

Wildflower Society
of WESTERN AUSTRALIA (INC.)



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Attention: Ms Belinda Heath

**Re Eglinton Estates- Clearing of native vegetation from Lot 1007 and Part Lot 1008,
Eglinton, WA Invitation for Public Comment**

Summary

In response to the invitation for public comment on the Eglinton Estates clearing of 298ha of native vegetation as advertised in *The West Australian* newspaper dated 14 June 2011, the Wildflower Society of Western Australia in conjunction with the Urban Bushland Council, strongly oppose such operations. Not only the Society and UBC, but numerous people from the scientific community have expressed concern about the continued clearing of Banksia Woodlands and flora and fauna habitat in the south-west of WA especially on the Swan Coastal Plain and including the Perth Metropolitan Region. Clearing of the entire 298ha in the eastern LSP of Eglinton Estates will result in a decline of important terrestrial flora and fauna species that contribute to overall ecosystem health. The Society believes that the precautionary principle must be applied in this case to protect the ten listed terrestrial species as outlined in the Referral for a Proposed Action prepared by Coffey Environments, as they are all known to occur in the Eglinton Estates Eastern LSP. Of particular concern is the habitat for both the endangered Carnaby's Black Cockatoo *Calyptorhynchus latirostris* which uses this area for foraging and roosting, and the endangered Graceful Sun Moth which is dependent on *Lomandramaritima* and *Lomandra hermaphrodites* which occur in the area.

Listed endangered species and communities

According to the *Environmental Protection and Biodiversity Conservation Act 1999* rulings under section 18; Actions with significant impact on listed threatened species or endangered communities are prohibited without approval. It is evidential that under point 3a, titled “Endangered Species”, the threat of endangered species in the clearing of the Alkimos area, will be of concern as survival rates and biodiversity of the area are critical to ensure ecosystem health into the future. The Graceful Sun Moth *Synemongratiosa*, Narrow curved leaf Grevillea *Grevillea curviloba subsp. incurva*, Southern Giant Petrel *Macronectes halli* and particularly Carnaby’s Black Cockatoo *Calyptorhynchus latirostris* are listed as endangered species under the EPBC Act. The failure to see and report these species in the area at the time of surveys conducted does not determine the non existence of these species on the site.. The area is well known to be Black Cockatoo habitat.

Clearing an area as large as 298ha will adversely affect habitat for Carnaby's Cockatoo by reducing their feeding, roosting and breeding or potential breeding habitat. The context for the region is the huge loss of thousands of ha of high quality pristine habitat in the adjacent western section of the Alkimos-Eglinton Estate as this was approved for urban development before the EPBC Act provisions applied. This loss of habitat and the loss of an additional 298ha of intact Banksia woodlands will undoubtedly lead to a long term decrease in the size of the population and will interfere with other efforts to recover the species and its habitat. Remarkably the WA State EPA, the provisions of the outdated Wildlife Conservation Act, and the ineffective clearing regulations under the (WA) Environmental Protection Act have all failed to protect this area and its listed endangered species.

Therefore we argue that the clearing of all or part of the 298 ha will 'modify, destroy, remove, further isolate and decrease the availability and quality of habitat to the extent that the species is likely to decline'. This is unacceptable and the proposal should therefore not be approved.

The decline of vegetation in the South-West

With much clearing occurring across the SCP, a further clearing of Alkimos will reduce options for the Carnaby’s migration and movement routes. “About 90% of the original vegetation has been replaced by cities, towns, farms, vineyards, orchards and industrial areas.

In many areas the small patches of remnant bushland remaining are not in pristine condition” (Johnstone, et al, 2010, 3). It cannot be assumed that food will be plentiful in southern and western coastal areas during Summer and Autumn as widespread clearing has already occurred. Furthermore, although the Referral mentions that “Carnaby’s have been recorded foraging in most suburbs including Shenton Park bushland, Bold Park, Kings Park, road side verges” (Saunders 1974, 17, in EPBC Ref: 2010/5777), this data is extremely out-dated and limits places for foraging leaving little opportunity for Carnaby’s to grow in numbers. The 500ha of ROS reserved for Parks and Recreation for public purposes that are intended to serve the endangered species, particularly *Calyptrorhynchuslatirostris* will become degraded due to human activity. David Mitchell’s *Recovery of Carnaby’s Cockatoo* paper in the *Endangered Black Cockatoo’s in Western Australia* Symposium (Urban Bushland Council WA Inc. 2011) points out that recovery attention needs to be focused on protection of Banksia, Pine and Tuart as these provide food and roosting areas. Banksia is dominant in the Eastern LSP. The 500ha ROS is inadequate space allocated to the recovery of Carnaby’s, considering that over 2,600ha is designated for Eglinton Estates as intact vegetation cannot be used to offset the clearing. The allocation of a small ROS or rehabilitation of a cleared area does not match or replace the existing habitat that provides a dynamic range of ecosystem services. Intact complex bushland ecosystems simply cannot be replaced by planting and therefore the concept of offsets for clearing Banksia Woodland is baloney as offsets do not contribute any additional biodiversity outcomes or protection of habitat beyond that already existing. Thus the application of conditions as offsets cannot be used to justify or excuse clearing in this case. Thus the proposal should be rejected in total.

Carnaby’s Migration

The greater area of Wanneroo is recognized as being a critical area for Carnaby autumn-winter migration and movements where they fly 138km from Manmanning to Gin Gin and surrounds (Johnstone, et al, 2010, 7). Assuming that the Carnaby’s will fly further to other areas in search of food and roosting are indeterminate as vegetation in other areas are on the decline. Furthermore, this places stress on already lengthened migration routes due to prolonged flying. If they do find other habitat, it is assuming that it provides adequate ecosystem services to service their lifestyles. Also, it implies a “doubling up” of species in areas that are already at a maximum and may not be welcomed by other species, causing conflict and further displacement which is already occurring for example in the the Perry Lakes housing development area (Owen, 2010, 25).

The loss of 125ha of 'potential' Black Cockatoo foraging habitat as specified by SEWPC's Significance Impacts Guidelines will send population numbers to further plummet as they have been on decline for the past 50 years (Johnstone, et al, 2010, 3). More recently, the Carnaby's populations are in steep decline in just a short period of 2010 compared to 2011 with a 33% reduction in numbers, according to XanderKabat from Birds Australia who was involved in the Great Cocky Count 2010 program that involved over 350 volunteers surveying 189 sites. (Xander, 2011, 2, Barrett, et al, 2010, 11). The Department of Planning released a report last month confirming the breeding habitat within approximately 5 km from the site. Significant portions of in-tact vegetation within 2-10 km radius to the West of the confirmed breeding site are zoned for future development. This shows that clearing for Eglinton Estates is not considering the cumulative impacts on the endangered species (Western Australian Planning Commission, 2011).

Vegetation affected by climate change

Areas of remnant vegetation that remain intact are being affected by climate change.

Professor Giles Hardy from the Centre for *Phytophthora* Science and Management School of Biological Sciences and Biotechnology, suggests as much as 60% of vegetation was affected in 2010 which was one of the driest and hottest years on record across the Perth Metropolitan Area (Hardy, 2011, 1). Vegetation change is one of the most important results of a changing climate because it affects the habitats of most terrestrial species (Thomas et al, 2008, 1). For example, the observed thinning of tree foliage and understory due to prolonged periods of drought forces species to migrate to other areas for breeding and foraging. These areas are becoming less available due to humans changing the natural landscape.

It cannot be assumed that the Carnaby's will migrate to areas where there is thought to be adequate vegetation for foraging, due to impacts of climate change. The clearing of Eglinton Estates is adding to the problem of climate change as it not only releases carbon dioxide into the atmosphere when vegetation is removed, it reduces carbon sinks and also eliminates the ability for vital ecosystem services to be fulfilled.

The Wildflower Society recommends that the proposal to clear 298 ha of bushland not be approved by The Minister and that the total area be retained and managed as intact bushland for conservation. Should you have any queries please phone 0413 770 888 or email jennynewman@rocketmail.com.

Yours sincerely,

Jennifer Newman

Miss J. Newman
Conservation Sub Committee Secretary



References

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