'Highlighted comments October 2021 on Native Vegetation comments of Nov 2019'

Native Vegetation in Western Australia Discussion Paper November 2019

Page v Minister's foreword - unfortunately this introduction fails to recognise 'up front' the significance of our remnant native vegetation within the South-west of the State at both the national and global scale which is an important component of marketing and the tourism industry *per se.* This area of the State is within the top 36 global biodiversity hotspots.

Whist this is acknowledged on page 1, it should have featured prominently as a key point in the foreword.

Page 1 Introduction -

Our landscapes and sense of place define…

'Our native vegetation … helps to regulate climate'

Page 2 The challenge –

Central paragraph - 'It faces ongoing degradation through fragmentation, **creeping edge effects** and loss of connectivity…' (see Attachment 1 below).

Page 5 Striking the right balance –

Paragraph 2 is highly biased towards development and alternative land use. In line 5 of the paragraph the word 'can' should be replaced by 'directly'…affect native vegetation.

Final line of paragraph 2 Add '….contemporary society but at a loss to native vegetation.'

Page 7 Responding to the challenge –

I strongly support monitoring vegetation decline where permits to clear are issued but further incremental creep/edge effects are allowed to occur or more blatant illegally exceeding approved areas. This point is made under the section 'Better regulation' final paragraph on Page 8 following.

Page 9 Box 4 What is a bioregion…

Many people working in protected areas and vegetation classification have preferred the acronym CAR**R** so as to also include a criterion for **R**esilient. This is a very important aspect which implies the need for management and protection to ensure that the CAR criteria are maintained in perpetuity.

Page 10 Box 5 Tracking the extent and location of clearing

I fully support the need to monitor the actual clearing taking place and any unauthorised on-going clearing due to unmanaged creep/edge effects or deliberate unauthorised removal.

Page 11 A State native vegetation policy

Expected benefits in central column: the lower two arrow points appear to be mutually exclusive. The target should be to get the best possible environmental outcomes, not certainty for 'business'.

In the third column second arrow point amend to 'Promote a bioregional approach to …. …enabling strong protection of regional areas with unique or at risk environmental values.

Page 12 Box 6 Proposed policy objectives

a. I disagree – management of native vegetation should strongly favour environmental outcomes.

b. and c. I strongly support these

Pages 13 & 14 Table 1

The Commonwealth EPBC Act and the Biodiversity Conservation Act should be moved up the table and inserted to follow the Planning and Development Act.

The Land Administration Act primary purpose is fundamentally flawed. Livestock grazing on native vegetation is not ecologically sustainable ! Also, please see my comments below regarding the Rangelands – Page 30 Box 21

Page15 Better information

The issues described in column 1 are broadly supported.

Under 'Desired outcome' in column 2 evidence should also be valid from other factual sources *eg* Google Earth which is increasingly up to date with improved resolution even for private users… and has historical time lapse options showing change.

Page 16 Box 8 Towards statewide, regularly updated native vegetation information

This is admirable as a target but will have a range of practicability depending on whether we are dealing with regional scale, landscape scale, reserve scale or site scale issues. For example, at a regional or landscape scale native vegetation may provide strong connectivity across otherwise cleared landscapes (Wilkins *etal* , 2006) – please see **References** and **Attachment 2** below.. **At a micro scale, creeping edge effects often have significant effects on localised occurrences of Threatened or Priority flora or on special fauna habitat due to increased predator access and lack of cover.**

As a general rule, day to day management and protection by the land 'owner' is critical for smaller areas (in the case of public reserves this may be a State or local government body). **Where unauthorised clearing or user edge effects are ignored by the 'owner', typically at local government level, and then, sometimes within a matter of months formally signposted by them and taken as a *fait accompli* , then in essence this should constitute**

‘clearing of native vegetation by default’. The Albany Heritage Park, which contains threatened and priority species of flora and fauna under both State and Commonwealth listing, and which incorporates Mounts Adelaide and Clarence (*Irredup* and *Corndarup*) as well as the National ANZAAC Centre and War Memorial *etc,* is an unfortunate case in point and of on-going concern to many community members.

Page 17 Box 9 Index of biodiversity surveys

This strategy is fully supported. I had over 30 years professional experience as the regional manager of the WA State protected area management agency across the whole WA South Coast Region between Denmark and Eucla, as well as a contributor to the IUCN Protected Area specialist networks for the same time frame, including mountains, caves & karst (WA Nullarbor), restoration ecology and connectivity conservation. However, as a retiree now I am at best regarded as a ‘citizen scientist’. Though not a botanist *per se,* my ‘lay’ knowledge of one priority flora species is considerable and most of the new occurrences over the past 4 years have been discovered by me. However, this species is extremely difficult to locate unless it is actively flowering.

A survey of the Albany Heritage Park was undertaken in Spring 2017 by a local flora consultant as part of the evidence being assembled to create (by clearing though *Very Good to Excellent* native vegetation) four **new** mountain bike trails totalling several km within the public reserve. The flora survey report was dated December 2017. Despite regular requests from December 2017 onwards I was denied access to this report by the local authority and could only access the contents by default when it became publicly accessible as an attachment to their application to approve the new trails under the EPBC Act in a referral dated 30 July 2019. This was a 19 month period of withholding the critical information and thereby hampering my own voluntary searches for the flora species throughout that period.

I am well aware of confidentiality requirements when dealing with Threatened or otherwise significant flora, or TEC’s and PEC’s. However, in the case discussed above the information was eventually there for anyone to access once included in the on line EPBC referral.

Page 19 Better regulation

Mostly qualified ‘OK’

Page 20 Box 10 Our work so far…

Change title to ‘Our work so far to strengthen regulation…’ and add some comment to indicate so. Arrow point 7 fully endorsed (unauthorised clearing).

Page 23 A bioregional approach

The South Coast ‘bioregion’ should extend along the South Coast from Israelite Bay through to just west of Albany and agency clearing application assessment staff in Perth should be specifically allocated to this critically important bioregion so as to understand its outstanding significance and the vast local knowledge within and outside government. For a time during my responsibility for commenting on clearing and development applications it was very challenging having to deal with Goldfields based/responsible staff for one half of the Fitzgerald Biosphere Reserve (Ravensthorpe Shire) and with allocated Great Southern staff for the other half of the biosphere reserve (Jerramungup Shire).

For such globally significant bioregions there needs to be appropriate consistency in processing and interpreting information and advice coming from people who reside in or have extensive knowledge of these regions.

Page 30 Box 21 Economic diversification to support Rangelands condition

As mentioned previously on line 4 of my comments above regarding **Page 17 Box 9**, I have had close involvement with the WA Nullarbor area, the southern part of which contains the largest semi-arid karst region in the Southern Hemisphere. Although in essence remote apart from the Eyre Highway and transcontinental railway further north, the area is of extremely high global significance with speleologists, recreational cavers, cave divers, academic scientists, museums, geo-tourism interests and others all well aware of the area's unique values within Australia and internationally. The bulk of the cave and karst features are located in Western Australia, largely on the Hampton Tablelands rather than the Roe Plains.

Unless planners are *au fait* with these subterranean values the potential impacts of surface land use are frequently overlooked. Hopefully the pastoral land reforms have taken the sub-surface values into due account for this part of the Rangelands, especially the impacts of cattle grazing on surface vegetation and any direct chemical disposal onto the land surface.

In order to undertake 'improved land condition monitoring systems and processes' it is critical to include impacts upon the underlying cave and karst features and the ground water which underlies most of the area. I initiated and lead edited the IUCN (International) *Guidelines for Cave and Karst Protection* published in 1997, which remain current.

Page 31 References You may wish to consider adding the following reference:

Wilkins, P., Gilfillan, S., Watson, J. and Sanders, A. (ed). 2006. ***The Western Australian South Coast Macro Corridor Network – a bioregional strategy for nature conservation***, Department of Conservation & Land Management (CALM) and South Coast Regional Initiative Planning Team (SCRIPT), Albany, Western Australia.

A pdf copy of this important report has been attached to my emailed submission and a screen print of the cover is also attached below as Attachment 2.

Comments on Albany Workshop Outputs

Congratulations on the brief workshop held in Albany on 23 January 2020.

I prepared my comments above without reading the workshop comments first … and now add these extra points after quickly reading through them: (my comments are added in red text)

- The use of the term 'balance' is of concern. As some participants have stated, a balance should have been set 80 years ago (p2) and the policy should be about protection because the balance has already been tipped the other way (p3) and … Protection of biodiversity needs to override economics.. (p3). Agreed
- Need to integrate information on the impacts upon climate change to inform assessments (p5) Not sure how
- **The exemptions for clearing quota of 5ha/annum without a permit is excessive and it should be reduced back to 1ha (p6)** **Agreed** – this was bad enough when I was assessing subdivisions & clearing impacts of only 1 ha being a means of some landowners incrementally clearing more vegetation.
- There is no consideration in current regulations for disease management eg *Phytophthora cinammomi*) and prevention of weed infestation post clearing/disturbance (p7) I always used to consider these in my land use planning assessments and advice
- Desktop mapping in 2D does not allow landscape preservation (p8) I suspect this was meant to say 'does not enable a consideration of what is outside the area under assessment. I always believed strongly in on-site inspection of even the smallest areas and to always look outside 'the box' – in some cases visual impact from far away including disturbances as seen from high elevation in protected areas. I was always

considerate of retaining or strengthening vegetation corridors and recommending fauna underpasses when planned new roads truncated native vegetation

- Desktop mapping is inadequate to capture small valuable patches.(p9) **Absolutely – local knowledge is critical as there are often considerable delays in small lflora or fauna occurrences being reported and brought into the system – easier for flora /veg but hard for fauna which move, swim or fly around…**

Attachments 1 & 2 follow below

Attachment 1

Mitigating biodiversity impacts of new sports venues

INATIONAL UNION FOR CONSERVATION OF NATUREINTERNATIONAL UNION FOR CONSERVATION OF NATURE

Brownlie, Susie (2019). *Mitigating biodiversity impacts of new sports venues*. Gland, Switzerland: IUCN Gland, Switzerland, xii+80pp, pp 4-5

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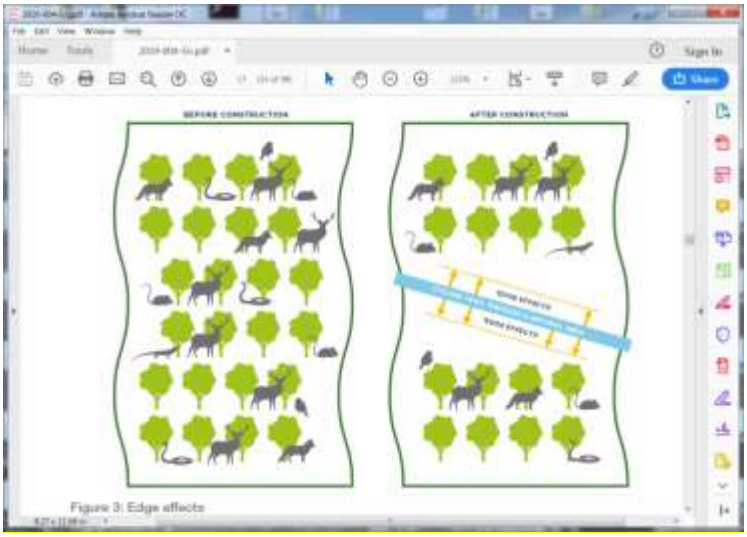


Figure 3: Edge effects

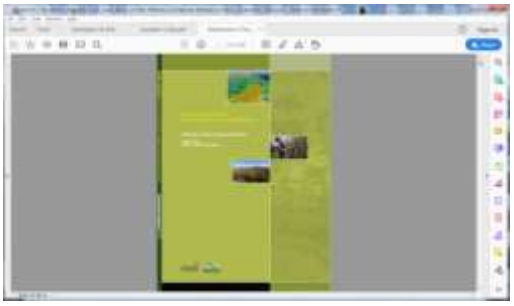
Marathons or cross-country trails through natural habitat can create a corridor of impact that is wider than the trail itself, due to edge effects (Figure 3).Apart from the direct impacts of the trail, spectators
can spill over into adjacent areas, causing some damage. In addition, animals some distance from a trail can react negatively to human activity, moving away from the source of disturbance. The consequence of these edge effects is that the area of habitat available to wildlife shrinks.
(Page 17)

Attachment 2

Cover page of:

The Western Australian South Coast Macro Corridor Network

A Bioregional Strategy for Nature Conservation, January 2006



A pdf copy of the document has been attached to my email submission

I recommend that pages ii to vii initially be printed off and also Figures 1-14

'Addendum 1'

OMISSION: approvals for narrow clearing of new trail alignments when passing through native vegetation

As mentioned in my comments on Page 16 Box 8 (last sentence of 1st paragraph) and illustrated within Attachment 1 *qv*, creeping edge effects often have localised irreversible impacts on adjoining vegetation and fauna habitat. This issue also needs to be recognised within the Better regulation section on pages 19 to 22 whenever clearing applications and approvals involve narrow corridor clearing for new recreational trails which will pass through areas of otherwise intact native vegetation.

Such trails are typically constructed by DBCA or local government bodies. The former organisation is generally alert to design and management needs, including dieback disease protocols, subsequent weed control and on-going maintenance so as to minimise edge creep. However, **local government bodies appear to lack such experience, fail to understand it or simply avoid considering it – thereby effectively sanctioning unauthorised additional clearing by default.**

Therefore, there need to be additional conditions applied to any such clearing permits, not only for initial clearing and construction but also required for on-going maintenance. Such regulations should be designed to minimise not only incremental widening caused by users but also over-zealous vegetation pruning, trail edge disturbance or erosion control

works undertaken by maintenance staff. Any volunteer trail maintenance should be prescribed, supervised and fully documented by the management agency.

'Addendum'

Special issues with narrow clearing alignments where linear edge 'creep' will inevitably greatly increase the total vegetation impact unless regular skilled maintenance is strictly undertaken and edge creep especially targeted.

Whereas most clearing of native vegetation is likely to be in broad areas or patches, **clearing for recreational trails within native vegetation is mostly narrow and linear.**

Recreational trails are generally developed by DBCA or local government bodies. The former organisation is generally alert to design and management needs, but local government bodies lack experience or commitment to managing recreational trails.

In the City, recreational trails are generally defined by a hard surface, usually tarmac with sealed, concreted or compacted & bonded gravel or limestone *etc.* Such surfaces are very conducive to bikes staying on trails and if they are joint use trails with walkers the 'keep left' rule automatically kicks in… often with a marked central line as well.

In the bush it is quite different. There is generally no clearly defined edge and the adjoining vegetation grows out to overhang the trail edges and users often trample on to the adjoining edges, for example if there are rocks to pass or any water puddles after rain. Bikes also tend to use trail edges for similar reasons. This results in incremental trail creep with the

walking/riding surface gradually moving out beyond the original cleared surface.

Maintenance workers tend automatically to maintain trail edges to the user width – not the original planned (and approved) width. This compounds the creeping edge impact but also, in the case of bikes tends to increase user speeds. Subject to the number and position of obstacles along trails such can very easily become up to 50cm per annum. The gradual widening also has micro-climate impacts on adjoining native vegetation and typically results in loss of any trail vegetation canopy resulting in less interception of rainfall, more rapid linear run-off and escalating erosion, which often exposes more roots and rocks which then encourage users to creep even more to the sides.

Even if water bars are in place, sooner or later they will usually be circumnavigated by cyclists…and then the water runs back onto the trail.

It is essential for the responsible managers to actively manage trails and take great care to minimise existing and potential edge effects through regular inspection and appropriate remedial action.

A recent application to the EPBC referral process