WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

4 July 2021

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

Re: CPS 9300/1 Shire of Ngaanyatjarraku

The Wildflower Society of WA (WSWA) has two main recommendations for the Department of Water and Environmental Regulation (DWER) and the Shire of Ngaanyatjarraku (SoN) for the clearing proposed in Clearing Permit application (CPS 9300/1), for the construction of a new gravel road to enable heavy vehicles to bypass the town of Warburton. These recommendations, which we contend can be achieved without undue effort, relate to minimising the clearing footprint of the road and the routing of the road, which may impact conservation-significant flora.

Minimisation of Clearing
Clearing for the 15.9 km bypass road is proposed to be up to 75.4 ha. This, on average, equates to a clearing width of 47 m. The accompanying flora survey (GHD 2021) also refers to gravel pits, but these are not mentioned in the clearing permit application; therefore, the clearing in the application should therefore be confined to the road construction envelope alone.

Many roads in the area, sealed and unsealed, have total maintenance zones that vary between 20 and 30 m wide. For example, both sealed and unsealed sections of the Great Central Road (the main road) leading into Warburton from the west have maintenance zones not exceeding 30 m, which itself is an extremely generous width. Clearing of 47 m wide on average is excessive; this clearing width could be substantially reduced without any loss of capability or loss of safety. No road design documents have been provided by the proponent that would otherwise justify such a large clearing envelope.

Impact on Conservation-significant Flora
Flora and Aboriginal heritage surveys were provided by the proponent with the application. It is noted that the proposed route does not approach within 3 km of any heritage location and, often, heritage sites are much more distant than that. Therefore, there is ample scope to vary the routing of the road to avoid impacts on the conservation-significant flora which have been observed (GHD 2021).

It is commented by the environmental consultants that the Threatened species, *Seringia exastia*, may have its Threatened status delisted: "a nomination to delist the species due to no plausible significant threats to the species has been prepared and considered by the WA Threatened Species Scientific Committee (TSSC)". However, this has not happened yet and, importantly, the evidence for such a delisting (Binks et al. 2020) did not test the population of *S. exastia* individuals from the project area. This is relevant because the Binks et al. (2020) study unexpectedly found that the samples of *S. exastia* that they tested were sufficiently similar to another widespread taxon, such that *S. exastia* (as currently understood) could be considered the same as the other taxon. However, because the population of *S. exastia* in the project area was not tested in that study, it would have to be assumed (perhaps incorrectly) that the population of *S. exastia* in the project area would be the same taxon as tested in the Binks et al. (2020) study. This has not been demonstrated and it is possible that the taxon

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in the study area is substantially different to warrant the highest conservation consideration. For these reasons, we strongly contend that DWER impose conditions that avoid impact on all individuals of the conservation-significant flora found in the flora survey. There is also no compelling reason why the two other Priority flora taxa in the development envelope should also not be avoided. Modifying the proposed route would achieve this.

Conclusion

The WSWA recommends further minimisation of clearing by the project, achievable by substantially reducing the clearing width of the proposed road. Routing of the road should also be done to avoid all impacts on conservation-significant flora.

WILDFLOWER SOCIETY OF WESTERN AUSTRALIA

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

References

GHD (2021). Shire of Ngaanyatjarraku. Warburton. Flora and Vegetation Survey

Binks RM, Wilkins CF, Markey AS, Lyons MN and Byrne M (2020). Genomic data and morphological re-assessment reveals synonymy and hybridisation among *Seringia* taxa (Lasiopealeae, Malvaceae) in remote north-Western Australia, Taxon, 69(2), pp 307-320.