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

Submission regarding Environmental Impact Statement:

Woolgoolga to Ballina Pacific Highway Upgrade; SSI-4963

I would like to register a formal objection to the proposed Woolgoolga to Ballina Pacific Highway Upgrade.

My reasons are as follows:

I believe that the EIS, even in admitting that the proposal will have significant impacts on threatened entities (species and populations), has drastically under-estimated the overall environmental impact and placed unwarranted faith in unproven mitigation methods and an unsubstantiated compensation package. I believe that the proposed upgrade, particularly that section between the Glenugie upgrade (complete) and Tyndale, will have significant impacts on threatened species and the threatened coastal Emu population. I consider that the proposed measures to ameliorate the environmental impacts of the upgrade (mitigation and compensation) will be inadequate and that the proposal will have far-reaching negative and long-term ecological consequences.

My ecological credentials:

I am a professional ecologist with nearly 30 years of practical conservation ecology experience on the NSW North Coast and elsewhere in eastern Australia. I have conducted ecological impact assessments, conservation planning assessments, landscape ecology assessments, corridor mapping, practical threatened species research, fauna survey and targeted biodiversity monitoring as a government scientist and also as an independent ecological consultant. I have direct experience with the fauna and habitats of the Woolgoolga – Ballina area.

The high conservation values impacted by the proposed upgrade:

The preferred route for the Woolgoolga – Ballina Pacific highway upgrade, through the Clarence Valley, North Coast NSW includes sections that impact high conservation value forest and wetland habitats. I consider these habitats to be significant at local, regional, State and National levels as they support critical populations of threatened fauna species.

Construction along the preferred route involves the clearing of large areas of large tracts of these high conservation value habitats and also further fragments habitats by creating a further substantial barrier to faunal movement. A prime example is that the clearing and construction along the proposed route places a significant barrier in the midst of the habitat of the endangered of the Coastal Emu population. With numbers only in the

vicinity of 100 individuals this Emu population cannot afford further habitat loss and fragmentation. This population requires enhancement of existing remnant habitats not further habitat degradation.

Many threatened fauna species will also be impacted along the proposed route including suites of state listed birds like the Black-necked Stork, Brolga, Australasian Bittern, Eastern Osprey, Square-tailed Kite, Spotted Harrier, Little Eagle, Bush Stone-curlew, Glossy Black-Cockatoo, Masked Owl, Eastern Grass Owl, Powerful Owl, Black-chinned Honeyeater, Grey-crowned Babbler and Diamond Firetail. I also believe that populations of state listed mammals (e.g. Rufous Bettong, Brush-tailed Phascogale, Yellow-bellied Glider, Squirrel Glider), reptiles (e.g. White-crowned Snake) and frogs (e.g. Green-thighed Frog) will also be impacted significantly. In addition species bird species listed federally such as the Rainbow Bee-eater, White-bellied Sea-Eagle, Latham's Snipe, Australian Painted Snipe, Fork-tailed Swift and White-throated Needletail will also be impacted. I do not believe that the impacts of the proposal, on these species, have been adequately addressed in the EIS, nor do I believe that the proposed mitigation and compensation measures will adequately account for these impacts. The lower Clarence Valley is a regional stronghold for species like the Black-necked Stork, Brolga, Bush Stone-curlew, threatened woodland birds, Rufous Bettong and Brush-tailed Phascogale and I believe that the impacts of habitat loss, degradation and fragmentation associated with the proposal increase the likelihood of localized population losses and localized extinctions for species such as these. If population strongholds and source habitats are impacted then flow-on effects may well be serious for adjoining populations of these species. These impacts are likely to be highly significant for local populations.

Inadequate mitigation and amelioration:

I believe that the proposed mitigation measures are inadequate to ameliorate the likely significant impacts of the proposal on threatened species and the threatened Emu population, particularly in the Glenugie – Tyndale section of the proposal. I consider the mitigation measures to be based more on hope than any demonstration of real effect; in an area of such overwhelming conservation significance, and when alternative routes with lower environmental impacts appear feasible, I find this to be unacceptable. I believe that the impacts of large scale habitat loss, degradation and fragmentation associated with this proposal will be significant whereas the proposed mitigation measures may well amount to very little for the species of most concern. The fact that these impacts are to be wrought within regional and State strongholds of threatened faunal species, meaning that consequent flow-on effects may cascade to adjoining populations, provides additional cause for alarm ringing and the genuine seeking of alternatives with lower environmental impacts.

Off-setting, through the acquisition of compensatory habitat, has been proposed and promoted in the EIS as the solution to address impacts on threatened entities. I believe that conservation should also be pursued within existing habitats by enhancement of on-site values and also connectivity values. To rely immediately upon the concept of compensatory habitat, in some as yet unknown location supporting an as yet known habitat types and quality, to ameliorate the major negative impacts of this proposal appears to me somewhat fanciful and lacking in scientific objectivity.

I hope that you will acknowledge and consider my concerns regarding this proposal in the light of my extensive ecological experience on the NSW North Coast and that you will seek to address these concerns by facilitating a changed approach to the upgrading of the Pacific Highway in this critical area. The conservation values impacted by the currently proposed route are simply too important to be impacted so heavily when viable alternatives exist.

Yours faithfully

David Scotts