

Submission
No 308

**INQUIRY INTO PROPOSAL TO RAISE THE
WARRAGAMBA DAM WALL**

Name: Name suppressed

Date Received: 9 September 2019

Partially
Confidential

9th September 2019

Mr Justin Field, MLC

Chair

Select Committee on the Proposal to Raise the Warragamba Dam Wall

Legislative Council

NSW Parliament House

Macquarie St

SYDNEY NSW 2000

Inquiry into the proposal to raise the Warragamba Dam wall

I _____, would like to make a submission to the Legislative Council Select Committee on the proposal to raise the Warragamba Dam wall.

I am currently employed by an environmental restoration company; my previous experience includes research in plant ecophysiology, assessment of invasive species impacts and on-ground ecological restoration work.

My contribution to this inquiry addresses term of reference:

1 c), *engagement between the NSW Government and the World Heritage Committee of the United Nations Educational, Scientific and Cultural Organisation (UNESCO) in relation to the project;*

1d, *the adequacy of Environmental Impact Assessment process to date, including the assessment of impacts on (ii) Aboriginal cultural heritage; (iii) ecological values of the Greater Blue Mountains National Park and v) communities on the Hawkesbury Nepean floodplain.*

1c) UNESCO's World Heritage Centre stated in July 2019 that going ahead with raising the dam wall would "likely... have an impact on the outstanding universal value (OUV) of the property" (Greater Blue Mountains World Heritage Area)^{1,2}. I fully support the World Heritage Committee's call for a full investigation and EIS to be submitted by the state and federal governments. I request that the federal government stand by their commitment to work with the WHC, and commit to rejecting any infrastructure project that jeopardises the internationally significant Greater Blue Mountains and surrounding conservation areas.

1d ii) Aboriginal heritage assessments carried out by SMEC have been deemed inadequate, inaccurate and unprofessional by traditional owners and independent researcher Dr Jim Smith who works with Gundungurra custodians. Only a quarter of the relevant area was surveyed to produce a report that includes many errors, copyright infringements and poor appraisal of the impact of flooding on

culturally significant sites and landscapes³. Insufficient time has been given traditional owners to respond to the report.⁴

1d iii) I cannot comment on the adequacy of the final EIS as it is yet to be released, however without undertaking formal surveys the preliminary Environmental Impact Assessment published in 2016 lists 17 threatened fauna and seven threatened flora species, as well as four threatened or endangered ecological communities upstream of the dam that are potentially affected by inundation due to raising the dam wall. Twelve threatened or endangered ecological communities occur downstream on the Hawkesbury-Nepean floodplain.⁵

The Preliminary EIS discusses that fact that raising the dam height would lead to an increased likelihood of slumping and erosion of river and streambanks due to higher rates of flow and longer inundation periods. Downstream, in particular, there are many areas of existing bank instability.⁵ In addition to the impacts on native vegetation during the construction phase, all of these changes in flow regime are likely to alter or remove areas of these TECs/EECs and create opportunities for the colonisation and spread of invasive riparian species. I have personal experience working in flood-prone vegetation communities, and have witnessed this sort of degradation occurring firsthand (eg Middle Creek and other tributaries to the Narrabeen lagoon). The necessity for later removing aquatic weeds and the disturbance this creates also exacerbates erosion and is a cost not factored into the proposal.

The ecological importance of these communities cannot be understated, and their diversity and complexity could not be recreated, should they be adversely affected by the proposed works. Aside from containing and providing habitat for rare and endangered species, these assemblages have intrinsic value in themselves. They are the culmination of millennia of interspecific interactions, many of which are yet to be documented in the scientific literature. Individual species are listed in the report as being likely to suffer adverse effects from the project, including the Macquarie Perch, Regent Honeyeater, Platyptus and various eel species. However, there is no discussion of wider ecological implications of these impacts, and such flow-on effects may not be detected for many years.

1d v) There is evidence to suggest that raising Warragamba Dam wall would not guarantee the mitigation of flood risk or damage to communities on Hawkesbury-Nepean floodplain⁶. The recent and proposed release of land for development on the floodplain indicates that urban growth is planned for these high-risk areas^{7,8}. Many alternatives to raising the dam have been proposed, for instance those outlined in a report by Prof Jamie Pittock⁸. By enabling increased housing density on flood prone land and seeking to prioritise the raising of the dam wall as State Significant Infrastructure over the development of evacuation routes, the NSW government seems to be endangering current and future residents whilst allowing developers to profit.

Yours Sincerely,

Colyton, NSW

References

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2. Morton A. and Zhou N. (2019) UN concerns about Warragamba dam plan labelled extreme embarrassment for NSW. <https://www.theguardian.com/environment/2019/jul/04/warragamba-dam-plan-threatens-blue-mountains-world-heritage-status>
3. Smith, J (2019) Submission to Enquiry into the proposal to raise the Warragamba Dam Wall.
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5. BMT WBM Pty Ltd (2016) Warragamba Dam Raising Preliminary Assessment
6. Hannan, P. (5/8/2019) Leaked charts 'undercut' case to lift Warragamba dam wall: opponents. <https://www.smh.com.au/environment/conservation/leaked-charts-undercut-case-to-lift-warragamba-dam-wall-opponents-20190803-p52djf.html>
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