

Perth and Peel Green Growth Plan (GGP):

Comments on: Draft Action Plan E: Harvesting of pines and post harvesting land use by Urban Bushland Council WA Inc.

Note: Broader Gngangara Mound groundwater issues are clearly identified in this plan E. Note: list of acronyms shown at end of document

SECTION IN ACTION PLAN E	ISSUE	RECOMMENDED CHANGE
<p>2: Background p2</p>	<p>Gives a clear summary of the historical development of multiple competing uses of the Gngangara Mound area including the Gngangara, Pinjar and Yanchep pine plantations. (See list at end of this table)</p> <p>The last paragraph on p2 says it all: it shows the Government’s list of priorities of the GGP with human use and exploitation first and dominating; then with ecosystem protection and MNES listed last:</p> <p>1: groundwater for public supply. (P1, P2, P3 areas not mentioned or shown on maps)</p> <p>2: horticulture and public open space (ie irrigated golf courses, ovals)</p> <p>3: timber supply under <i>State Agreement Act</i></p> <p>4: BRM supply</p> <p>5: new urban and industrial land use</p> <p>6: Carnaby’s Cockatoo foraging and roost habitat</p> <p>7: ‘other’ environmental values: wetlands, MNES</p> <p>The Strategic Conservation Plan does not ‘balance’ these matters.</p> <p>The overarching environmental issue is massive over use of groundwater from uncontrolled and inadequately controlled human abstraction from the Gngangara Mound.</p>	<ul style="list-style-type: none"> * Make environmental matters and MNES as first priority in GGP process. * Provide maps to clearly identify P1, P2, P3 areas of UWPCA <p>Control and reduce abstraction:</p> <ul style="list-style-type: none"> * <i>Significantly</i> reduce use of Gngangara Mound for public supply: Water Corp should be made to reduce use according to Ministerial and licensed conditions. Increase price of potable water; increase restrictions on garden watering. * Review and set controls to very significantly reduce licensed abstraction for horticulture. Remove bores from P1, P2, P3 areas. * Cease irrigation of golf courses on the Gngangara Mound. * Replace harvested pines by revegetation with local Banksia woodland species as a top priority, and include some pine areas. Grassland only species not acceptable. * BRM supply should not be permitted on the Gngangara Mound UWPCA.
<p>3.1: pine harvesting p3</p>	<p>21,825 ha pines to be cleared at 1,400 – 1,800ha/yr</p> <p>Only 5,000 ha to be replanted, <u>means 16,825 ha net loss of Cockatoo feeding habitat.</u> Will lead to totally unacceptable loss of 58% Carnaby’s population.</p> <p>Clearing of pines and net loss of habitat for Carnaby’s should have been referred to the Commonwealth under the <i>EPBC Act</i> for assessment some years ago.</p>	<p><u>All plantation clearing should be replanted with Banksia woodland species mostly, and some with pines, without further delay, including the areas already harvested.</u></p> <p>This is a state government responsibility and it should be enforced by the Commonwealth under the <i>EPBC Act</i>.</p> <p>The unacceptable loss of Carnaby’s food habitat and forced population decline must be drawn to the attention of the Commonwealth DOE under the <i>EPBC Act</i>. Loss of 4,400 (58% of 8,000) Carnaby’s for the GGP region does not meet</p>

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		<p><i>EPBC Act</i> objectives for an endangered species, and does not meet Recovery Plan objectives.</p>
<p>3.2: Continue plantation p3-4 3.4: Water Impacts p10-11</p>	<p>5,000 ha pines only to be replanted. It is questionable that this would result in groundwater rising again. The DOW Hydrogeological record series Report no. 60 (September 2012) gives evidence of groundwater abstraction many times above licensed and earlier allocations and of declining hydraulic heads and falling superficial groundwater levels. eg. Groundwater levels east of Loch McNess have declined by more than 1.5m in the 20 years prior to 2010, with 1m of this decline attributed to abstraction from the Leederville aquifer, and only 0.5m due to decline in rainfall. Thus strict review and reduction of allocations and control of abstraction is needed as the first priority.</p>	<p>Rigorous review and strict control of greatly reduced groundwater allocations and actual abstraction by all users is needed as the first priority.</p>
<p>3.3 Land not continued to be used as a plantation p6 And 3.3.2 p10 3.4 Water Impact p10-11</p>	<p>1,174 ha is proposed to be allocated for urban and industrial use. GGP Maps do not show the location of P1, P2 and P3 areas of Underground Water Pollution Control Areas (UWPCA). Maps do not show which if any of these areas in 3.3 are on P1, P2 or P3. <u>However it does document in 3.3.2 that South Pinjar, West Ellenbrook, and part Nowergup (1) are P1 areas of UWPCA. This should have excluded these areas from proposed urban or industrial uses from the start.</u> <i>This section quotes requirements of P1 areas in UWPCA and states that ‘development in these areas will increase the risk to the quality of the drinking water source.’ But then it states: ‘However, as a strategic decision has been made to allow urban and industrial development in these P1 areas instead of being retained for drinking water source protection, DOW will need to either amend the boundary or change the priority areas to P3....to allow the development.’ THIS IS A DENIAL OF PROPER GOVERNANCE AND IS TOTALLY UNACCEPTABLE.</i></p>	<p>No potential future use whatsoever for urban or industrial or mining landuse on P1, P2 or P3 UWPCA areas should be permitted. Areas identified as P1 must be removed from all proposals for urban, industrial or other development. Prevention of potential contamination or degradation of public water sources in P1 areas of UWPCA is of paramount importance and the community is strongly supportive of such protection. This very widely held community position was strongly voiced at the <i>Dialogue with the City 2004</i>. The GGP must be amended so that this fundamental principle of prevention and protection of all potable drinking water supply areas (P1, P2, P3) is maintained. The ‘special requirements’ for P1 areas proposed for development are unworkable nonsense and this attempt at justification to suit developers must be removed in the interest of public health and proper public water supply management. The proposal represents irresponsible governance and must be changed to uphold proper protection of all P1 areas. There should be no mining for BRM on P1, P2 or P3 areas. No transfer from Crown lands to freehold.</p>

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3.3 Page 6	<p>The 16,825 ha area of plantation which will be cleared and not replanted with pines are proposed to be converted to grassland or low water use vegetation. Thus they will not be returned as Carnaby's habitat and this is unacceptable. The justification is that it will stimulate a rise in groundwater levels but this is questionable as below, and is certainly contrary to the requirement for provision of habitat to maintain Carnaby's Cockatoo population viability under the Strategic Conservation Plan.</p> <p>Notably, clearing of pines from 2002 onwards has not induced a water table response close to Loch NcNess (DOW Report No. 60, Sept 2012)</p>	<p>Replanting and conversion to grassland species is unacceptable and should be completely removed from the GGP.</p> <p>This 16,825ha area should be revegetated to provide Carnaby's habitat as an urgent priority and under legal requirement specified under the EPBC Act.</p>
3.3.1 Land not for plantations p9	<p>Clearing, raking, burning, slashing and prescribed burning as in third last paragraph on page 9 is not supported.</p> <p>Grassland: Increased rainfall recharge giving any significant rise in groundwater is not substantiated and is not justified. Grassland provides no Carnaby's habitat replacement and this is unacceptable.</p>	<p>After pine harvesting, debris should not be burnt as this increases acidity of the soils, reduces organic matter content and promotes grassy weed invasion. There should be no 'prescribed burning' for the same reasons and also because it is likely to foster more arson.</p> <p>Thus, we strongly object to the third last paragraph on page 9 and recommend it be removed.</p> <p>No revegetation with grassland. This is a major change that is needed in Action Plan E and for all other Action Plans. The State Government needs to be reminded that the GGP is part of the SAPPR process which is for the protection of MNES, not their destruction.</p>
3.3.2 (Crown) Land for transfer to freehold for urban, industrial use p10	See 3.3 above.	See above
3.4 Water Impacts p10-11	See comments above for Section 3.2 p 3-4	See above
Section 4 Implementation framework: 4.1, 4.2, 4.5	These sections need to be completely revised in line with the recommendations given above for all parts of Section 3.	Completely revise Section 4 in line with recommendations above for Section 3 and especially for removal of all proposed urban and industrial and BRM extraction from P1, P2, P3 UWPCA; and also for requirement to

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		revegetate all areas harvested for pines to provide Carnaby's replacement habitat as an urgent priority.
4.6 Funding arrangements p17	It states that no funding mechanisms are needed to implement Action Plan E. Failure of the state government to propose and provide for proper revegetation is a fundamental failure and needs to be changed. The state government has chosen the cheapest option, rather than proper protection of an endangered species.	Provide substantial and adequate state government funding to revegetate and properly manage the former harvested areas as renewed Carnaby's habitat as recommended above for Section 3.

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GENERAL COMMENT ACTION PLAN E	The Action Plan is un-necessarily long and is repetitive. There are major unacceptable impacts from Action Plan E for Carnaby's cockatoo and these are not adequately addressed as MNES in the GGP. There is no consideration of the impacts of climate change in terms of provision of food and water for the endangered Carnaby's cockatoo.	Revise and rewrite Plan E more concisely with primary focus on rehabilitation for Carnaby's habitat and revegetation with Banksia woodland species and other forage habitat. Seriously address and provide reduction of over-abstraction of the Gngangara Mound. Address climate change as a threatening process to MNES.

Summary of background on page 2 of Action Plan E

- (1) 1996 decision to remove 23,000ha pines and not replace them to increase groundwater recharge on the Gngangara Mound
- (2) harvest pines by 2020 as supply of softwood under a State Agreement Act
- (3) Pines have replaced (ie mitigated) cleared Banksia woodlands as Carnaby's food progressively since 1950s
- (4) The 23,000ha of pines supplied ~57% food resource for Carnaby's. 5,000ha pines to be replaced at 500ha/year, commenced 2012. Thus 18,000 ha net loss for Carnaby's forage and roosting habitat
- (5) Proposed BRM mining, and proposed new urban expansion areas are identified on the Gngangara Mound.

ACRONYMS

BRM	basic raw materials
DOE	Department of Environment - Australian Government
DOW	Department of Water - State Government

EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i> is the Australian Government's central piece of environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the EPBC Act as matters of national environmental significance. More about the EPBC Act
GGP	Perth and Peel Green Growth Plan (is part of the Strategic Assessment Perth Peel Region)
MNES	matters of national environmental significance
P1 P2 P3	Underground Water Pollution Control Areas (UWPCA) <u>Priority 1 (P1)</u> areas cover land where protection of the water source is the prime consideration and will normally apply to land owned by the State, such as forests. P1 areas are managed with the principle of risk avoidance. <i>Water Catchment reservations</i> are applied to land defined as P1 areas. <u>Priority 2 (P2)</u> areas cover land where there is low-risk development, such as low intensity rural areas, or where development with conditions is allowed so risk of pollution to the water source is minimised. P2 areas are defined by <i>Rural Water Protection zones</i> in the MRS. <u>Priority 3 (P3)</u> areas cover land where protection of the water source is managed to co-exist with other land uses, and will normally apply to land where more intensive development has occurred such as residential, commercial and industrial areas. Protection of P3 areas is achieved through management guidelines rather than restrictions on land use.[REF: https://www.water.wa.gov.au/_data/assets/pdf_file/0016/4912/86090.pdf]
SAPPR	Strategic Assessment Perth Peel Region
UWPCA	Underground Water Pollution Control Areas - refer to P1, P2 and P3 above.