



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

15 December 2022

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 proposed trails in the Albany Heritage Park (AHP) because of the impact to Aboriginal Cultural Heritage, the further impact to both critically endangered fauna, and significant flora.

The objection of this proposal arises from the lack of consideration in the published documents of not only the immediate potential impacts, but more significantly; the future impacts that these new trails may cause.

### **Wildflower Society Position Statement**

The Wildflower Society is opposed to the development of trails for mountain biking in the conservation estate, unless the areas proposed for development are completely degraded. A copy of the statement and the background that lead to that position are attached to this submission.

### **Offsets**

The existing flora is an established ecosystem that cannot be replaced by planting 50,000 seedlings over 1.7 Ha. The existing mature vegetation homes critically endangered fauna and is a habitat for breeding, refuge, and as food sources. Further, the “proposed offset of 1.7 hectares is less than half the amount of proposed vegetation to be cleared. This proportion of seedlings does not provide the same value as the proposed vegetation to be cleared. Seedlings do not provide a replacement food source, habitat for foraging or as a refuge, nor a replacement for a breeding ground. The existing values of the established flora have not been considered when proposing this offset. Clearing this vegetation will take decades to reach the current ecological value had, and still, after decades of growth this revegetated offset which does not consider seedling or developmental death, does not equal half of the proposed quantity to be cleared.

### **Flora**

The flora survey recorded 413 taxa within the AHP, which is comprised of a high proportion of conservation significant species, with populations of seven DBCA listed Priority flora and habitat for one EPBC listed orchid.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

*Caladenia harringtoniae* (T)  
*Stylidium falcatum* (P2)  
*Lasiopetalum* sp. Denmark (B.G. Hammersley 2012) (P3)  
*Synaphea preissii* (P3)  
*Adenanthos cunninghamii* (P4)  
*Corybas ?limpidus* (P4)  
*Spyridium spadiceum*  
*Thysanotus isantherus* (P4)

The concerns of upland vegetation types situated on granite outcrops as they contain a high proportion of conservation significant species and are often shallow soil habitats that are vulnerable to erosion and other threats. However, this has not been acknowledged by the proposal of traversing over granite outcrop. Granite outcrops and surrounding vegetation are considered conservation significant due to their restricted distribution, high number of conservation significant taxa and their ability to act as climatic refuge. It has been observed and noted that the existing mountain bike trails have impacted vegetation negatively.

*C. harringtoniae* is listed as 'Threatened' flora protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). While stated, that "no *C. harringtoniae* will be knowingly taken or disturbed as a result of constructing the trails", it is not stated on how this will be assisted or enforced. There is no mention of botanists with the skills to identify this threatened species being on site during the removal and destruction of the vegetation. We would expect to safely presume that the individuals involved in the vegetation clearing will have none to extremely little knowledge of the species of flora being removed, so while technically the removal of *C. harringtoniae* will most definitely be done "unknowingly", this statement provides no comfort nor evidence that there will be anything but the removal of this listed threatened species if in fact in the scope of work.

### **Dieback**

One of the major, most detrimental impacts that these trails will have, is the spread of dieback, *Phytophthora cinnamomi*. The new trail is designed and planned to run through identified infested areas of this unforgivable water mould. Although, the collection of reserves has been identified as 'unprotectable' against *P. cinnamomi*, prevention of its spread is still applicable and required. Developing these new trails will cause for further spread and therefore death of more flora species than what is listed in the reports, resulting in a greater decline of fauna species, some of which are listed as Critically Endangered. The turning over, disruption and transportation of moist soils has an extremely high likelihood of transmitting *P. cinnamomi* further than previously identified infected areas of vegetation. The consequences relating to the spread of *P. cinnamomi* have not been appropriately addressed and require more in-depth planning and the development of improved control methods that will be implemented. While cleaning stations for trail participants are mentioned to be installed, this does not suitably account for the negative impacts which dieback will have when it is undoubtably left not controlled to needed measures.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

### **Cultural Significance**

The cultural significance that Albany Heritage Park holds has great importance for the Noongar people. The hills are enspirited locations, requiring caution and respect by those who elect to ascend their heights. These areas were utilised for the ingenious construction of lizard traps, for ceremonial stone arrangements, and special resources were acquired from these environments. The uplands were constructed by significant dreamtime spirits and exact praise or punishment from people depending upon the respect shown them. (Hopper, 2022). These bike trails threaten the conservation of Aboriginal cultural heritage and cannot be ignored. It is vital that any engagement in the area such as this which holds such great significance, is done so with direct and close communication with Noongar Elders.

### **Fauna**

There are several species listed as Critically Endangered that reside in the Albany Heritage Park, where there are proposed clearing permits. The Western Ringtail Possum, and three species of cockatoo; Carnaby's black cockatoo, Baudin's black cockatoo, and the red-tailed black cockatoo. While it is referred in the proposal application that the clearance of vegetation is to be minimal and “will not impact the ring tail possum”, long-term effects have not been addressed. Land clearing, habitat fragmentation, habitat removal, and further erosion caused by mountain biking will have significant impacts on these species, which cannot be ignored particularly due to their conservation status.

The Western Ringtail Possum is listed as Critically Endangered. It is mentioned that the total population numbers of the Western Ringtail Possum are expected to be much higher as suburban areas have not been included in recent surveys. However, the habitat reduction in suburban areas will have caused a higher ringtail population in areas like the AHP, by pushing Western Ringtail Possums into remaining habitat, therefore increasing competition for food, potential breeding partners, and their survival. The full extent of future impacts has not been listed nor considered; these impacts have been deliberately left out of these published proposals to reduce the public knowledge of the true detriment that will be caused if the trail construction proceeds. Although precautions can be taken to minimise potential deaths in the construction period through the use of small machinery and manual labour, the deaths of these critically endangered species cannot be definitively assured that they will not occur during construction.

As discussed in the offset section of this document, the value of mature tree canopies and dense ground vegetation cannot be offset nor replaced to the extent that will be lost. The flora that will be cleared provides the safest passage for travel, and once removed, invites predatory invasive species such as foxes and cats which will be significant to the reduction of the Western Ringtail Possum population.

The following is a guideline referenced from the Matters of National Environmental Significance: Significant Impact Guidelines 1.1 (DoE 2013), which defines the impacts to Critically Endangered species as significant as follows: (This is also referred to in section 2.4 page 16, of the Attachment 22 Possum Impact Statement document).



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

“An action is likely to have significant impact on a critically endangered or endangered species if there is a real chance or possibility that it will:  
lead to a long-term decrease in the size of the population  
reduce the area of occupancy of the species  
fragment an existing population into two or more populations  
adversely affect habitat critical to the survival of a species  
disrupt the breeding cycle of a population  
modify, destroy, remove, isolate or decrease the availability of quality of habitat to the extent that the species is likely to decline  
result in invasive species that are harmful to a critically endangered or endangered species becoming established in the endangered or critically endangered species’ habitat  
introduce disease that may cause the species to decline, or  
Interfere with the recovery of the species.”

Majority of the above points are more than probable to occur from this proposed trail plan, most of these points have already been discussed in this submission document, however, they have been overlooked in the formal assessment submitted regarding Western Ringtail Possums.

### **Fragmentation**

The proposal as described will further fragment the bushland areas in which the trails have been planned. The fragmentation increases the potential for weed invasion through the carriage of soil and transport resulting from increased runoff that is generated by the compacted surfaces of the trails.

Fragmentation discourages the use of bush patches by small birds and animals and changes the species diversity of insects and small reptiles due to the continual disturbance that occurs on a daily basis through the increased exposure of edges to sunlight, wind and rain that does not occur in undisturbed bushland areas.

It is understood that firebreaks have already been reinstated in these reserves over the last 12 months using an exemption to the clearing regulations. These increased a high level of fragmentation within the reserves.

Evidence collected by Dr Stephen Hopper indicates that trails already used within the reserves have increased in width from 1 meter to 10 metres in some areas within the reserves and areas of rutted trails have lead to the informal creation of track diversions as a result of poor maintenance of the trails that currently exist.

### **Control of Unplanned Uses of Trails**

A survey by CyclesWest conducted in 2021 identified that at least 35% of mountain bike riders prefer to use informal trails in preference to formal trails and list leads to increased fragmentation of bushland where mountain biking occurs. The does not appear to be any commitment made by the City of Albany to containment of activities to the trails proposed or control of use of the trails by e-bikes or off-road motorcycles, both of which are frequently used in the areas proposed according to observations of local Society members.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

The City had also not considered the impact of mountain biking on passive recreation in the reserve areas. Observations made in a University study in Victoria has highlighted that the visitation to areas where mountain biking is permitted declines dramatically when mountain bikes are introduced. It also found that people undertaking passive recreation tend to use an area for several days in comparison to mountain bikers who tend to use an area once then move on, with reduced economic value to a region as a result.

### Summary

The Wildflower Society of WA asks the City of Albany to reconsider and redact the proposal for the implementation of new trails. The cultural aspect from First Nations Noongar people cannot be overlooked of what these hills mean from a spiritual and cultural point of view. Class A reserves home critically endangered species which cannot take further challenges to their species survival. These extremely old landscapes home Significant flora species, which also cannot face and increase number of challenges for their survival. Not only will flora be cleared and removed for the initial construction of these trails, but the inevitable spread of dieback which will increase from trail usage through the transportation of wet soils on hiker shoes and bike tyres, will cause more flora death then what has been listed in these documents. As well as the slower erosion and deep ruts along the trails which are evident in the existing trails, some of which have been illegally founded, and such behaviour should not be rewarded with government sanctioned trails. Recreational use of this area does not and cannot outweigh the importance of this land from the documented aspects above. This land and reserves must be treated with more respect and conservation status then what is being proposed, to ensure the best chance of the survival of these flora and fauna species, as well of the cultural significance that these hills have to the traditional custodians of Menang country. The society urges the City of Albany to listen to the advice provided by a range of experts, including Professor Steve Hopper, who has spent a decade in this area researching the importance of this land, which is a globally recognised biodiversity hotspot.



PO Box 519,  
Floreata WA 6014

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

### Reference

Hopper, S. (May, 2022). Careful planning is required for our recreation trails. Southerly Magazine, 30, 31.