

421 Coolgardie Road
via
BALLINA NSW 2478

**DIRECTOR GENERAL
NSW DEPARTMENT OF PLANNING AND INFRASTRUCTURE
MAJOR PROJECTS ASSESSMENT
GPO BOX 39
SYDNEY NSW 2001**

Dear Sir/Madam,

SUBMISSION: PACIFIC HIGHWAY UPGRADE EIS -WOOLGOOLGA TO BALLINA

I would like to provide the following comments on the Environmental Impact Statement (EIS) about the upgrade of the Pacific Highway between Woolgoolga and Ballina, and particularly the construction of the motorway in the Glenugie to Maclean section, the Woodburn to Clarence River section and the section in the vicinity of the Wardell Heath.

This particular section of the Pacific Highway upgrade (Woolgoolga to Ballina) is one of the largest and longest construction projects along the eastern seaboard and I have objections to the proposed route and adequacy of the mitigation measures proposed to ameliorate the impacts of the proposal:

- the impact on the endangered population of Coastal Emu;
- the impact on 80+ threatened fauna species;
- the inadequate number of fauna over-passes and under-passes;
- the current proposal passes through environmentally sensitive areas of forest and wetland;
- the close proximity to the pristine coast will certainly result in the inevitable application from developers to open up the area for housing, particularly Woolli;
- an increased safety risk to fire fighters during wildfire events.

ENDANGERED POPULATION OF COASTAL EMU

The Coastal Emu population is listed as Endangered. The Coastal Emu is not sedentary, and it is normal for the Emus to be very mobile to follow the availability of plants, eating shoots, fruits and seeds which is their diet. In short, they consistently roam and follow seasonally available food resources. The construction of a major highway through their normal habitat is likely to severely threaten their ability to roam and seek vital food, and could, inevitably, threaten their existence. In the Clarence the majority of documented Emu sightings are from the forested areas (and adjacent farmlands) through which the proposed "Route B" passes. In the Tabbimobile to Woodburn section Emus occur both sides of the proposed route. The forests and heaths to the east of this section are regularly affected by extensive and severe wildfires. The proposed motorway will be a barrier to recolonisation of the area by all fauna including the Emu. It is realistic to suggest that the motorway will also be a barrier (or trap) to those animals trying escaping these wildfires. In times of wildfire movement to a small number of widely spaced fauna passes may not be possible.

I have concerns that there has not been any baseline monitoring done regarding the population of Coastal Emus. It is on record Roads and Maritime Services (RMS) identified the current preferred route in 2006. It is only recently RMS trialled the attachment of satellite trackers to Coastal Emus. In my opinion this project should have been initiated some years ago in order to obtain the critical data on the movements of the Emus and as the potential for significant impact on this population should have been recognised many years ago. The delay in assessing these impacts is unacceptable.

The construction project should be delayed until the movement / dispersal patterns in both the Clarence valley and Double Duke / Tabbimobile areas are well understood. This should include an assessment using tracking to determine seasonal movements.

The suggestion that RMS will build a land bridge post construction if the emus do not use the flood mitigation related under passes is at best unrealistic. There is no information in the monitoring strategy to outline how long or how many emus will trigger this very expensive addition. At the very least my immediate concern would be the issue of budgetary allocation to provide for this possibly quite expensive project. Unless this is included as a budgetary contingency, it would not be a fully costed project, particularly against the ecologically less destructive route option. It is imperative for this to be included to enable an accurate budget comparison.

Proposed Route Adoption

If the proposed route is the final agreed decision, I would strongly recommend that an increased number of underpasses and bridges at strategic locations be included so that the current population of Coastal Emus can be at least maintained. This should be undertaken in consultation with the 'Save the Coastal Emu Committee', which is supported by BirdLife Australia (Northern NSW).

In the vicinity of the Wardell heath the motorway should follow the existing route to avoid isolating the Wardell heath and to reduce social impacts on the Meerschaum Vale area (to the west of the Wardell heath).

ENVIRONMENTAL ISSUES

At the moment the proposed highway route will pass through some of the most ecologically diverse and relatively intact forested areas of anywhere in northern NSW. It is worthy to note that in the case of the Clarence Valley, the major reason for this high biodiversity is the absence of a major road through the area.

I have grave concerns about the survival of the other 80+ threatened species and the non-threatened species that will lose their habitat when the forests are cleared for the motorway. The Black-necked Stork, Brolga, Australasian Bittern, Eastern Osprey, Square-tailed Kite, Spotted Harrier, Little Eagle, Bush Stone-curlew, Glossy Black-Cockatoo, Masked Owl, Sooty Owl, Eastern Grass Owl, Powerful Owl, Black-chinned Honeyeater, Grey-crowned Babbler, Diamond Firetail, Koala, Long-nosed Potoroo, Grey-headed Flying-Fox, Spotted-tailed Quoll, Brush-tailed Phascogale, Yellow-bellied Glider, Squirrel Glider and more, have been recorded from along the proposed route. In addition, the federally listed Rainbow Bee-eater, White-bellied Sea-Eagle, Latham's Snipe, Australian Painted Snipe, Fork-tailed Swift and White-throated Needletail, as well as numerous mammals, reptiles, amphibians, invertebrates and threatened flora species, have also been recorded along the proposed route.

The wetlands and rainforests in the vicinity of Wardell, and through which the proposed motorway route passes, support numerous threatened fauna and flora species. These vegetation communities in themselves are also recognised as EEC's. In addition, these communities are already highly fragmented and somewhat isolated. Additional fragmentation is not sustainable and will result in a decline in local fauna populations.

The protection of compensatory habitat elsewhere will not assist these habitats and species. The effective isolation of the forests east of the motorway and of the Wardell heathlands is of considerable concern. The number of fauna passes is insufficient considering the length of the motorway.

I understand the primary reason for not duplicating the existing route between Glenugie and the Yamba intersection and between Woodburn and Ballina is the cost of building bridges over flood plain. This has recently been achieved successfully with the Kempsey upgrade and the Ballina bypass. Obviously it can be done, however the choice is one of economics over the environment. Of course, it is a budgetary issue; however I only need to remind you of a recent windfall to the Government when discovering approximately addition \$1 billion by the Auditor.

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, which is why they are protected. The cumulative impacts on these EECs will be catastrophic. Furthermore, there is insufficient detail in the offset strategy to determine whether 3421 hectares of 'like for like' vegetation can be acquired let alone the ability to acquire 948ha.

It is highly unlikely that the RMS is going to be able to find 56ha of Lowland Sub tropical Rainforest as outlined in their offset strategy, in addition to 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.

While a focus on the protection? Of EEC areas is important it discounts the importance of the non-EEC areas as flora and fauna habitat and the values of these "other" vegetation communities as corridors and natural areas for the community to value. These areas have many other social values in addition to their wildlife values i.e. timber production, honey production, carbon storage, ground water feed-in areas, etc.

The whole notion of "like for like" compensation is meaningless unless the destroyed area of ecological community is replaced through habitat planting or enhancement of highly degraded habitats in close proximity of the destroyed ecological community. To do otherwise results in a continuing decline in the extent of the particular habitat across the region and therefore a continuing decline in flora and fauna populations.

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 and an opportunity to adequately assess the social and environmental costs of the project.

COASTAL HOUSING DEVELOPMENT

My concern with proposed route is its close vicinity to the currently pristine east coast and the impacts on these small coastal towns has not been adequately assessed.

Currently, there exist only the small villages of Woolli, Minnie Waters, Sandon and Brooms Head. They exist only because it's a long trip by road to get to any of these locations, and therefore this usually attracts the pre-determined visitor or resident. These locations do not usually attract the casual highway traveller.

I have no doubt that if the proposed route is built, there is every likelihood that over a short period of time property developers will see potential and exert pressure to expand these villages area for a housing boom. Indeed they may look further at other pristine beach areas for development. It would only take the inclusion of an exit from the highway and the subsequent upgrade or new road for this to occur.

This will, of course, require an expansion of existing or new infrastructure, placing more stress on the local fragile environment. I would easily predict the demise of the Coast Emu and many other local populations of endangered species. This associated potential for development and adverse impacts has not been addressed in the EIS or associated planning documents.

INCREASED FIRE SAFETY RISK

In the section Iluka to Woodburn severe and extensive wildfires occur on a regular basis. The proposed route and associated fencing will increase the fire safety risk for those property owners living adjacent to the motorway and will increase the safe escape options available to fire fighters during times of emergency. Therefore I am of the opinion that a significantly increased number of under and over-passes is required in this area.

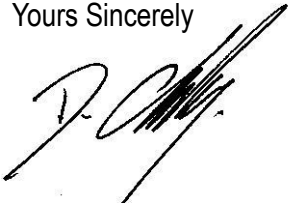
CONCLUSION

In my opinion the proposed route has an unsustainably high environmental cost. The large-scale impact on the forests along the proposed route and the many endangered species including the Coastal Emu (Endangered Population under the NSW Threatened Species Conservation Act) is real.

I request that the current proposed route throughout the Clarence Valley and to the west of the Wardell Heath be rejected, and for the Clarence Valley adopt the orange option which is a much less damaging option for the Valley's ecosystems. I also submit that the adequacy of the fauna passes be re-assessed and enhanced.

I submit that the preferable route is the existing Pacific Highway route.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'D. Charley', with a stylized flourish extending from the end.

David Charley
22 January 2013