

## **Submission re the proposed raising of the Warragamba Dam wall.**

I am making this submission as someone who has over the past 65 years regularly visited the Blue Mountains to personally enjoy sightseeing and bushwalking as well as introducing many friends and overseas visitors to the area.

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. Following are some of the reasons why I believe that this assessment should not be accepted as a basis for decision making.

1. Severe fires during the summer of 2019/20 devastated 81% of Blue Mountains Heritage Area. No post-bushfire field surveys have been undertaken.
2. Only 27% of the impact area was assessed for Aboriginal Cultural Heritage.
3. Threatened species surveys are substantially less than guideline requirements. Where field surveys were not adequately completed, expert reports were not obtained.
4. No modelling of the stated flood and economic benefits of the dam wall raising are outlined in the EIS.

I oppose the raising of the dam wall for the following reasons:

1. 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.
2. 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.
3. 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.

4. 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.
5. 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.
6. 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.

Thank you for this opportunity to comment on this proposal.

Michael Bull