



# WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

17 May 2021

The Chairman  
Environmental Protection Authority  
Locked Bag 10  
Joondalup DC WA 6919

Re: Byford Rail Extension Project, Assessment Number 2261

## **Introduction**

The Wildflower Society of Western Australia (WSWA) hereby makes a submission to the EPA on the Byford Rail Extension Project submitted by the Public Transport Authority (PTA). Our focus in this submission is on the deficiencies, inadequacies and oversights of the project. As presented, the project has avoidable impacts on threatened native vegetation and flora that we believe necessitate a modification or redesign of certain sections. Inadequacies in the offset package may also further threaten processes on black cockatoos. We detail these issues below, mainly referring to the Environmental Review Document (ERD; PTA 2021).

## **Lack of Avoidance and Minimisation**

The proposed rail extension runs adjacent to Lambert Lane Nature Reserve (on the west) and Fletcher Park (on the east). Along that section of the development envelope, either side of the existing line, is a threatened ecological community (TEC): *Corymbia calophylla*-*Kingia australis* woodlands on heavy soils SCP3a, listed as Endangered under the EPBC Act and Critically Endangered under the State BC Act (PTA 2020). Approximately 1.91 ha of this TEC will be impacted by the proposal at this location (page 130, ERD). In addition, a small section of the TEC in Good condition, adjacent to the current rail line north of Byford Station, will be impacted (Fig. 14C, ERD).

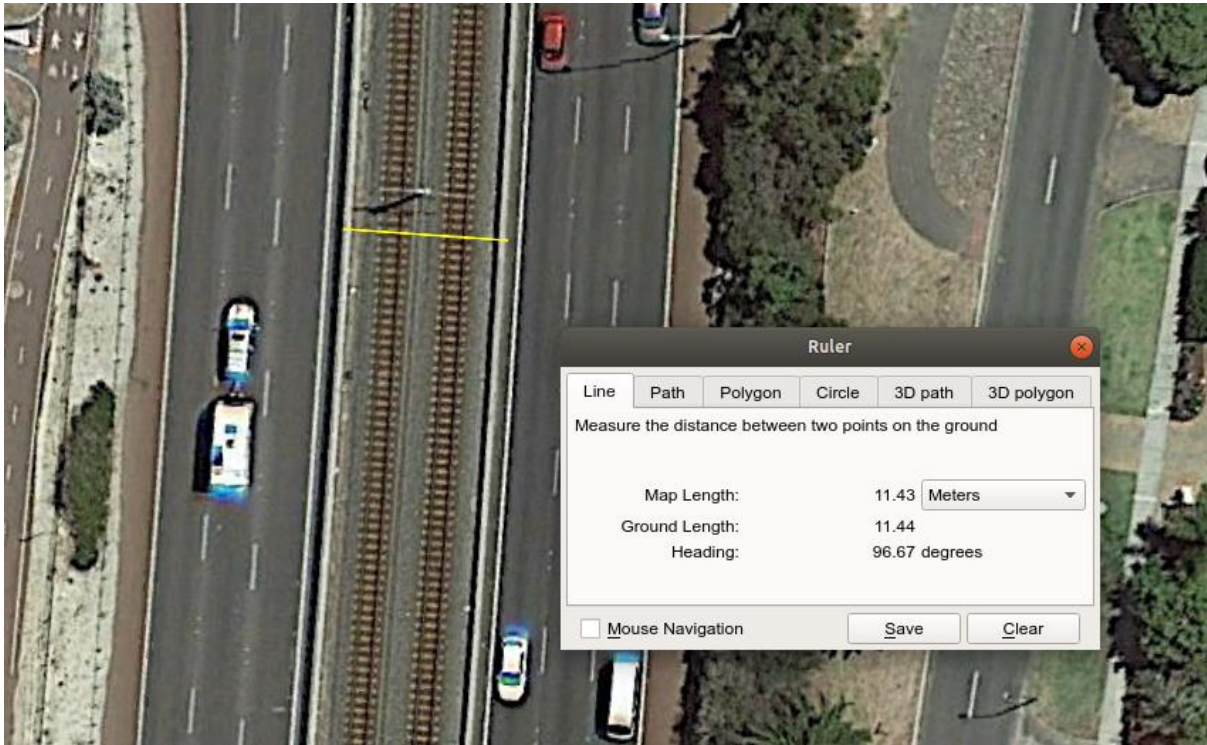
On page 130 of the ERD it is stated that:

"The PTA has designed the Proposal to avoid areas of TEC SCP 3a where possible and minimise impacts to this community through narrowing the Proposal Footprint width as far as practicable, particularly through Lambert Lane Nature Reserve / Fletcher Park areas".

The WSWA strongly disagrees that the narrowing of the footprint is as far as practicable. In this rail section, the planned disturbance envelope (DE) has indeed been narrowed, but only to about a width of 45 m. We contend that this is not only far wider than needed, but if the DE were narrowed to a feasible extent then the TEC need not be impacted at all. We base these assertions by giving an example of minimisation that the PTA has previously achieved in a constrained environment: the Kwinana Freeway. As shown below (from Google Earth imagery), there are many sections of the line in which two rail lines, the power line infrastructure and concrete barriers cover a width of only 11.4 m.



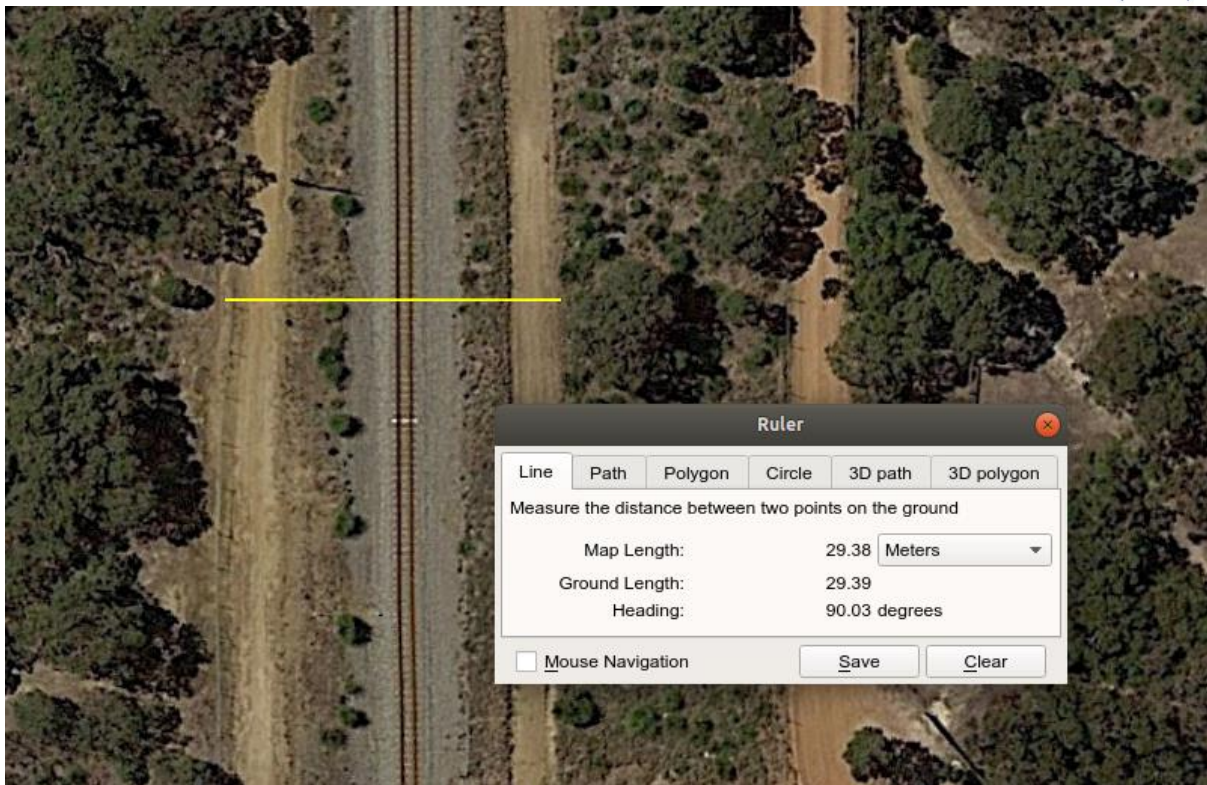
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On page 52 of the ERD it is stated that the principle shared path (PSP) may also be used as the maintenance track in environmentally sensitive areas. We contend that there is enough space in the existing rail reserve, between the existing vegetation, to accommodate not only two rail lines but also this PSP/maintenance track. The image below is from a narrow section of line between Fletcher Park and Lambert Lane NR, and highlights that there is currently at least 29 m of room available.



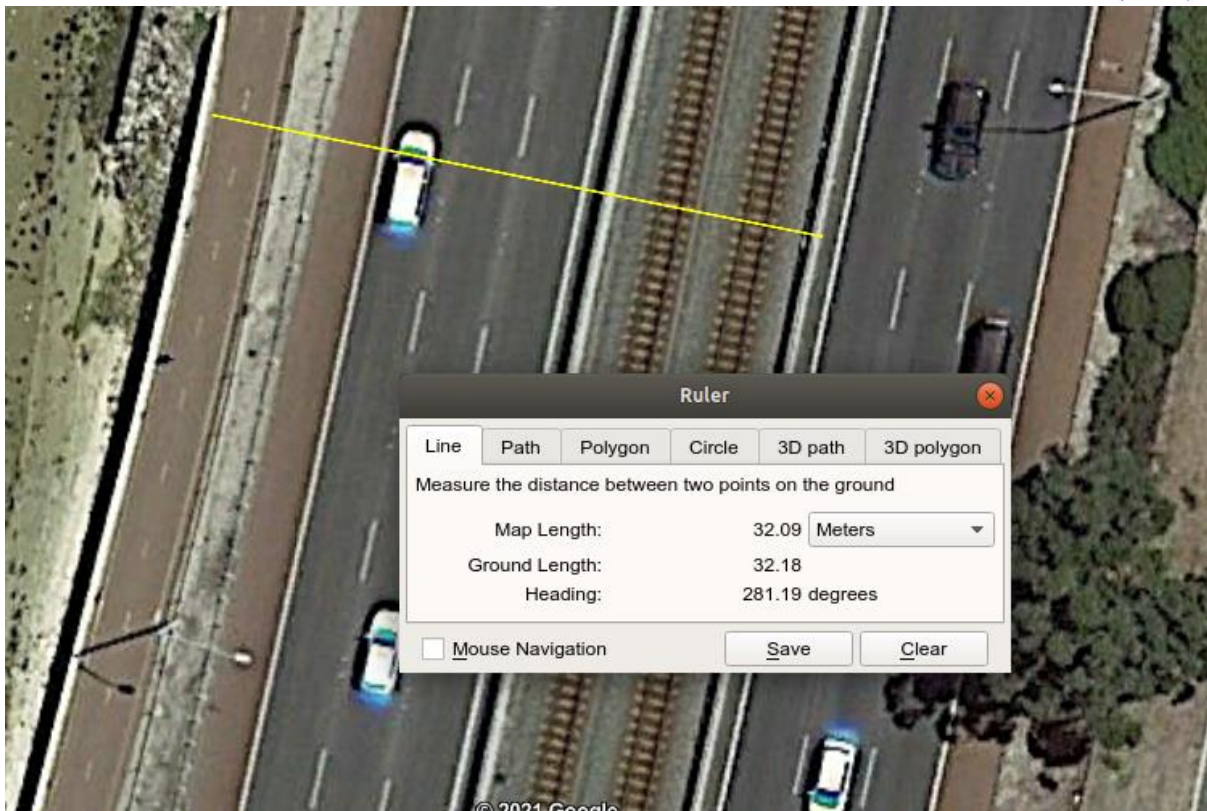
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Again, we highlight a section from the Kwinana Freeway to demonstrate what actually is practicable, given tight constraints. Here, two rain lines, the power infrastructure, three car lanes, an emergency lane, space between the road formation and the PSP, and the PSP itself take up just over 30 m in total. Therefore, it is possible to route only two lines and a maintenance track/PSP in a similar, or even narrower, width.



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### Impact on Threatened and Priority Flora

One Priority 2 flora taxon, *Johnsonia pubescens* subsp. *cygnorum*, will be impacted by the project (page xix, ERD). Several individual of this taxon have been observed in the DE adjacent to Lambert Lane NR or Fletcher Park (Fig. 14B, ERD). If the DE in this section were narrowed, as we contend is possible (above), then those individuals would be spared. Narrowing this section of the DE would also avoid any possible impact on the Threatened orchid, *Diuris purdiei*, which may occur in this stretch of bushland, although it was not observed during the flora surveys because it usually only flowers after fire (page 117, ERD).

In addition, there are individuals of *Johnsonia pubescens* subsp. *cygnorum* within the DE north of Byford Station (Fig. 14C, ERD). This section of the project also appears to have a DE width of approximately 45 m (Fig. 14C). If the DE were narrowed in this section, it is likely that these individuals can also be avoided.

The above avoidance measures notwithstanding, *Johnsonia pubescens* subsp. *cygnorum*, is a small, herbaceous plant. It is certainly possible that individuals of this plant could be successfully translocated with the entire root system kept intact along with the surrounding soil. Given that there are parts of both Lambert Lane NR and Fletcher Park in degraded condition, there is an opportunity to rehabilitate some areas, possibly with the inclusion of translocated plants.

Because Priority flora do not receive the same degree of protection under the EP Act as Threatened flora, the potential residual impacts on *Johnsonia pubescens* subsp. *cygnorum* by the proposed



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clearing were not regarded as being Significant (page ix, ERD). However, given that, in many cases, the listing of flora as Threatened follows their listing as Priority flora, the Precautionary Principle should be followed to reduce the impacts on these flora as much as possible, not simply as much as is convenient. The WSWA therefore contend that the EPA mandate that these flora should be avoided in the first instance and, where avoidance is not possible, translocated.

### Offsets

As detailed above, we contend that the great majority of the potential impact to the SCP3a TEC could be avoided. Nonetheless, some residual impact may remain and require an offset. The various offset options canvassed in the Draft Offset Strategy (section 3.3, PTA 2021) appear reasonable, except for the omission that management and monitoring of any such offset must occur over the full period over which the offset benefit is calculated, namely, 20 years. It would be unacceptable if an offset involving management/rehabilitation/revegetation were required and for it to be only managed/monitored/rehabilitated for a much shorter duration, for example, five years.

The offset package proposed for the residual impact on black cockatoo habitat unfortunately will likely guarantee a net loss of habitat. The package of using part of Lowlands Reserve as an offset assumes that revegetation will occur as an offset requirement for the loss of SCP3a TEC (page 56, PTA 2021). However, if, as we contend, that very little loss of the TEC should occur, then little or no revegetation will take place. Even if revegetation were to take place, it is assumed, but not specified, that such revegetation would contain commensurate numbers of habitat plants. This is presumptuous and an oversight. In the absence of a revegetation component, the offset is inadequate because it means that the black cockatoos will have reduced foraging habitat in the future, at a time when significant parcels of their foraging habitat have been removed or destroyed (e.g. parts of the northern pine plantations). This is a threatening process which the EPA should not allow. The remedy for this offset package is to mandate a revegetation component compensating for the foraging habitat loss.



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### Summary

The WSWA contend that sufficient avoidance and mitigation measures have not been proposed for the sections of the Byford Rail extension project that run through and adjacent to the SCP3a TEC. We have demonstrated that the TEC can be completely avoided in the section adjacent to Lambert Lane NR and Fletcher Park, and likely also avoided in the other sections of the proposal that impact the TEC. We strongly recommend that the EPA demand that the PTA modify their proposal to avoid all impacts in these sections. The proposed offset packages have shortcomings, potentially contributing to an increase in threatening processes for black cockatoos; revegetation components in the offsets are necessary to mitigate these threatening processes.



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

### References

Public Transport Authority (2021). Byford Rail Extension: Environmental Review Document

Public Transport Authority (2021). Byford Rail Extension: Draft Offset Strategy