

Submission 30-11-2021 Warragamba Dam Wall Raising

18/11/2021

Warragamba Dam Assessment Team

Planning and Assessment

Department of Planning, Industry and Environment

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I strongly object to the proposal. The details of my objections are given below.

I have not made any political donations in the previous two years.

I am opposed to this project due largely to the carnage it would cause to the functioning ecosystem in the Burragorang Valley and the World Heritage Blue Mountains National Park and the final blow it would cause to the Gundungurra Traditional Owners.

I am also concerned with the Systemic Failures of the EIS which are as follows:

- The engineering firm (SMEC Engineering) who undertook the environmental and cultural assessments for the project have an established history abusing Indigenous rights, recently being **barred from the world bank**.
- Severe fires during the summer of 2019/20 devastated 81% of Blue Mountains Heritage Area. **No post-bushfire field surveys have been undertaken.**
- Only **27%** of the impact area was assessed for Aboriginal Cultural Heritage.
- Threatened species surveys are **substantially less than guideline requirements**. Where field surveys were not adequately completed, expert reports were not obtained.
- **No modelling** of the stated flood and economic benefits of the dam wall raising are outlined in the EIS.
- The **integrity of the environmental assessment is fundamentally flawed**, and cannot be accepted as a basis for further decision-making by the Minister for Planning.

The Blue Mountains World Heritage area is not just a world class National Park, in 2000 it was inscribed on UNESCO's World Heritage list in recognition of its Outstanding Universal Value for the whole of mankind. Raising the Warragamba dam wall and consequent damage to natural and cultural values would be a clear breach of these undertakings and Australia's obligations under the World Heritage Convention.

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;
- Unique **eucalyptus species** diversity recognised as having Outstanding Universal Value under the area's World Heritage listing such as the Camden White Gum;
- A number of **Threatened Ecological Communities**, notably Grassy Box Woodland;
- Habitat for endangered and critically endangered species including the **Critically Endangered Regent Honeyeater and Sydney's last Emu population**.

Gundungurra Traditional Owners have not given Free, Prior and Informed Consent for the Dam proposal to proceed

- 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.

Outstanding Biodiversity of National Conservation Significance within the Warragamba Catchment Area.

1. The Warragamba Catchment Area contains a diversity of ecosystems reflecting the diversity of geology and climatic conditions. Seventy – seven different vegetation communities have been described for the area of which seven are considered Endangered Ecological Communities (EEC's) under the Biodiversity Conservation Act (2016) (NPWS 2003).
2. The vegetation communities referred to collectively as the Grassy Box Woodlands on the middle and upper Wollondilly River valley, also known as the Burratorang area, are some of the most intact and extensive examples of Temperate Grassy Box Woodland ecosystems surviving in all south-eastern Australia. They are considered part of the Endangered Ecological Community White Box-Yellow Box- Blakely's Red Gum EEC which is listed under both State and Federal Threatened Species Acts. Grassy Box Woodland habitat will be lost to flooding should the dam wall be raised.
3. The Grassy Box Woodlands of the Burratorang are some of the most intact examples of these ecosystems remaining in all south-eastern Australia. Domestic stock were removed in the late 1950's due to the dam construction and introduced pastures were not widely used leaving largely intact native grasslands. Much of the original native

fauna survives including the Dingo, which has been exterminated from most of NSW. The Dingo, a top order native predator, co-exists with other native predators the Wedge-tail Eagle, Spotted-tailed Quoll and Lace Monitor which exist in a natural equilibrium with their native prey species, the Eastern Grey Kangaroo, Eastern Wallaroo, Swamp Wallaby, Red-necked Wallaby, threatened Brush-tailed Rock Wallaby, Wombat and Emu. This may be one of the only locations in Australia where the natural equilibrium between native predators and native prey can still be found in a Temperate Grassy Woodland ecosystem. The Dingoes of Burratorang should be nominated for listing as an endangered population under the Biodiversity Conservation Act (2016).

4. The Grassy Box Woodlands of the Burratorang also support a wide diversity of woodland birds including 25 threatened species. It includes one of the most threatened species in Australia, the Regent Honeyeater, which is listed as Critically Endangered under State and Federal threatened species Acts and has been recorded breeding in the Burratorang area recently. The proposal to raise the dam wall would destroy critical breeding habitat of the Regent Honeyeater and have dire consequences for the species survival in Australia, pushing the species towards extinction. With as few as 350 individual Regent Honeyeaters known to be surviving in Australia and less than half a dozen known contemporary breeding sites any loss of breeding habitat could have disastrous impacts for the species. In addition, it is estimated more than 50 percent of remaining feeding and breeding habitat of the Regent Honeyeater was burnt in the 2019/20 bushfires. The protection of remaining unburnt feeding and breeding habitat is critical. The National Recovery Plan for Regent Honeyeater identifies breeding habitat as *habitat critical for survival* of the species and that *"It is essential that the highest level of protection is provided to these areas."* Any loss of critical breeding habitat in the Burratorang cannot be offset.
5. Other threatened woodland birds include the Swift Parrot, Turquoise Parrot, Little Lorikeet, Diamond Firetail, Hooded Robin, Scarlet Robin, Flame Robin, Brown Treecreeper, Varied Sittella, Speckled Warbler, Painted Honeyeater, Black-chinned Honeyeater, Dusky Woodswallow, Barking Owl and Masked Owl. Woodland birds have declined dramatically throughout much of their range across the slopes and tablelands of NSW and include some of the most threatened species in NSW (DECC 2007, DPIE 2021).
6. Other threatened woodland fauna includes the Squirrel Glider, Koala, Brush-tailed Rock Wallaby and Eastern Free-tailed Bat (DECC 2007). The colony of Brush-tailed Rock Wallaby on the Wollondilly River is one of the few remaining in a Grassy Woodland ecosystem in the entire Sydney Basin. The presence of the Dingo may benefit the Brush-tailed Rock Wallaby by suppression of the introduced Fox. Surveys for the Koala have not been extensive or comprehensive and this species may be more abundant and widely distributed than currently known, especially in woodland habitats. Restricted access into the catchment has limited the number of fauna surveys and other rare and threatened species may yet be found. One species, the threatened Brush-tailed Phascogale, a small tree-dwelling carnivorous marsupial, could be present. It may yet be detected by modern camera survey techniques.

Impact of Raising the Dam Wall by 14 to 17 m.

1. Raising the dam wall by at least 14 m or more will flood thousands of hectares of threatened and endangered ecosystems and their threatened flora and fauna, in particular a Temperate Grassy Box Woodland ecosystem of national conservation and scientific significance.
2. Flooding will destroy thousands of significant Aboriginal cultural sites and destroy landscapes of great cultural significance.
3. Flooding will destroy 65 kilometres of Wilderness Rivers.
4. Flooding will destroy thousands of hectares of habitat contained in the World Heritage listed Blue Mountains National Parks.
5. Flooding will destroy thousands of hectares of Declared Wilderness.
6. Flooding will impact on iconic bushwalks such as the Katoomba to Mittagong walk.
7. Flooding will impact on historic pastoral properties.
8. Flooding the Blue Mountains National Parks will threaten the World Heritage status of these reserves which will have a direct impact on tourism for Blue Mountains communities.

What Raising the Dam Wall won't do.

1. Professor Jamie Pittock (ANU) said raising the Warragamba Dam wall won't prevent large flood events from affecting the communities of the Hawkesbury-Nepean floodplains. Forty-five percent of flood waters originate from the Nepean and Grose Rivers and other catchments below the dam wall.

Alternatives to Raising the Dam Wall.

1. Use funds to buy back highly flood prone properties.
2. Use funds to build high level evacuation roads so existing residents on the floodplain can evacuate from flood waters.
3. Do not further develop flood prone lands for housing, especially anything below the 1:500 flood levels.
4. Use funds to expand or duplicate the desalinisation plant to provide guaranteed water supply and keep water storage levels in the current dam below maximum.
5. There are many 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.
6. Alternative options were not comprehensively assessed in the EIS. Any assessment of alternatives does not take into account the economic benefits that would offset the initial cost of implementation.
7. 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.

Conclusion

The uniqueness and condition of the grassy box woodland ecosystems of the Warragamba Catchment Area warrant them being given special status as a Scientific Reference Area which should be protected by their inclusion as an Area of Outstanding Biodiversity Value or listed as an Endangered Ecological Community under the Biodiversity Conservation Act 2016 and Environment Protection and Biodiversity Conservation Act (1999).

The suite of ecosystems that are contained within the Warragamba Catchment Area and the Blue Mountains World Heritage National Parks and other NPWS reserves rival the biodiversity of Kakadu or the Kimberly regions of northern Australia. The protection of these ecosystems in their entirety is crucial to maintaining the biological integrity of the Blue Mountains World Heritage National Parks and their World Heritage status.

I am greatly concerned with the injustice to the Gundungara Traditional Owners by the imposed western civilisation and their loss of tribal lands. In the Burraborang valley a great percentage of their cave art and rock stencils have been covered by the waters of Warragamba Dam and are now lost. It is of great concern that the current government wishes to perpetuate their cultural loss by proposing virtually the rest of their cultural assets for no meaningful return. Any more loss by projects such as the current proposal by the Gundungarra would be a disgrace to the NSW Government.

I therefore conclude that from the perspective of the great biodiversity and complete intact functioning ecosystem that exists in the Burraborang valley coupled with the great loss it would cause the Gundungarra that this proposal be rejected.

Your Sincerely

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