



To info@epa.wa.gov.au

1. Name:

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5. Preferred Option for decision by the EPA: Public Environmental Review (PER)

6. Reasons for your preferred option for decision of the EPA?

Ellenbrook Reliable Water Storage Project

'The Water Corporation proposes to develop a new water supply tank and associated infrastructure to ensure future supply requirements for the community are met. The development will occur over three phases and will require the clearing of approximately 16.52 ha of native and non-native vegetation.'

1.) Clearing 16.52Ha and in a Bush Forever site

Clearing 16.52 ha of native and non-native vegetation is unacceptable and even more unacceptable is that the proposal is for clearing part of a Bush Forever site. The site is Bush Forever Site No 399 (Melaleuca Park and Adjacent Bushland, Bullsbrook/Lexia.)

The process of implementation of Bush Forever sites has stalled and there are many examples of development proposals and actual developments in Bush Forever areas. We call on the EPA to step in and protect this Bush Forever site from development.

Under the Strategic Assessment process, there is a presumption that Bush Forever sites will be respected. The Water Corporation should not pre-empt this process.

2.) Threats to the Perth region

The Perth region is under very serious threat: falling ground water levels, declining rainfall, higher temperatures, disease, clearing, fire, weed invasion. Clearing of any Banksia woodland should be suspended. The Water Corporation must observe this and understand the significance of our Banksia woodlands.

3.) Part of a regionally significant contiguous linkage

As the Water Corporation's Rupert Duckworth states quoting from Bush Forever document Volume 2 Page 218, this Bush Forever site 'is listed as being part of a regionally significant

contiguous bushland/wetland linkage. It is of particular significance as it provides corridors through otherwise highly cleared lands and provides linkages of regional significance'.

Like the Bush Forever sites themselves, the linkages or Greenways are recognised in Bush Forever as important in maintaining diversity and for the other well known reasons.

4.) Priority 3 Ecological Community (PEC) 'Swan Coastal Plain *Banksia attenuata* - *Banksia menziesii* woodland. (SPC 23b)

This community is present within the northern section of the project area and is associated within the vegetation type *Banksia* Low Open Forest (11.86 ha)

Priority 3 areas are 'Poorly known ecological communities' (DPAW website). It is understood that this community has been nominated as a Threatened Ecological Community under the EPBC Act.

5.) A controlled action because of MNES - Three species of black cockatoo.

The Department of the Environment has determined that this proposal is 'a controlled action because it is likely to have a significant impact on foraging habitat for the listed Carnaby's Black-Cockatoo.' A major factor in the precipitous decline in Carnaby's cockatoo numbers is because of the clearing of hundreds of hectares of pine trees in the Gngara area. Further clearing of pines is on the calendar.

The aim of the federal department is that Carnaby's Cockatoo will persist into the future, but there is no confidence that this will be achieved. Birdlife Australia has stated that Carnaby's Cockatoo will be extinct within 20 years if trends of 15% per year decrease in numbers as reported over 5 years from 2010 to 2014, continue. Habitat should be retained, enhanced, and increased not decreased.

6.) 'Counterbalancing'

It is obvious that offsetting in whatever form does not lead to a net gain of habitat. We submit that the loss as proposed cannot be offset at all.

The compromises have already been made and it is now critical that Bush Forever sites are not encroached on by clearing.

Yours sincerely

UBC Vice-president.

27 May 2015