

Text of UBC on-line Submission to EPA on level of assessment for Water Corporation proposal for tanks, p/l etc in Bush Forever 399, adjacent BF 300 Ellenbrook **27 March 2014**

1. This is a Bush Forever site 399 and adjacent site 300 of regional, state and national significance and is supposed to be set aside as part of the CAR reserve system (ie conservation estate) for the Perth MR for the protection of the state's rich biodiversity.
2. Clearing of Bush Forever is contrary to the Bush Forever whole of government policy endorsed by the EPA.
3. It includes clearing of 14.5ha of Banksia attenuata -B. menziesii woodlands, SCP23b, listed as a PEC by the State - which should therefore not be cleared and disturbed.
4. The Banksia woodlands of the project area are on the FPAL for assessment as a TEC under the Strategic Assessment Perth and Peel Regions being done now under the federal EPBC Act. This means that the whole area is to be treated as a TEC and therefore should not be cleared.
5. The area is critical foraging and roost habitat for Carnaby's Cockatoo, listed as endangered and is thus a Matter of National Environmental Significance (MNES) under the EPBC Act. Habitat within 6km radius of a roost site is classed as critical habitat and should not be cleared (DEC 2013 Geoff Barrett).
6. The proposal is at variance with clearing principles (a), (b) and (h) and therefore should not be cleared. The Banksia woodlands are especially species rich on a world standard and thus loss is contrary to the EPA's principle of the conservation of biological diversity, especially in an area which is supposed to be secured for the purpose of conservation.
7. There are alternatives: The tank could be located on the cleared quarry site or on nearby cleared land. Just because a pipeline and reservoir site may have been located on a map by the Water Corporation for many years does not mean that it should now be located there. The whole project should go back to the Water Corporation for review: is it really necessary? Where could it be located outside both Bush Forever and other bushland?
8. Offsets: The biodiversity of cleared Banksia woodlands and loss of Carnaby's habitat and that of hundreds of other species cannot be replaced and therefore cannot be offset. Clearing always results in a net loss of biodiversity and habitat. Any replanting of Cockatoo food takes at least 10-20 years to be productive and Cockatoos suffer the net loss of habitat in this period, thus deaths will occur. Clearing of areas such as this is the 'classic death of a thousand cuts'. The EPA must call a halt to this cumulative loss which is pushing Carnaby's Cockatoo to extinction. We in the community want to retain this iconic species in the Perth region - this is a matter of significant public concern and the EPA must take heed of this.
9. The proposal will have a significant impact on MNES (Carnaby's Cockatoo; species rich Banksia woodlands and more) and should be rejected at this early stage so that the Water Corporation goes back to review the whole project. It should never have considered locating infrastructure in Bush Forever. Notably this is not the only example they are pursuing and it is time that the OEPA and EPA formally advised them to keep all their proposals out of Bush Forever and other nature conservation reserves.
10. Incursion into Bush Forever will also increase degradation of surrounding bushland by weed invasion, soil disturbance, groundwater drawdown, dieback and other diseases especially in a drying climate.
11. The site is set in an already over-cleared landscape. Bush Forever is the absolute minimum to be set aside as essential infrastructure for the conservation of biodiversity to benefit all of us, and for WA's duty of care to the conservation of biodiversity. These areas were acquired with public money for this purpose, not for destruction.

THEREFORE FOR ALL THESE REASONS WE STRONGLY RECOMMEND THAT THE PROPOSAL BE ASSESSED AS API category B (environmentally unacceptable).

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