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PHCC Working Together
Peel-Harvey Catchment Council

9 February 2022

Department of Water and Environmental Regulation (DWER)
Clearing Regulation
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To whom it may concern

Submission for Purpose permit CPS 9469/1, Crossman Road, Shire of Boddington

Peel-Harvey Catchment Council (PHCC) is a community based, Natural Resource Management (NRM) regional body working across the Peel-Harvey Catchment, covering over 1.1 million hectares of the Serpentine, Murray, Hotham, Williams and Harvey River catchments. PHCC promotes an integrated approach to catchment management and the way we protect and restore the environment within the Peel-Harvey catchment guided by our vision of “People Working Together for a Healthy Environment”.

With funding provided through the Australian Government’s National Landcare Program, PHCC’s current projects support a suite of activities and actions that closely align with the Peel-Harvey NRM Strategy – *Bindjareb Boodja Landscapes 2025* and the Australian Government’s Threatened Species Recovery Plans and Conservation Advice. The focus is working with the community, landholders and other relevant stakeholders to improve the trajectory of a range of threatened species, including threatened Black Cockatoos across the Peel-Harvey Catchment. Given these interests, PHCC wishes to provide comment on the application for a Purpose Permit (CPS 9469/1) to clear 4.85ha within a 19.24ha footprint for road widening and drain re-alignment. Comments, rationale and recommendations are listed in the following.

General comments

PHCC understands the need for, and fully supports carefully planned and implemented measures for road safety along this section of Crossman Road in order to maintain the road in acceptable condition. This should be balanced against protection of habitat for threatened species, biological corridors and benefits to local communities through amenity, prevention of soil erosion and provision of shade and shelter for adjacent livestock. The comments, rationale and recommendations below seek to ensure that any granted permit for works minimise impacts while allowing the proponent to undertake works to achieve safety outcomes.

Rationale

- **Roadside vegetation plays an important role in the conservation of Western Australia’s flora and fauna as well as community wellbeing.** The value of roadside vegetation was formally recognised in the 1960s by the then Premier of Western Australia, the Hon. David Brand who

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*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

presided over a widening of road reserves of all new road reserves to at least 40 m to service transport needs and promote conservation. The Western Australian Roadside Conservation Council (RCC) (<https://www.dpaw.wa.gov.au/management/off-reserve-conservation/roadside-conservation>) notes that **while many roadside reserves are inadequate in size to support many plant and animal communities, they are integral in providing connections between larger areas of potentially more suitable remnant patches.**

- In cleared and fragmented landscapes, **the vegetation in road reserves acts as wildlife corridors, provides essential habitat including for species such as Carnaby's cockatoo, and benefits local communities with amenity, preventing soil erosion and providing ecosystem services such as shelter to adjacent livestock.** The committee states it is therefore important that native vegetation is protected regardless of the apparent conservation value it contains and notes that it is important to acknowledge that even degraded roadsides have the ability to act as corridors for the dispersal of a variety of fauna.
- As part of RCC's Roadside conservation value mapping program, roadside vegetation in the Shire of Boddington, including Crossman Road east was assessed between 2005 - 2009 (Roadside Conservation Committee 2010 *Roadside Vegetation and Conservation Values in the Shire of Boddington, Report* https://www.dpaw.wa.gov.au/images/documents/conservation-management/off-road-conservation/rcc/reports/roadside_vegetation_and_conservation_values_in_the_shire_of_boddington_september_2010.pdf). This report rated Crossman Road as a 6 (i.e. Medium-low) for conservation value, based on six attributes, namely: structure of and extent of native vegetation; number of native species; level of weed infestation; value as a biological corridor, and predominant adjoining land use. **Corresponding management recommendations for this category of roadside include (p31)**
 - minimising disturbance caused by machinery, adjoining land practices and incidences of fire, (such as through adopting a road design that occupies the minimum space, pruning branches, rather than removing the whole tree or shrub; not dumping spoil on areas of native flora)
 - carrying out a targeted weed control program;
 - retaining remnant trees and shrubs;
 - allowing natural regeneration;
 - spreading local native seed to encourage regeneration; and
 - encouraging revegetation projects by adjacent landholders.
- **Vegetation along the road corridor provides important feeding resources for Forest red-tailed black cockatoo (*Calyptorhynchus banksia*) and Carnaby's black cockatoo (*Calyptorhynchus latirostris*).** Although not in the locale all of the time, they are present in large numbers when they browse in the surrounding paddocks and roadside trees. These species are listed as Vulnerable under the [Biodiversity Conservation Act 2016](#) (BC Act) and Endangered under the BC Act and the Commonwealth [Environment Protection and Biodiversity Conservation Act 1999](#).
- **Proposed clearing of 4.85 ha of native vegetation in a 19.24 ha footprint, without replacement of important food resources, is likely to be detrimental to local cockatoo foraging.** Widespread clearing of high value foraging habitat has contributed significantly to historical and ongoing black cockatoo decline in southwest WA. Carnaby's cockatoo was once very numerous in Western Australia, however, since the late 1940s the species has suffered a 30% contraction in range, a 50% decline in population. Between 1968 and 1990 the species disappeared from more than a third of its breeding range (Saunders 1990; Johnstone and Storr 1998; Saunders and Ingram 1998; Garnett et al. 2011 cited in Department of Parks and Wildlife 2013). Under



local black cockatoo species' approved Recovery Plans (see Department of Parks and Wildlife (2013), Carnaby's cockatoo (*Calyptorhynchus latirostris*) Recovery Plan, Department of Parks and Wildlife, Perth, Western Australia

<https://www.awe.gov.au/sites/default/files/documents/carnabys-cockatoo-recovery-plan.pdf>)

loss and fragmentation of habitat, including foraging areas is the primary driver of the species' historical and ongoing decline in southwest Western Australia. The importance of the road corridor for foraging is evident in regular observations of feeding (see Attachment 1). Risks to birds from road strike has been mitigated through community-led installation of signage alerting motorists (see Attachment 2).

- The application states that “trees will not be cleared unless found in the shoulder of the road”. **Given the large number of trees adjacent to the current road shoulder, dependant on the extent of road widening, this has the potential to impact a large number of habitat trees and other mature trees.** There is a significant number of habitat trees (*Corymbia calophylla*, *Eucalyptus wandoo*, *E. marginata* and *E. rudis*) directly adjacent to the current road shoulder boundary that would fall within the extended road shoulder as part of road widening and would be included in cleared vegetation. See Attachments 3 and 4 for examples of large wandoo (*E. wandoo*) and marri (*C. calophylla*) trees along edges, with trunks located outside of current road shoulders that may form part of proposed road widening.
- **It is unclear whether trees found in the shoulder of the proposed road widening extends to canopy or trunk system.** The application in its current form would allow clearing of these rather than preferred partially pruning.
- It is noted that most of the clearing would be regrowth or recent fallen debris, however for trees which may be in the shoulder of the road and need to be cleared, **it is unclear if a fauna habitat assessment has been undertaken or submitted. This assessment would identify significant habitat trees that may be impacted by clearing, including those with hollows suitable for black cockatoos, or other threatened arboreal mammals** such as the brush tail phascogale or red tail phascogale (*Phascogale* sp.). Locally, remnant vegetation supports nesting of these species (<https://biocache.ala.org.au/explore/your-area#-32.8055|116.4724> Accessed 4th February 2022).
- **There are five wider sections of vegetated road reserve within the application that appear excessive for the purpose stated.** Maps of these sections show they lie within the clearing footprint that are likely habitat and food resources for threatened fauna. For example Map A – western end, adjacent to lot 11 on Plan12661 (south side) and area adjacent to Lot 1878 on Plan 114205 (northern side)) contain habitat trees with hollows and high-value black cockatoo food resources (predominantly *C. calophylla*). It is unclear in the application the need for, or extent to which these areas of vegetation will be impacted by clearing.
- **The application states that “the majority of the clearing is new vegetation or recent fallen debris” however these areas are not accurately identified or the area of mature vegetation quantified.** The Crown Reserve on the corner of Albany Highway and Crossman Road (map D) is a registered Black Cockatoo roosting site, and any clearing in this section of Crossman Road may cause destruction of roost trees.

Recommendations

- **Implement the corresponding management recommendations for the category of roadside conservation values within the above-mentioned RCC report, Roadside Conservation Committee 2010 *Roadside Vegetation and Conservation Values in the Shire of Boddington*, Report p31.** This includes minimising clearing for construction and maintenance, and avoiding indiscriminate clearing, that will enable the Crossman Road roadside vegetation to continue to act as a biological corridor and habitat.



- **The extent and actual area of clearing required, including number of habitat trees, should be properly assessed and mapped, in preference to the entire road corridor applied for.**
- Given the significant number of medium to large trees in the road corridor that fall within the clearing footprint, and are likely to fall within extension of the road shoulder across **the clearing footprint, road widening that includes removal of these trees should only occur where completely necessary.**
- **Pruning should be investigated rather than widening where clearing can be avoided.** If canopy is overhanging the shoulder then we recommend it is pruned only.
- **A fauna assessment should be undertaken by a qualified person/s, for occurrences of suitable and occupied hollows for threatened fauna species.**
- **For cleared areas of native vegetation which are black cockatoo feeding species, we recommend a requirement for offset planting of at least equivalent food and nesting resources for cockatoos in the local area.**
- **Any hollow limbs removed from the site should be salvaged, stock-piled, and made available to Natural Resource Management organisations for habitat enhancement/reconstruction at other sites.**
- **Consider lowering the vehicle speed limit of the section of road where cockatoo feeding is focussed and where birds have previously been killed by vehicle strike.**
- **Efforts to increase road user awareness of the need to slow down where cockatoos are on roadsides would be valuable.** This would be particularly important as road widening would likely lead to increase in vehicle speeds, and bird mortality. We acknowledge that the Shire of Boddington has already installed black cockatoo signage on Crossman Road. It is recommended to review this signage to determine if any modifications are required.
- **Trees, dead or alive, that contain obvious hollows should be inspected for black cockatoo nesting in Spring, prior to any permit being granted.**

If you wish to discuss the matter further please contact Dr Karen Bettink (PHCC's Program Manager, Land Conservation) on 6369 8800 or email admin@peel-harvey.org.au.

Yours sincerely



Dr. Steve Fisher
Acting Chief Executive Officer

Enc: Attachments: 1 to 4.



Attachment 1: Evidence of black cockatoos foraging on edge of Crossman Road (2021).



Attachment 2: Community-initiated black cockatoo foraging warning sign to motorists deployed to Crossman Road (2021).



Attachment 3: Example of medium to large habitat trees (*Eucalyptus wandoo*) on edge of current road shoulder within the clearing footprint on Crossman Road. Location on Google streetview is shown below image (<https://www.google.com/maps/place/Crossman+Rd,+Western+Australia+6390>).



Attachment 4: Examples of medium to large habitat trees (*Corymbia calophylla*) on edge of current road shoulder within the clearing footprint on Crossman Road. Location on Google streetview is shown below image.



