

# Bushwalking NSW

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## SUBMISSION – ENVIRONMENTAL IMPACT STATEMENT – WARRAGAMBA DAM WALL RAISING

### Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from nearly 70 bushwalking clubs throughout the state, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

In preparing this submission, Bushwalking NSW has reviewed the Environmental Impact Statement (EIS). Bushwalking NSW has also been informed by comments and suggestions by representatives of our member organisations and other affiliates. Our affiliated clubs and their members have been enjoying the Greater Blue Mountains Area for generations and it is widely considered one of the premier bushwalking destinations in the country.

While our submission has a focus on bushwalking and outdoor recreation, we also have a strong connection to environment and have made comment on environmental issues where we feel this is warranted.

We have also touched on topics that have not been adequately addressed in the EIS.

### The Greater Blue Mountains Area is Bushwalkers Business

When the World Heritage Nomination for the Greater Blue Mountains Area was submitted for inscription on the World Heritage List back in 1998, the nomination specifically referenced the development of the 'bushwalker' movement from the early 20<sup>th</sup> century and the role of this movement in conserving places and areas of environmental significance. People like Myles Dunphy and the early bushwalking clubs were instrumental in the struggles to establish the Blue Mountains National Park and the later Kanangra-Boyd National Park. Melissa Harper in *The Ways of the Bushwalker* (NewSouth Publishing 2020) documents the role of bushwalkers in these conservation battles.

The Greater Blue Mountains Area is revered as a bushwalking destination. It is the place where many have their first experience of remote area bushwalking and camping. Places like the Kowmung and Nattai Rivers have drawn bushwalkers for decades and decades and will continue to do so.

So why is this history and connection ignored in the EIS? We can find little reference to bushwalking and outdoor recreation except as it relates to popular and accessible places like lookouts and picnic areas. There is no reference to the importance of the entire Greater Blue Mountains Area as a bushwalking destination since the early 20<sup>th</sup> century nor is there any reference to the role that bushwalkers played in the creation of the national parks within this area.

We are also dismayed that this connection to special places like the Kowmung will be impacted by the proposed wall raising. We are not reassured by statements that the inundation of the lower reaches of the Kowmung will be temporary and intermittent. Any inundation will impact the hydrology, riverine vegetation and aquatic ecology of the river. Its

why we go there. As the EIS acknowledges, the Kowmung is also a declared Wild River under the National Parks and Wildlife Act, 1974. Wild Rivers should not be impacted by developments such as dam wall raising.

The Wild River Assessment that was prepared by the National Parks and Wildlife Service in 2005 also included reference to the importance of the river's catchment for wilderness bushwalking, adventure caving, canyoning and camping opportunities.

The Kowmung should be left as a Wild River.

### ***Warragamba Special Area***

As the EIS notes, the Special Area - No Entry extends for three kilometres from the top of the full storage water level in Lake Burragorang (formed by Warragamba Dam). Apart from two designated walking corridors, this Special Area prohibits access to the public, including bushwalkers.

Unfortunately, the EIS is silent on the potential expansion of the Special Area around Lake Burragorang. Our concern is that the Special Zone will be expanded in response to a larger inundation area. This could potentially restrict access for bushwalkers for iconic bushwalking destinations such as the Wild Dog Mountains, the Jamison and Kedumba Valleys (including part of Mount Solitary), lower Kowmung and Cocks Rivers and parts of the Nattai and Wollondilly Rivers.

We need to know the implications of the proposal for the current boundaries of the Special Area and whether boundaries will expand.

### ***Inundation in the Greater Blue Mountains Area***

We remain confused about the area that would be inundated should the proposed wall raising proceed. The EIS states that about 300 hectares of the upstream impact area within the listed Greater Blue Mountains World Heritage Area will be affected by temporary inundation.

However, this is contradicted by the 2016 Warragamba Dam Raising Preliminary Environmental Assessment by BMT WBM which identified a much larger temporary inundation area (about 1900 hectares) and up to 65km of river frontage to be affected (based on Figure 3-7). This study was also prepared before the NSW Government announced that the wall raising would be increased from 14 metres to 17 metres.

This discrepancy is not explained in the EIS. We are also not convinced that the loss of any part of the Greater Blue Mountains World Heritage Area can be off-set by land reservations elsewhere as proposed in the EIS. Places like the Greater Blue Mountains Area are not simply blocks of Lego that can be replicated somewhere else.

### ***Other Environmental Issues***

As bushwalkers we have a strong connection to environment and we have significant concerns in relation to the following:

- Ecological assessment since the 2019/2020 bushfires has not been underpinned by comprehensive field investigations. We cannot be confident that the conclusions made in the EIS reflect the post-fire ecological status of the inundation area.
- We are not convinced that offsets are adequate measures in relation to Critically Endangered Species such as the Regent Honeyeater. A better measure to protect species like the Regent Honeyeater is to not disturb their habitat in the first place. Similar comments apply to species such as the Camden White Gum and Kowmung Hakea.
- The proposed impact on Gundungurra cultural and archaeological sites and places is unacceptable and it is clear that the studies undertaken for the EIS remain incomplete.

The proponent's team should immerse themselves in the story of Mirrigan and Gurrangatch to understand the significance of this land to Gundungurra people. We are also not convinced that the Gundungurra community has had sufficient opportunity to assess the proposal.

## **Conclusions**

BNSW is dismayed that the proposal could come this far without an adequate recognition of alternatives to raising the dam wall and without an adequate understanding of how this proposal will change the Greater Blue Mountains Area.

There are many alternative options to raising the Warragamba Dam wall that would protect existing floodplain communities. We consider that these have not been adequately considered.

We reject this EIS and request that the proponent reconsiders this ill-judged project.

Yours sincerely,

Bill Boyd

President

Bushwalking NSW Inc.

**Submission prepared by the Management Committee of Bushwalking NSW Inc.  
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