DRAFT SUBMISSION TO PACIFIC HIGHWAY UPGRADE ENVIRONMENTAL IMPACT STATEMENT

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

Dear Sir/Madam,

Submission on Woolgoolga to Ballina Pacific Highway Upgrade

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 NSW. One of the key reasons for this high biodiversity is the absence of a major road to date.

The primary reason for not duplicating the existing route is the cost of building bridges over flood plain. This has recently been achieved successfully with the Kempsey upgrade – it can be done, but the choice is one of internalising or externalising costs at the expense of the environment. Money we can be found as illustrated by the State Government who recently discovered they had $1 billion they didn't know they had.

The environmental costs of clearing over 948 hectares of vegetation including 337 hectares of Endangered Ecological Communities (EECs) including the nationally listed Lowland Subtropical Rainforest cannot be measured nor replaced –that is why they are protected. The cumulative impacts on these EECs are 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. This is the only means available of providing a fully costed project.

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 best possible 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.

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

Yours faithfully

Debrah Novak

Date 16th Jan 2013

Major Projects Assessments, Department of Planning and Infrastructure,

GPO Box 39

SYDNEY NSW 2001

Dear Sir/Madam,

Submission on Woolgoolga to Ballina Pacific Highway Upgrade

I wish to comment on the recently released Environmental Impact Statement (EIS) on the upgrade of the Pacific Highway between Woolgoolga and Ballina. In particular I have serious concerns about the route through the Clarence Valley from Glenugie to Maclean. My concerns are based on the potential impact on threatened species (both state and federally listed) and ecosystems generally along the route. The potential impact on the Coastal Emu is of grave concern. With a greatly reduced population of about 100+ birds any disturbance to it habitat should be avoided. The proposed bridges and other methods to address this issue are all unproven and all monitoring will do is document a further decline in the population. I have grave concerns about the survival of the other 80+ threatened species and all of the non-threatened species that will lose their habitat when the forests are cleared for the highway. The protection of compensatory habitat elsewhere will not assist these habitats and species.

I therefore call on the determining authorities to reject the preferred route throughout the Clarence Valley and to adopt the orange option which is a much less damaging option for the Valley's ecosystems.

At a time of great biodiversity loss we cannot allow such a major impact on the Clarence ecosystems. There is a viable alternative and it needs to be adopted.

Yours faithfully

Debrah Novak

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