WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

19 October 2021

Main Roads Western Australia
Don Aitken Centre
Waterloo Crescent
EAST PERTH WA 6004
By email

Attention: Euan Sutherland

Re: 1862 – Bindoon – Moora Road (M002) SLK 26.4 – 30.6 Upgrade Project

The Wildflower Society of Western Australia (WSWA) wishes to thank Main Roads Western Australia (MRWA) for the opportunity to comment on the Clearing Assessment Report (CAR) for the proposed project to upgrade the section of the Bindoon-Moora Road (M002) SLK 26.4 – 30.6. Following inspection of the site on 7 October 2021 WSWA is of the opinion that the works are warranted. However, WSWA contends that the road upgrade should be generally carried out through acquisition of land on the eastern side of the road to minimise the amount of clearing required and provide adequate space in which to establish the drainage required to protect the road pavement as drainage in the area flows from east to west.

General Comment
This CAR clearly understates the work that is required to bring M002 up to the design standards described in the report. The description of the works should be "Road Widening and Drainage Reinstatement" but appears to have been described to fit a funding model rather than openly stating the works required. The CAR highlights the lack of planning that has gone into development of the project to allow a development timeframe which fully considers all the options for development of the road section to meet a balance of environmental, social, safety and economic outcomes.

The CAR provides no detail on the actual width of clearing to occur at any specific location along the road and does not append the detailed design required to enable a definitive assessment of the clearing to be completed. It also presents the view that all work will be contained within the existing road reserve when inspection of the site clearly suggests such a proposal is not possible if the road formation described and the drainage design proposed is to fit within a 20m width from the existing fenceline on the east side of the road.

The biological surveys described in the document are not provided and specific detail of the area surveyed is unclear (was it just the project area or did it include a more regional assessment of the biological features?) other than a very high level map of the project area. It is unclear if the biological surveys only described the expected zone to be cleared of vegetation or included areas adjacent to the expected zone of vegetation clearing.

The report reads like it has been completed to tick a regulatory box, rather than clearly assessing the impact of the clearing.

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The concept of consultation described in the document is deceiving. The process of consulting interested parties is to simply present what MRWA proposes to do and to not truly consider alternatives proposed, as the comment in the document indicates it is MRWA's view that no alternatives exist.

The Current Road Alignment

The current road has a sealed surface that measures less than 6.0m in seal width and less than 0.5m of shoulder along much of its width. On the east side of the road the width of road reserve between the edge of bitumen and the existing fence line is less than 3.0m from the edge of the shoulder to the existing fence line. The batters on the drain along much the east side of the road have batter slopes that are steeper than the design proposed.

Much of the vegetation on the east side of the road, particularly the mature Eucalypt trees, stand immediately adjacent to the existing fence in a single line as individual or patches of less than 5 trees. These trees are all within 3m of the road edge.

A contiguous road rail corridor lies adjacent to the west side of the road. The vegetation width in the corridor between the edge of the road shoulder and the railway access track is generally between 25m and 30m wide. This corridor links a number of reserves from Betts Nature Reserve in the south (adjacent to the Wannamal West Road) to the Wannamal Lakes Nature Reserve in the north (both of which are wetlands) and reserves at Mogumber, Gillingara, Koodjee and Koojan to the north. The corridor also links to the Moore River North and East Branches to form a significant reserve/corridor network in the region. The condition of vegetation in the corridor varies but it is in a far better condition than the vegetation of the east side of the road, even within the Wannamal Town area.

The Clearing Assessment Report (CAR)

In the project description within the CAR, there is no discussion of the availability of the land on both sides of the road to provide the space required to extend the pavement evenly on both sides of the road and accommodate the drainage required to manage the drainage from east to west. The evidence observed suggests that drainage on the east side of the road has been extended as part of the road maintenance to contain the overland flow from the east to the point where it occupies the balance of space available from the existing fence to the edge of the currently inadequate shoulder. Therefore WSWA would contend that the extension of the sealed surface would require works to be conducted only on the west side of the road, eroding the width of vegetation in the road rail corridor and reducing its width to a point where the edge effects will result in the gradual decline of the vegetation condition and invasion of weeds throughout the total width of the corridor.

WSWA would agree that the vegetation condition on the east side of existing road, outside the Wannamal Townsite, is completely degraded. Inside the Wannamal Townsite the condition of the vegetation is variable and dependent on localised land use.

Description of the vegetation condition on the west side of the road in the CAR appears to reflect the vegetation condition immediately adjacent to the road, rather than the condition of the road/rail corridor, and is typical of the edge effects expected on such edges. In some areas, for example at road intersections and opposite the Wannamal telephone exchange, the vegetation condition has been more heavily influenced by the effects of clearing for sight distance, vehicle parking and informal development of turn pockets for heavy vehicles entering and leaving these points.

Within the CAR, there is not plan that defines the extent of clearing to occur to allow the width of actual clearing to be carried out within the road/rail corridor. WSWA contends that much of the increase in road width required will occur on the west side of the existing road as the space available on the east side will be required for drainage improvements.

The CAR has failed to consider the importance of the road/rail corridor in linking reserve areas regionally and its ability to provide for movement of fauna between reserved areas along its length in the region and its networking with the branches of the Moore River which it intersects at a number of points in the region. A corridor of 25-30m width is a significant width of vegetation at a regional scale in an otherwise highly cleared landscape and is worthy of conservation. WSWA would suggest records of bird movement between Lake Wannamal and the wetlands in the Betts Nature Reserve will indicate the corridor does provide opportunity for some smaller waterbirds to move between these two conservation areas, while not discussed in the CAR.

Conclusion

WSWA agrees that the vegetation on the east side of M002 is highly degraded along much of its length. WSWA is of the view that the road/rail corridor on the west side of the road is significant as it forms part of corridor which links remnants of conservation significance both locally and regionally.

Given the land available, WSWA contends that much of the works required to be completed will require clearing on the west side of the road as the area available between the existing road structure and the fence in the cleared areas cannot accommodate the road widening and drainage proposed. The clearing on the west side of the road will result in a significant loss of width of the road/rail corridor. The extent of this clearing has been estimated by WSWA based on field inspection and has not been assessed from the road design as it was not made available.

WSWA recommends to MRWA that acquisition of cleared land on the east side of the road be carried out to accommodate the road improvement, thus allowing the full width of the road/rail corridor to be retained and not result in any significant local loss of vegetation.