

SUBMISSION - WARRAGAMA DAM RAISING PROJECT – SSI-8441 - DR WENDY VARNEY, LEURA

Personal information: Please note that I do **not** want my address or suburb/town or any other personal information shown online. Only my name and title may be used. Thank you.

Statement of objection to the proposal: I object to the proposal

Grounds for objection: My objection is on social and environmental grounds and on the basis that the EIS is inadequate, shallow and does not take adequate account of the full need to address climate change at a deep and thorough level. (See my full submission below for a more detailed explanation.)

I declare that I have not made any reportable or other political donations and am attaching a statement to that effect.

**SUBMISSION BY DR WENDY VARNEY
PhD in Science & Technology Studies,
BA (Hons in Political Science)**

OVERALL INADEQUACY OF THE EIS

The EIS produced by SMEC suffers from grievous omissions, shallowness and bias. It is repetitive and hides behind gloss and jargon without sufficient interrogation of what the long-term goals are and how the project might meet those broader goals. It lacks a proper and thoughtful presentation of the suite of alternatives that any EIS should be expected to cover, basically boiling the question down to “the project” or the alternative of “no project.”

While some of this has to do with the skewing of the work undertaken by the company given the responsibility for producing the EIS, there is also the problem that the whole notion rests on a number of assumptions of dubious worth and which have themselves been insufficiently probed. The framing of the problem leading to the claimed “solution” is poorly designed and the “solution” weakly presented to fit that design. The methodology is flawed.

This is a pro-development plan giving rise to a pro-development EIS. The real issue here is that those proposing the raising of the dam want more development on Sydney’s floodplain. The proponents are clearly not too worried about flooding because there will continue to be more flooding and it will affect more and more people as there is more development but the proponents of this idea appear to want to forestall the crisis we are heading for in the short-term.

For much of the EIS, the discussion treats the issue as, for the major part, an engineering issue, assuring that other dams of a similar type (mass concrete gravity) have been raised elsewhere (pp. 10-14). This tells us it is possible but not that it is advisable or desirable.

It points to other dams which have been raised, eg in Venezuela and California but does not discuss what negative impacts might have resulted (though clearly different environments might give rise to quite different threats and challenges).

Costs are downplayed and benefits exaggerated or detached from the questions that need to be asked regarding them. Even so, the benefits as they are presented in the EIS are weak and fall apart as soon as any discussion of real costs and real alternatives comes into play.

To give just one example, the EIS states that “The initial closing of the new Windsor Bridge would have been delayed by around half a day....” (p. 19) a benefit that hardly seems huge when weighed against the flooding of a great deal more of this

precious valley. Furthermore, there was disquiet that the new Windsor Bridge would be inadequate – a claim that did not take long to prove very likely correct. So now, instead of admitting the bridge's inadequacy, are pro-development planners trying to come at this from a different angle to save face?

To probe just a little in terms of alternatives, I point out that on p. 25, one of the alternatives mentioned was to "Disallow all new dwellings within the 1 in 500 in a year flood extent" which was considered too "Costly and difficult, given large areas above the 1 in 100 chance in a year floodplain have been approved and/or zoned for residential development."

From this, it seems that the producers of the EIS are claiming that the flood risk is serious enough that a great deal more of the valley must be sacrificed, along with the habitats and species within it, but simultaneously claiming it is not so serious that development has not been going ahead and approvals halted.

What is being avoided here is indeed mention of one of the alternatives and any EIS on this proposed raising of the Warragamba Dam must be prepared to consider such alternatives. The few, and poorly canvassed, alternatives mentioned here are too hastily dismissed (without full discussion of the reasoning but only with the EIS's conclusion as to the inadequacy of these alternatives, so that readers are left "having to take the EIS's word for it." A great many stakeholders will not want to do that and for good reason.

LOCAL ENVIRONMENTAL IMPACTS

On p. 27 of this EIS, the key changes to the environment from this proposal are reduced to the points across seven lines.

The claim that the total area impacted would be just 0.03% of the whole of the Blue Mountains World Heritage area (p. 32) misses the point. National parks and World Heritage areas are ecologically complex and have many interrelationships within and outside of them which are still not fully understood by ecologists, much less engineers and proponents of engineering projects. These are not lamingtons where you can carve them up and refer to them as large or small slices, even miniscule slices. Habitats are connected and have a biological dependence across whole-of-environmental-area, which has to be considered by detrimental impacts on all part of the area. Suggesting that we are talking only of 0.03% displays an ignorance of these connections.

Likewise claiming that areas will only occasionally be flooded and that that will be temporary misses the point of how that changes the type of habitat they become. It may have taken millions of years for a specific species to adapt to an area and flooding an area that would not normally be flooded changes it in essence, making it impossible for some plants to survive there. How much attention was paid to endangered species that may become extinct should this proposal go ahead?

The areas under threat provide present habitat for a number of endangered and critically endangered species. These include the Regent Honeyeater. Some of the

ecological communities found within the discussed area are themselves threatened, including Grassy Box Woodland. Furthermore, the threatened area has among the most diverse collection of Eucalyptus species found anywhere.

The proposal would also threaten Sydney's last emu population and deprive many who are unable to travel more broadly in Australia to see examples of our national bird.

World Heritage status is not simply bestowed but comes with obligations, several of which would be breached were this proposal to go ahead. The Blue Mountains World Heritage area was added to UNESCO's World Heritage list on the basis of satisfying several categories that made it of "Outstanding Universal Value." It is beholden on all of us to cherish and protect these aspects of the Blue Mountains World Heritage area and not allow them to be degraded and their intrinsic qualities diminished. These were among our undertakings as part of Australia's obligations under the World Heritage Convention.

Loss of World Heritage status or even disputes and downgradings within the process can be detrimental to ecotourism and to its economic contribution, yet it is estimated that some 65 kilometres of wilderness rivers, as well as 5,700 hectares of National Parks, would be inundated by the proposed dam project. This would be an horrific loss and includes 1,300 hectares found within the present Greater Blue Mountains World heritage area.

Special mention must be given to the pristine Kowmung River, declared a Wild River under the National parks and Wildlife Act, 174, which would be threatened and would be an especially regrettable impact. Future generations would not look favourably on the loss of this river's pristine qualities, kept intact up until this threat.

The EIS shows no understanding, on the part of its producers or those who have come up with the initial plan, to understand ecology and its intrinsic value. For instance, the EIS refers to "visual amenity" and claims "Most of the areas subject to temporary inundation are where public access is not permitted" (p. 34). However, inundation and its accompanying ramifications in terms of ecological losses and degradation as great as those we are discussing here are about far more than whether they can be seen.

This flippant statement reduces all ecological wonders to anthropomorphic features and reduces all humanity to those who look from lookouts. Seriously, we are not so shallow, not so disconnected from the environment and certainly not so one-dimensional, although there is a growing fear within me that the planners in this case may be just that.

Another inadequacy in ecological terms is seen on p. 35: "...the assessment includes consideration of the unburnt area as refuge for species displaced," By such a statement, the producers of this EIS appear to discount that there will likely be horrific fires in the future due to climate change and that some of the "now unburnt" area may soon be burnt. Species are already being driven to too small areas, many of them not of the necessary habitat or size needed.

Furthermore, it has been estimated that the severe fires during the summer of 2019-2020 devastated around 81% of Blue Mountains Heritage Area, yet there appear to have been no post-bushfire field surveys undertaken as part of this assessment, leaving it totally inadequate in yet another area.

The project, as planned, includes use of offsets. It should be noted that the practice of attempting to compensate for environmental damage by such means is flawed and has been largely debunked. (See, for example, Sharon Beder, *Environmental Principles and Policies*, UNSW Press, Sydney, 2006.) Environmental loss is not remedied by “saving” something elsewhere which should of course be saved, or by remediating something which should never itself have been damaged. Unique habitats stand or fall on their own conservation not on the conservation or restoration of some other habitat somewhere else, nor is the situation improved by payments. Attempts to put a value on endangered environments are fraught and fail when they are reduced to offsets of this kind.

GLOBAL ENVIRONMENTAL IMPACTS - CLIMATE CHANGE

The EIS addresses the wrong question regarding climate change, looking at the vulnerability of the proposed project, which is surely only a very minor (though important) part of the issue.

The broader and more important issue is the contribution of the project to climate change and how it might hamper, sidestep, ignore, or otherwise impede the urgent actions which must be taken to keep temperature rises to a minimum of 1.5 degrees C. This is a major task with the risk of dire consequences if we cannot meet our global obligations in this regard.

Per capita, Australia is one of the worst offenders in terms of fossil fuel activities and general consumption. Added to this, we have been among the worst laggards in setting goals and pursuing change, refusing to commit to methane reduction and being a cheering squad for the watering down of “phasing out” of fossil fuels to “phasing down.”

Although NSW has done much better than the Federal Government in addressing climate change, it has been allowed to go unchallenged in terms of the wider interrogation of what needs to be done and it is within this context that the state has taken an unacceptably aggressive approach to development and to a bigger NSW (with the new Premier recently proclaiming he was in favour of a “big NSW”). This can only put more pressure on the earth at a time when we need to be trying to contain, not expand, production, development growth and the emissions these give rise to. This needs urgent addressing and there is no way any major development of the type proposed here should go ahead until such time as we have had a full-scale multi-sector discussion about the long-term goals of the state.

This project, and the assumptions on which it is based, are incompatible with the road that Australia and NSW needs to be pursuing to seriously address climate change and to our global obligations.

CONSULTATION

Consultation is totally inadequate in relation to this proposal and the plans around it and the wider (though in this case very narrow) decision-making process. The discussion of stakeholders very glibly sidelines those who have both active and passive interests in this World Heritage Area and in its conservation, which would need to consider the interests of future generations.

Bushwalkers are among one of the numerically strongest activity groups in the state and yet get little look-in in this EIS, basically falling into just one of the “interest groups.” Likewise, naturalists and conservationists are given little appreciation, although they often fill the role of speaking up for future generations where those generations cannot speak for themselves. This EIS does them a great disservice.

Approval process, as discussed on p. 41, appears to be weighted so as to get approval rather than genuinely seek the views of residents, councils and other stakeholders. The EIS gives diagrams of the process but it is clearly a closed process, with little engagement allowed by those who might have alternative views and alternative suggestions. This cannot be considered genuine consultation.

The cost-benefit analysis aspect – such as it is – dismisses environmentally engaged stakeholders in a similar manner, with no real interrogation of who benefits and who bears the brunt of the planned development and whether the process might be already skewed in favour of development. It is an extremely poor example of community engagement and there have been no procedures built in to the process which would have allowed early contributions by stakeholders such as environmentalists, residents and bushwalkers.

There are, therefore, so many whose interests have been completely overlooked, including (as mentioned) future generations who will already be bearing the brunt of the possibly disastrous impacts from climate change; and bushwalkers and conservationists, presumably lumped in under ‘special interests groups’ as though they simply have their “quirky little interests.”

This has exacerbated the risk-benefit analysis already being based on flawed assumptions and debunked methodology. It is hard not to conclude this whole EIS undertaking been done in such a way as to bolster the conclusion it, unsurprisingly, reached.

SOME FURTHER POINTS

There has been an entirely inadequate assessment of the cultural and social impacts of the proposal, including inadequate assessment of the indigenous cultural heritage of the area, and also inadequate recognition of the noise, traffic and other impacts on small communities during the dam’s raising, should it go ahead.

Since 45% of floodwaters are derived not from the area that will be behind the dam but from areas outside of the upstream Warragamba Dam catchment, it is not a

“solution” that cannot prevent flooding in the Hawkesbury-Nepean Valley downstream and should not be sold as being able to do more than it can.

Alternatives are more likely to be workable and agreeable to communities if they encompass a number of options, not simply “one big project.”

CONCLUSION

The EIS suffers from being based on unquestioned and largely erroneous assumptions which are at odds with future needs and community interests, which still need to be canvassed properly because the decision-making process and opportunities for real consultation have been inadequate. It appears to be an attempt to justify a planned development rather than a scrutiny of the project’s real worth, costs and benefits.

Environmentally, this project would be a disaster, bringing far too great risk of degradation to the precious and unique Blue Mountains World Heritage Area. Furthermore it is in sharp conflict with the corner we need to turn in order to meet our obligations regarding climate change and containing its otherwise horrendous impacts.

In short, this glossy production looks good but, when read, disappoints hugely. Its methodology is flawed and the proposal to raise the Warragamba Dam should most certainly not proceed.

I strongly suggest: Back to the drawing board with a proper exploration of alternatives and proper and thorough community consultation.

POLITICAL DONATIONS DISCLOSURE STATEMENT TO MINISTER OR THE DIRECTOR-GENERAL

Name of person making the disclosure: Dr Wendy Varney

Interest in the planning application: I am a PERSON MAKING A SUBMISSION IN RELATION TO THE APPLICATION

I hereby declare that I have made no political donations, reportable or otherwise, and have no pecuniary interest in the project.

Wendy Varney
19 Leura Mall,
Leura NSW 2780

Ph: 04 3559 3428

(Note: Without a scanner or printer, I was unable to download and print the form but trust this will suffice. Please let me know if there are any problems arising from this. Thank you.)