

## **DRAFT SUBMISSION TO PACIFIC HIGHWAY UPGRADE ENVIRONMENTAL IMPACT STATEMENT**

Major Projects Assessments, Department of Planning and Infrastructure,  
GPO Box 39  
SYDNEY NSW 2001

### **Submission on Woolgoolga to Ballina Pacific Highway Upgrade**

Dear Sir/Madam,

Please consider the following comments on the Environmental Impact Statement (EIS) on the upgrade of the Pacific Highway between Woolgoolga and Ballina.

The main focus of my concern is the proposal to construct 48km of new highway through Glenugie to Maclean. This is the largest construction of new highway along the eastern seaboard and it will pass through the most ecologically diverse and relatively intact forested areas of anywhere in coastal NSW. One of the key reasons for this high biodiversity is the absence of a major road to date.

Following the existing route has negligible environmental impact as most of the flood plain has been cleared. Social / economic impacts are arguably minor as well when compared to the proposed route, consequently the primary reason for not duplicating the existing route is the cost of building bridges over flood plain. This has however recently been achieved successfully with the Kempsey upgrade by building the longest bridge in Australia across the Macleay and floodplain– it can be done, money can be found. . But the choice is one of internalising or externalising costs at the expense of the environment.

The environmental costs of clearing over 948 hectares of vegetation including 337 hectares of Endangered Ecological Communities (EECs) and the Nationally listed Lowland Subtropical Rainforest cannot be measured nor replaced –that is why they are provided protection. The cumulative impacts on these EECs is unacceptable. There is insufficient detail in the offset strategy to determine whether 3421 hectares of 'like for like' vegetation can be acquired. For example, it is very unlikely that the RMS is going to be able to find 56ha of Lowland Sub tropical Rainforest as outlined in their offset strategy, not to mention the other EECS. That is why they are provided 'state wide recognition and protection. This detail needs to be made available and the vegetation communities identified and assessed as being suitable prior to the EIA being endorsed. These acquisition costs need to be factored into the equation now as being part of the overall project budget. Given that all these EECs occur predominantly within the coastal zone, the costs associated with purchasing suitable coastal properties is likely to be significant. There also needs to funds set aside for the set up and management of these lands by OEH. Without this information it is impossible to determine whether this route and this project is the most cost effective. To omit detail on the costs of these offsets at this stage makes the cost benefit analysis provided in Section 1.3 meaningless and the offset strategy nothing less than guiding principles which cannot realistically be met.

The EIA has made it clear that this project is likely to have a significant impact on *'several threatened flora and fauna, most notably the coastal emu endangered population and the critically endangered Lowland Rainforest of Subtropical Australia*

*present in the study area*'. I suggest that further impact on these species and populations is unacceptable, particularly when there is no feasible way of mitigating nor offsetting the impacts, therefore the process should infer that the RMS revisit the project and avoid these impacts by altering the route.

I also have concerns and could not locate any detail in this extremely large document on what percentage of the current traffic will use this new highway. The options paper suggested that only 30% of the traffic will be using this road while the 70% which comprises local traffic will continue to use the old highway. S. 1.14 outlines that most of the through traffic is heavy vehicles. What funds will be used to maintain the existing highway? Surely this costs cannot be left to local Council. Can the environmental, social and economic costs be justified considering this will be the most expensive part of the highway upgrade with 48km of new road and that this road is being constructed (it would appear) for the heavy transport industry in order to reduce the fatalities in which trucks are disproportionately represented in. Detail on how the existing highway will be maintained needs to be included.

It is also proposed in S 3 'Need' that somehow Grafton city will benefit by having the highway bypass the city centre. With the State Government cutting the more public service jobs which is the largest employer in Grafton, retailers will struggle to survive even more with the loss of business from travellers pass through. .

I have concerns that there has not been any baseline monitoring done in regard to the Endangered Population of Coastal Emu. RMS identified the route in 2006. Only recently have RMS trialled the attachment of satellite trackers. This project should have been started five years ago to get data on the location and the most effective crossing structures for the emus to continue utilising the Coldstream. To suggest that RMS will build a land bridge post construction if the emus do not use the flood mitigation related under passes is unrealistic. There is no information in the monitoring strategy to outline how long or how many emus will trigger this very expensive addition. Is there money to be set aside for this project? Again without this, it is not a fully costed project against which the ecologically less destructive route option can be accurately compared.

Finally I have issues with the timing and the size and complexity of this document. This EIA should not have been put on public exhibition throughout the Christmas holiday break. I understand the exhibition period has been extended but it does not give the public a real opportunity to attend public information nights or consider and prepare a submission whilst most are enjoying the annual summer break. I also take issue that the highway EIA has been rolled into one document. This should have been presented as separate projects which would make it easier for the public and agencies to consider. This has only been done to expedite the process to meet political deadlines, not for the benefit of the public. The DoP has an obligation to make sure the public has adequate time and the information is presented in an appropriate format.

In summary, the environmental costs are too great for very little gain. I therefore call on the determining authorities to reject the preferred route throughout the Clarence Valley and to reconsider the existing route which is a much less damaging option for the Valley's ecosystems and possibly tax payers and rate payers' contributions.

Yours faithfully

Gina Hart  
7 Hiawatha Road  
Minnie Water NSW 2462.