

Bidaminna Project – call for PER

Due Tuesday 20th December 2022

<https://consultation.epa.wa.gov.au/seven-day-comment-on-referrals/bidaminna-project/consultation/intro/>

5. Preferred option for decision by the EPA

- Assess - Public environmental review

6. What are the reasons for your preferred option for decision of the EPA?

Note: Please give succinct reasons for your recommendation. Your comments should not exceed 500 words (about one A4 page).

The Urban Bushland Council WA Inc opposes this proposal.
A PER would enable valuable and significant public comment.

1.) **Clearing of up to 950 ha of native flora and vegetation:**

This clearing of native flora and vegetation '(Banksia Woodlands TEC/PES, Priority flora, Other significant flora (if present))' cannot be recreated by filling in as the sand is extracted.

2.) **Banksia Woodlands:**

Nearly 80% of the Survey area is Banksia Woodlands (*Banksia attenuata*, *B. menziesii* and *B. ilicifolia* with *Eucalyptus tottiana*. Also *B. dallaneyi* (p 40 Spectrum).

Banksia attenuata woodland over species rich dense shrublands is a TEC listed as endangered. The average species richness for this community in a 10m by 10m plot is 64.5 (draft Banksia Woodlands of the SCP – Draft description and threats: dceew.gov.au). There is so little of this vegetation community left. The Interim Recovery Plan August 2016 for the *Banksia attenuata* woodlands community states: 'iii) there may be many occurrences but total area is small and all or most occurrences are small and/or isolated and very vulnerable to known threatening processes.'(1.11 p 13).

3.) **Mitigation:**

It is not clear how the mitigation proposed for potential environmental impacts (as noted by Image Resources , supporting Information p 8): 'Provide flexibility in the development envelop to allow significant flora and Banksia Woodlands TEC/PEC

disturbance to be avoided or minimised' could be possible. In short, the mitigation strategies will not protect the values of the area. As it states (p 9) 'clearing within the Banksia Woodlands TEC/PEC will be required'. This is not acceptable.

4.) Conservation Significant Fauna

Spectrum's surveys recorded:

- Carnaby's Cockatoos (Endangered EPBC Act).
- Land snail, *Bothriembryon perobesus* (DBCA Priority 1).

Carnaby's Cockatoo

- The habitat suitable for Carnaby's Cockatoo foraging (ie the Banksia Woodlands) was rated at '9' – 'very high quality' – across the entirety of the Survey Area.
- 45 trees have the potential to become breeding trees as their diameter at chest height is >500m.
- Potential roosting sites and watering points are along the Moore River, just one kilometre to the north.
- Three Important Bird Areas (IBAs) for Carnaby's Cockatoos occur in the region surrounding the survey area (Dutson, Garnett and Gole 2009; DDEC 2012a)
- The Bindoon-Julimar area 57 km SE of the survey area, supports at least 110 pairs of nesting Carnaby's Cockatoo. It is also the one of just two of the largest nesting/breeding sites for the Carnaby's Cockatoo (the other being xx just west of Ravensthorpe).
- **A national recovery plan has been produced for Carnaby's cockatoo, and outlines the recovery actions required to prevent further decline in distribution and abundance of the species (DPaW, 2015).** Management objectives that this proposal conflicts with include:
 - Identify, protect and manage habitat critical for survival (nesting, foraging and roosting) across the species' breeding and non-breeding range.
 - Monitor population parameters, habitat, threats and status of the species.
 - Monitor the impacts and implement strategies to reduce other factors detrimentally affecting Carnaby's cockatoo and support rehabilitation programs.

We, people and government of the State and the nation must act now to enable Carnaby's Cockatoos to persist into the future.

5.) Aboriginal Sites and Other Heritage Places

There are three registered Aboriginal Sites and Other Heritage Places recorded as being located within the Bidaminna Project assessment area. (Horizon Heritage Management).

- Noongar heritage – the Moore River is a highly significant place to Yued people and its maintenance and protection is vital to help preserve Yued Noongar cultural heritage values.
- The rivers, pools and wetland areas of the Shire of Gingin were part of an extensive communication network that linked Aboriginal groups across the Swan Coastal Plain with other Noongar groups to the south; Whadjuk, Gnaala Karla Boodja and Ballardong.

A Public Environmental Review (PER) will enable the Yued and other Noongar peoples to participate more actively in the environmental assessment of this proposal.

(UBC submitted 19/12/2022)

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