

31 May 2023

Office of the Appeals Convenor Level 22 Forrest Centre 221 St Georges Terrace PERTH WA 6000

RE: CPS9674/1 - Proposed Road Widening, Shire of Kellerberrin - Goldfields Road Reserve

The Wildflower Society of Western Australia (hereafter referred to as "the Society") wishes to lodge this appeal to request the Shire of Kellerberrin be requested to provide a summary of the alternatives considered in the decision to widen this section of Goldfields Road. The request is based on the assessment of the place of Goldfields Road in the broader landscape. The potential for genetic differentiation of the plant species identified to be removed in the project area is another consideration given the existing vegetation cover compared to the pre-European cover over the whole of the Kellerberrin Local Government area. This cover was identified as only being 7.4% in 2004 and it is expected to be less at this time given the permits granted and the exemptions available under the Clearing Regulations.

Landscape Values

As shown in Figure 1 overleaf, the section of Goldfields Road between Great Eastern Highway and Morris Road (the section described in the vegetation report accompanying the permit application), although narrow and comprising mainly trees and shrubs, provides a linkage between remnant blocks and stream corridors which are linked to more widespread block remnants and other linear corridors. The function of these corridors in the Kellerberrin area was the subject of several studies in the 1980's and 1990's conducted by the CSIRO Division of Wildlife and Ecology team based at Helena Valley. The findings were reported in several conference papers and journals, including Saunders et al (1987) and Saunders and Hobbs (eds) in 1991. These studies, and similar studies conducted by others since then, have found that even narrow corridors with incomplete vegetation structures, as evidenced along Goldfields Road, provide habitat linkages for a variety of fauna despite their incompleteness in areas where landscape fragmentation is as severe as occurs at Kellerberrin. Indeed, Goldfields Road in its entirety links a range of remnant areas that are a result of its early history as an access route to the Iligan and Goldfields. This resulted in the creation of many small reserves along the route to service the requirements of the travelling public of the time. These remnants serve as valuable sources of biodiversity across the wheatbelt.

The creation of an offset in a single isolated reserve does not offset the values of a linear corridor that connects small adjacent remnants or bigger remnants. Studies conducted as early as the 1980's, by the WA Museum and researchers like Dr Denis Saunders, identified that fauna needs to be able to move between remnants to satisfy feeding, roosting and nesting requirements. The Society believes in this, and other cases, the offsets provided do not reflect the values lost.

WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)



Figure 1: Place of Road in Landscape

Genetic Diversity

Within species there are differences in the plant genetics that vary from site to site but are not accounted for in the macro-biodiversity management that is addressed by policy and legislation, such as the Clearing regulations. This genetic diversity is likely to be critical in the conservation of species with the progression of climate change. The loss of gene pools which are highly localised is a lost opportunity that we cannot afford in areas where the loss of biodiversity, such as local areas with such low levels of vegetation cover as we find in Kellerberrin. Isolated plants, such as the trees and shrubs that are described in this project's vegetation study, need to be protected to maintain the gene pool and allow the vegetation transects that roadside vegetation represents to be conserved for further study and the benefit of society.

An example of this genetic diversity was identified when six populations of *Banksia cuneata* east of Quairading were studied. Of those six populations, four different genetically different populations were identified. The Society does not hold copies of the final reports of these studies, which we recall were conducted by Dr Stephen Hopper. We would be interested to identify the environmental factors that could be tied to this diversity. The Society believes this diversity will be more important for species of Acacia and Eucalypt that are found in widely varied environments to identify their value in re-establishing vegetation under changed environmental conditions, such as salinity and water table rise which is common in the wheatbelt. A common species is *Eucalyptus loxophleba*, individuals of which can be found growing in highly saline environments as well as wet areas with high fresh groundwater.

Given that the reports by Stephen Fry and Dylan Copeland were prepared for the Shire of Kellerberrin almost eight years ago, the Society considers the Shire should be required to re-assess the vegetation condition and composition to assess if additional work is required to avoid, minimise, mitigate, or offset losses that will occur, particularly as habitat trees and the genetic diversity.



Summary

The Society contends that the Decision Report and the proposed Permit Conditions have not fully addressed the values with the overall landscape that corridors, that are partially representative of the former vegetation of the landscape, provide for nature conservation and natural resource management. It is also concerned that the reports provided as support for the Clearing Permit are now aged and have not been updated.

The genetic variability of the vegetation identified in the proposed clearing area is not understood. The Society believes there needs to be some research into the genetic variability of the plant species identified in this area to establish if that variability has value and needs protection if we are to address issues associated with climate change and species suitability for the revegetation efforts that are required to address the land degradation issued and environmental changes that are currently evident locally and more broadly in the wheatbelt.

Lastly, the Society believes the offsets proposed for the suite of road developments described in Stephen Fry's report are grossly inadequate. They are diametrically opposite to the losses that are occurring in the landscape. The block remnant identified as an offset is not sustainable within a network of remnants and corridors in the landscape to allow movement of fauna to meet their combined habitat requirements.

