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SUBMISSION ON WOOLGOOLGA TO BALLINA PACIFIC HIGHWAY UPGRADE SSI-4963

The Clarence Valley Conservation Coalition (CVCC) is a community group which has, since its formation in 1988, been involved with environmental protection and sustainability both in our immediate local area and beyond.

Scope of CVCC Submission

The CVCC will limit its comments to the section of the highway which is to pass through the Clarence Valley – specifically the section from Glenugie to the Clarence River.

Originally when the highway upgrade in our area was being discussed, we understood that the planning of - and environmental documentation on - the various north coast sections would be separate. We have some concerns now the various sections have been lumped together as the Woolgoolga to Ballina upgrade. We trust that comments on a specific part of the proposed route will not be disregarded in some mistaken belief in "integrity of the whole plan".

A. COMMENTS ON ENVIRONMENTAL IMPACTS - GLENUGIE TO THE ILUKA TURNOFF

1. The Clarence Valley Conservation Coalition opposes the proposed highway route through the Clarence Valley because of the severe impact it will have on the biodiversity of the area.

2. The 48 km of the route from Glenugie to the Clarence River will have a devastating effect on flora and fauna.

- Around 948 hectares of vegetation will be cleared in an area important for its biodiversity. Threatened flora species to be destroyed include Square-fruited Ironbark and Weeping Paperbark.
- Vegetation to be cleared includes 337 hectares of Endangered Ecological Communities (EECs). Amongst these EECs are sections of Nationally Listed Lowland Rainforest.

- The Endangered Coastal Emu (with an existing population of only about 100 birds in the Clarence Valley) will have its range bisected by the highway. This almost certainly will have a disastrous effect on this remnant population.
- More than 80 other threatened species will be impacted by the chosen route. Species relying on this area for habitat include the Rufous Bettong, Powerful Owl, Yellow-bellied Glider, Grey-crowned Babbler, Diamond Firetail, Black-chinned Honeyeater, Brown Treecreeper and Squirrel Glider.

3. At a time when scientists and members of the community are becoming increasingly concerned about extinctions and the threat of extinctions as well as general biodiversity loss, we need to be taking a much more precautionary approach to developments which are certain to have severe impacts on the natural world.

4. The CVCC is concerned that the RMS has chosen from its original list of possible routes the one which will cause the most severe environmental damage.

5. While social and economic factors need to be considered in route selection, it is important to remember that both the economy and society are subsets of the environment. Neither will continue in a healthy state if the environment continues to be damaged. It is not just this one development – damaging as it will be – but the cumulative impact of many developments which place unreasonable stress on the natural world.

6. The CVCC believes that the least damaging route environmentally would have been the orange route in the original list – the route which follows the existing highway. Construction of the highway upgrade in the Kempsey area clearly indicates that such a route, with the highway raised to limit problems with flooding, is possible. While this may be dismissed as being too expensive, there is the question of valuing the environment and biodiversity loss along the route already chosen by the RMS. The true cost of the chosen route has not been assessed because the cost of the environmental damage that is inevitable has not been factored in.

B. COMMENTS ON SOME OF THE MITIGATION MEASURES

1. The Endangered Coastal Emu

The CVCC is very concerned about the mitigation measures proposed for the endangered coastal emu.

- There is no certainty that the underpasses described in the documentation will be an effective measure in allowing the emus access to their range. As well as the issue of whether the species will use an underpass, there is the issue of the location of these structures to suit the birds' movement pattern.
- The RMS (former RTA) has known about the coastal emu issue in the Clarence Valley for years and the fact that its highway upgrade will impact on this species. However, it has not undertaken or, as far as we know, moved to have undertaken any scientific studies of this species until very recently. Moreover this recent satellite-tracking study of young birds raised in captivity has been a failure. It did not run its intended course, largely, as we understand it, because of the mortality of a number of the subject emus.

The RMS' lack of commitment to any research on this matter is extremely disappointing and does not augur well for its mitigation proposals.

2. Off-sets

- The CVCC acknowledges that offsets are supported by government instrumentalities and developers as a way to expedite developments in areas with important natural values which will be destroyed or severely damaged by developments.
- However, it cannot be logically argued that providing another area as compensation will result in no net biodiversity loss. Quite obviously biodiversity lost in one area cannot be replaced by biodiversity already existing in another area.
- And net biodiversity loss is a major issue. Scientists and members of the community are concerned about this and about the cumulative impact of biodiversity loss across the nation.
- Governments and their instrumentalities continue to pay lipservice to the concept of ecologically sustainable development and its principles but, in reality, little has changed. Putting in place measures such as off-sets merely gives the appearance that something positive is being done.
- Even if off-sets were a valid compensation for loss of ecosystems, there is always the problem of finding the equivalent or even near-equivalent ecosystems to use as off-sets. Where, for example, will the RMS or its agents find suitable offsets for the Clarence Lowland Rainforest EECs ?

CONCLUSION

In conclusion the Clarence Valley Conservation Coalition strongly opposes the chosen route for the Pacific Highway through the Clarence Valley because of the devastating environmental impact this development will have on an area with significant remnant native vegetation which provides habitat for a broad range of fauna, including many which are threatened.

Leonie Blain
Hon Secretary