



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

4 August 2023

Native Vegetation Regulation
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC, WA 6919

Via email info@dwer.wa.gov.au

Re: **CPS10249/1 Shire of Carnamah, Coolimba-Eneabba Road**

The Wildflower Society of Western Australia (hereafter the Society) makes this submission in regard to the clearing of vegetation proposed by the Shire of Carnamah along the Coolimba - Eneabba Road in the vicinity of the turnoff into Lake Indoon with a view to improving sight lines. The Society objects to the issue of this clearing permit.

The grounds for our objection are as follows:

- Following a visit to the site, the need for this permit appears to be the lack of routine management of the sight line clearance.
- The vegetation composition has developed well beyond the composition of vegetation that would normally occur from sight line disturbance.
- There were at least 5 Conservation Significant species acknowledged as very likely to be present, but only 1 was found.
- Flora survey only found 23 native flora species. This is remarkably low. This may be because are large areas of Barlkarra wetland (intermittent inundated flats) along with smaller areas of Sumpland, but the report also indicates one vegetation association, 378, occurs within the survey area and this consist of Shrublands; scrub-heath with scattered *Banksia* spp., *Eucalyptus todtiana* & *Xylomelum angustifolium* on deep sandy flats. Nevertheless, some other conservation significant species such as *Eremophila subangustifoliam* and *Korthalsella arthroclada* are known from habitats such as this and actually recorded close to the area proposed to be cleared.
- Flora Survey undertaken in April 2023. Unlikely to find/identify all significant species, especially orchids.
- *Thelymitra pulcherrima* is a P2 and known from the Lake Indoon area which surrounds the area to be cleared. It flowers in September and evidence of its presence would only have nee seen post August.
- *Paracaleana dixonii* (T) is known from the area and would only have been found by experts in this orchid and only in October or November. The report indicates WA Herbarium and TPFL records indicate population both side of Eneabba-Coolimba Road 1.4 km east of Lake Indoon turn off in deep sands with *Banksia* woodland/shrubland, yet the Flora survey for the project did not find any or did not think that there was much chance of it being present. Of course not. They looked at the wrong time. The permit application/Flora survey report acknowledges this: "its potential occurrence cannot be



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- excluded based on the habitat recorded, proximity of the previous record and timing of the field survey undertaken”.
- *Acacia vittata* (P2), *Calytrix chrysantha* (P4), and *Calytrix eneabensis* (P4) were not recorded at the site proposed to be cleared even though these species have been previously recorded close to the survey area, in habitats that are also likely to occur within the survey area/area proposed to be cleared. This is very unusual.
- The flora report itself says the following. “Proportion of flora identified is a Constraint. The field survey was completed outside spring flowering period and therefore annual species were unlikely to be present and identification of all species was not possible. Specimens were collected where necessary however identification to species level was not possible for all collections”. The fact that the flora survey was not conducted over at least two seasons is a Fatal Flaw. It does not follow the EPA guidelines for flora surveys, and it will certainly have missed the flowering season for the bulk of the flora in the area.

Following a site visit, the Society would contend that selective removal of larger trees and shrubs the limit vision along the road to the left and right when exiting the access from Lake Indoon is a preferred action to clearing as the batters on the road are very sandy and prone to wind erosion.

In Summary, the society considers this application should be rejected in its current form. If it is resubmitted, it should include a flora survey which follows the EPA guidelines and considers selective removal of the specific vegetation which disrupts the line of sight.



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