



Submitted 18th October 2022

Proposed clearing of trees that are a roost site for Carnaby's Cockatoos on Beale Park Spearwood for soccer fields, clubrooms, playground.
Public portal application under *EPBC Act* whether it should be a controlled action.

The Urban Bushland Council WA Inc believes that the proposed action – Beale Park Redevelopment in the City of Cockburn Western Australia - is a controlled action because:

- It is likely to have a significant impact on matters of national environmental significance.

‘A significant impact is an action that has an important, notable consequence’.
(dcceew.gov.au)

- (1) The MNES are Carnaby's Cockatoo and
- (2) Forest Red-tail Black Cockatoo
- (3) In addition, the site may qualify as a TEC for Tuart Woodlands and Forests of the Swan Coastal Plain.

Birdlife Western Australia:

Birdlife Western Australia is a highly respected organisation that has been working on black-cockatoo recovery actions since 2001. They identify and prioritise roosting, nesting and foraging sites for recovery actions (birdlfe.org.au)

Ground 1: Beale Park is a major roost site (code COCSPER001)

The 2020 Great Cocky Count for numbers of Carnaby's Cockatoos roosting at Beale Park was 100, making it the second largest roost population since the count began. (StrategenJBSandG 'Black Cockatoo significance assessment').

Roost sites have certain characteristics:

- (1) tall (>25 m) grouped trees both native and non- native to Western Australia,
- (2) not too densely forested amongst other trees,
- (3) close to water,
- (3) close to food (Banksia and pine).

Carnaby's Cockatoos show fidelity to a roost site. With the proposed loss of this roost site, the flock will have to adapt (yet again), and this will put pressure on other roost sites that the displaced birds might go to. A roost site to the west at Manning Park Hamilton Hill - COCHAMR002 - had 506 Carnaby's Cockatoos roosting there in 2019 and 369 in 2018 (2019 Great Cocky Count Report).

We can see that resources are likely significantly strained with the additional birds, of necessity, roosting in an already full roost site.

Ground 2: Proposal is contrary to advice in the ‘Carnaby’s Cockatoo (*Calyptorhynchus latirostris*) Recovery Plan’.

One recovery action is ‘**Protect and Manage Important Habitat.**’ The advice continues: ‘Identify, protect and manage habitat critical for survival (nesting, foraging and roosting) for Carnaby’s cockatoos across their breeding and non-breeding range’.

‘Habitat critical to the long-term survival of Carnaby’s Cockatoo [over the non-breeding season] depends on foraging habitat capable of providing enough food to sustain the population. More recently, night roost sites have been recognised as important components of the non-breeding habitat.’ (p12 Carnaby’s Cockatoo Recovery Plan).

The Recovery Actions in the Recovery Plan identify what has to be done; ‘primarily directed towards protection and enhancement of existing habitat’ (p38 *ibid*)

Research and advice has been given. In this proposal, if implemented, the advice would have not been followed.

The proposal is of significance for the following reasons:

- The Carnaby’s cockatoo population is declining and this is one of the many losses, if implemented, of roosting and habitat loss that cumulatively are continuing the decline
- This is an endangered species: that is in danger of extinction
- The area of occupancy would be destroyed/reduced
- The quality and availability of a roost site and a feeding site would decline.

Ground 3: Forest Red-tailed Black Cockatoo (FRTBC)

We cannot see any reference by StrategenJBS&G of Red-tailed Black Cockatoos roosting or feeding in Beale Park. This is surprising as the assessment is of ‘Black cockatoo significance’.

This writer is aware of FRTBCs in the area. These birds enjoy eating eucalyptus seeds and blossoms. FRTBCs are prevalent at Manning Park to the west of Beale Park, so I am sure they would be present at Beale Park.

Ground 4: The site may meet the requirements of being a TEC for Tuart Woodlands and Forests of the Swan Coastal Plain.

This vegetation community is critically endangered, and must be valued as significant.