

13th December 2013
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Pacific Highway Upgrade - Woolgoolga to Ballina
Application no. 551 4963.

To: Dept. of Planning and Infrastructure
Fax no. 02 9228 6355

Attention Director - Infrastructure Projects.

Dear Sir / Madam,

Hope this finds you well.

I recognize Roads & Maritime Services have made laudable efforts in response to issues raised in submissions in regards to the Pacific Highway upgrade between Woolgoolga and Ballina.

However I maintain the following points are critical and unalterable; in short I maintain my objection to the proposal (the "preferred" route)

- The "preferred" route impacts on 123 Threatened fauna and flora species in total.
- The "preferred" route from Glenugie to Harwood opens up a major corridor through an extremely sensitive area which is habitat to in excess of 80 Threatened species of fauna and flora. All would be significantly impacted by the proposal.
- Impact on the largest remaining endangered coastal emu population on the east coast (albeit approx. only 110 in number) would be too significant to counterbalance.

There is no scientific evidence that the suggested bridges and underpasses would be used by the coastal emu and may result in further population fragmentation.

- ^{Potential} Impact on the nationally threatened Koska through the loss of 375 hectares of Koska habitat (a significant area) is unacceptable. Both the emu and the Koska are national icons and both have already been severely diminished.

- The project traverses six endangered ecological communities listed in previous submissions but are as follows: Sub-tropical coastal floodplain forest of the N.S.W. North Coast Bioregion (TSC Act), Swamp sclerophyll forest on coastal

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Swamp oak floodplain forest of the NSW North Coast, Sydney Basin and South East corner Bioregions (TSC Act), Coastal Cypress Pine shrubby open forest of the North Coast Bioregion (TSC Act), Freshwater wetlands on coastal floodplains on the NSW North Coast, Sydney Basin and South East Corner Bioregion (TSC Act), Lowland Rainforest on floodplain in the NSW North Coast Bioregion (TSC Act) and Lowland Rainforest of sub-tropical Australia (EPBC Act) which is critically endangered.

- the "preferred" route approximates a number of significant wetlands in the Coldstream River catchment - they should be fully avoided.
- RMS policy of ① "avoiding impacts on biodiversity" should necessarily dictate adoption of the "orange" option - i.e. augmenting the existing Pacific Highway
- ② "offsetting residual impacts", meaning protection of some special areas elsewhere still results in net loss of biodiversity.
- Social and economic considerations, by RMS' own admission, more valued over ecological considerations, in light of Australia now facing its second great vertebrate extinction, is really unacceptable, don't you think?

The Preferred Infrastructure Report cannot significantly alter the

- direct mortality of fauna
- the loss of connectivity for flora and fauna (including links to National Park State forests and identified local and regional wildlife corridors).
- the fragmentation of habitat, resulting edge effect from road noise, altered light and wind levels
- changes to water quality as a result of works in or adjacent to aquatic habitats and alterations to natural hydrological flows.
- invasion and spread of weeds and pest fauna species, and potential spread of disease pathogens.

Most of these impacts can be totally avoided in the Clarence Valley section by adopting the orange option, i.e. augmenting the existing Pacific Highway.

Thank you for the opportunity to comment on the Preferred Infrastructure