

BUTLER TO EGLINTON RAIL EXTENSION STAGE 1

UBC SUBMISSION to EPA 18 Jan 2019

1. General comment

The additional information provided is in a very large number of documents and Appendices. This is overwhelming and beyond our capacity to study it all. It is far too long and is partly confusing. Also the public comment period is over the Christmas holiday break which is unfair for people who are on holidays and deserve time off with families etc.

2. Formal PER should have been done.

Given the complexity of the natural landscape and the range of significant environmental factors and social context pertaining to this section, it should have been formally assessed as a PER together with part 2.

3. Cumulative impact: parts 1 & 2.

Some of the data presented is for both parts 1 and 2 of the railway extension. The whole should have been considered and assessed with parts 1 & 2 together - regardless of the wishes of the PTA.

FURTHER, the social and environmental context of the whole Metronet railway extension of parts 1 & 2 should have been and still should be considered: especially the sustainability of the associated continued low density urban sprawl, and especially its linear nature.

Perth is one of the most sprawling cities in the world - with impacts of inefficient transport, very high car use resulting in very high total emissions for car, truck, and bus use and high travel times for commuters. The EPA should be considering the total Greenhouse gas emissions from continued urban sprawl with total land clearing, building of large oversized houses, paths/infrastructure with vast hard areas creating a heat island effect, and high concrete content levels.

Concrete manufacture and use produces and uses very high emissions.

4. Land clearing

The continued land clearing of an inherently biodiverse landscape for outer urban sprawl is both environmentally and socially unacceptable. The rail extension will be used to justify clearing of surrounding lands and we submit that this must be considered in this proposal. Clearing of 70.22 ha just for the transport corridor is really only part of the proposal in planning terms and environmental impact.

The new information description of the 70.22 ha proposed for clearing does not show which areas are TECs under the EPBC Act separately from State listed plant communities and habitats of endangered species.

Clearing of TECs, both state and EPBC listed, is unacceptable and they cannot be offset. The principle of AVOIDANCE should apply to all TECs.

Clearing of any of the critically endangered *Melaleuca huegelii*-*M. acerosa* shrublands on limestone ridges is unacceptable. Also approval of this stage 1 would be used to justify stage 2 AND THE ASSOCIATED CLEARING OF OTHER AREAS FOR HOUSING. Notably the rail line appears to be located along the ridge line which is the habitat of this ecological community. This TEC ridge should remain fully and be protected.

5. EPBC Act listed Banksia Woodlands TEC

For the Banksia Woodlands of the Swan Coastal Plain TEC under the EPBC Act, the federal Approved Conservation Advice applies. This states that this ecological community is to be PROTECTED to prevent its further loss of extent and condition.

Thus its clearing should not be permitted by the EPA and (State) Minister for the Environment.

The documentation does not present or map this feature and this is unacceptable.

The 'classic death of a thousand cuts' is apparent with this proposal.

6. Status of SW Biodiversity hotspot ignored.

The SW of WA is already over-cleared and, for this reason alone, further clearing should be AVOIDED. Our SW globally recognised Biodiversity Hotspot is so named FOR CONSERVATION PRIORITY BECAUSE IT IS UNDER THREAT. The Perth region is recognised as a sub-hotspot of biodiversity in this larger region. Thus the EPA should be recognising and using this basic fact by declaring such clearing environmentally unacceptable, regardless of the size of the patches being considered.

7. The endangered Carnaby's Cockatoo MNES.

All the vegetation proposed to be cleared or impacted is described as Carnaby's Cockatoo habitat.

The federally approved Recovery Plan is for Carnaby's population to be maintained and restored. The population is in steady decline as clearly shown in successive Great Cocky Counts conducted by Birdlife WA. The loss of habitat is the key reason for this decline.

Therefore any clearing of Carnaby's habitat should not be permitted and this is reason alone for this proposal to be rejected as environmentally unacceptable.

The further VERY SUBSTANTIAL loss of Carnaby's habitat by the assumed future associated clearing for urban sprawl and for the part 2 Metronet rail extension to Yanchep must be considered at this stage. This would be totally environmentally unacceptable. Therefore the expensive, publicly funded Metronet Rail extension should be declared environmentally unacceptable at this stage.

8. Other significant fauna

Other fauna which are MNES include the Western brush Wallaby, and the migratory Rainbow Bee-eater. There are no doubt many other significant fauna species - reptiles, insects etc. Clearing threatens all these fauna species. These losses cannot be offset. There would be a continued net loss of habitat and thus fauna populations. This is environmentally unacceptable in our Biodiversity Hotspot.

These are just some of the significant environmental factors with unacceptable impacts upon them.

Therefore it is recommended that this stage 1 Metronet Rail proposal Butler to Eglinton be declared environmentally unacceptable.

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