



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 552
Gladesville 1675**

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

Re: Submission – Warragamba Dam Raising Project – SSI-8441

We are a local environment group established over 55 years ago. The aims and objectives of the Society include-

- Respect for the land and its flora and fauna and original custodians:
- The education of the membership and the community, particularly in the local area, in nature conservation and protection of the environment.
- The promotion of ecologically sustainable land use and development at the local, state, national and international levels.
- Advocating measures at the local, state, national and international level necessary to safeguard the environment from all forms of pollution to ensure, clean air, clean water and a healthy environment and address climate change.

The Society has been actively campaigning over many years on the mitigation of climate change, ceasing further exploitation of fossil fuels, supporting renewable energy, protecting native forests and wildlife, opposing destructive land clearing and preserving our precious biodiversity.

We are writing to express our opposition to the proposal to reduce the impact of flooding in the Hawkesbury/Nepean Valley by increasing the height of the Warragamba dam by 14 metres.

The Environmental Impact Assessment (Chapter 21, p150 to 159) demonstrates that raising the dam wall will have a detrimental effect on the World Heritage area and the Aboriginal cultural heritage upstream from the dam, but page 190 the *Task Force Assessment Report* (January 2019) states that this will not prevent flooding of the valley. The *Task Force Assessment Report* which is an essential part of the EIS shows that there are alternatives that will not have an impact on the World Heritage Area and Aboriginal cultural heritage.

We note that reducing the water level in the dam by five metres combined with better management of water flows from the dam (Section 5 of the *Task Force Assessment Report*) will reduce the impact of flooding and avoid any impact on the World Heritage Area and Aboriginal cultural heritage.

The *Task Force Assessment Report* states that the net benefit/cost of this proposal is \$58m (p108) as compared to \$165m (p138) from raising the dam wall by 14 metres.

The amount of \$165m is overstated as the impact of this alternative on the World Heritage Area and the Aboriginal cultural heritage has not been fully considered. We note that the EIS is flawed in key areas including,

- Just three hours were spent surveying for koalas and one day spent surveying for platypus across 65 kilometres of watercourse that will be intermittently inundated by the raised dam wall.
- The extent of the inundation that will occur in the pristine Kowmung and Kedumba Rivers is seriously understated. This means that the certain environmental and cultural damage that would be done in their catchments is not admitted.
- Impacts to threatened species from dam inundation have only been considered for one quarter of the impact area (1,400 hectares of the 6,000 hectare impact area).
- No experts were engaged to undertake studies of the impact of the dam project on the Outstanding Universal Values for which the Blue Mountains national parks were originally placed on the World Heritage list.
- The NSW Government has refused to obtain the Free, Prior and Informed Consent of the Traditional Owners, the Gundungurra People, to the dam project.
- Just one quarter of the impact area has been surveyed for its Aboriginal cultural significance -- which alone found over 300 significant cultural sites.

The net benefit/cost of raising the dam wall by 14 metres would be substantially reduced where the impact on the World Heritage Area and the Aboriginal cultural heritage is fully considered and valued.

We note that the *Task Force Assessment Report* (section 9.1.1) takes into account an increase in the population and development in the Hawkesbury/Nepean Valley and this is reflected in the above benefit/cost figures.

There is a fundamental flaw in permitting further development and population in an area that is subject to flooding. Whether the level for 1 in 100 years is 17.3m AHD or about 13.5m AHD (where the dam wall is raised by 14 metres, refer page 190 of *Task Force Assessment Report*) the suffering and loss still occurs when the flood arrives.

The only way to minimise this suffering and loss is to prevent further development and prevent further population increase in the flood prone areas. This is the most sensible course of action and would have the effect of closing the gap between the two benefit/cost outcomes.

Taking into account the understatement of the impact on the World Heritage Area and the Aboriginal cultural heritage of the proposal to raise the dam wall by 14metres and the benefit from avoiding further development and population increase in the valley leads to the conclusion that the most appropriate approach to mitigating the impact of floods in the Hawkesbury/Nepean Valley is to reduce the water level in the dam by five metres and to more effectively manage water flows from the dam.

Such an approach would avoid any impact on the World Heritage Area and the Aboriginal cultural heritage and minimise suffering and loss from flood events.

In summary the most appropriate approach to minimise suffering and loss from floods in the Hawkesbury/Nepean Valley is to prevent further development and population in the flood prone areas, reduce the level of water in the dam by five metres and more effectively manage water flows from the dam.

Francis Breen
President

17 December 2021
0478 882716