NSW Department of Planning & Infrastructure
Major Project Assessment
GPO Box 39
SYDNEY NSW 2001

Proposed Pacific Highway Upgrade: Woolgoolga to Ballina – Preferred Infrastructure Report (PIR) - Objection

Attention: Dominic Crinnion

Dear Sir

Friends of the Koala welcomes the opportunity to provide comment on the Proposed Pacific Highway Upgrade Woolgoolga to Ballina PIR.

You will be aware that our group has had a long-standing concern regarding the impact of the Upgrade on the Region's koala populations, particularly those in the Broadwater to West Ballina sections (9,10,11).

We note the additional work which has been undertaken for the PIR by way of field surveys, review of the koala connectivity structures and preparation of the informing Koala Management Plan.

We are pleased to see acknowledgement that the northern populations are "important" for the purposes of the *Environmental Protection and Biodiversity Conservation* (EPBC) *Act* 1999 We are also pleased to note that the final Koala Management Plan will "be specific to the project section, stage, program of works or singular element of infrastructure…" (p.4)

In our view however the ameliorative measures described in the PIR are still inadequate for mitigating the impacts of this project on the koala population. We also point out that the Draft Referral Guidelines for the Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) were placed on public exhibition on 5 December 2013.

We have previously referred to the Ballina Shire Koala Habitat Study. The [Final Draft] Koala Habitat and Population Assessment: Ballina Shire Council LGA prepared by Biolink Ecological Consultants will be presented to Ballina Shire Council for adoption at its meeting on 19 December 2013.

We draw your attention to the Study's Recommendation 4 (p.56) which calls for rigorous evaluation of ameliorative options for koalas along future Upgrades to the West Ballina – Broadwater section of the Pacific Highway, specifically at the proposed Wardell by-pass section with a view to ensuring that the movement needs of koalas during the construction phase can be accommodated, whilst after completion all opportunities for both safe passage under the highway and exclusion of access to the road corridor by koalas have been maximised.

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We strongly support this recommendation and suggest that the author, acknowledged specialist koala ecologist Dr Stephen Phillips, who has worked extensively in the Northern Rivers region for many years, be consulted in regard to koala management measures in both the Ballina local government area as well as the Richmond Valley local government area. Dr Phillips will be commencing a study in selected areas of Richmond Valley Shire similar to the one just completed for Ballina Shire in the New Year.

We must reiterate however, our long-held view that conservation of the Lower Richmond Valley koalas and perhaps, more indirectly, other populations with which they are associated is dependent on the Upgrade route being based on the existing route in the Broadwater to West Ballina sections. We still stand by this view and totally reject the route under consideration.

We thank you for the opportunity to make this submission and for your consideration of our suggestions and concerns.

Yours sincerely

Lorraine Vass
President
12 December 2013