



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Ms Susan Templeman MP
Federal Member for Macquarie
Ground Floor, 299 George St
Windsor NSW 2756
By Email: Susan.Templeman.MP@aph.gov.au

19 February 2023

Dear Ms Templeman

**Great Western Highway upgrade - Blackheath to Little Hartley- EPBC Number:
2022/09399 - Referral on whether the proposal requires further assessment
and approval under the EPBC Act**

The Society was very concerned to learn on 15 February that the period for comment on the referral of the proposed Great Western Highway upgrade - Blackheath to Little Hartley had opened on 30 January (at the end of the summer holiday period) and had already closed. We understand that, in fact, no comments were received from the public. The Society was not aware that this referral was open for comment and did not see any publicity or public notice in regard to it. The proposal is a multi million dollar tunnel project with an eight year construction period under sensitive bushland and swamps and near waterways feeding into Sydney's water supply catchment. The Society believes that if it had been publicised it would have attracted informed comment regarding impacts on matters of national environmental significance.

The Society ask that you make representations to the Minister for the Environment that the project should have further consideration and assessment under the *Environmental Protection and Biodiversity Conservation (EPBC) Act* and that the period for public comment on the project be extended and publicised.

The Society has serious concerns about the project's impacts on matters of national environmental significance including the Greater Blue Mountains World Heritage Area, listed threatened species and ecological communities including nationally listed swamps. The EIS for the project appears to have been hastily produced with necessary studies not yet available. Further, the Society is concerned that the EPBC Act referral has occurred concurrently with exhibition of the EIS. As you would be aware, matters of national environmental significance should be incorporated into the scope for the preparation of an adequate environmental impact statement from the outset.

The Society believes there will be a significant risk that the tunnel's construction could negatively impact aquifers supplying groundwater to groundwater-dependent ecosystems, and their dependent species, along both sides of the proposed tunnel corridor, including within the World Heritage Area. Groundwater to the Commonwealth-listed peat swamps that align the corridor and their populations of endangered giant dragonfly and Blue Mountains water skink, both groundwater dependent species, could be impacted. Both species have been recorded in the swamps between Medlow Bath and Mt Victoria, including in the Greaves Creek, Govetts Leap, Popes Glen, Porters Pass, Centennial Glen, Hat Hill Creek, Victoria Creek, upper Grose River and Kerosene Vale catchments.

The Society is also concerned that tunnelling could have a negative impact on aquifers that supply water to moist cliff-face communities. This includes an endangered heath, *Epacris hamiltonii*, which only occurs in the Mountains and is restricted to moist rock overhangs along Greaves, Katoomba, and upper Govetts creeks. Further, a detailed hydrogeological study must be carried out along the tunnel corridor to identify and examine any aquifers which might be affected during tunnel construction and their relationship with the swamps and moist cliff-face ecological communities.

We believe that this project should be assessed fully under the EPBC Act. Thank you for assistance on this matter.

Yours sincerely

A black rectangular redaction box covering the signature of Madi Maclean.

Madi Maclean
President
Blue Mountains Conservation Society
mobile  or email gcs@bluemountains.org.au