

Response ID ANON-V1CC-J6RS-J

Submitted to **Southern Link Road Stage 3**

Submitted on **2020-12-15 09:20:57**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Wildflower Society of Western Australia

4 What is your postal address?

Postal address:

PO Box 519

Floreat WA 6014

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?

Reasons:

We firstly have concerns about whether all conservation-significant flora taxa that will potentially be impacted have been found, as well as whether the TEC vegetation has been correctly characterised. These concerns are due to several factors:

- the flora surveys from 2015 identified nine vegetation types from eight quadrats; three vegetation types were identified (in the subset of the site surveyed) from seven quadrats in the 2018 flora survey.
- only two quadrats have been positioned in the development area; all others have been located in other parts of the wetland.
- the southwest area of the wetlands (adjacent to and including part of the development area) has been mapped as being in good condition (prior to fire); this area was burnt in November 2015 (i.e. after original 2015 survey), but this area has only had one quadrat subsequently located in it for surveying. Fire ephemeral species may only be observed in that area, given the absence of recent fire elsewhere. More sampling effort may reveal additional individuals of conservation flora species, or additional conservation flora species.
- The EPA technical guidance (2016) states that there should be a minimum of three quadrats per vegetation unit, but this has not occurred.

Given that there is uncertainty as to which TEC the vegetation actually belongs to (Mucchea Limestone or Clay Pans of the SCP, see Referral Supporting document) as well as what is the exact boundary of the TEC/s, more sampling is likely warranted, and that the sampling should ensure that the areas most recently burnt are adequately sampled. We also note that the 2018 flora survey found two priority species not found in the 2015 survey, again highlighting the benefits of additional survey effort. Public assessment by the EPA is warranted to allow full scrutiny of the survey adequacy.

The details of any offset plan are critical. There is an unexplored potential for translocation of large intact slabs of vegetation (with soil) into presently degraded areas as part of an offset rehabilitation plan; this appears to have not been considered. In any event, the type and quality of offset requires full scrutiny when part of a TEC with so little remaining area is to be affected.

We also believe that public assessment is warranted because further public scrutiny is required on the hydrological implications of the development and the modelling of the impacts. It is stated that the development will maintain the water flow to the TEC, but it appears as though this is only because the projected evaporation in the hydrological model is substantially reduced post-development. This may or may not be valid, but further public scrutiny is required as the model details and model validation have not been presented.

By checking this box you are consenting to your comments being used to inform the EPA's decision on whether to assess this proposal and, if so, the level of assessment, and understand that your comments and / or any part of your submission may be made public. If you wish your comments and / or any part of your submission (i.e. name and contact details) to be treated as confidential, please make a specific request in your submission. It is important to note that a request for confidentiality does not make your submission automatically exempt from disclosure. While the department will use its best endeavours to comply with your request, your submission (or part thereof) may still be disclosed if required under the Freedom of Information Act 1992, for procedural fairness purposes or under any other applicable law. :

Yes