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Nature Reserves Preservation Group, Inc.

TO: Mike Pengelly
EPA
DATE: 11 September 2010
CC: Giles Glasson, Shire of Kalamunda
SUBJECT: Proposed expansion of Forrestfield/High Wycombe Industrial area

Dear Mike,

As discussed in our previous phone conversation, I am contacting you in respect of the proposed rezoning to light industrial of the area known as High Wycombe Stage 3 under the Kewdale Hazelmere Integrated Masterplan ie the area bounded by Sultana Road, Milner Road, Poison Gully and Roe highway (Map attached). Stages 1 and 2 of this area have already been or are in the process of being developed and I understand that Stage 3 has yet to be submitted to the EPA for guidance as to the level of assessment. The NRPG is concerned that the area has substantial coverage of natural bushland in good condition that is already protected due to the widespread presence of rare, vulnerable and threatened species and should therefore remain intact.. We have detailed some relevant points below.

1. Under Bush Forever all bushland east of the Swan Coastal Plain will be protected by the agreed presumption against further clearing of these vegetation complexes, (Volume 1, page xiv), applied through the planning and environmental approvals process.
2. Stage 3 contains the threatened ecological community TEC 20a. Both the Forrestfield complex and Southern river Complex exist in the area and are well below the target 10% preservation.
3. Discussions with Bronwyn Keighery indicate that any flora present in Bush Forever areas 45, 122, 213, 319 and 320, 386 may be presumed to be in the area of interest
4. .Rare and endangered, vulnerable and significant flora exist in the area including:
 - *Conospermum undulatum* (R),
 - *Banksia mimica* (R),
 - *Macarthur keigheryi* (R),
 - *Haemodorum loratum* (3),
 - *Isopogon drummondii* (3),
 - *Lambertia multiflora* var. *darlingensis* (3),
 - *Persoonia sulcata* (3) (*ecologia* 1991),
 - *Schoenus pennisetis* (1),
 - *Schoenus benthamii* (3),
 - *Conostephium minus* (4),
 - *Verticordia lindleyi* subsp. *lindleyi* (4),
 - *Stachystemon axillaris* (4),

- *Eucalyptus marginata* subsp. *elegantella* (1),
- *Tripterooccus paniculatus* ms (1),
- *Myriophyllum echinatum* (3),
- *Stylidium longitubum* (3),
- *Villarsia submersa* (4),
- *Verticordia lindleyi* subsp. *lindleyi* (4),
- *Platysace juncea*,
- *Byblis lindleyana*,
- *Conospermum triplinervium* (hybrids with *C. undulatum*),
- *Levenhookia preissii* (rarely recorded on the Swan Coastal Plain).

Many of these are listed federally as well as in WA.

5. Significant fauna exist in and utilise the area including a substantial population of quenda.
6. The area is also utilised extensively by migratory birds listed under the EPBC Act including rainbow bee eaters, three species of black cockatoo, and several species of egret.
7. The habitat of *C. undulatum* is being increasingly threatened due to the clearing of much of the airport land. A recent survey and possible reassessment of its status is being carried out by Melissa Oakley (DEC).
8. A substantial portion of the area in Stage 3 is bush on private property which contains *C. undulatum* and probably other species. These bush areas currently comprise a substantial part of the wildlife corridor used by the resident quenda population. While there is a network of bridal trails in the area they have not been maintained and some have been cleared of vegetation so they do not represent an adequate wildlife corridor. In addition, the linkage of bush forever Site 123 (Sultana Road) with Site 45 (Poison Gully) by wildlife corridors alone is not considered adequate.
9. The area takes in part of Poison Gully which is a wildlife corridor. The Poison Gully watercourse also ultimately discharges into the Munday swamp wetland. That wetland is a lake under the Environmental Protection Policy (Swan Coastal Plains) 1992. Drainage of water into an EPP lake is contrary to that policy.
10. The predominant soil type is Bassendean Sand over Guildford Formation (Qpb/Qpa: S10). Drainage in the area is compromised by that layer of laterite on average about 30 cm below the surface and so use of the area by trucks with the concomitant storage of fuels is a danger with respect to pollution of groundwater and of Poison Gully.

In accordance with the above facts, the NRPB considers the area should be deemed as unlikely to be environmentally acceptable for redevelopment under Section 40 of the EPA Act.

Sincerely,

Aileen Reid (Committee member) for Steve Gates
President/Chair, NRPB