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

by email plan_comment@planning.nsw.gov.au

19 January 2013

Dear Sir/Madam,

Re: Woolgoolga to Ballina Pacific Highway Upgrade SSI-4963

Wildlife SOS objects to the proposed upgrade.

Wildlife SOS is a wildlife conservation organisation founded in the Clarence Valley. Our objection to the upgrade is to the broad environmental impact, and also to more specific issues relating to Sections 3 and 4 being the 48.2 kilometres between Glenugie and Maclean.

The Environmental Impact Statement [EIS] highlights significant issues that we believe have not been adequately addressed.

1. Of particular concern to Wildlife SOS is the impact the preferred option will have on the Endangered population of Coastal emu.

Page 221, chapter 10 of the EIS identifies a number of measures to be taken with regards the Coastal emu. In addition the RMS has produced a fact sheet which provides "information on the investigations undertaken to date and how RMS will mitigate potential impacts and maintain access to habitat for the Coastal emu".

Significant deficits have been identified with regard the information in both those documents:

1.1 The baseline monitoring has not been successful.

The pilot project of satellite tracking has been stopped due to the morbidity and/or mortality of the emus involved. This project forms part of the strategy for emu management outlined in the EIS and promoted by RMS.

- 1.2** The landscape plan suggests food plants such as soybean, oats or rye could be used as ground cover to attract emus to a crossing zone.

These plants are not part of the native diet of the Coastal emu and there is no evidence to confirm if the crops are eaten preferentially or only at times of food shortage. Therefore these introduced crops cannot be considered a reliable or 'attractive' food source.

These crops are also seasonal, and as such would at best attract the emus for limited periods.

Information published by the Department of Primary Industries 2006-07 states "in the rain-grown environment of the north coast of new south wales (nsw), achieving consistently high soybean yields requires careful consideration of a range of crop management aspects." The RMS plan does not include any provision for such crop management.

- 1.3** The landscape plan states dense plantings will be used as a natural barrier fence in some locations.

The Coastal emu is predominately a forest dwelling bird accustomed to moving through dense vegetation. The planting as described will not be a barrier, nor will such planting direct the emu to a particular crossing.

- 1.4** The EIS suggests that emus can be educated with respect to fences and crossings.

There is no evidence to confirm that emus can be educated to use designated crossings.

There is evidence from Western Australia and Queensland which confirms large ratites such as emu and cassowary have difficulty negotiating fence lines, and also have difficulty using underpasses.

Local observations indicate that the Coastal emu is impeded in its movements by a fence line, even when the fence has been in place for a long period of time.

- 1.5** The location of connectivity structures [see map attached] fail to provide for emu movements throughout the distribution range.

Only four dedicated emu structures are provided in the 48.2 kms of the proposed highway.

Two of those structures are located where there is minimal emu activity recorded.

Two areas with documented high levels of emu activity, being Shark Creek and Pillar Valley, have no dedicated emu structures.

The area north of Shark Creek which has consistent emu activity on the western side of the proposed highway and also Brooms Head Road to the east, has no connectivity structure to accommodate direct traverse.

The connectivity structures do not accommodate any future re-expansion of the Coastal emu to it's previously and comparatively recently documented range between Coffs harbour and Ballina. [ref: OEH Threatened species Scientific Committee determinations]

1.6 The design of the majority of connectivity structures is unlikely to be suitable for emus.

The EIS notes some details of the structures; however those details do not include height – which is equally important as length. An underpass of sufficient length, but not of sufficient height, is unlikely to be used by the emu, which is the largest of Australian birds and can stand at almost 2 metres tall.

The majority of connectivity structures are drainage culverts. These structures are not only small, but their very purpose does not allow for suitable 'attractive' vegetation to be included, nor do they provide access during times of high water levels.

The Coastal emu is similar in size and shares similar behaviour to the Southern Cassowary. Research from Queensland, states "that incorporation of underpasses for use by cassowaries has only demonstrated high levels of success where these take the form of high bridges with rainforest understorey underneath. Smaller underpass structures were not successful."
[M. Goosem et al, 2011].

2. Clearing over 948 hectares of vegetation including 337 hectares of Endangered Ecological Communities (EECs) including the nationally listed Lowland Subtropical Rainforest.

The loss of these ecosystems has not been measured. Without such measurements the mitigations proposed are reduced to, and limited by, unproved assumptions – with the accompanying risk these valuable ecosystems will be lost forever.

3. In excess of 80 threatened species of flora and fauna are to be impacted – many of which are listed state and/or nationally.

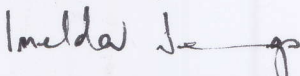
There is no evidence to suggest relocation on a vast scale could be successful or even attempted. Therefore it is unlikely the objective of the EIS to maintain or improve biodiversity values can be met. The offset strategy is challenged by the fact that some of the areas to be impacted are unique, and restricted to very specific topographical locations e.g. Lowland Sub tropical Rainforest.

To suggest these areas can be established in alternate locations with similar essential characteristics does not acknowledge the fact these areas have been recognised as needing protection due to the rare and/or fixed attributes required for their survival.

The environmental debt encompassed by the proposed motorway is not acceptable. What is required is a highway upgrade which sets new environmental standards and best practice mitigation to support irreplaceable environmental values; maintains habitat connectivity; and prevents mortality of the Endangered population of Coastal emu.

Thank you for the opportunity to make this submission.

Yours sincerely,



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Secretary

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Proposed emu distribution and proposed emu connectivity structures

