



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

16 May 2021

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

Re: CPS 9182/1 City of Albany

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9182/1) to the City of Albany (CoA) for the clearing of 3.42 ha for various trails in the Albany Heritage Park (AHP).

This area of native vegetation has high biodiversity and conservation values and we contend that any proposal for clearing must avoid clearing wherever possible in the first instance, and minimise the extent, where clearing is absolutely necessary. Further to this, the main reasons for our objection are the lack of clearing minimisation as well as the possibility of further spread of dieback caused by *Phytophthora* and the possible impact on conservation-significant flora. We detail these concerns below, principally referring to the "proposal" document (City of Albany 2021).

### **Lack of Avoidance and Minimisation**

The City of Albany does not discuss the implications of not proceeding with this proposal, given the greater economic importance of passive recreation activities to the local economy than the benefits derived from mountain biking. (see attachment). Further, it does not justify why the trails proposed exceed the guideline design standards in the Western Australian Bike Management Guidelines (2019).

The proposed clearing has walk, dual-use and mountain bike trail components. Substantial opportunities for clearing minimisation exist mainly from reductions in the proposed clearing width, as well as reductions in the proposed trail lengths. It is the experience of WSWA members that this activity mix, which is currently available in the area, foregoes a significant degree of safety on trails.

The Western Australian Mountain Bike Management Guidelines (2019) state (in Appendix 4) that the minimum trail width for easy trails should be 900 mm, with a minimum cleared width of 1000 mm; and a trail width of 600 mm, with a minimum cleared width of 900 mm, for moderate trails.

Given that clearing in the AHP is through a high-conservation value area with high biodiversity all minimisation efforts should be exercised. However, the proposed clearing is for 2.8 m in width for the easy mountain bike trails and 2 m for the intermediate (which we interpret as meaning medium difficulty) trails. This is clearly in excess of double the actual required minimum according to the guidelines that should be followed.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

We reiterate that any clearing with the AHP should minimise the amount of clearing, but the proposal clearly does not make any serious attempt to do that. The project overview states that the clearing widths are:

- "deliberately wider than the final planned trail widths to allow for the following:
- room to move when constructing the trail, especially in steep rocky sites;
  - the inclusion of trail features (e.g. jumps) and possible adjacent easier options; and
  - possible edge effects post construction (e.g. by bike riders running off track)"

These reasons for requiring expansive clearing are not acceptable because they should be the exception rather than the rule. The minimum clearing widths in the Western Australian Mountain Bike Management Guidelines should NOT be exceeded.

The proposed extensions to the walk trail have a planned average clearing width of 2 m. There are plentiful examples of walk trails in national parks and other high-conservation-value areas that are no more than 1 m in width. There is no demonstration by the CoA that a 2-m width is necessary for the walk trails. The WSWA contends that such a width is excessive and could be reduced substantially without loss of amenity.

The WSWA contends that a substantial trail length reduction could also be achieved without loss of amenity. The Mt Adelaide mountain bike trail is planned to be "easy". That being the case, it is likely targeted towards novice riders, many of whom may not want to ride back uphill on steep gradients (and, besides, the other of the proposed mountain bike trails caters for that). Therefore, the length of the Mt Adelaide trail could be halved and the section of the proposed trail that would run otherwise through parts of the AHP currently not infected with dieback would not need creation. This section of track could easily link up with the existing dual-use path at the base of this proposed trail.

### **Potential Spread of *Phytophthora cinnamomi***

Serious avenues for the spread of *Phytophthora cinnamomi* (*Pc*) are evident in the proposal. We stress at the outset, that simply because the entire AHP has been marked as "unprotectable" against *Pc* does NOT mean that it is a lost cause and attempts to limit the spread of *Pc* should be abandoned. Indeed, the proposal document stressed that "the City is committed to protecting native vegetation from the introduction and spread of dieback to and within the AHP, and to areas outside of the AHP".

The primary potential avenue for *Pc* spread is via installation of the trails into areas currently not infected. Such uninfected areas are the lower parts of the proposed Mt Clarence trail and the eastern lower parts of the Mt Adelaide trail. Clearing and continual use of these trail sections would likely result in the spread of *Pc* from the infected to the uninfected areas.

The proposal does not consider restricting use of the trails to dry conditions. However, *Pc* is much more likely to be spread in wet conditions. Whilst measures to "encourage" walkers to clean their boots and riders to clean down their bikes will be provided, the reality is that bikes and boots traversing through an infected landscape into an uninfected one may/will spread *Pc*.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Although the rehabilitation plan for decommissioned trails could be amended and is secondary to the proposed clearing, it is disturbing that *Pc* hygiene has not be adequately considered. The project overview states that "Rehabilitation sites will be ripped where necessary, weeds will be controlled and bare areas covered with vegetation cleared from new trail alignments". Given that (above-ground) vegetation can contain *Pc*, spreading of material from infected to uninfected areas could directly cause spread of *Pc*.

### **Potential impact on conservation-signification taxa**

Several significant flora taxa may be impacted by the proposed clearing. From the available documentation, it is not clear whether any individuals of the Threatened orchid *Caladenia harringtoniae* have been found in the development envelope; however, it is apparent that it is likely to occur in some sections of the proposed Mt Clarence mountain bike trail. The application also lists the Commonwealth-listed orchid *Drakaea micrantha* as a species potentially to be impacted. Four other Priority flora species have been recorded, with the P1 *Stylidium falcatum* being located in several parts of the Mt Clarence mountain bike trail as well as the connecting trail from the existing pilot mountain bike trail.

None of the publicly-available documentation provides information as to how the impact on these species is to be either avoided or mitigated. The application by the CoA simply states that there will be measures to mitigate impacts on species of conservation significance. In the absence of information detailing avoidance and mitigation measures, we contend that this is a critical failing of the clearing proposal.

### **Other considerations**

Creation of illegal trails, in particular, is recognised by the proposal and is stated as a reason behind the need for additional (official) trails. However the CoA has not demonstrated that the creation of new trails will stop the continued creation of illegal ones. Perversely, it may even exacerbate the problem by creating additional avenues from which illegal trails may be created. Fundamentally, not only does the need for additional trail creation need to be made, but also the unintended consequences of doing so need careful consideration and investigation.

We have also received reports of (illegal or unintended) widening of existing trails, thereby magnifying their impact on the natural landscape. The proposal does not appear to adequately consider this possibility/likelihood, which is just as relevant for the relatively wide proposed trails, as it is for the narrower trails, that we contend (above) are possible/ more appropriate without loss of amenity.

### **Conclusion**

**The WSWA recommends that the clearing proposal be rejected due to: a lack of clearing avoidance and minimisation, the likely spread of dieback caused by *Phytophthora cinnamomi* and the possible impact on conservation-significant flora.**



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Your sincerely,



<http://www.wildflowersocietywa.org.au/>

### References

City of Albany (2021). Albany Heritage Park Link Trails (V2): Project Overview.

Department of Biodiversity, Conservation and Attractions (2019). Western Australian Mountain Bike Management Guidelines.