STEP Inc

Community-based Environmental Conservation since 1978

7 December 2021

Warragamba Dam Assessment Team
Planning and Assessment
Department of Planning, Industry and Environment
Locked bag 5022
Parramatta NSW 2124

Dear Assessment Team

Objection – Warragamba Dam Raising Project – SSI-8441

STEP Inc is a local community-based environmental group, with a membership of over 550 in the Hornsby/Ku-ring-gai area. Our main objective is to preserve natural bushland in northern Sydney and beyond, wherever it is under pressure from future development, population increase, alienation or degradation and to ensure proper management of this bushland including preserving its role as habitat for animal species.

STEP has not made any reportable political donations in the last 2 years.

There is no information in this submission that STEP wants to withhold from public exhibition.

STEP is pleased to be able to comment on the Environmental Impact Statement for the Warragamba Dam wall raising.

STEP objects to the proposal. This hugely costly project ($1.6 billion) will bring about a cost to the environment that is unquantifiable and unacceptable. There are alternative measures that can be taken at a lower financial cost that will not have these environmental consequences.

The EIS has failed to adequately address seven main areas of concern.

- Environment
- World Heritage
- Aboriginal Heritage
- Housing on flood plains
- Proposed dam raising not stopping flooding
- EIS not properly considering alternatives
- EIS not considering the cost of offsetting environmental damage

<u>Environment</u>

The EIS relies on biodiversity surveys completed before the wildfires of 2019-20 which burnt 81% of the Greater Blue Mountains and before the subsequent floods. Threatened species surveys were less than guidelines require, nor were expert reports obtained where the field surveys could not be properly completed.

Many species were driven to near-extinction by the fires and the project can only increase the risk of extinction but these risks can only be properly assessed by a detailed up-to-date examination, not just a desk-top analysis.

The most egregious example is the critically endangered Regent Honeyeater. There are only between 200 and 350 individual birds left in the wild. It is NSW's rarest bird and its habitat would be inundated! The surrounds of Lake Burragorang that will be affected is a critical breeding ground for the birds. Much effort and money has been expended in the Recovery Plan for these birds that will be wasted if this wall raising goes ahead.

Other examples are:

- There are 45 plant species listed as vulnerable or endangered and 9 that have sole or significant populations in the catchment.
- The Grassy Box Woodland Threatened Ecological Community, among others, would be flooded. It supports healthy populations of dingo, quoll, woodland birds and other native species.
- The Kowmung River, one of few remaining Wild Rivers, would be affected by the new flooding.

There are other omissions from the EIS. It does not assess the impact on platypus habitat and food supply. Likewise, aquatic macroinvertebrate populations, necessary for platypus and the EPBC-listed Macquarie Perch and Blue Mountains Perch, are not assessed well enough.

Even if the waters behind the higher dam wall are held at a level that inundates land that is above the current high water mark for a short time, the cumulative effects of this change in soils and habitats will be harmful to large number of plants and animals.

World Heritage

The Blue Mountains World heritage area was inscribed on UNESCO's World Heritage list for its Outstanding Universal Value for all mankind, along with Macchu Picchu and the pyramids.

To inundate 1300 hectares of Greater Blue Mountains World Heritage Area is a breach of Australia's obligations under the World Heritage Convention. Under Article 4 of the Convention Australia must do all it can to identify, protect, and conserve the cultural and natural heritage of the GBMWHA.
Altering just a small amount of the GBMWHA would, in this case, result in a 'large proportion on a global basis because this is the only place where the eucalypts are listed for World Heritage'. (Professor Kirkpatrick)

Aboriginal Heritage

The original inundation to create Warragamba Dam ruined thousands of culturally significant sites. The known sites in the proposed enlarged flooded area provide evidence of at least 14,000 years, possibly 22,000 years, of Aboriginal occupation; but the landscape connects Aboriginal people back as far as creation stories. The EIS assessment of cultural sites was carried out before the 2019-20 fires.

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. The consent of these traditional owners to this project has not be obtained.

Given that there are alternatives to raising the dam wall, we should avoid further destruction of art sites, scar trees, campsites, shelters and other treasures, which after all, make up Australia's real heritage.

Housing on floodplain

Flood plains are ideal for grazing, horticulture and cropping owing to high soil nutrient content and moisture. Past planning mistakes have led to the construction of many houses at risk of flooding in the Hawkesbury Nepean Valley. Raising the dam wall will create a temptation to build more. Priority should be given to measures to reduce the impact of potential floods by improving roads along escape routes and warning systems.

Proposed dam raising will not stopping flooding

Flooding in the H-N Valley is not only sourced from the Warragamba catchment rivers. Significant flows come from rivers below the Dam such as the Grose and the Nepean itself. For example, the Warragamba catchment contributed less than 60% of the flows in the March 2021 flood. Thus raising the Dam wall will contribute almost nothing to major flood mitigation.

EIS not properly considering alternatives

Alternatives to raising the dam that would produce similar results with no upstream environmental nor aboriginal cultural heritage damage include

- lowering the full storage level of Warragamba Dam by 12 metres to free 795 billion litres of airspace for flood control;
- voluntarily acquiring the most vulnerable properties
- upgrading evacuation roads and flood forecasting
- restricting future development on flood prone land.

“The position of the general insurance industry is now that without satisfactory environmental and cultural heritage impact assessments being completed and made public to allow for full and open assessment, the ...industry is unable to support the proposal as it currently stands. [It] would advocate for the exploration of alternative mitigation options to reduce flood risks for downstream communities in consultation with the industry and traditional owners.” (Andrew Hall, Chief Executive Officer of the Insurance Council of Australia, 15 February 2021)

EIS not considering the cost of offsetting

The EIS includes the following statement:

> To compensate for and offset the assessed impact, the Warragamba Offset Strategy focuses on purchasing and managing additional and appropriate land containing the values of the Greater Blue Mountains World Heritage Area to achieve no net loss.

All biodiversity impacts from temporary inundation must be assessed in order to determine the required biodiversity offsets. At present it appears that the government seeks to avoid the estimated $2.88 billion offset costs by considering only the damage done during construction and not the long term permanent damage caused by the increased area of inundation.

In any case it is impossible that critically endangered species, World Heritage listed areas and wild rivers can be suitably offset by a credit trading system.

Conclusion

Owing to the unsatisfactory EIS and the damage that raising the Warragamba Dam wall will cause, STEP recommends that alternative methods of flood control be implemented.

Yours sincerely,

Jill Green
President