



2/188 Winton Lane  
BALLINA NSW 2478

21 January 2013

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

Dear Sir/Madam,

**SUBMISSION ABOUT THE PACIFIC HIGHWAY UPGRADE ENVIRONMENTAL  
IMPACT STATEMENT -WOOLGOLGA TO BALLINA – GLENUGIE TO MACLEAN  
SECTION – OBJECTION TO THE PROPOSED ROUTE**

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 highway through Glenugie to Maclean.

I have objections to the proposed route.

This particular section of section of new highway is one of the largest construction of new highway along the eastern seaboard and I am concerned about three specific issues relating to the current proposed route:

- the impact on the endangered population of Coastal Emu;
- 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 Wooli.

**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. 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.

I have concerns that there has not been any baseline monitoring done regarding the population of Coastal Emus. It is on record 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.

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 a 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 auspiced by BirdLife Australia (Northern NSW).

### **ENVIRONMENTAL ISSUES**

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

I understand 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 and the Ballina bypass. Obviously it can be done, however the choice is one of economics and 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.

It is highly unlikely that the Roads and Maritime Services (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.

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.

### **COASTAL HOUSING DEVELOPMENT**

My final concern with proposed route is its close vicinity to the currently pristine east coast.

Currently, there exists only the small villages of Wooli, 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 usually attracts the pre-determined visitor or resident. These locations do not usually attract the casual highway traveller.

I have not 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.

## CONCLUSION

In my opinion the the proposed route has a high environmental cost. The impact on the pristine forest and the endangered Coastal Emu is real.

I request that the current proposed route throughout the Clarence Valley be rejected, and instead adopt the orange option which is a much less damaging option for the Valley's ecosystems.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'G Clark', written in black ink.

Gary Clark