



14 December 2021

Submission re: Proposed Raising of the Warragamba Dam Wall

I write on behalf of the Blue Mountains Community Interagency (BMCI), a network and forum of some 50 representative community organisations working across the Blue Mountains community in NSW (eg neighbourhood centres, youth services, children's services, aged & disability support, family support).

Blue Mountains community members and groups have raised several concerns with local services around the proposed raising of the Warragamba Dam wall; on behalf of our community, BMCI wishes to submit their opposition to the proposal to raise the Warragamba Dam wall for the reasons outlined below:

Environmental Impacts

- ❖ Based on a published WaterNSW assessment on flood levels, the raising of the Warragamba dam wall threatens to flood up to 4,700 hectares of the World Heritage listed Blue Mountains National Park, as well as the inundation of 65 kilometres of wilderness streams.^[1] This flood risk includes threats to old-growth forests in untouched land of the Blue Mountains National Park, flooding land simultaneously protected under a World Heritage listing. The NSW Government has also stated that inundation by sediment-laden flood waters would occur in the World Heritage Area for five weeks at a time.^[2]
- ❖ Flooding caused by the dam wall ultimately threatens the potential extinction of local flora and fauna species in the Blue Mountains National Park. The Blue Mountains region is home to 48 threatened plant and animal species.^[3] Flood risk threatens to endanger already established local fauna species, such as the Regent Honeyeater, which is currently listed as Critically Endangered. The Burratorang Valley floor, to be inundated by the proposed raising of Warragamba Dam wall, is the most fertile regional habitat and key breeding site for this species, which cannot be adapted in another site due to rotational use of habitats by the species.^[4] Similarly, the lower Nattai Valley is home to one of Sydney's refuge koala populations which will be inundated by the raising of the Warragamba Dam wall. Flood risk also threatens local flora species such as the nationally threatened Camden White Gum, which could be made extinct. Additionally, flood risk threatens the potential destruction of Sydney's last wild river, the Kowmung, which could actually place at risk the Blue Mountains' World Heritage listing itself.

Indigenous Australian Impacts

- ❖ Flooding will similarly destroy and desecrate hundreds of significant Aboriginal cultural heritage sites which are sacred and of significant value to the local peoples of Gundungurra Country. Cultural sites, including caves containing Indigenous art, as well as waterholes where ceremonies and camps were held, would be inundated by a single flood. These threatened cultural sites are located around the Kedumba, Kowmung, Kanangra and Jenolan rivers, with



more than 100 new sites in the Burragorang Valley, and over 860 sites in the southern Blue Mountains at risk of complete destruction.^[5] Other sites around Jooriland, Byrnes Creek, Nattai, Little River, Tonalli River and Werriberri are at serious risk of flooding.^[6] These cultural sites are currently protected under the Blue Mountains World Heritage listing. Australia's Aboriginal historical and cultural heritage is at threat of being wiped out and denied the respect and protection it deserves. It is the NSW Government's responsibility to protect Australia's rich cultural heritage sites belonging to the Traditional Owners, the local Gundungurra people. If these sites are destroyed, they, as evidence of our ancient Indigenous civilisations and Aboriginal creation stories, will be lost forever.

- ❖ Aboriginal cultural sites such as those in the Burragorang Valley play a significant role in local knowledge and storytelling of our ancient past by local Elders. These sites are some of the rarest evidentiary examples of ancient cultures worldwide, and are already protected under the World Heritage listing – but are directly in the line of threatened flooding due to the proposed raising of the dam wall.
- ❖ The Traditional Owners of the land, the Gundungurra people, insist they were never properly consulted nor asked permission for access to their land in relation to the protection of their cultural sites, such as in relation to the compilation of the flawed NSW Government's Heritage Assessment in 2018 (subsequently referred by the Australian Government to be redone). Transparency and accountability appear to be lacking in relation to proper respect for and consultation with the Traditional Owners of the land on which the cultural sites are located.
- ❖ An Indigenous Cultural Assessment by SMEC Engineering - a company with a poor international reputation for 'white-washing' local Indigenous cultures and causing cultural destruction - gave Traditional Owners only 40 days to review a 2,000 page Draft Cultural Assessment, and Traditional Owners say they were told they are not allowed to share it with anyone, including experts. This assessment has since been updated in late-2021.^[7]

World Heritage Impact

- ❖ The very existence of Aboriginal cultural sites in the Blue Mountains influence and provide value to the World Heritage listing granted to the Blue Mountains National Park in 2000, a privilege not many States, Territories or even countries around the world are lucky enough to be granted. Similar to the loss of native flora and fauna, the destruction and removal of Gundungurra cultural sites could also threaten the award of the Blue Mountains World Heritage listing on the world stage.
- ❖ In addition, the World Heritage status provides a significant boost to the local economy - tourism and hospitality being by far our most significant 'industry'.

Nearby Area Impacts

- ❖ Flood risks from the raising of the dam wall threaten subsequent flooding downstream in the Nepean catchment area, risk future large-scale NSW Government proposed development in the Nepean region of NSW. A proposed additional 134,000 residents on Western Sydney floodplains after the dam is raised, would be at significant undisclosed flood risk to their prospective homes.^[8] Raising the dam wall would thus encourage significant over-



development on flood-prone areas in Penrith, Londonderry, Riverstone and Windsor. This would not only cost taxpayers \$1 billion, but would predictably result in increased traffic congestion, high-density housing, overcrowded schools and hospitals in surrounding areas. The raising of the dam wall would appear to be a developer-driven move that will make it easier to build on flood-prone areas in Western Sydney, against the wishes of local communities such as the surrounding Blue Mountains and Hawkesbury regions. It is interesting that development has been suggested as a revenue-raising project to pay for the raising of the Warragamba dam wall.^[9]

- ❖ Half of all floodwaters in the Hawkesbury-Nepean originate from catchment areas that are not upstream of Warragamba Dam.^[10] This means that even if a raised Warragamba Dam was to hold back some flood waters, other catchments could still cause significant flooding in the valley. In fact, flood waters from the Grose River alone can cause moderate to major flooding in the lower Hawkesbury region.^[11]

Additional Reasoning

- ❖ The NSW Government's Department of Planning Industry & Environment's State Environmental Planning Policy (SEPP) for the development of areas in the Nepean region in the coming years allows for development below the 1:100 year flood planning level.^[12] International best practice dictates that floodplain development should not occur below the 1:500 year level.^[13]

Organisational Input

- ❖ International, Federal, State and Local bodies such as the International Council on Monuments and Sites (ICOMOS), the Australian Government's Department of the Environment and Energy, the Insurance Council of Australia, the National Parks and Wildlife Association, the Gundungurra Land Council, the Gundungurra Aboriginal Heritage Association, the Give A Dam campaign, and local Blue Mountains MPs, have publicly noted sentiments against the raising of the dam wall. These opposing sentiments - which range from environmental, World Heritage listing, local Indigenous, developer, insurance, political, economic, and local civilian knowledge, risks and impacts - have all repeated the same message: that the raising of the dam wall is of great risk to the Blue Mountains and surrounding areas.

On behalf of the Blue Mountains community, BMCI requests you note the above group submission as a matter of significant concern to the Blue Mountains community and local Traditional Owners.

Yours sincerely,

Kris Newton
Manager



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- [1] WaterNSW. 2016. Warragamba Dam Raising Preliminary Environmental Assessment, page 26. Prepared by BMT WBM Pty Ltd, Sydney. <https://bit.ly/2rzXjtz>
- [2] WaterNSW. 2016. Warragamba Dam Raising Preliminary Environmental Assessment, page 24. Prepared by BMT WBM Pty Ltd, Sydney. <https://bit.ly/2rzXjtz>
- [3] WaterNSW. 2016. Warragamba Dam Raising Preliminary Environmental Assessment, page 26. Prepared by BMT WBM Pty Ltd, Sydney. <https://bit.ly/2rzXjtz>
- [4] Ross Crates et al. 2018. Submission to the New South Wales Legislative Council's inquiry into the Water NSW Amendment (Warragamba) Bill 2018, Inquiry into Water NSW Amendment (Warragamba Dam) Bill 2018. <https://bit.ly/2UsVs6F>
- [5] [6] Isla Cunningham (2018). Gundungurra Group Lodge Proposal to Protect Sacred Sites at risk in Warragamba Dam Plan, The Blue Mountains Gazette. <https://bit.ly/2NN8xbp>
- [7] SMEC. 10 September 2021. Environmental Impact Statement – Chapter 18: Aboriginal Cultural Heritage – Warragamba Dam Raising, pp.1-81.
- [8] Infrastructure NSW. 2017. Hawkesbury-Nepean Valley Flood Risk Management Strategy, page 3. <https://bit.ly/2wDd4VL>
- [9] Sarah Gerathy. 2016. Warragamba Dam: Wall Flood-Protection Plan Raises Environmental Concerns, Australian Broadcasting Company. <https://ab.co/2G8np0E>
- [10] Department of Primary Industries. 2014. Office of Water. Hawkesbury-Nepean Valley Flood Management Review Stage One. <https://bit.ly/2JxtchB>
- [11] Australian Water and Coastal Studies (AWACS). 1997. Lower Hawkesbury River Flood Study. Prepared for NSW Department of Land and Water Conservation, Sydney.
- [12] Environmental Planning and Assessment Act 1979, State Environmental Planning Policy (Penrith Lakes Scheme) Amendment 2017, page 19. <https://bit.ly/2PrXwrT>
- [13] Caroline Wenger, Karen Hussey & Jamie Pittock. 2012. The Use of the 1:100 Year Standard in the United States: Insights for Australia? Australian Environment Review, Vol. 27, pages 337-342
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