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

Submission on Woolgoolga to Ballina Pacific Highway Upgrade

I wish to raise my concerns about threats to vegetation and Endangered Environmental Communities posed by the preferred RMS route.

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. 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 with 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 areas is limited by the small population size of many species. At this time we know there is enhanced risks from unpredictable fluctuations in environmental conditions caused by global climate change. Disruption of natural ecological processes may result in a large reduction in the ecological function of the community.

As a regular volunteer for Landcare, I believe weed invasion also poses a major threat to Lowland Rainforest, with introduced vines and scramblers having particularly serious impacts. 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. Driving along the Pacific Highway regularly, is evidence of the mass invasion of weeds that follow the road.

I am also concerned about threats to the endangered Coastal Emu population.

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. 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. If RMS proceeds with this route and the emu population is destroyed, it can never be bought back. The Clarence Valley relies heavily on tourism because we have such a rich and varied biodiversity. It must be protected.

I was shocked by the conclusion to the RMS's own Executive Summary of the Biodiversity Assessment, which 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.

I therefore urge the 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