



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

6 April 2021

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

Re: CPS 9225/1 Main Roads WA

The Wildflower Society of WA (WSWA) would like submit several comments to the Department of Water and Environmental Regulation (DWER) with respect to the Clearing Permit application CPS 9225/1 submitted by Main Roads WA (MRWA) for construction of parts of the principle shared path in the Mitchell Freeway project. In general, we do not object to the granting of the permit, however, we contend that other offsets or revegetation is warranted to compensate for the residual impacts to Priority Ecological Communities and flora. In addition, we believe MRWA should be exceeding the legal requirements rather than seeking to reduce their responsibility through use of the lowest assessment requirement, given they are proposing to work in an area where much of the natural vegetation has been removed by land development and the proposed project will submit the public to the values provided by the vegetation remnants.

Proposed Offsets

The project has recognised that there will be residual impacts on native vegetation, including impacts on Commonwealth-listed Tuart Woodlands TEC and Threatened Carnaby's Cockatoo. The offset package near Lake Clifton (MRWA 2021a) exceeds the minimum required using the Commonwealth Offset Calculator; it is commendable that MRWA has chosen to exceed the minimum requirements.

There are also impacts to a State-listed Banksia Woodlands PEC, which was not assessed as qualifying as Commonwealth-listed Banksia Woodlands TEC due to patch size and condition. However, we have queries over the condition assessment (below) and, in any case, it should be recognised that there is a residual impact on this vegetation. This residual impact should be offset in some manner (e.g. revegetation or improving the condition of vegetation adjacent to those larger patches which were mapped as being in better condition).

Accuracy of Vegetation Classification

As mentioned above, we have reservations about the quality of the vegetation assessment and mapping. In particular, it is not clear whether all of the impacted areas of Banksia Woodlands have been adequately assessed. For example, patch BP07 is listed in Table 16 (MRWA 2021a) as not being assessed or mapped, yet it appears in other figures (e.g. Fig. L.3.4) as being "Not Banksia TEC" and its condition is assessed as Completely Degraded. However, we note from aerial (and other) imagery that these patches do have intact structural vegetation, which calls into question this condition assessment. This condition assessment obviously impacts on its importance as remnant vegetation but appears to be incomplete in its assessment.

Impact on Priority Flora

We also note that individuals of P4 species *Jacksonia sericea* will be impacted by the clearing, but no consideration is given to compensating for this residual impact by MRWA.

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Conclusion

Although the majority of residual impacts to threatened ecological communities and fauna are planned to be offset by MRWA, it appears that other residual impacts remain and are not considered to be counterbalanced. The WSWA recommends that DWER ensure that other residual impacts on Priority Ecological Communities and Flora are adequately assessed and counterbalanced when assessing this clearing proposal. Such measures will enable the project to introduce the public using the facility to appreciate the values provided by the enhancement of the remnant vegetation.



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

References

Main Roads Western Australia (2021a). Native Vegetation Clearing Permit Offset Proposal: Mitchell Freeway Principal Shared Path Gaps Proposal (Ocean Reef Road to Hepburn Avenue)

Main Roads Western Australia (2021b). Native Vegetation Clearing Permit Supporting Documentation: Mitchell Freeway Principal Shared Path Gaps Proposal (Ocean Reef Road to Hepburn Avenue)