

8 June 2014

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Department of Water
7 Ellam Street
Victoria Park
WA 6100

Objection – Rights in Water and Irrigation Act 1914 – Ref. RF 1 (Gateway WA application for a licence under s5C to take 629,000 kL from the Perth – Superficial Swan aquifer for dewatering and dust suppression at the intersection of Roe and Tonkin Hwy, Forreestfield.

To whom it may concern

The Urban Bushland Council wishes to lodge an objection to Gateway WA being granted the abovementioned licence they are seeking for dewatering and dust suppression at the intersection of Roe and Tonkin Highways.

There is no action that would overcome our objection as we do not wish to see such a large amount of groundwater taken from this environmentally sensitive area.

The intersection of Roe and Tonkin Highways is directly adjacent to Bush Forever Site 319 (Dundas Road Bushland), which is an area of very high conservation value bushland and wetlands. Not only has a great deal of native vegetation been cleared for the Gateway project in this area but it also faces the prospect of having very large volumes of groundwater being extracted beneath it as well.

The area in question is of special conservation significance, lying as it does on the eastern side of the Swan Coastal Plain. Notably also the Government's Bush Forever policy states that there is a presumption against clearing on the eastern side of the Swan Coastal Plain. In this very poorly conserved part of the Plain the native vegetation is especially diverse and Site 319 exhibits this quality accordingly. It contains Critically Endangered floristic community type 3a and Endangered community types 2 and 20a. It also contains the DRF species *Conospermum undulatum*.

We are concerned that the wetlands and Banksia Woodlands on this site may be detrimentally affected by groundwater extraction. Our climate is drying and native vegetation is having to withstand extended periods of very low rainfall on top of this overall drying trend – as well as unusually severe heat stress in the summer. We do not want this exceptional conservation area having its environmental values compromised by large scale groundwater extraction. Such extraction in an area we understand has complex hydrology could reduce groundwater levels significantly and thereby threaten the health of native vegetation.

Representatives of the UBC attended the recent 3 day national conference on Acid Sulfate Soils held here in Perth and notably there was no listed attendee from Main Roads. The UBC has strong concerns about Acid Sulphate soil problems arising. We are not convinced these can always be anticipated and always be dealt with satisfactorily. It is our strong view that this area is too ecologically sensitive and valuable for such large environmental impacts to be contemplated. We therefore recommend that for this site 'wet construction techniques' be used. This means that no dewatering should be permitted and further that the Department of Environmental Regulation should oversee and regulate any roadworks so that dewatering is avoided and environmental damage minimised.

Yours faithfully

President
Urban Bushland Council WA Inc

cc Dr Stephen Appleyard DER