Paul Freeman - Fwd: Submission Details for Beth Williams

From:Stephen O'DonoghueTo:Paul FreemanDate:Tuesday, 28 February 2012 10:39 AMSubject:Fwd: Submission Details for Beth Williams

>>> Beth Williams <bethwillms@optusnet.com.au> 2/19/2012 2:59 pm >>>



Disclosable Political Donation: no

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, NSW

Content: Submission Tarrawonga Coal Project - Open-cut coalmine extension

I object to the Tarrawonga Coal Project extending into Leard State Forest and diverting Goonbri Creek to prevent flooding of the open-cut mine pit and final void. I write on behalf of Armidale National Parks Association of NSW.

One of the most serious impacts of this proposal is the destruction of the southeastern part of Leard State Forest, which must be added to the destruction of forest ecosystems by the Boggabri Coal extension proposal plus the Maules Creek project. The three projects together remove about three quarters of the forest, leaving only the northeastern corner of the forest still standing. The cumulative imp acts on biodiversity of this loss of vegetation are unacceptable.

This total clearing of vegetation and all its ecological communities by open-cut mining cannot be mitigated by progressive rehabilitation of re-contoured land after mining, or by the proposed biodiversity offsets. This violates the principle of "no nett loss ...maintain or improve vegetation/biodiversity." This justifies refusal of all three projects.

Cumulative impacts

The Flora Assessment indicates the Tarrawonga Project would require the progressive removal of approximately 397 ha of native vegetation. This includes approximately 145 ha of native vegetation in the Leard State Forest, and approximately 13 ha of Box-Gum Woodland, which is an endangered ecological community.

The impact of this clearing for the Tarrawonga project must be added to the clearing of 1,665 ha of native bush and 545 ha of endangered EECs for the Maules Creek Coa I project, plus the total clearing for the continuing and extended Boggabri Coal project. These three projects will destroy more than three quarters of Leard State Forest, plus a total of more than 1,165ha of the Grassy Box Woodland endangered ecological ecosystem, an EEC of national significance. Leard State Forest, 7,464 hectares, is the single biggest remnant of native vegetation left on the heavily cleared Liverpool Plains. The cumulative impact of its destruction will have a very high and probably irreversible impact on biodiversity values of the bioregion.

Leard forested land will be replaced by a desert landscape of open-cut coal pits, with statutory rehabilitation unable to compensate for many years, if ever. This will mean absolute destruction of a significant woodland area in a cleared landscape, plus irreparable loss of biodiversity, with little or no hope of effective remediation or mitigation from offsets for many years, despite the EP&A Act 's statutory requirements for rehabilitation and offsets for each project site.

The adverse effects of the open-cut mines will be compounded by the clearing for coal seam gas extraction in the Pilliga East forests by Santos (formerly Eastern Star Gas), which will severely fragment the most iconic and largest woodland and forest west of the Dividing Range in NSW and effectively disrupt any connectivity benefits from

replanting and rehabilitation proposals.

Offset areas and corridors for the mines are purported (in the environmental assessment documents) to link the Pilliga forest area a few km west of the mines with the Nandewar Range a few km to the east. The cumulative impacts of all the developments taken together will certainly greatly devalue these "corridors" and make them unable to "maintain and improve" or "compensate" for the destroyed environment.

This justifies refusal of all three pro jects.

Diversion of Goonbri Creek, and provisions to prevent flooding of open-cut pit and final void.

I have serious concerns that the provisions to divert Goonbri Creek and prevent flooding of the open-cut pit and final void will prove inadequate to contain the extreme rain events that are likely to become more frequent and more extreme in the local area, due to global warming and accelerating climate changes

These concerns are heightened by the Feb 2012 flooding of the Boggabri mine's current open-cut pit, forcing a 30ML per day pump-out and licensed discharge of potentially contaminated water to the Namoi River. (ABC rural news bulletins and programs 16/17 Feb 2012). This is a serious worry for downstream water users in the Namoi valley, and indicates the need for a review of flood and spill risk in all three coal projects operating in Leard State Forest, plus Santos's coal seam gas operations in the Pilliga.

I submit there must be an urgent review of water and flood management proposals for the Tarrawonga Coal Project to take full account of measured levels of rainfall, amount of runoff and levels of accumulated floodwater in the Boggabri Coal mine pit and dams, and the levels reached in all creeks and drainage lines during the flooding and subsequent discharge to the Namoi River. No approval should be issued if it is found that there is a significant risk of future flood and spill events from the operations of Tarrawonga Coal PL. Biodiversity offset proposal.

The acquisition of 1660 ha of well-vegetated private land adjoining Mount Kaputar NP as a biodiversity offset is a welcome improvement on the proposals of Boggabri Coal and Maules Creek projects, but can in no way compensate for the total destruction of ecosystems and biodiversity by the three projects in most of the relatively intact public forest in Leard State Forest.

It should be questioned whether the offset area situated on the 600m elevation contour is truly similar in its soil types, ecosystems and array of species to the impacted areas of Leard State forest on the 200-300m contour some 20-30 km to the south. Biodiversity offsets are supposed to provide "like for like" replacement vegetation and habitat to compensate for what will be destroyed on the impacted areas affected by the projects.

It is futile to try to mitigate the impacts of each individual site without taking account of the total cumulative impacts on the region and the environment.

Conclusion

Armidale Branch of the National Parks Association of NSW believes that the Tarrawonga Coal Mine project should be rejected for all the above reasons.

We ask for refusal of the Tarrawonga Coal Project open-cut coalmine extension in Leard State Forest because of its contribution to the cumulative impacts of mining on the region and the envir onment, as identified above.

The destruction of Leard State Forest by open-cut mining will have a very high and probably irreversible impact on biodiversity values of the bioregion, justifying refusal of all three coalmining projects in the area.

Submission compiled by Beth Williams, Project Officer, Armidale National Parks Association of NSW 19/2/12 25 The Avenue, Armidale NSW 2350. Phone 02 6772 4454

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Submission for Job: #4588 Tarrawonga Coal Project https://majorprojects.af finitylive.com?action=view_job&id=4588 Site: #2229 Tarrawonga Mine https://majorprojects.affinitylive.com?action=view_site&id=2229

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