

## NATIVE VEGETATION STRATEGY

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Thank you for the opportunity to comment. The initiative and the invitation to comment are timely and appreciated. It is good to see government initiating input from the community and I look forward to seeing a report on what the community has said and what DWER will do about it.

Friends of Point Peron is a tiny local volunteer bushland community group of maybe 40 active members (but lots of supporters out there) who are engaged at least weekly throughout the year in studying, weeding, planting, watering, mulching, cleaning up rubbish, monitoring breaches of gates and bollards for DBCA and (when we can attempting to educate Council and the community about the values of native bush. Our comments are largely limited to urban Bush Forever sites and in particular are based on our experiences with Cape Peron, Bush Forever 355 and Lake Richmond BF 358.

PAGE 1.

### **Our valuable vegetation.**

The document omits the value of nature in supporting good mental health. A research paper by Dr Keren Geddes was summarised at the public hearing of the subcommittee of the WAPC into the Mangles Bay Marina. This paper made the point that in many places throughout the world experiences in nature both wild and domesticated have been found to aid in recovery from trauma. Dr Geddes' submission was by chance followed by a person who was clearly not an academic and was unused to speaking in public. This person began by revealing that she suffers from schizophrenia and bi-polar and when she is beginning to feel "off" she goes down to Cape Peron (BF 355) and walks amongst the trees and feels calm. In this fragmented and frenzied world full of noise, commands and manipulation, to stand under a tree is to experience stability, patience, quiet and confidence.

I further add my own thought in this time of 'climate grief'. Without arguing the validity of the concerns around climate change, I know that for me and others

planting a tree is something significant, potentially long lasting and beneficial, that we, given our relative powerlessness in society, are able to achieve. Dr George Burns and others have written about the economic value of bush to society in among other places 101 Stories for Enhancing Happiness and Wellbeing.

Page 3 Box 1. This is good as far as it goes but it fails to include the benefits people derive as mentioned above, plus the benefits of having somewhere to walk your dog unbothered, fly a kite freely without worrying about power lines, the pleasure of seeing some native in flower, the pleasure of seeing and smelling the bush after it rains for the first time in weeks. I know these will be seen as soft and woolly but they are real to many and are benefits that should be acknowledged..

Box 2 is wrongly labelled. It's all about salinity, erosion and clearing. No mention of Bush Forever 2000 !

Box 3. My experience with the implementation of both the EPA Act and the EPBC Act through my involvement in the Mangles Bay Marina shemozzles is that neither is worth much, I'm sorry. So often the outcome of serious environmental inquiries was "impacts can be managed, or offset" and it was clear that the political imperatives were driving the assessment. This was most clear in the events that led up to the withdrawal by the Conservation Commission of their Objection to the Office of the Appeals Convenor following phone calls from the Minister's office !!! Hence we need an independent Environment Court please.

### **The Challenge of Priorities page 2**

The need for government action to do more to prevent the eroding of native vegetation is made forcefully and painfully evident from my experience with the Water Corporation's SDOOL2 proposal. This shows I believe that however consultative some government departments are they are still locked in a paradigm which places money and short term solutions before environment and future generations.

While I of course accept the need for duplicating this pipeline, my experience corresponding with Water Corporation, DBCA and DWER reinforced the above conclusion. In spite of earlier maps showing the community four options for a route for the duplication, in 2019 Water Corporation selected the most damaging and risky route both for the thrombolites at Lake Richmond (a totally

unique TEC of worldwide importance and recognition) and for Bush Forever site 355 (Cape Peron). Three of the earlier options in 2010 showed the route going through (under) suburban streets. However by 2019 WC had decided that it would be too difficult due to "presence of services" and disruption of residents. While WC did announce some mitigation of risks to thrombolites through choice of a more expensive method, and while they have announced a four year strategy to deal with weeds, there remain concerns about the quality of vegetation shown on their maps and the risks of long term damage to thrombolites. Research into the state of the thrombolites by Dr Ryan Vogwill conducted and completed BEFORE mid 2019 shows that the thrombolites are not growing and that the disrupted balance to groundwater infusion into the Lake is the main reason. Dr Victor Semeniuk, world recognised hydrologist, argued strongly that the original SDOOL1 posed a risk to the thrombolites that had not been admitted by WC who claimed that their health was fine without presenting evidence. Back then this was NOT true but the information was not available to Friends of Point Peron or Dr Semeniuk.

### **Responding to the Challenge. p7**

I congratulate the drafters here on the level of modest rational honesty.

### **Bioregional approach.**

I note that this concept is to be applied in the paper only to regions outside of Perth and I applaud the attempt to avoid the one size fits all approach.

However I'd point out that within one soil type (Quindalup for instance) within 500 metres there can be almost complete changes in vegetation communities: from around Lake Richmond to under the mature tuarts in the east of BF 355 to the Dune Swale Reference patch at Mt Atom there is often massive variation in vegetation communities or in how similar plants express themselves in terms of size, leaf colour and shape etc. I'm not a trained botanist but from this information I take that local is where the truth is found and informed local citizen scientists are vital to inform and supplement the paid scientists' work. I'd also raise in this context the issue of the impact on scientists of being paid to produce reports that favour or can be used to favour a developer's proposal. Scientists have to eat I know BUT ...

### **Monitoring changes to vegetation extent page 10**

Collection of data needs to be greatly improved for three reasons,

1. agencies who should monitor impacts on TECs sometimes do not do their job or do the absolute minimum.

2. small visible losses accumulate to compromise the survivability of vegetation communities. BF 355 is 107ha of native bush but has lost over 25% of the area of Cape Peron to excisions. BF 358 is 28ha of native bush including the area of the Lake itself but has lost maybe 10% to excisions on the edges.

3. Much recording of vegetation communities by botanists is flawed, partly because they have relied too much on aerial photographs and previous surveys and not enough on ground truthing their categorisations or on involving those with hand on local knowledge over time of reserves. The result is that both invasive weeds and TECs have been missed.

BF 355 and 358 provide case studies of all these reasons. The Federal Department of Environment advertised for comment on a proposal to develop a block contiguous with and in the immediate catchment of Lake Richmond (BF 358) for seven days. They did not notify anyone, not even local Council. As a result no one appealed and the proposal was declared to not need any EPBC action, even though it impacted directly on two TECs, the thrombolites and the sedges in the holocene dune swales around the Lake.

2. BF 355 has suffered over 25 excisions some made before 2000 but other smaller impacts are happening ongoingly. The accumulated impact is to reduce the connectivity of native flora and fauna, expose native flora to exotic weed invasion, and to reduce the viability of coastal vegetation communities. Leaving out the historical examples, the ongoing ones include: the above mentioned SDOOL2, excision of half a hectare to allow a wider intersection to Stirling Naval Base (advertised for comment); laying of NBN cabling along roads (not advertised to my knowledge); clearing of firebreaks (not advertised); 4WD drivers breaching gates or bollards and driving over trees; arsonists lighting fires; bulldozing firebreaks to prevent active fires from spreading; planting of exotic species along road verges or in leaseholds by ignorant (or uninformed) landholders; clearing of park edges to insert or replace road signs damaged by vehicle crashes; clearing around Water Corporation pumping stations, spraying by Water Corporation along its drain to control weeds (FPP approves of this but it still has an impact).

3. This cuts both ways. In 2019 botanists consulting on the Lake Richmond draft Management Plan claimed to have spent 4 person days on the ground in several sections of BF 358 but they failed to notice at least 20 *Rhamnus alaternus* (Italian buckthorn), some up to 3 metres in height. No botanical surveys of BF 355 between 1986 and 2012 has ever mentioned the presence of this weed, yet FPP has discovered it is widespread in the eastern half of the Park and some specimens are up to 12cm in diameter with at least 14 rings. In some places this weed has become totally dominant.

Conversely botanists working on the Mangles Bay Marina proposal produced maps showing *Eucalyptus gomphocephala* (tuarts) in parts of BF 355 where there are none and missed specimens up to 10 metres in height and 60 years of age where there are collections that are impossible to miss. Did the botanists confuse them with similar natives or were they relying on aerial photographs ? Whatever, the conclusion has to be that without targeted ground truthing all surveys must be suspect.

### **Page 12 Policy objectives.: Imbalancing!**

"The management of native vegetation is consistent, transparent and strategic and strikes a balance between environmental, economic, social and cultural outcomes to Western Australians." Hmm. This sentence comes from a mechanistic view of the world in which everything is measurable by the same scales. Balance is the wrong word here. You cannot weigh such different concepts or entities as if they were all composed of grams or could be put on a scales. Some of them depend on other entities, some are to some degree optional while others are essentially vital to life itself (bush walking versus water), some are visible front and centre while others are invisible (trees versus Oxygen production) some are well articulated while others cannot speak for themselves (the share market versus insects), some affect us all but some are known only by a few [REDACTED] ). You cannot strike a balance between these things. You may be able to strike a balance between what you think members (stakeholders?) of the community think is important but that's not what paragraph a is saying.

page 20 **Better regulation ?** What do you mean by my sector ? I'm a retired pensioner just doing his bit to look after what's left of our bush.

1. Improved protection for native vegetation
2. Transparent evidence based decisions
3. Improved compliance with and enforcement of clearing regs.
4. Equitable treatment of all submitters on EIS.

### **FPP supports all of the following measures strongly :**

a WA specific a single framework for native vegetation

A State Native Vegetation policy to be mandatorily considered in all relevant government decision-making

No further net loss and instead requirement to demonstrate net increase in both general native vegetation cover and specific targeted vulnerable species cover.

publicly available records of areas of native vegetation cleared each year, both legal and illegal and areas burnt.

Local Government have proscribed weed lists but they are in my experience weak at following through with both local residents and with other government/industrial agencies: Either this should be taken away from them or local government should have either more teeth to bite or more funds to educate or preferably BOTH. LGAs should have resources to engage local communities in understanding their local species and ecological linkages and the value of bush corridors and see my comment on page 1.

Aboriginal Ranger Program should be strongly supported particularly now that we have been made more aware of the traditional fire management tools which will need to be adapted to the modern landscape and cityscape.

### **As well FPP would like to see**

All Bush Forever areas should be further protected AND legislatively protected. Creation of an independent environment court to assess EIS and PERs.

Higher thresholds for any proposed offsets

Elimination of the system of merely proposing areas or numbers of a species to be replanted as offsets and instead requiring demonstration down to species and biomass levels of equivalence or better and specifying what actually existing sites are being proposed): it's ridiculous to believe that a 100 year old tuart has an offset that is any younger than 100 years.

Easier access for the public to Florabase - it's brilliant but I don't have enough access to get information esp on local invasive weeds.

All DBCA signage that reveals the ecological links between plants, insects, fauna and climate (as appropriate) and the value to native vegetation of bush that does not appear attractive (e.g. Acacia scrub that dies)

Greater prominence in signage given to First Nations people's stories about nature that illustrate these links.

Greater ability of DBCA/DWER to enforce compliance with clearing regulations and to be able to apply meaningful penalties in relation to the wealth and capacity of the lawbreaker.

Lake Richmond should be a Ramsar wetland and we need a Wetland Policy in Government processes.

Stop roadside clearing: the roadsides and railverges in the wheatbelt esp around Dalwallinu to Morowa and Geraldton are stunningly beautiful in the spring (and also gorgeous in other seasons) if they are allowed to flourish. They provide a constantly varying panoply of our native plant ecology that makes it impossible not to stop and photograph.

Engagement of informed and experiences (though not necessarily academically qualified) members of local communities in monitoring, reporting on and consulting to Government on local bush: I know the CAC's are meant to do this but the RLRP CAC really only has three members who are engaged in landcare itself. The others have interests in parts of the Park which are marginal and do not involve caring for nature.

### **How does FPP use native vegetation data ?**

To select species for revegetation

To exclude subspecies that don't belong in our patch

To select seeds for direct seeding

To educate members of the community in the value of native bush, e.g. ecological links with fauna - quenda, tuarts and micorrhizal fungi.

Assessing what stages in regrowth sections of our local BF are at in order to determine which to tackle invasive weeds in first and what to plant/sow where.

Thank you,  
James Mumme