



14 June 2013

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Main Roads Metropolitan Region  
PO Box 6202  
East Perth WA 6892  
Attention: Shane Collins, Environmental Officer

**REID HIGHWAY – MALAGA DRIVE INTERCHANGE**  
**- MAY BE AT VARIANCE WITH CLEARING PRINCIPLES A, B and H**  
**- IMPACT ON LIGHTNING SWAMP BUSH FOREVER SITE**

Dear Sir/Madam

Thank you for requesting the Urban Bushland Council's (UBC) comments on the proposal above. The UBC does not support the continued clearing of native vegetation in the Perth region and seeks to ensure that clearing is limited to the absolute minimum for this project and that any impacts on remaining vegetation, particularly the two Bush Forever sites, is similarly minimised.

We note that this proposed interchange appears almost identical to that at Alexander Drive. We believe that the footprint of the Malaga interchange could be substantially compressed by adding retaining walls, and also could re-use the soil storage area which is clearly visible south of the highway.

We are most concerned that the studies done have not recognised or taken into account the presence of two wetlands and potential threats to them. This must be addressed.

**Recommendations**

**1. We support the recommendations from the GHD Biological Survey, 2011:**

a) To investigate the importance of the site in supporting the Graceful Sun Moth (*Synemon gratioosa*; Schedule 1 [WC Act] Endangered [EPBC Act]). We expect that a proper survey for the Sun Moth has already been carried out or else shall be carried out next survey season.

b) A portion of Bush Forever site 307 (Lightning Swamp Bushland) is within the Study area. For Bush Forever sites there is a general presumption against clearing. Measures should be taken by Main Roads to ensure direct and indirect impacts from the proposed project do not negatively impact on Lightning Swamp Bushland. **Of critical importance is the existence of two small significant and intact wetland areas just north of the drainage channel which have not been identified in the study. This is a serious omission and must be addressed.**

As well as likely weed incursion as a result of adjacent disturbance, we are unaware of what the hydrological changes or potential drainage impacts may be. Potential impacts are likely to be significant, judging by the extent of the construction of the similar Alexander Drive Reid Highway interchange.

**The Urban Bushland Council strongly recommends that the design be reviewed so that the possibility of compressing the footprint and identifying and reducing the hydrological impacts by building on and off ramps more centrally is achieved.**

c) **That a Hygiene Management Plan be developed to manage dieback and weeds.** Dieback is a major threat to bushland and spread of the disease is a serious risk where there is runoff from infected (introduced) road materials. Once dieback is introduced it cannot be eliminated. All road materials used must be tested and certified dieback free. Also all the area disturbed should be regularly monitored for dieback.

d) **That areas not designated for clearing be fenced before commencement of construction to ensure degradation of any additional areas of native vegetation does not occur.**

## **2 Black Cockatoos**

We value the site as habitat and a food resource for the Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo. Your assessment is that this site is not significant for cockatoos. We disagree with this as all woodland and proteaceous shrubs in the area is habitat for these increasingly endangered birds.

It is time that all government agencies and utilities including Main Roads take into account the significant, rapid and continuing decline of these bird's once expansive range. **Thus we recommend the extent of clearing should be curtailed as much as possible by review of design and construction techniques.**

## **3. Further study warranted**

Many flora and fauna species were missed by the biological studies, and these studies did not include fungi which are as important as flora and fauna. There is known to be a white form of *Hovea pungens* (Devil's Pins) in Lightning Swamp Bushland – both inside the fence and within the road reserve in the area in very good condition. In addition, one of the small wetlands mentioned above includes a pink form of *Hypocalymma angustifolium* (White Myrtle).

**We recommend that further studies be carried out of both the project area and surrounding bushland for these and other species of significance, and that these populations of flora be avoided and protected.**

## **4. Further input**

The Urban Bushland Council recommends that there be continued consultation with the Friends of Lightning Swamp Bushland via their President John Williams both before and during the project's term. The members of this group have considerable local knowledge and expertise in the bushland and wetlands of the area.

Yours sincerely

President

cc Friends of Lightning Swamp Bushland  
Cockatoo Coalition  
Wildflower Society of WA - Conservation Committee  
Conservation Council  
WWF