



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

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Department of Water and Environmental Regulation
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CPS 10262/1 Miling Rd East and Richardson St, Miling WA 6575, Shire of Moora.
Proposed clearing of 18.4ha of native vegetation with a disturbance footprint of 19.1ha.

The Wildflower Society of Western Australia (the Society) submits these comments in response to the proposed clearing of 18.4ha of native vegetation with a disturbance footprint of 19.1ha. The proposed native vegetation is current and potential critical habitat to threatened flora, over 50 conservation significant flora, and endangered fauna. This proposal should not be approved as an alternative to use previously cleared land adjacent to the proposed bushland is available. The vegetation to be cleared has high conservation value vegetation due to the fragmented landscape, little remaining vegetation, and critical habitat locally and regionally.

- The two vegetation associations (VA) identified in the proposal area are both significantly below the recognised retention goal to maintain biodiversity of 30% (7.2% and 14.4%).
 - This excludes the highly fragmented landscape of this bioregion which adds even more importance onto the need for native vegetation retention. ²Department of Environment Regulation (now DWER) states that highly fragmented landscapes may need representation greater than 30% to maintain biodiversity.
 - VA 632 is also a restricted ecological community (<12,000ha pre-European extent), which ²DER states would require a greater retention than 30% yet has less than half that remaining in the Avon subregion.
 - The acceptance of this proposal would be a direct contribution to the cementing of the irreversible decline of Australia's biodiversity.
 - ²DER's written guidelines for native vegetation clearing and protection will not hold any integrity if this clearing permit is approved, as it opposes multiple ^{1,3} conservation advice documents (urging the retention of all critical habitat).



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Threatened and Conservation Significant Flora and Fauna

- Permit approval will result in the removal of conservation significant and threatened flora habitat. While there were a lack of physical observations of significant flora and fauna, removing the native vegetation completely excludes the potential for these species to occur. Conservation advice and management plans for significant flora and fauna all repeat the notion that habitat (current and potential) should be conserved.
 - This is particularly relevant to orchids which are known not to emerge unless conditions are favourable/optimal.
 - The precautionary principle must be applied for the protection of Western Australia's biodiversity, and Threatened species/communities.
 - ¹*Caladenia drakeoides* Interim Recovery Plan (IRP) states that “*all known habitat is habitat critical*” and critical habitat is identified as “*additional occurrences of similar habitat that do not currently contain the species (these represents possible future translocation sites)*”. The IRP also states, “*No developments should be approved unless the proponents can demonstrate that they will not have a significant impact on the ... **local surface and ground water hydrology.***” The supporting document states that this project is likely to cause the development of perched groundwater tables (pg. 8).
- *Caladenia cristata* (P1) was identified in Miling (1987) as a small population which was lost due to rising salinity levels. The vegetation and soil described in the proposed area is representative of *C. cristata*'s habitat, and as a potentially Threatened species, the habitat should not be cleared as it will eliminate future/potential habitat for this species. As a population was located not overly far from the development area, it is possible that there are unknown populations in the local vicinity. Salinity increases resulting from vegetation clearing will further jeopardise the species' likelihood of occurrence (and possible current presence).
- Carnaby's Black Cockatoo (CBC) have extremely limited breeding habitat which is accompanied by foraging and roosting habitat, and water sources within a 12km radius. Conservation advice states that any remaining habitat is deemed as **critical habitat** to the survival of the species. CBC have been eradicated from some traditional breeding grounds in the northern wheatbelt due to extensive habitat clearing and altered fire regimes. The



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continuation of removing habitat including when deemed as ‘poor quality’ is limiting the chances of this species’ survival and ability to increase population numbers. CBC population numbers are rapidly declining from lack of habitat, further habitat destruction will contribute to the species’ decline as well as removing the opportunity for population growth.

- No current suitable nesting hollows does not excuse the removal of potential breeding trees. Eucalyptus species (i.e. York Gum) take over a century to gain the potential to have breeding hollows suitable of size. While no current hollow is present, removing the trees ensures there are no new hollows for a minimum of 100 years.
- CBC are listed as endangered as extinction is in their near future, breeding tree species must be **retained**, and areas rehabilitated to ensure their existence continues.
- Avoiding potential breeding trees is not an adequate mitigation for this clearing permit to proceed. CBC require near-by foraging/roosting habitat and water sources, otherwise fatality rates increase dramatically as the distance travelled is too great. This is identified as **critical habitat** to the **survival** of CBC, and therefore should not be permitted under any circumstance.

Summary

The Society believes the environmental risk arising from clearing the proposed native vegetation is far too great, and vegetation, which is extremely under represented and identified critical habitat, must be at a minimum protected and rehabilitated. Previous and current poor efforts to protect this remnant bushland, including the proponent’s lack of effort as their activities would have contributed to the decline in vegetation quality; should not be reason to permit further clearing, this would be a reward of poor maintenance and destruction. The landscape in the Shire of Moora has been severely cleared and fragmented, contributing to a rapid decline in biodiversity and a large loss of species. There is cleared land adjacent to the proposed lots that can be acquired for such activities, the expansion of CBH does not have a higher value than just the proposed 20ha of remnant bushland.



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

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Reference

- ¹ Brown, A., Holland, E., & Kershaw. K. (2003). Hinged Dragon Orchid (*Caladenia drakeoides*) Interim Recovery Plan NO. 141. 2003-2008. Department of Conservation and Land Management Western Australian Threatened Species and Communities Unit.
- ² Department of Environment Regulation. (2014). A guide to the assessment of applications to clear native vegetation. Under Part V Division 2 of the Environmental Protection Act 1986.
- ³ Threatened Species Scientific Committee. (2016). Conservation Advice *Caladenia drakeoides* Hinged dragon orchid.