

Response ID ANON-UQK7-788C-J

Submitted to **Tonkin Highway Grade Separated Interchanges (Hale Road and Welshpool Road) (Updated)**

Submitted on **2021-04-06 14:07:07**

Introduction

1 What is your name?

Name:

Email:

3 What is your organisation?

Organisation:

Wildflower Society of Western Australia

4 What is your postal address?

Postal address:

P O 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:

1. The proposal is a controlled action under the EPBC Act
2. Six Bush Forever areas are either in the Development Envelope, within the Survey Area and one outside the area. These environmentally significant areas would be more intensively fragmented and diminished if the proposal is approved.
3. The proposal will cut through the north eastern part of the Greater Brixton Street Wetlands (BF 387). 'The wetlands are the only remaining substantial area characteristic of the heavy seasonally inundated soils of the Pinjarra Plain.'(p46 Doc D20). There is also a proposal to nominate the Greater Brixton Street Wetlands for Ramsar listing, so any road incursion into the Greater Brixton Street Wetlands is not supported.
4. There is a proposed Yule Brook Regional Park from the Lesmurdie Falls NP to the Canning River Regional Park that could be affected by the Main Roads proposal.
5. The development envelop is 51.5ha and that involves clearing native vegetation and habitat for animals.
6. Wetland impacts significant and unacceptable: There would probably be some dewatering and also clearing of 16.4ha of Conservation Category Wetlands, 10.62 ha of REW, 5.91ha of Multiple Use Wetlands and 4.27ha of the Brixton Street Swamps. - all habitat for animals. (amphibians, reptiles, birds and mammals). All dewatering has unacceptable impacts and should not be allowed.
7. Areas of various floristic community types will be cleared, some of which are 'endangered'. The WSWA knows that FCT20a has a restricted distribution limited to the SCP.
8. 'Approximately half of the development area and surrounding lands is categorised as 'palusplain'. The consequences of building roads and the effect on groundwater are too great - even though the money has been granted. Words such as 'where possible', 'where practicable' and 'avoiding as much.....as possible' are not convincing and do not justify destruction of significant wetlands.
9. The WSWA wants the EPA to assess the environment over which the proposal is planned. It is not acceptable that Main Roads states on each EPA objective under 'Outcomes' - 'The EPA objective can be met through the implementation of an appropriate environmental Offset Strategy to counterbalance residual impacts.' The first action by MRWA should be to demonstrate how it can 'avoid' then 'minimise' the impact of the project impacts not to avoid any management of impacts through diverting any on site environmental improvement through offsets that do not result in on-site mitigation of impacts.
10. Three species of significant black cockatoo species forage in the trees and the clearing of 141 potential breeding trees is not acceptable. These cannot be offset.
11. The vegetation is also important for quenda conservation . Past local development for housing and the Roe Highway has already cleared a significant area of local quenda habitat and further reduction is not acceptable as it will remove the remaining thickets of vegetation that are preferred quenda habitat.
11. There is potential to disturb Aboriginal heritage sites in the area that include features associated with the vegetation.

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