

30th October 2008

nvp@dec.wa.gov.au

Native Vegetation Conservation Branch
Department of Environment and Conservation
Locked Bag 104
Bentley Delivery Centre WA 6983

Application for clearing 7001 native trees
Allerding and Associates on behalf of Telstra Corporation Ltd.
Fire hazard Reduction (CPS 2763/1)

INTRODUCTION

Bush Forever site 196

The proposal for clearing 1706 native trees is in Bush Forever site 196, Gngangara Road Bushland, Landsdale/Cullacabardee. The area of the Bush Forever site is 236.6ha.

The qualities of this site are described on page 229 of Bush Forever, volume 2 and include Conservation Category Wetlands, Threatened Ecological Communities and significant flora and fauna. It is also 'part of a regionally significant fragmented bushland /wetland linkage.'

Underground Water Pollution Control Area

The site is also on the Underground Water Pollution Control Area – Gazetted (Proposed Priority) (Page 62, Table 3 Bush Forever Volume 1)

Lack of information

The only information available to us from the Native Vegetation Protection Branch is the aerial map with the proposed clearing areas marked in blue.

Allerding and Associates acting for Telstra could not supply information relating to the flora and fauna surveys and other necessary documents. After continuing enquiries a hard copy would have been available for an off the cuff price of \$250. A disc was available for no charge. We make the point that trying to collect information to make an informed submission, is time consuming and unnecessary. It would be valuable if adequate information were available and that navigation through the web site provided www.dec.wa.gov.au/nvp was possible.

After persistence, on Monday 27th October Mary Gray and Margaret Owen, Urban Bushland Council Executive members, met a Telstra executive on site and were shown around by the consultant David Hancock of Natural Area Management and his colleague. The nature of the proposal was explained and we were shown over relevant parts of the site.

Explanation and recommendations

It is obvious that the equipment and operations at this site are extremely valuable and that the facility is of strategic importance for communications in the Perth region. However, the bushland is also invaluable. The UBC does understand that the facilities must be protected from fire and following the short explanation below we put forward recommendations in regards to fire protection, offsets, dieback and 'other'.

The proposal to remove vegetation was put forward to protect the technical equipment from damage by fire. In the hierarchy of clearing around facilities, there is a proposed gradation from either hard stand or 15cm mown vegetation to thinned vegetation.

The three areas are as follows;

- Directly surrounding and under plant (in the case of Telemetry Tracking Command and Monitoring antennas), there is either hard-stand or slashing or mowing of vegetation to around 20 centimetres height.
- In the next concentric circle, clearing is proposed to 50cm (0.5metre) height. Within this section there are old habitat trees and tall Xanthorrhoea. The UBC is reluctant to support this proposal because of the quality of the vegetation. A photograph is included.
- In the third concentric circle some trees are proposed for removal to comply with a formula for reduction of fuel load.

The UBC appreciates the care taken in the selection of trees by Natural Resource Management for proposed protection within the third section (the outer section), should the proposal be approved.

COMMENTS AGAINST CLEARING PRINCIPLES

Principle (a) - at variance

The vegetation proposed for clearing and thinning has a high level of biodiversity of flora and fauna and is mostly in excellent condition. The condition of vegetation is generally better than at other comparable sites (Whiteman Park, Beechboro Road Bushland etc).

Principle (b)- at variance

The vegetation provides habitat for significant fauna including Quenda and Honey Possums as well as many small bird species now restricted on the Swan Coastal Plain. (Refer John Dell DEC for technical information).

Principle (c)- at variance

One of the areas proposed for clearing and thinning is wetland and may contain *Verticordia nitens* a significant flora species.

Principle (e)- at variance

Bassendean central and south vegetation is under represented in Bush Forever - due to excessive clearing at both Perth and Jandakot Airports. Also similar vegetation is at risk on other sites on the Gnangara Mound, including Whiteman Park, due to excessive groundwater abstraction and lowered groundwater levels which are in breach of Ministerial conditions. (Refer to Dr S Appleyard, Hydrologist DEC for technical information)

Principle (f)- at variance

Some of the area proposed for clearing and thinning is wetland vegetation.

Principle (i)- at variance

Clearing and loss of leaf and ground litter layer has the potential to contribute to deterioration in groundwater quality due to loss of calcium and buffering capacity in the soil profile. (Refer to Dr S Appleyard, Hydrologist DEC for technical information)

RECOMMENDATIONS

The Urban Bushland Council recommends the following be made legally binding conditions:

Please note that these comments and recommendations apply to the whole of Bush Forever site 196, not just the areas proposed for clearing.

A) Fire prevention measures

- *Perimeter fencing* at the site be improved by changing to (cyclone) mesh to at least 2m height. Fencing is currently around one meter high on Alexander Drive. This is patently inadequate and people can easily step through.
- *Surveillance of the boundaries* to exclude unauthorised entry and thus exclude entry to potential arsonists and fire accidents, for example by off-road vehicle users and wildflower pickers. The bund would be particularly attractive to motorised vehicles. Wildflower pickers are known to enter and pick illegally and this is a threat to the ecological integrity of the bushland and is a potential means of spreading dieback. Integrity of the fence to be maintained through regular daily surveillance.
- *Prescribed burning: **There should be no prescribed burns within the bushland.***
On our visit (27.10.08) we saw the result of a recent prescribed burn. Tinder dry grass trees and other dried out vegetation remains and we believe that this is actually an increased fire hazard. We firmly believe that prescribed burning is counterproductive on the Swan Coastal Plain as the dried out vegetation remaining after fire is more flammable and grassy weed invasion is encouraged thereby *increasing* fire hazard. Many invasive weed species benefit from fires such as Perennial Veldt Grass. (City of Wanneroo Draft Local Biodiversity Strategy, 2008-2013, p 22).
Furthermore fire is catastrophic for fauna. Burning kills honey possums and nesting small birds and kills or injures reptiles and invertebrate fauna.
We are aware that these burns were carried out in two areas (cells) where the ground fuel load study indicated that the sites exceeded 8 tonnes per hectare fuel load. (*Status of the recommendation of the FDC (Fire Design and Commissioning) report*, provided by Telstra). However the final sentence of point 10 is “All other cells are within the 8 t/Ha load tolerance and in line with the current schedule for burns to take place.”
We do not support this policy on this landform especially with so much of the site classed as wetlands. We believe that regular burns are detrimental to the sustaining of ecosystem processes (eg nutrient cycling and pollination) and degrade bushland condition. In particular wetland ecosystems including peaty soils should never be burnt as fire is highly destructive resulting in soil acidification and loss of the massive carbon store in peaty sediments. It must be remembered that half of the site is Conservation Category Wetland.
- *Back up power supply:* We draw attention to fuel tanks, of necessity located above ground (because of the location on the UWPCA). These tanks contain 90,000 litres of diesel fuel. With advice, we recommend that the tanks, if not already on a concrete slab, are so placed and bunding consisting of concrete slab walls be placed around the tanks high enough to contain leakage. Further that Telstra be required to have back up power from a combination of solar and wind power so that the quantity of diesel on site can be reduced. Of course these renewable power sources could be in use at all times greatly reducing Greenhouse gas emissions for the site.

B) Fire suppression

- *Rapid response to fire:* Telstra be required to provide fire tenders ready on site at all times for fast response to any fire before FESA Units arrive. The best way to control fire is to respond rapidly while a fire area is small. At other bushland sites such as Kings Park and Bold Park the land managers have their own units on standby at all times. We were advised that there are no such units on the Telstra site and this is most surprising.

C) Offsets

- *Firebreak rehabilitation not eligible:* We do not consider the rehabilitation and revegetation of firebreaks, (some as wide as 50 and 100 metres), to be offsets for loss of bushland.

We understand that an area to the west of the site, around the Telesat site and along Alexander Drive, is to be rehabilitated to assist in the absorption of Radio Frequency emissions. This area includes the recently built bund. We do not consider this rehabilitation work to be an offset for loss of bushland as this work is already proceeding regardless of the proposed clearing.

- *Purchase bushland buffer:* It was in the past believed (by Telstra with State Government agreement) that land to the west of Alexander Drive (offsite) would serve as a buffer (to prevent unwanted interference) to the Telstra site. After pressure from landholders however, some of this land has already been sold and houses constructed. The land is currently zoned 'Urban deferred' and rezoning to 'urban' is proposed.

We strongly recommend that as an offset, Telstra be required to purchase land to the west of Alexander Drive opposite the Telstra site boundary, to act as a buffer for Telstra equipment and as a buffer to the integrity of Bush Forever site 196. Where these bushland sites are separated, the construction of a vegetated strip connecting the sites would be highly beneficial both to Telstra and to native biodiversity protection and this is a recommended condition. This action would be a genuine offset and would be a very beneficial act. It is worth investigating if these purchases could be assisted by the Commonwealth government as it is in the interests of protecting good telecommunications as well as biodiversity protection.

- *Assess Threatened Ecological Communities (TEC):* Further we believe that the bushland blocks (for offsets as above) may include Threatened Ecological Communities (TEC 20a?) and we recommend that they all be assessed by the WATSCU of DEC. If they comprise TECs, they should not be granted a clearing permit according to the Clearing Principles. This should significantly lower their purchase price as they would not be valued as 'developable' land.

D) Dieback

- David Hancock and Telstra are aware of and have mapped the location of dieback areas on the site. David Hancock explained to us the measures taken to prevent its spread. ***We recommend that conditions to control dieback are written into the decision and are made legally binding in regards to this proposal.*** Examples are that there be strict dieback hygiene, that access towards the Telesat site should be only from the east, and to strictly isolate dieback areas so that there is no access to them. Also unauthorised public access be tightly controlled as in (A) above.

E) Other comments

- **Monitoring groundwater levels**

We recommend that Telstra monitor the ground water levels within the site and keep records as evidence for any changes which occur, due to a drying climate or from groundwater abstraction or other reasons. This would be apart from the Water Corporation's monitoring points on the perimeter.

Maintaining groundwater levels and intact native vegetation cover is quintessential to sustainability of the natural ecosystem of the excellent quality Bassendean central and south vegetation of Bush Forever site 196. If groundwater levels drop and good vegetation cover is lost, the soil and water table will acidify and fail to support fauna and flora to the point of collapse of the now intact ecosystem.

- **Potential rezoning of the area to the west of Alexander Road opposite Telstra land**

We recommend that Telstra continue to submit that the land should not be rezoned to 'Urban'. There is still an opportunity to stop this proposed rezoning. The significant environmental issues as well as the need for prevention of interference to Telstra infrastructure need to be formally brought to the attention of State planners (DPI) and the WAPC by DEC.

- **The proposal for tree removal will lead to two elongated areas of bushland**

The bushland to the east of the main buildings and the bushland within the horseshoe shape of the proposed affected areas (see map) will be vulnerable to degradation due to the ratio of edge to interior. The bushland is in excellent condition and Telstra, through Natural Area Management, is managing the bushland for weeds.

- **Water tanks**

We also note that buildings near the Telesat site, but to the east of it, have a large roof area which could act as a good water collector if tanks were installed to collect the water. These could be used in the event of fire.

CONCLUSION

We are faced with an extremely high quality area of bushland and wetland in *excellent* condition and under-represented in Bush Forever with a highly technical and important telecommunication facility built within it. The facility was built in the bushland perhaps because the bushland was not valued but also because of the absorption qualities of the bush required by the facility.

The aim of the proposal to clear 1701 trees is to reduce the threat of fire to the facilities. We are not confident that the proposal, if approved, would be superior to just having a smaller cleared area around each facility. Other measures we have recommended we believe are more important fire prevention measures. Arson and bushland degradation from a variety of causes are both likely to increase markedly as suburbia encroaches if such measures are not taken.

We strongly oppose prescribed burning on the site as it is catastrophic to fauna and to the wetland ecosystems comprising more than half the site. Burning may result in acidity and will completely degrade the bushland in time. This has already happened on other Bassendean landform sites on the Gngangara Mound.

Urban Bushland Council representatives are happy to discuss these matters further at any time.

Yours sincerely

C Mary Gray
President

Margaret Owen
Secretary