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## Submission – Warragamba Dam Raising Project – SSI-8441 – Greg Buckman, Crestwood

Dear Warragamba Dam Assessment Team,

I would like to make a submission to the Warragamba Dam Raising Project EIS.

I object to the 14m raising in the Warragamba Dam as proposed in the EIS.

I have made no reportable political donations of more than \$1,000 in the past two years.

I have done extensive bushwalking through the area of the Warragamba catchment since the 1970s and know it well.

Reasons for my objection:

## **Environmental impact**

The EIS understates the impact of raising the dam wall. During floods, it will affect an estimated 65km of wilderness rivers and 5,700ha of national park area including 1,300ha within the Greater Blue Mountains World Heritage Area. The Kowmung River will be particularly affected despite it being declared a 'Wild River' under the *National Parks and Wildlife Act 1974*. Many species of fauna and flora will also be affected including several eucalypt species recognised as having Outstanding Universal Value under the area's World Heritage Listing, in particular the Camden White Gum. Several Threatened Ecological Communities of Grassy Box Woodland will also be impacted. Fauna that will be negatively affected include the Critically Endangered Regent Honeyeater and Sydney's last Emu population.

## Inadequate consideration of alternatives

The EIS does not adequately consider and discuss the alternatives to raising Warragamba's dam wall. In particular, it gives inadequate consideration to the options of lowering the dam's full supply level by 12m and buying back all dwellings within the 1-in-100 chance flood area. The EIS says the lowering of the full supply level by 12m would impose a higher risk to the existing dam and would require alternative Sydney water supply to be sourced. However, there is no detailed assessment of this option, the EIS simply says its cost 'would be very significant'. This is inadequate for such a far-reaching decision: this option deserves

several pages of detailed analysis and consideration as does the second option of buying back all dwellings within the 1-in-100 chance flood area. Consideration of this option is even less detailed than the lowering of the full supply level. The EIS simply says of this one that it would 'have major economic and social impacts' and 'would incur considerable costs'. To be a credible EIS, proper consideration should be given to alternatives not just short, high-level statements. This is a major flaw in the EIS.

## Systemic flaws in EIS process

There were a number of shortcomings in the EIS development process that erode confidence in it. These include:

- No surveys were undertaken of the impacted area after the 2019-2020 fires (which burnt 81% of the Blue Mountains World Heritage Area);
- Only 27% of the impact area was assessed for its Aboriginal Cultural Heritage;
- The EIS's threatened species surveys were substantially less than guideline requirements. Where field surveys were not adequately compiled, expert reports were not obtained; and
- No modelling of the flood and economic benefits of raising the dam wall are outlined in the EIS.

For all these reasons, I consider the EIS to be inadequate and do not support the proposed 14m raising of Warragamba Dam.

Yours sincerely,

Dr Greg Buckman