

17th May, 2008.

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Submission on application received for a clearing permit, 28/4/08
Vorina Enterprises Pty Ltd on Behalf of Keyview Investments Pty Lrd, Area Permit,
Lot 26 on diagram 65445, Breera, Shire of Gingin, Stock Piling, 50ha (CPS 2440/1

Dear Sir or Madam,

This is the Urban Bushland Council WA's submission arguing against the granting of a clearing permit for the above proposal.

The proponent's plan is to clear 50 ha of native bushland for Composting Class 11 Putrescible Waste Landfill and Contaminated Soils. Allied to this application for clearing is the road which will impact on Chandala Swamp and Chandala Creek.

One of the Environmental Protection Authority's objectives is 'to protect areas identified as having significant environmental attributes and to maintain the abundance, diversity, geographic distribution and productivity of flora and fauna species and ecosystem levels through the avoidance or management of adverse impacts and improvement in knowledge.'

We believe that the site, Lot 26 Ioppolo Road, Gingin, is a site of high floral species richness and diversity and approval of the clearing permit would not protect this area. The eastern side of the Swan Coastal Plain is characterised by high levels of clearing therefore there is a presumption against further clearing. (Bush Forever Vol 2). The application for clearing a further 50 hectares with such dire consequences must not be granted.

The following taxa exist in or adjacent to Lot 26.

Priority three taxa; *Verticordia rutilastra*

We understand that the site contains priority three flora, *Verticordia rutilastra*. The population of this species is considered to be a range extension with the main population lying between Moora and Mt Lesueur.

Priority four taxa; *Calytrix sylvana*

This species has a very limited distribution

Priority four taxa; *Hypolaena robusta*;

This species has a limited distribution on white sands and sand plains.

Declared rare flora; *Chamelaucium lullfitzii*

The upgrading of Ioppolo Road will see the clearing of this declared rare flora which only occurs in four places, with the major populations being between Breera and Ioppolo Roads.

A **Threatened Ecological Community** may be present on Lot 26. This may be FCT 20a or FCT 20b. This community is marked as being located immediately to the south-west along Ioppolo Road.

FCT 20a is *Banksia attenuata woodlands over species rich dense shrublands* and

FCT 20b is *Eastern Banksia attenuata and/or emergent Eucalyptus marginata woodlands*.

Both communities are listed as endangered by DEC.

The current distribution of FCT 20a is described as *limited as there are very few occurrences and each of these is small and /or isolated and extremely vulnerable to known threatening processes*.

(Consulting Botanist, Arthur Western, is visiting the area around Lennards Road, about 8 kilometers to the north of Lot 26 within the next week and a half and he is interested in looking at the area around Lot 26. His observations can be forwarded to the Native Vegetation Protection Unit after that visit.)

Dr Weston also forwarded the following information;

Assuming that the blue-hatched area in the middle of the map attached to the email to which I am replying is the Vorina Enterprises site, then its vegetation is mapped by Hedde, Loneragan and Havel (1980) as a Dandaragan Plateau vegetation complex, probably Moondah Complex (64) or possibly Karamal Complex - South (61) or maybe both. I have read that 9.8% of the Moondah Complex is in secure tenure and that 27.3% of the Karamal Complex is. Apparently, according to EPA Guidance No. 10 (2006), the EPA expects that where less than 30% of an ecological community (including a vegetation complex) survives (in secure tenure), then none of it should be cleared. So the DEC should be especially concerned about any clearing of Moondah Complex vegetation, especially if it is in reasonable condition.

Introduced Tagasaste does grow on Lot 26 in old paddocks.

A brook runs through Lot 26. Advice in the WAPC Avon Arc Sub-Regional Strategy Report Appendix E is that;

wetlands predominate in the whole of the Shire of Gingin and in association with the Bassendean soils leave a shallow water table. (p124)

Also;

the porous and non retentive soil allows for nutrients to flow readily into the groundwater and waterways, adversely affecting the quality of groundwater and the waterways that feed into the Swan River. The Ellen Brook, flowing in a north-south direction through the Planning Unit, is the largest contributor of nutrients into the Swan River. (page 123)

Because of this potential for contamination, the site is not an appropriate one for a putrescible waste landfill and contaminated soil dump.

It would appear that this proposal is at variance with many of the clearing principles. At variance would be;

Native vegetation should not be cleared if-

(a) it comprises a high level of biological diversity

(c) it includes or is necessary for the continued existence of rare flora

(d) it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community

(e) it is significant as a remnant of native vegetation in an area that has been extensively cleared

(f) it is growing in, or in association with, an environment associated with a watercourse or wetland

(g) the clearing of the vegetation is likely to cause appreciable land degradation.

An attempt was made to get a copy of the Spring Significant Flora Search, Report no. CO 7123:4 by RPS, 280 Churchill Avenue, Subiaco, ph 93824744, but there was no answer. The mobile number is non operational.

Chandala Swamp and Creek

We understand that a new section of road in connection with this proposal is planned, which will impact on Chandala Swamp and Chandala Creek. Chandala Swamp is on the Directory of Important Wetlands in Australia. It lies in the Shire of Chittering and covers 100ha. The Australian Wetlands Database states that the area is “thought to be significant for recharge of the Gngangara groundwater mound (A. Hill pers.comm.)”

Under “Ecological Features” the database states;

*A major breeding area for waterbirds (21 spp) in south-western Australia; particularly important for breeding and roosting by herons and allies, supporting one of WA’s largest breeding colonies of Straw-necked ibis *Threskiornis spinicollis*.*

On the significance of Chandala Swamp, the database states;

A good example of a wooded swamp, typical of the Swan Coastal Plain. Identified as meeting one Ramsar Criterion for listing as a Wetland of International Importance (Jaensch and Watkins 1990)”

Twenty-two species of bird breed at this Swamp and in 1983, 5000 Straw-necked Ibis were counted there.

The current land use is ‘Nature conservation’ and “land adjoining the reserve on the north-east side which includes much of the swamp’s surface catchment has been purchased by the Government and is proposed for future addition to the Nature Reserve.”

Threats to the Swamp are listed as ‘salinisation of inflow, eutrophication and damage to vegetation by cattle occasionally entering reserve and by goats.’

This area is on the eastern edge of the scarp within the sub-catchment of the Ellen Brook and with further clearing there is an increasing risk of salinity. There is also the risk of Acid Sulfate Soils.

Chandala Swamp is obviously a very important wetland which should not be threatened by unedifying proposals such as roads through the area and clearing of adjacent bushland.

Fauna

Listed Threatened Species

Southern Carpet Python-*Morelia spilota*.

It is believed that a fauna survey has not been conducted and of course clearing would have a terrible impact on fauna. We are informed by Vanessa Trundle who lives in the vicinity of the proposed development that the area is rich in vertebrates. On her property and surrounding properties there are echidnas, rock wallabies, a rare blue butterfly and the Southern Carpet Python, *Morelia spilota*. In the 1995 edition of *A Guide to the Reptiles and Frogs of the Perth Region* by Bush, Maryan, Browne-Cooper and Robinson, it is noted about this python;

The combined effect of habitat destruction, predation by foxes and feral cats and bush fires has made a noticeable impact on its numbers. It is currently gazetted as a threatened species. (page 161)

Listed Endangered Species under State and Federal Governments

Carnaby's Cockatoo

Vanessa Trundle states that Carnaby's Cockatoos nest in Breera Reserve, which used to be part of her farm, and that this species will be nesting in Lot 26.(pers comm.) It is not known if the proponent has referred the proposed clearing to the Federal Government under the EPBC Act.

Carnaby's Cockatoos are endangered and they need every food source available to them to have a hope of surviving. On their journey through the landscape seeking suitable breeding places, they cannot have areas of food sources missing. The Black Cockatoo Recovery Society of Australia has travelled 30,000 kilometres since last July, rescuing cockatoos which are generally not injured but which are starving.

Amphibians

Chocolate Burrowing Frog; *Helioporus inornatus*.

This frog has a very restricted range and is present in Chandala Swamp and surrounds. (Vanessa Trundle, pers comm.) The Guide book quotes Main; Restricted to the Darling Range in the vicinity of "sandy, acid peat bogs."

Long-necked or Oblong Turtles; *Chelodina oblonga*

These turtles are common in the area.

In addition, the UBC understands that a wildlife corridor would be lost if Lot 26 is cleared. As stated in Bush Forever, volume 2, page 71, vertebrates such as birds and mammal species and many invertebrates "need a large area for their home range and hence their survival."

Conclusion

The application for clearing 50ha of a site with significant native vegetation containing significant species and communities is highly inappropriate. Further, the effect on an important wetland must be considered as part of the proposal. The proposal would not comply with most of the clearing principles and the Urban Bushland Council expects the Native Vegetation Protection Unit to recommend against the clearing application.

Yours faithfully,

Margaret Owen, secretary.