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Major Projects Assessments
Department of Planning and Infrastructure,
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Submission on Woolgoolga to Ballina Pacific Highway Upgrade

Valley Watch Inc. is a community organisation based in the Lower Clarence. Our mission statement is "to advocate for a healthy and biologically diverse environment and preserve the quality of life of the Clarence Valley".

The Valley Watch Committee has thoroughly examined the EIS on the upgrade of the Pacific Highway between Woolgoolga and Ballina. Two matters are of deep concern to us.

1. Threats to vegetation and Endangered Environmental Communities

The proposal to construct 48 km of new highway from Glenugie to Maclean is the largest construction of new highway along the east coast and will pass through one of the most ecologically diverse areas in NSW. Much of this area is undisturbed woodland. One of the key reasons for the high biodiversity of this area is the absence of a major road. The construction of a new highway will be a major threat to the fauna and flora of this woodland.

The environmental cost of clearing almost 1000 hectare of vegetation is enormous. About one third (337 hectares) is classified as Endangered Ecological Community (EEC) of one sort or another. They are classified as EECs to ensure their protection. We believe the so-called "like for like" offset strategies which have been proposed are no substitute for what will be destroyed. In many cases there appears to be no "like for like". There is certainly insufficient detail in the strategy to determine whether such an area of "like for like" vegetation can be acquired.

Since European settlement, Lowland Rainforest has undergone a large reduction in geographic distribution due to clearing. For example, A. G. Floyd (1990a) has estimated the Big Scrub lowland rainforest near Lismore, originally estimated to cover 75,000 hectares, has been reduced to only 300 hectares since European settlement – that is, a reduction of 99.93%. Relative to the longevity of rainforest trees, many of which live for several hundred years, these represent large reductions in the geographic distribution of the community. "Clearing of native vegetation" is listed as a Key Threatening Process under the Threatened Species Conservation Act (1995).

Extensive clearing of Lowland Rainforest has resulted in fragmentation and loss of ecological connectivity. The integrity and survival of small, isolated stands is impaired by the small population size of many species, enhanced risks from unpredictable fluctuations in environmental conditions (stochasticity), disruption to pollination and dispersal of fruits or seeds, and likely reductions in the genetic diversity of isolated populations (Lott 1990, Rossetto *et al*. 2004a, b). Disruption of these ecological processes may result in a large reduction in the ecological function of the community.

Weed invasion also poses a major threat to Lowland Rainforest, with introduced vines and scramblers having particularly serious impacts (Floyd 1990a). Many of these exotic species form dense thickets capable of smothering indigenous plants, reducing both reproduction and survival. The invasion and establishment of exotic species in Lowland Rainforest results in a large reduction in the ecological function of the community. "Invasion and establishment of exotic vines and scramblers" is also listed as a Key Threatening Process under the Threatened Species Conservation Act.[1]

2. Threats to the endangered Coastal Emu population

Some of our members have been engaged in an annual Coastal Emu Census (under the auspices of the National Parks and Wildlife Service, now Office of Environment and Heritage) in the Clarence Valley for the past ten years. They have seen a significant reduction in both Coastal Emu habitat and numbers in that time. Following bushfires in the Valley, the census in 2006 showed only about 80 emus – down by about a third from the previous year. The numbers have recovered slowly since then but are still no more than 120 south of the Clarence River – the site of the Glenugie to Maclean highway construction.

One of the chief threats to the survival of the emu population has been the motor vehicle. Over 55 emus have been killed by motor vehicles since 2000, according to WIRES[2]. An examination of emu habitat (Attachment A) shows the bulk of the remaining emu population is to be found east of the current Pacific Highway. The proposed route, however, neatly bisects the population. This will not only expose the emus to greater risk from motor vehicles, it also dramatically reduces the range for the two halves of the population.

Emus forage widely and need to be very mobile to follow the availability of food. Their diet requires that they be free to roam. The construction of a major highway through their normal habitat is likely to severely threaten their ability to move freely in search of food. Assurances from RMS that they can provide underpasses or overpasses are completely unsubstantiated.

Only recently has RMS attempted any baseline monitoring and that has had to be abandoned because of the death of some of the emus being tracked. At the very least, the construction of the proposed highway must not proceed until such baseline monitoring is done. It is not enough for RMS to say that will take too long – they should have been doing it years ago. But if RMS proceeds and the emu population is destroyed, it can never be bought back.

The conclusion to the RMS's own Executive Summary of the *Biodiversity Assessment* says:

There is no conclusive scientific knowledge on the ability of each of the assessed species to sustain a loss of the magnitude expected or resilience to change including adaptation to the proposed mitigation measures. **As such, there is a risk that the project could have a significant impact on several threatened flora and fauna, most notably the coastal emu endangered population and the critically endangered Lowland Rainforest of Subtropical Australia present in the study area.**

Valley Watch therefore rejects the proposed route for the Pacific Highway upgrade and calls on RMS to return to the "Orange" route which approximates the existing highway. It is the only suitable route that will reduce the impact on the Valley's ecosystems.

Yours faithfully

Gillian Lowbridge
Secretary

References:

Floyd A. G. (1990a) *Australian Rainforests in New South Wales* Volume 1 (Surrey Beatty and Sons: Sydney.)

Floyd A. G. (1990b) *Australian rainforests in New South Wales* Volume 2 (Surrey Beatty and Sons: Sydney.)

Lott R. (1990) *Rainforest* (Australian Heritage Commission: Canberra.)

Rossetto M., Jones R., Hunter J. (2004) "Genetic effects of rainforest fragmentation in an early successional tree (*Elaeocarpus grandis*)" *Heredity* **93**, 610-619.

http://www.environment.nsw.gov.au/determinations/LowlandRainforestEndCom.htm

http://www.wiresnr.org/Emysurvey.html

Attachment A

Coastal emu habitat