



19 Falls Rd
Wentworth Falls
NSW 2782

Mining and Industry Projects
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

**Part 3A Modification 4 – Invincible Mine Extension (07_0127 MOD 4) and
Part 3A Modification 2 – Cullen Valley Mine Extension (DA 200-5-2003 MOD 2)**

I object to these proposed modifications to the Invincible and Cullen Valley coal mines because it will adversely impact on the internationally significant pagoda landform complex located on the western edge of the Great Dividing Range in Ben Bullen State Forest. This public forest should be fully protected from open-cut mining in a state conservation area.

The coal in this proposal is of poor quality and there are better quality substitute resources that can provide for at least 25 years electricity generation by the two power plants in the Lithgow Region. The claim of increased costs to electricity consumers if the Coalpac proposal does not proceed is a wild exaggeration. Nearby underground mines have provided for local electricity power plants for over 20 years.

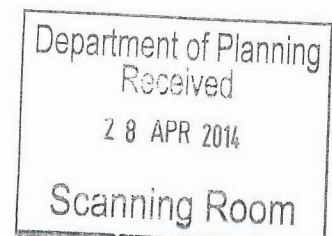
The proposal will destroy by open-cut mining the unique biodiversity, scenery and geological values associated with the pagoda landform complex. Its outstanding values include a Grassy Box Woodland – a nationally endangered ecological community, many nationally endangered Clandulla geebung shrubs and 2,300 threatened Capertee Stringybark trees. Given the importance of the natural environment, the Planning Assessment Commission recommendation for independent vegetation study should not have been ignored by Coalpac in its current environmental assessment.

The proposal fails to provide the 300 metre minimum buffer recommended by the Planning Assessment Commission from the base of the pagoda rock formations and the open-cut area. The buffer provides protection for wildlife, including many Lyre Birds and the threatened broad headed snake. If such a buffer were provided, there would be no mine.

The proposal is less than two kilometres from Cullen Bullen and dust from this project will lead to increased morbidity and mortality in the community from respiratory and cardiovascular disease. Noise, truck movements and blasting will also adversely impact on residents. The proposal intends to vastly increase water extraction from underground workings from 26MI/year to 750MI/year, but fails to address the ongoing fires underground and in waste heaps. Where 2MI/day of water pumped from old workings is to be released ^{is} not explained.

The Aboriginal cultural heritage assessment lacks credibility because it did not find a cave art site in the proposed disturbance area for the Cullen Valley Mine. Previous studies had missed other important Aboriginal cave art sites in the area.

Despite Coalpac's claim, ecosystems cannot be replanted on farmland or after open-cut mining native forests. No mature woodland has ever been established in mine rehabilitation. The biodiversity offsets are inadequate, and cannot replace a Gardens of Stone Stage 2 reserve over Ben Bullen State Forest.



The Environmental Assessment does not deal with cumulative impacts either from Pine Dale and Neubecks Creek open-cut proposals or from future stages by Coalpac after this mine proposal is completed in four years. These proposals will further degrade an intact environment.

The pagodas, cliff and cave overhangs are susceptible to subsidence hazards yet Coalpac did not protect these features from high wall mining as recommended by the Planning Assessment Commission.

Please refuse consent to both proposed modifications and stop open-cut mining in the Gardens of Stone region.

Yours sincerely,

Warwick Mosman
24 April 2014