed eagle, wombats, emu and many species of fish. This proposal will affect their survival by changing their habitats. These species depend on the Greater Blue Mountains habitats remaining intact, due to the impact from greater Sydney residential development where they have already lost much of their habitats. More than 400 animal species will be negatively impacted by this proposal where most have a threatened status of endangered or even critically endangered.
- Unique **eucalyptus species** diversity recognised as having Outstanding Universal Value under the area's World Heritage listing such as the Camden White Gum would be affected.
- A number of **Threatened Ecological Communities**, notably Grassy Box Woodland would be negatively impacted.
- Habitat destruction for endangered and critically endangered species including the **Critically Endangered Regent Honeyeater and Sydney's last Emu population** would occur. Of serious concern is the Critically Endangered Regent Honeyeater. **The EIS concludes that the project**

**poses potential significant impacts to contemporary breeding habitat for the Regent Honeyeater that “cannot be avoided or minimised.”** Flooding the Burragorang Valley will be tantamount to signing off on the **bird’s extinction**.

3. The report justifies the destruction of our World Heritage site

-This is the ***largest destruction of conservation lands ever proposed***, let alone approved in NSW. The NSW government openly announced it would **ignore** the advice of the UNESCO World Heritage Committee in order to proceed with the project.

-The Preferred Infrastructure Report (PIR) even opens the ***possibility for changing the World Heritage (The Blue Mountains National Park) area boundaries, in an attempt to avoid Australia’s international obligations***.

- Experts say if the project is approved the ultimate outcome of that could be a listing of the Blue Mountains on the list of **World Heritage in Danger** or, eventually, a potential delisting of the site.

4. Traditional Owners again ignored

- The report has again disregarded the concerns of Traditional Owners, not including important information about sacred sites that would be flooded.

- If the dam wall is raised, sites of immense cultural and historical significance in the beautiful Burragorang Valley — irreplaceable Indigenous cave art galleries and occupation and burial sites — will be drowned

- Over **1541 identified cultural heritage sites** would be inundated by the Dam proposal.

- The Aboriginal Cultural Heritage Assessment Report has been severely and repeatedly criticised by both the Australian Department of Environment and the International Council on Monuments and Sites (ICOMOS) for not appropriately assessing cultural heritage in meaningful consultation with Gundungurra community members.

5. Alternatives to raising Warragamba Dam wall dismissed

**There are alternative options** to raising the Warragamba Dam wall that would protect existing floodplain communities. A combined approach of multiple options has been recommended as the most cost-effective means of flood risk mitigation. Alternative options were not assessed in the EIS. Any assessment of alternatives does not take into account the economic benefits that would offset the initial cost of implementation.

On average, 45% of floodwaters are derived from areas outside of the upstream Warragamba Dam catchment. This means that no matter how high the dam wall is constructed, it will not be able to prevent flooding in the Hawkesbury-Nepean Valley downstream.

So **other alternatives** MUST as a matter of urgency be considered. They are-

-Establishing extra evacuation routes and roads for people living in the Penrith and Hawkesbury areas.

-Stop allowing further development in the floodplain, thereby worsening the situation.

-Construct spillways.

-Develop a program of compulsory acquisition of existing downstream flood affected properties over time to create floodplain open space corridors to capture water. These areas should never have had houses on them. Insurance Council of Australia boss Andrew Hall said the public money spent raising the wall would be better used buying back flood-prone land that never should have been developed in the first place- historically poor planning decisions were made. Buy-backs could be offered to people willing to relocate who want to leave areas on identified flood plains in western Sydney. Those residents that would rather stay could be offered government funded support to modify their homes and raise homes to higher levels making them more resilient in flood times.

- Increasing the use of recycled water uptake.

-Releasing water from Warragamba Dam prior to heavy rains through BOM's advance warning notices to create more of an 'air gap'. By lowering the drinking water storage you create an additional **permanent** air gap and offset this through greater and more active use of the desalination plant.

- Manage flood evacuation roads including mitigation routes, levees, and critical communications infrastructure to bolster flood prevention and evacuation infrastructure. Redirect the billions of dollars that raising the dam wall would cost into this vital infrastructure to protect people now.

-Raise river-bank levees to protect affected properties.

Finally, this proposal will cause **irreversible damage** to this complicated ecosystem in the Blue Mountains and devastate threatened native species. The environmental damage is too high a cost for **limited** benefits to protect flooding for *some* people on these floodplains. There are alternatives to raising the dam wall that must be explored further to give people the opportunity to plan their lives now and still protect the unique irreplaceable world heritage listed Blue Mountains.

Yours sincerely,