

Blackheath to Little Hartley tunnel EIS submission
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As a longtime member of the Upper Blue Mountains community, I feel I have a responsibility to protect, and act as a custodian to the magnificent Greater Blue Mountains World Heritage Area (GBMWhA), not only for those of us privileged to be living here, but for all of Australia and the world. Therefore I cannot support the Katoomba to Lithgow GWH Upgrade, nor can I support the plans to build an 11-km tunnel from Blackheath to Little Hartley as described in the EIS.

My first issue with the planned upgrade and tunnel project is the politicisation of this project by the Bathurst National MP Mr Paul Toole, and the Bathurst MLC Mr Sam Farraway, and their rush to ram this project through the Blue Mountains so the trucking industry can shave 8 or 9 minutes off their driving time from Sydney to the West, at a cost of over \$8 billion. This must be the biggest pork barrel project in the history of Australia. And the biggest irony of all is that us residents in the Upper Blue Mountains and Little Hartley must endure 9 or more years of construction chaos from building this huge unnecessary project, while these two politicians are hoping to get pork barrel kudos from their constituents out West and from the trucking lobbies. When I started reading the EIS the first sentence was an ominous sign: "The Great Western Highway is the key east-west road freight (and transport) route...". This project, sadly, is all about trucks, and getting more and bigger trucks onto the GWH, in fact gigantic 36m trucks! Nowhere had I ever seen or heard mention of this enormous sized truck potentially plying our highway here, on a road with 6 school zones, over 20 traffic lights, and several towns with parallel parking beside the highway. Safety is often mentioned in this EIS, yet the introduction of giant trucks that can weigh up to 91 tonnes is far from bringing safety here to what is essentially a local road for many of us residents of the Blue Mountains.

One of the most disappointing results of the politicisation of the GWH Upgrade is that the project was cleverly divided into 3 REFs, with only an EIS for the tunnel section, in order to minimise the scrutiny over this project and break up any continuity in environmental assessment between these areas. The TfNSW staff keeps telling us at meetings that they have all this experience digging tunnels in Sydney, but they haven't drilled a tunnel this long previously, nor through a fragile mountain ecosystem filled with wondrous wetland ecosystems that are sustained by the many underground aquifers, in an area so special that it has been granted World Heritage status. The Katoomba to Lithgow GWH Upgrade must be assessed by an all-project EIS before any construction starts, to guarantee that this highway upgrade has the absolute least impact possible on this amazing mountain environment that helps drive a thriving tourist-based economy with 8 million visitors per year.

Another disappointing result of the politicisation of this project is the rushed, incomplete nature of this EIS. The EPBS assessment that would normally occur before an EIS is released

hasn't been conducted yet; we're told the hydrology studies and assessment of potential downstream impacts on Greaves Creek from the Blackheath tunnel portal construction weren't able to be completed before the release of the EIS; and numerous other reports and studies mentioned throughout the EIS "have yet to be completed." Why? Because this EIS was rushed to be released just before the NSW State election occurs on 25 March, in less than 4 weeks after submissions are due. I've heard it said about this EIS by a number of local people, that if they were a teacher and a student turned in this EIS as their end of term project, they would either fail that student or return it to them marked "Incomplete." This is not acceptable.

I have many concerns with this EIS and the proposed 11-km Blackheath to Little Hartley tunnel project:

1) First and foremost is my concern with the plans for the Blackheath worksite. Occasionally when the Blackheath worksite is mentioned in the EIS, I have found a reference referring back to the Katoomba to Blackheath Upgrade project REF for assessment and approval of this worksite, such as in Chapter 14, section 14.2.4: **For the purposes of the environmental impact statement, it has been assumed that the Katoomba to Blackheath Upgrade and Little Hartley to Lithgow Upgrade and associated drainage, flooding and water quality infrastructure have been assessed, approved and are operational prior to construction of the project.**

Another example is from Chapter 12, Section 12.2, **the assessment considers a baseline environment, where the Katoomba to Blackheath Upgrade and the Little Hartley to Lithgow Upgrade adjoining the project to the east and west respectively, are under construction and associated construction sites have been cleared of vegetation. As a result, the project's direct impacts have been determined with reference to the construction footprint required by the project, minus the overlapping areas that are being assessed by the Katoomba to Blackheath Upgrade and Little Hartley to Lithgow Upgrade (referred to as the development footprint).**

However the Katoomba to Blackheath Upgrade project REF has the Blackheath worksite not at the corner of Evans Lookout Rd and GWH, but back about 500-1000m at Tennyson Rd, back south along the GWH, and any assessments or approvals of this REF mentioned as a baseline for the EIS are only for the worksite at this location. It is only in the Submissions Report for the Katoomba to Blackheath Upgrade published after public comments on the original REF, in October 2022, that one finds the Blackheath worksite for this REF has been quietly moved to the corner of Evans Lookout Rd and GWH, with little or no environmental assessment (and no opportunity for public comment on these changes, so technically it never has been approved by anyone except TfNSW staff) despite now being located in the heart of the upper catchment of Greaves Creek, which is part of the Sydney Water Special Catchment area for our drinking water, which flows into Lake Greaves, and then on through to the GBMWA, through the iconic Grand Canyon hiking area to eventually reach the Grose River. Myself and others have looked through the chapters of this 233 pg Submissions Report and there is next to no information about the clearing of vegetation, or the management of weeds and sedimentation, or dealing with drainage issues as suggested multiple times in the EIS. What is mentioned and detailed in accompanying maps is the extension of the construction service road that will be used by construction vehicles and

emergency services traveling between Medlow Bath and Blackheath, so it connects with Valley View Rd between two unfortunate homes that will find themselves beside a new highway of huge construction vehicles, and the re-alignment of utilities such as fibre optic cables, but basically nothing about the environmental impacts of clearing this area of vegetation and transferring it into a major worksite. It is this sort of trickery and deception that can more easily be hidden when a big project like the GWH Upgrade is not under an all-project EIS, and is instead conveniently divided into 3 REFS and 1 EIS where there is little continuity and even less accountability in the environmental management of these four parts.

Also problematic with the Blackheath worksite is the proximity to at least 10 nearby homes, plus the neighbouring homes across the street and farther along Evans Lookout Rd and Valley View Rd. The back fences of these 10 homes will go from being an ideal garden setting with undeveloped national park and forest and animals, to a denuded hell realm of dust and noise and vibrations and lights and machinery, and hundreds of vehicle movements per day, 24/7 with the digging of the cut and cover tunnel portals to align with where the TBMs finish. Why can't TfNSW give these poor souls a break and move the worksite back south a few hundred metres, as well as creating a barrier between the worksite and the back yards of these homes? What if you lived there? When I asked Alistair Lunn about what mitigation would be offered these home owners, he told me the usual offer was double glaze glass and air conditioning. This construction site will be here 9+ years, first with the Katoomba to Blackheath Upgrade, followed by the tunnel construction, and finishing with the building of permanent infrastructure that will accommodate tunnel personnel, emergency workers, water treatment, etc. Can you actually think that families can survive being locked in their homes for all those years behind double glazed windows, air conditioning on (in summer only), their children unable to play in the back garden because it is choked in dust?

Another issue with the Blackheath worksite is the plan to store up to 5000 cubic metres of tunnel portal spoils, uncovered. But the Little Hartley worksite, with a spoil pile of up to 20,000 cubic metres, will be enclosed in an acoustic shed to reduce noise and minimize drainage issues from weather events. Yet only a few residences are near the Little Hartley site, compared to the Blackheath site. Are the folks in Little Hartley considerably more noisy about their situation and have therefore been placated with promises of an acoustic shed? Surely the homes adjacent to the Blackheath worksite deserve an acoustic shed? And with this worksite situated right in the headwaters of Greaves Creek, it seems a no-brainer to be covering this spoils pile to prevent drainage and sedimentation issues if we have large rainfall events of hundreds of millimetres in a day or two as has happened several times in the past few years.

And then there is the issue of parking. A 100-car parking lot is mentioned in the EIS, as is the potential for workers to use on-street parking along Evans Lookout Rd. during the day and at shift-changes. Has TfNSW actually looked at the potential for parking cars along Evans Lookout Rd? There isn't much room due to the residents' gardens, therefore a better plan is needed to reduce the impact on these residents who have the unfortunate situation of having your worksite moved to butt up against their back fences.

2) Another major concern I have with the Blackheath tunnel project is the construction of the Blackheath tunnel portals. Because Roadheader machines must be used instead of TBMs to dig the cut and cover tunnel portals, to a point where the TBMs will come out of the ground from their journey up from Little Hartley, the EIS states that the portals cannot be lined like the tunnels dug by the TBMs, which will be lined with a cement casing. In the EIS it states that reductions in baseflow of around 15 to 17 per cent (for a 95th percentile year (dry year)) are predicted at Greaves Creek near the Blackheath portal, and in drier years there may be impacts to peat swamps. It goes on to say that further investigation into the impacts of baseflow reductions on watercourses and swamps will be undertaken during design development, and if revised modelling determines that a reduction in baseflow to the valley floor infill swamps of Greaves Creek is likely and that there is a risk of detrimental impacts to these ecosystems as a result, then mitigation actions such as lining the Blackheath tunnel portal would be assessed for their effectiveness in addressing the risk. I find it hard to imagine, knowing that there could be a reduction in baseflow into Greaves Creek of 15-17% in dry years, that TfNSW isn't automatically choosing to line these tunnel portals? What happens if we have an extended El Nino period lasting for a year or two, or more, after the tunnel is completed, and Greaves Creek and the associated THPSS wetlands downstream and into the WHA are severely impacted, but it's too late to line the tunnel portals because they're already built? This is unacceptable, and these tunnel portals need to be lined as a matter of course.

Also of concern regarding the Blackheath worksite and associated impacts upon the Greaves Creek catchment, is the choice by TfNSW to use just a 1500m radius buffer zone around this worksite for assessment purposes. I can see where the use of a 1500m radius buffer zone around tunnel worksites in the Sydney area is perfectly acceptable, but the Blackheath worksite is such a short distance from the boundary of the GBMWHA, and the many federally listed THPSS wetlands associated with the Greaves Creek drainage further downstream, which have known populations of endangered Giant dragonflies and Blue Mountains water skinks, but are inconveniently left out of this assessment due to being just outside of the assessment area, but close enough to be impacted by this major project. This too I find unacceptable within proximity to a WHA.

3) The impact on aquifers and groundwater from construction of the Blackheath tunnel is yet another major concern. According to the EIS, there will be cross tunnels approximately every 120m between the two main tunnels. Because these cross tunnels cannot be lined like the main tunnels, which are dug by TBMs, the digging of these cross tunnels using the Roadheaders will, according to the EIS, result in a maximum predicted tunnel groundwater inflow level that would peak at around 750 to 1,850 cubic metres per day (750,000 – 1,850,000L per day, 8.7 to 21.4 litres per second) associated with construction of the cross passages. This is 750,000 to 1.85 million litres PER DAY that will be entering the tunnel system, that will not be held in the many aquifers that are within the sandstone layers of the Upper Blue Mountains. Aquifers are the engine room of the many listed THPSS wetland ecosystems throughout the Blue Mountains, nourishing a wide range of flora and fauna, with several species endangered. The EIS goes on to explain that total inflows would be expected to decrease around 2029 once construction of these elements is complete. That's about a five-year period, if construction was to start in 2024. What if there is an extended

period of El Nino with drought, impacting on the natural resupply of groundwater? These impacted wetland ecosystems could dry up, as has happened where coal mining has interrupted aquifers near Lithgow. This is totally unacceptable.

The 260m long access tunnel planned to be dug at Soldiers Pinch is another concern. We learned at an online session with TfNSW that like the cross tunnels, this access tunnel will also be dug by a Roadheader machine and cannot be cement lined. We were told that only the top portion of this tunnel will have a waterproof lining, because the lower portion of this tunnel will be below the claystone layer where much of the groundwater is held within the Upper Blue Mountains sandstone. However, if TfNSW were to consult with the different coal mining companies operating nearby in Lithgow, they would learn of the difficulties with groundwater ingress experienced while mining under the claystone layer, and the resulting damage caused to nearby swamps and creeks. The engineers of this project need to go back and do their homework properly, and maybe they could have if this EIS wasn't so rushed and incomplete.

The cement lining in the main tunnels is another concern, as there are different types of cement that can be used, but some types can cause water that seeps through to become alkaline. It is hoped that TfNSW will address this issue and use an appropriate cement type, as any changes to pH in nearby wetland ecosystems can cause serious negative impacts on flora and fauna.

4) The lack of concern for Climate Change in this EIS, and the impacts this project will have upon our climate, is quite shocking. The EIS hardly mentions Climate Change throughout its 1000s of pages. Chapter 23 Sustainability, Climate Change and Green House Gases is one of the shortest chapters in the EIS, at just 17 pages, and there is basically no discussion of the impacts this road project will have on Climate Change due to encouraging more vehicles to use the GWH. Despite claims in the EIS that this tunnel project will reduce traffic due to allowing larger trucks, research has shown in the United States that building bigger roads doesn't relieve traffic congestion, it typically increases traffic problems. Sydney has discovered this every time roads like the M4 are widened; the result is more cars and trucks will use those roads.

The use of rail over road for transporting goods is basically dismissed in the EIS, with little regard for the huge benefits in reducing greenhouse gas emissions from transporting goods by rail, as well as the huge difference in safety per km/tonne compared to shipping by road. If a big truck is in an accident, the chances are not good for survival of the occupants in a passenger vehicle.

5) The online submission process is terribly complicated for most people. You couldn't have made it much harder for someone to make submission if you had tried. I'm sure there are people out there who were all ready to make their submission, but were stymied by the process and lacking anyone to assist them, they may have given up. Surely you have a well-paid IT team that can design an easier, user-friendly submission process for future EIS submissions?

Conclusion:

The Blue Mountains does not need an \$8 billion highway upgrade and tunnel to solve the transport issues currently facing the GWH. Yes, we have traffic congestion in Blackheath on some Sundays and holidays Mondays, but what is truly needed instead of a big, expensive tunnel and accompanying 4-lane dual carriageway through a World Heritage Area, is a new, broader, more holistic approach to the future of transport in NSW and Australia that looks at the big picture, with concern for Climate Change being the centrepiece of the design, incorporating less polluting rather than more polluting forms of transport, especially rail, and encouraging mass transit to be used rather than individual vehicles. The movement of gravel and coal and other similar mass commodities by truck should be phased out from using the GWH through the mountains, perhaps by initiating a gradually increasing "Climate Change levy" on trucks transporting these heavy goods, and at the same time making provisions to encourage these commodities to be transported by rail instead, greatly reducing the number of trucks using the GWH. Imagine if the \$8 billion for this GWH Upgrade went toward upgrading the rail system, improving the existing GWH as well as Bells Line of Road for use by passenger cars, and creating a free passenger train service to the Blue Mountains, with regular minibus services meeting the train passengers and delivering them to places of interest, restaurants and accommodation, to encourage them to leave their cars at home. And imagine if the billions of dollars in subsidies to the fossil fuel industry in Australia were also to be reduced, this too would encourage the shift from road to rail and help Australia meet its Climate Change targets.

At the very least, the Katoomba to Lithgow GWH Upgrade and the Blackheath to Little Hartley tunnel must come under an all-project EIS, and any plans to begin construction work at Medlow Bath halted, until an all-project EIS has been completed and put before the communities from Katoomba to Lithgow for their assessment. We deserve far better than what Paul Toole, Sam Faraway and TfNSW currently envision with their massive, expensive highway upgrade plans for the Blue Mountains and our magnificent World Heritage Area.