



Cumberland Bird Observers Club

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3 February 2013

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

e-mail: plan_comment@planning.nsw.gov.au

Dear Sir/Madam,

Re: Woolgoolga to Ballina Pacific Highway Upgrade

Cumberland Bird Observers Club Inc (CBOC) is a community organization with about 600 members based in Sydney. We are interested in promoting bird conservation both in Sydney and wider afield in Australia as a whole.

The Woolgoolga to Ballina Pacific Highway Upgrade Environmental Impact Statement (EIS, Main Volume, Chapter 10), and particularly the proposal to construct 48km of new highway through Glenugie to Maclean, raises major concerns about the impacts of this project on native birds and other wildlife, as well as on natural habitats. Having a major highway on this route would cause large and unacceptable impacts to numerous bird species, including many that are listed as Threatened, as well as to high quality habitat including several Endangered Ecological Communities (EECs).

For these reasons CBOC requests that this section of the Highway not be built following the proposed route; rather, that a less environmentally damaging route should be used. More details are given below.

The section of the new Highway described in the Upgrade EIS would pass through the one of the most ecologically diverse and relatively intact forested areas in NSW. One of the key reasons for the high biodiversity currently existing there is the absence of a major road to date. The minimum “footprint” of the project involves the destruction of at least 975 ha of natural vegetation (forest and wetland), which includes 338 hectares of Endangered Ecological Communities (EECs), which should be protected from any major development and not further reduced. Among these EECs is Nationally listed Lowland Subtropical Rainforest which cannot be replaced.

The EIS lists 35 threatened species of birds (Nationally under the EPBC Act 1999 or in NSW under the TSC Act 1995) that would be impacted to varying degrees by this project. Five species

(Australian Painted Snipe, Regent Honeyeater, Swift Parrot, Double-eyed Fig-Parrot and Red Goshawk) are nationally Threatened. The remaining 30 include wetland birds, forest Owls, rainforest birds, woodland birds, and forest or heath birds. This large number of species is a clear reflection of the diversity and quality of much of the habitat that would be adversely affected by a highway along this route.

Of particular concern is the coastal population of Emu. This has been reduced over the years to only about 100-130 individuals. The project as planned would bisect important habitat for Emu activities both pre- and post-breeding, and expose the birds to greatly increased danger from vehicles. If the proposed highway were built, for the Emu population to have any chance of survival it would need to have effective means of crossing safely between the areas of its range split by the road. We understand that the movement patterns of birds across the proposed route have not been studied for a useful length of time (even though this route was mooted 5-6 years ago). Thus, we doubt that the ideal locations for effective safe crossing points (underpasses or overpasses) would be accurately known at this time. Presumably a large number of these crossing points, with associated barrier fencing, would be needed to prevent large scale mortality of Emus.

Severe deleterious effects on birds and other fauna are inevitable from such a major construction, which would involve total vegetation destruction in a corridor 48 km long and at least 100 m wide (up to 400 m in places). For many bird species, and nearly all other animal types, this would be an uncrossable barrier, and very dangerous for many that attempted it when the traffic is flowing. During construction there would be noise, lights at night, and detrimental effects on the quality of wetlands that the road is built over, or through. Impacts on habitat and animal territories in presently intact vegetated areas could be reduced by running the highway along the very edges of State Forests, National Parks and other important reserves; and not far inside them, or even a few hundred metres inside. It is not known whether or not the planned route follows this principle as far as it could.

The proposed route appears likely to sever important wildlife corridors, further affecting the long-term viability of many species.

CBOC does not know whether technological methods that might allow animals to cross the highway safely (e.g. possum runs) have been sufficiently tested to as be regarded as useful in conserving wildlife populations bisected by this proposed road. Even if these facilities have a proven track record in NSW, they would presumably be needed in large numbers, at considerable expense. Barrier fencing, to prevent animals going onto the road, is likely to be effective in some cases. Again, many kilometers would be required in strategic locations, adding to the cost. Certainly we consider the costing of this highway option needs to include all these “impact amelioration” methods and infrastructure up-front.

There is insufficient detail in the offset strategy to determine whether 3421 hectares of ‘like for like’ vegetation can be acquired. For example, it is very unlikely that the RMS is going to be able to find 56ha of Lowland Subtropical Rainforest as outlined in their offset strategy, not to mention the other EECS. In any case, “offset” areas are of little use in reducing impacts of a particular project if they are not located close to the affected area, or if they consist of only fairly similar habitats or are not strictly maintained in the natural state in the long term. Offsets can rarely prevent a net loss of wildlife and other ecological values caused by a major development.

Conclusion

CBOC considers that the currently proposed Woolgoolga to Ballina Pacific Highway upgrade route is likely to have an unacceptably harmful impact on wildlife and its habitat throughout much of its length. We therefore request that the determining authorities reject the preferred route through the Clarence Valley (as described in the EIS document) and adopt the “orange” option, which is a much less damaging option for the Valley’s valuable ecosystems, and may be competitive in cost once true environmental costs are factored into the present proposal.

Yours faithfully,

Ian Johnson

**Conservation Officer,
Cumberland Bird Observers Club**