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Department of Environment; Energy

Public comment on referral

CITY OF ALBANY/Tourism and Recreation/Multiple lots, Albany, WA
EPBC 2019/8480: City of Albany: Albany Heritage Park Link Trail

The proposal is to construct 3 new Mountain Bike Trails referred to as the 'Link Trail' in the Albany Heritage Park, WA.

The Urban Bushland Council WA Inc. submits the following comments.

Although the proposal states that the disturbance footprint will be only 1.83ha, the potential direct and indirect impacts will be very much greater due to increased 'off track' incursions and damage and will significantly increase the risk of active spread and activity of Phytophthora Dieback.

The proposal has an underlying assumption that the construction of 3 new trails for mountain bikers and proposed controls will stop the current uncontrolled off track incursions and damage by bikers described below* throughout the Mt Clarence and Mt Adelaide reserves. We submit this is not acceptable and indeed the new tracks will attract a very significant net increase in use by bikes racing and mountain biking both on and off-track which will increase damage to the natural setting and its MNES and heritage values. As demonstrated in the proposal, the sites are currently not being adequately managed. In addition, our concern is that this lack of adequate management will continue as well as be extended to any new areas.

**The construction of illegal trails is currently one of the greatest threats to the area's environmental values. Although there is already a large network of trails within the AHP, new trails are being constructed by persons unknown on a regular basis. Not only is vegetation being cleared and new areas being opened up, there is no control over where these trails are being built. There is no consideration of locations of rare flora, or the habitat requirements of threatened fauna. There is no control over the potential introduction of dieback and weeds to these areas.*

City of Albany staff have closed a number of these illegal trails (with brushing, covert cameras and signs), but trails are often reopened or people are likely to just be pushed into other areas to do the same again.

With new trails inviting more active recreation use by racing bikes, the conflict with passive use and tourism visitation will greatly increase. These two uses are in conflict and are incompatible.

In addition the direct and indirect impacts on MNES and the direct and indirect impacts on values of National and State Heritage places will be increased significantly.

In summary the significant impacts on MNES which are unacceptable are:

1. For the critically endangered Western Ringtail Possum: Clearing of 1.6ha of critical habitat, fragmentation and degradation of their habitat, potential collisions and frightening of possums and increased predator access (eg by foxes, wild dogs at night via tracks)
2. Degradation and loss of the foraging habitat of the 3 species of endangered Black Cockatoo, especially as a result of the likely increased spread of Phytophthora Dieback as well as Marri

Canker. Marri is a very significant foraging habitat for the Black Cockatoos. Likely loss and degradation of foraging habitat is greater than suggested in the proposal and is indeed significant.

3. Under the *EPBC Act*, **Phytophthora is a key threatening process**. The new Mountain Bike trails and the likely increased off-track bush bashing - despite the proposed signage and other minor measures designed to stop such behaviour - will inevitably result in a net increase in active recreation use and misuse. This in turn will inevitably facilitate an increase in spread of active Phytophthora within the reserves by spread of soil by wheels. Mitigation measures proposed will not eliminate this spread.
Increased bike use will also increase erosion which will help spread dieback and other diseases such as Marri Canker.

Despite the commitments in the proposal: *'dieback hygiene practices will be applied when undertaking works. For example, machinery and equipment will be clean on entry and exiting the site, and low-risk dieback material will be used on trail surfaces where required.'* The spread of Dieback will inevitably be facilitated.

The proposal to install 'rattle points' where tracks change from dieback infested to 'uninterpretable' (ie vulnerable) in order to dislodge soil from bike wheels and frames will not guarantee their effectiveness in removing all infected soil. In addition, in near urban areas in Perth Metropolitan area where dieback cleaning stations have been installed (eg Ellis Brook Valley Reserve (Martin), Maniana Park (Queens Park) there is evidence of many park users avoiding these cleaning stations and or damaging them. Their installation is not adequate.

It is simply not possible to prevent the spread of this Phytophthora key threatening process with the construction of one or all three new stages of the Mountain Bike trail. The risk of catastrophic impact resulting from spread of Phytophthora is unacceptable. Offsets and mitigation measures cannot remove or excuse such risks. Such risks must be avoided in this iconic landscape of such high nature and social heritage values.

Therefore the Urban Bushland Council WA Inc submits the Albany Heritage Park Link Trail proposal should be assessed as environmentally unacceptable and should not be permitted.