

30 April 2021

Department of Water and Environmental Regulation Prime House 8 Davidson Terrance Joondalup WA 6027

Re: CPS 9221/1 Pasquale and Fortuna Boccomazzo, Marbellup, City of Albany

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9221/1) to Pasquale and Fortuna Boccomazzo for the clearing of 28.274 ha of land to return it "to pasture for fodder production and grazing". Our main concerns are that no environmental surveys have been conducted and hence conservation-significant flora and fauna may be impacted by the clearing. Additionally, connectivity with remaining remnant vegetation would likely be substantially impacted in a landscape of fragmented natural vegetation.

Potential impact on conservation-signification taxa

No surveys for flora of fauna have been conducted by the proponent, with the only information supplied being that the area contains regrowth vegetation of between 18 and 25 years of age. Aerial imagery does indicate that much of the area is likely regrowth or plantation. However, there are also substantial patches in the southeast part of the application area, and, also, in the northwest part that appear to have the structure of native vegetation. The condition of the entire area cannot be accurately assessed without a flora survey.

Using the Naturemap utility, 10 Priority flora taxa have been recorded in the local area (within 7 km of the centre). One threatened species, *Banksia brownii*, has also been recorded nearby, however, it is unlikely that it is in the application due to serious conservation efforts involving this species. Because many trees will be cleared by the proponent, conservation-significant fauna, such as black cockatoos, may be significantly impacted.

Given the potential impact on these significant species, it is imperative that environmental surveys be performed before any assessment of the proposed clearing can take place.

Impact on Connectivity

The surrounding landscape is a mixture of farmland interspersed with remnant vegetation and plantations. These remnants, and areas of denser vegetation and trees, likely serve as important corridors for native fauna. Furthermore, the maintenance of remnants and the prevention of further fragmentation is critical for the long-term survival of those native vegetation communities. As proposed, the clearing would increase fragmentation and reduce connectivity.

WSWA believes that maintenance of connectivity is critical to the sustainability of the vegetation patches on a landscape scale and without it both species diversity and fauna habitat will be lost



Conclusion

The WSWA recommends that the clearing proposal be rejected due to unknown impacts on conservation-significant flora and fauna. Critically, before the impacts can be accurately ascertained, detailed on-site environmental surveys should be mandated by DWER before the clearing impact is assessed. Finally, should clearing to some degree be granted, revegetation or offsets should be required to counterbalance the likely residual impacts of vegetation loss and reduced habitat availability for fauna species such as black cockatoos.

