

Please accept my submission regarding the Environmental Impact Statement (EIS) for the Warragamba Dam Raising proposal.

I am an ecologist by training and have spent the last 15 years working as an environmental and strategic planner at for local and state government (Victoria). I first visited the Blue Mountains region in 2015, not long after moving to regional NSW. Having long heard of its spectacular beauty and followed its captivating stories, such as that of the Wollemi Pine, I was awed and inspired by vast beauty. I was certain to be a return visitor, camping, walking and enjoying the offerings of the small towns.

I wish to object to this dam proposal in the strongest possible terms. I have outlined my concerns and reasoning in relation to the EIS

1. The flawed project justification

The project justification provided by WaterNSW is that raising the dam wall is required to reduce the risk of future flooding to residents and businesses across Western Sydney.

This rationale is deeply flawed, with nearly half the floodwaters that have historically impacted the floodplain coming from rivers outside the Warragamba catchment.

The EIS itself notes that “...floods can occur without contribution from the Warragamba catchment...” (pg 4 Executive Summary).

The recently released interim report from the [Select Committee on the Proposal to Raise the Warragamba Dam Wall](#)ⁱ (the Committee) suggests:

“the focus of the NSW Government should be directed to those flood risk mitigation options that can maximise flood risk mitigation while minimising upstream impacts. The evidence heard by the Committee casts significant doubt over whether raising the Warragamba Dam wall can achieve those objectives.”

Raising the dam wall will encourage further ill-advised development in vulnerable, flood prone areas without providing any guarantee of future protection.

As someone who has spent time working in strategic land use planning, it is clear to me that better urban planning, not short-sighted engineering solutions, is what is required.

The Committee report recommends more consideration of alternatives to a dam wall raising, including lowering the full supply level of the existing dam, improved evacuation routes, and moving people off flood prone land, including consideration of buybacks.

I strongly support the consideration of these alternatives.

2. Totally unacceptable environmental and cultural impacts

The World Heritage listed Blue Mountains National Parks have been given the highest possible international status and protection in recognition of the area’s extraordinary biodiversity and ecological integrity.

Current and future generations rightly expect all levels of government to protect the Greater Blue Mountains World Heritage Area forever.

Raising the Warragamba Dam wall will inflict terrible damage on the environmental and cultural values of the catchment. In the words on the Committee chair Justin Field MLC:

It is unequivocal that the project will have significant, if not devastating, impacts on upstream biodiversity, including on critically endangered species like the Regent Honeyeater and pristine wild rivers like the Kowmung.

Australia is a signatory to the World Heritage Convention and has an obligation to protect the ecological integrity of the Greater Blue Mountains World Heritage Area. The upstream area that will be subject to inundation contains some of the best remaining grassy woodland ecosystem in NSW, complete with healthy populations of dingo, quoll, woodland birds and many other native species.

The impacts on threatened species is particularly alarming. The EIS concludes that the project poses potential significant impacts to contemporary breeding habitat for the Regent Honeyeater that “cannot be avoided or minimised.” The Regent Honeyeater is listed as Critically Endangered at both a state and federal level, with as few as 350 individuals remaining in the wild.

The destruction and degradation of breeding habitat for Regent Honeyeaters is incongruous with the time and money that the Federal and NSW Governments have invested into the recovery program, including the Regent Honeyeater Captive Breeding and Release program.

It is unacceptable and inconsistent with the National Recovery Plan for any avoidable loss or degradation of breeding habitat to occur.

3. Deficient assessments

The EIS relies upon biodiversity and cultural surveys conducted before the “Black Summer” wildfires of 2019/20, which burnt 81% of the Greater Blue Mountains. Those fires changed the face of the Blue Mountains and drove many species to the brink of local extinction.

Modelling by BirdLife Australia suggests as much as 50% of contemporary Regent Honeyeater foraging and breeding habitat was burnt in the 2019/20 bushfires. Protecting any remaining unburnt breeding habitat is of the highest conservation priority.

It is not sufficient to do a ‘desktop’ analysis of the impacts of the fires on the project area, a new survey is needed.

The Commonwealth Department of Environment and the International Council on Monuments and Sites have both pointed out very serious failings in the assessment of the impact on the cultural heritage of the Gundungurra traditional owners. No consent has been obtained from the Gundungurra Traditional Owners for the work that will significantly impact their cultural heritage.

4. Offsetting unfeasible and ineffective

The proposal relies upon the payment of biodiversity offsets to mitigate the irreparable environmental damage to the biodiversity of this unique and internationally significant area. I oppose this approach.

The EIS itself notes that the impacts of temporary inundation of upstream areas are difficult to estimate:

While temporary inundation may impact certain aspects of ecosystem health, the extent to which this may occur is substantially dependent on a large range of independent variables such as topography, frequency, depth and duration of inundation ... (pg 30 Executive Summary).

It would be inappropriate to approve a plan that relies on offsets, when offset liability cannot even be estimated.

Calculations based on the NSW Government's own offset trading scheme suggests that the total cost of biodiversity offsets could double the cost of the project, costing around \$2 billion.

Offsets are rarely an appropriate response to proposed biodiversity loss and especially for critical habitat for the survival of a species, in this case breeding habitat for the Critically Endangered Regent Honeyeater.

I am especially opposed to the Project's offset strategy for the Regent Honeyeater. There is no evidence that breeding habitat for Regent Honeyeaters can be successfully offset.

5. Out of step

Finally I'd like to highlight how out of step this project is with the local, national and international community expectations of government when it comes to environmental and cultural heritage management.

In the shadow of global climate talks, increasing activism on the extinction crisis and while anger simmers following the desecration of Juunkan Gorge, with NSW still reeling from the 2019/20 mega-fires, record levels of land clearing and a species extinction crisis. Protection of the natural environment, anywhere, regardless of status, should be of the highest priority.

But, if there is any time and any place where the protection of nature and culture must be prioritised, surely it is in now in World Heritage listed National Parks.

This proposal falls grossly short of that obligation. If the EIS is approved it will confirm our growing international reputation as environmental vandals.

Thank you for your consideration of my submission.
