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Great Eastern Highway Upgrade Project SLK 56.4-67.8 EPBC 2022/9151

EPBC 2022/9151 Preliminary Documentation - Response to Submissions

Version Control

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A	Nov 2024	Principal Environment Officer	Author
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ACRONYMS AND ABBREVIATIONS

Abbreviation	Description
DBH	Diameter at Breast Height
DE	Development Envelope
DWER	Department of Water and Environmental Regulation
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
FRTBC	Forest Red-tailed Black Cockatoo
GEH	Great Eastern Highway
ha	hectares
km	kilometre
m	metre
Main Roads	Main Roads Western Australia
WA	Western Australia

1 INTRODUCTION

1.1 Background

Main Roads Western Australia (Main Roads) proposes to upgrade a section of Great Eastern Highway (GEH) between Straight Line Kilometre (SLK) 56.4 and 67.8 (the Great Eastern Highway Upgrade Project, the Proposed Action). The Proposed Action passes through Coates Gully and is located approximately 56 kilometres (km) east of Perth and 25 km west of Northam in Western Australia (WA). The Development Envelope (DE) comprises an area of approximately 35.15 hectares (ha) and represents the impact footprint within which all development will be contained.

Currently, GEH is a sealed two-lane rural road and is the main east/west link between Perth, Kalgoorlie and Adelaide. The highway provides a major transport link, forming part of the Perth - Adelaide Corridor and supports social and economic integration between the west and east of Australia. In some cases, GEH is the sole connection between a large number of remote communities and the Perth metropolitan area. GEH is a heavy haulage route and is an essential route for the international transport logistics chain for mining, agriculture and other export industries.

The Proposed Action aims to improve the efficiency and safety of this section of the GEH by widening of the alignment, intersection improvements and additional overtaking lanes.

The key components of the Proposed Action include:

- Clearing of up to 15.7 ha of suitable habitat for Black Cockatoo species, including 15.6 ha of potential breeding and low quality roosting habitat, and up to 400 suitable Diameter at Breast Height (DBH) trees for Black Cockatoos.
- Additional westbound and eastbound overtaking lanes.
- Intersection improvements at Bodeguero Way, Wariin Road, Chedaring Road, Hawke Avenue, Inkpen Road, Coates Road and Oyston Road.
- Removal and relocation of all rest areas/parking bays within the DE.
- Upgrade to drainage, kerbing, culverts and installation of safety barrier.

1.2 Criticality of project

This route has been identified as the third riskiest road in regional WA for three consecutive RAC surveys (2017, 2019 and 2022).

The Proposed Action is required due to the poor safety record of this section of the existing GEH major freight route, largely due to its poor geometry, lack of passing lanes and containing elements that are below current national road standards. Intersections also have poor sight distance and poor approach alignment to GEH which present as a significant safety risk for road users.

Four upgrade options were considered for the Coates Gully section of GEH. The only alternative option to the Proposed Action that provides the same or better predicted reduction on crashes (+80%) is a total realignment of the GEH, largely through state nature reserves, which would result in increased impacts to Black Cockatoo foraging and potential breeding habitat.

The Proposed Action will deliver significant safety benefits along the Coates Gully section of the GEH. Motorist safety is a significant problem in this section of the GEH, as evidenced by the crash data (56 crashes over 4 years) (Main Roads, 2024a). The existing highway geometry is the main contributing factor to the high crash rate, as it contains elements that are below current design standard for the nominated 110 km/h highway design speed. Intersections also have poor sight distance and their approach alignment to the GEH is frequently poor. Seal and pavement width is below the recommended link standard of 12 m seal on a 12 m formation and the signs, lines and delineation are substandard and/or inconsistent. There are also limited safe passing opportunities for the traffic volumes and composition.

The delivery of the Proposed Action will result in this section of GEH becoming substantially safer for road users.

In addition to road safety, other benefits that will be realised once the Proposed Action has been delivered includes increasing the efficiency of heavy vehicle operation, reducing the longer-term maintenance costs for the road and improving travelling time through reduced congestion.

1.3 Environmental assessment process

On 28 March 2022, a delegate of the Minister for the Environment determined the Proposed Action was a 'Controlled Action' under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to be assessed by Preliminary Documentation. The relevant controlling provisions are listed threatened species and communities (sections [s] 18 & 18A).

On the 13 April 2022, the Department of Climate Change, Energy, the Environment and Water (DCCEEW, formerly the Department of Agriculture, Water and Environmental Regulation [DAWE]) requested additional information to inform the assessment of the relevant impacts of the Proposed Action. In making the request, DCCEEW considered the Proposed Action may impact Matters of National Environmental Significance (MNES) including:

- Carnaby's Cockatoo (*Zanda latirostris* formerly *Calyptorhynchus latirostris*) – Endangered.
- Baudin's Cockatoo (*Zanda baudinii* listed as *Calyptorhynchus baudinii*) – Endangered.
- Forest Red-tailed Black Cockatoo (FRTBC, *Calyptorhynchus banksii naso*) – Vulnerable.

Preliminary Documentation was prepared to address DCCEEW's request for further information to support assessment of a Controlled Action by Preliminary Documentation. The Preliminary Documentation was published on 11 October 2024 for a public review period of ten business days, ending on 25 October 2024.

Four submissions were received directly by Main Roads during the public review period.

1.4 Purpose of this document

The Preliminary Documentation was made available for ten business days between 11 and 25 October 2024.

The purpose of this document is to present Main Roads' responses to the four submissions received during the public comment period on the Great Eastern Highway Upgrade Project.

2 SUBMISSIONS RECEIVED AND MAIN ROADS RESPONSES

At the completion of the public review period, four public submissions were received (Appendix 1).

Submissions were received from:

- Nick Smith (Submitter 1).
- Leonie Stubbs (Submitter 2).
- Anonymous (Submitter 3).
- Conservation Council of WA (CCWA) (Submitter 4).

The principal issues raised in the public submissions related to:

1. Opposing the project in principle.
2. The amount of Black Cockatoo foraging habitat to be cleared, with impact considered to be unacceptable.
3. Lack of verge maintenance, resulting in indirect impacts on adjacent areas.
4. The potential conservation status change of Baudin's Cockatoos to Critically Endangered.
5. The proposal having an unacceptable significant residual and cumulative impact on Black Cockatoos.
6. Offsets not providing sufficient additional short-term and long-term habitat for Black Cockatoos.

Main Roads responses to the public submissions received are provided in Table 1. Changes to the Proposal

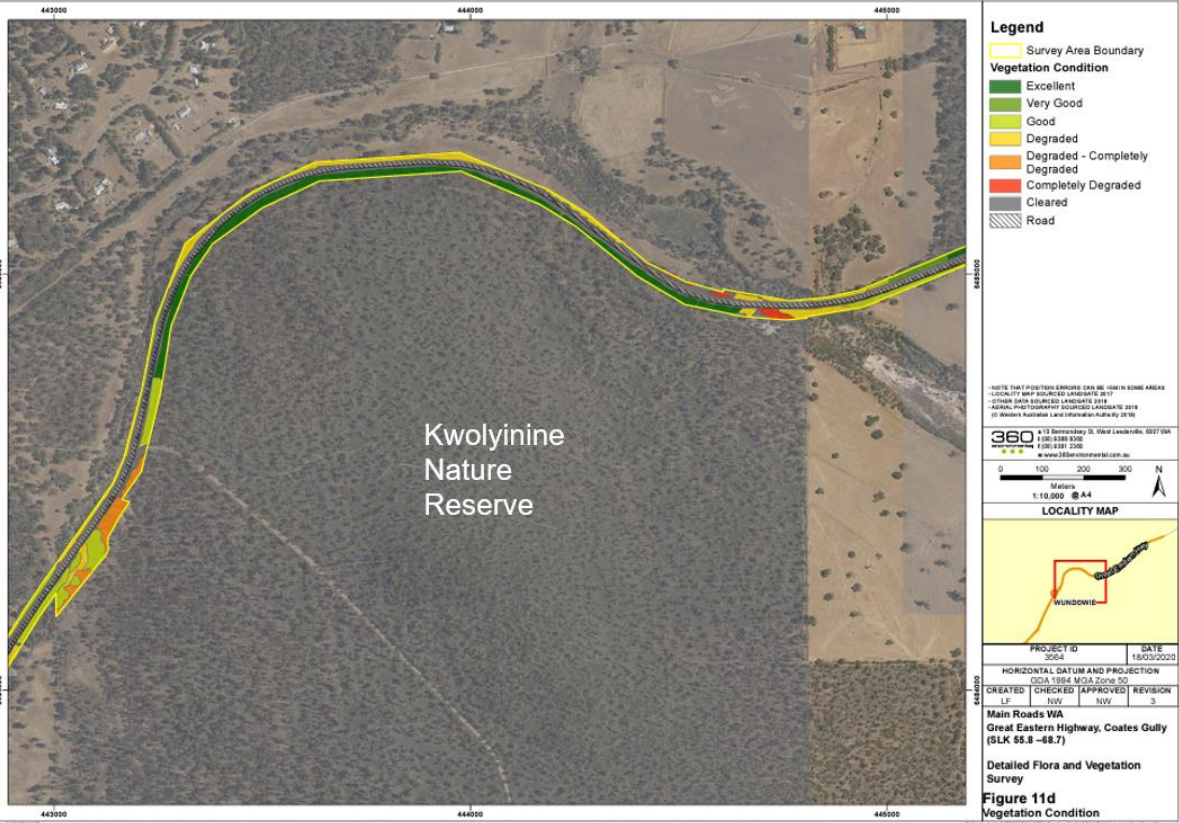
Changes have been made since the publication of the Preliminary Documentation. These changes relate to:

- Minor editorial changes and improvements.
- Increasing the area to be revegetated within the Offset Site from 23.5 ha to 29.1 ha.
- Preparation of an Offset Revegetation Plan.
- Updated dieback mapping.
- Additional commentary within the Offset Strategy regarding short and long term impacts and the benefits provided by the offset proposed.
- Additional commentary on Aboriginal Peoples participation.

Table 1: Public submissions received and Main Roads’ responses

No.	Submitter	Submission	Main Roads response
1	Submitter 1	Opposes the proposed upgrades and requests that an external and independent audit is undertaken prior to works commencing.	<p>The section of Great Eastern Highway between El Caballo Resort and Bakers Hill is in poor condition and has been identified as the third riskiest road in regional WA for three consecutive RAC surveys (2017, 2019 and 2022). Of particular concern is the inadequate road formation and seal widths, and the narrow or absent shoulders. The existing highway geometry through the Coates Gully area contains elements that are below design standard for a national highway, with the intersections along this section also having poor sight distance for vehicles trying to enter onto GEH.</p> <p>Motorist safety is a significant problem along this section of Great Eastern Highway where there have been 56 crashes over four years. The existing highway geometry is the main contributing factor to the high crash rate. The proposed upgrades will reduce driver fatigue and frustration and lead to improved safety outcomes.</p> <p>All approvals conditions, for both the state and the commonwealth, for the proposal will be complied with, including any need to undertake internal and external audits.</p>
2	Submitter 2 Submitter 3 Submitter 4	Amount of Black Cockatoo foraging habitat being cleared is significant and unacceptable.	<p>Clearing of approximately 15 ha of Medium quality foraging habitat is required to allow for more than 11 km of Great Eastern Highway to be upgraded. Although clearing is required, Main Roads has:</p> <ul style="list-style-type: none">• minimised its clearing footprint wherever possible• has positioned the alignment into disturbed areas to avoid better quality habitat• although Black Cockatoos are not known to breed within the development envelope, avoided all trees that contain hollows large enough to support Black Cockatoo breeding. <p>As discussed within Section 5.1.2 of the Preliminary Documentation (Main Roads 2024a), the results from the Great Cocky Count series suggests that the local Black Cockatoo populations (Carnaby’s Cockatoo and FRTBC) are low in the area around Coates Gully, Wundowie.</p> <p>As per Section 5.1.2 of the Preliminary Documentation (Main Roads 2024a), an assessment by Australian Black Cockatoo Specialists identified that the native vegetation along the highway in the Proposed Action is considered to be low quality of in terms of the food value and volume that it can provide for Black Cockatoos. Marri grows poorly in heavy soils with a high clay content and does not reach a size where its canopy produces meaningful quantities of seed. Mawson (1995) found that the largest 2% of marri trees in jarrah-marri forest sites studied accounted for an estimated 85% of fruit and seed production. Small marri trees (<6 m tall) flower sparingly and set few seeds. Wandoo trees are not recorded as being a food source for FRTBC and are only fed on by Carnaby’s Cockatoos during the flowering period to access nectar.</p> <p>Regionally, more than 32,000 ha of foraging habitat is considered to be within 12km of the Proposal Area (Main Roads 2024b and GoWA, 2022). The loss of approximately 15 ha of foraging habitat for this proposal represents a loss in the order of 0.05% of regional foraging habitat, noting that the habitat itself was considered Medium foraging quality.</p> <p>Given the loss of Medium quality habitat within an area that appears to have naturally low Black Cockatoo numbers, the large amount of foraging habitat available locally and the proposal to recreate foraging habitat immediately adjacent to the Proposal Area, it is considered that the foraging habitat to be cleared for the project is not an unacceptable impact.</p>
3	Submitter 3	The IUCN’s Critically Endangered conservation status of Baudin’s Cockatoos and likely conservation status change under WA Biodiversity Conservation Act.	<p>Assessments and decision making for state and commonwealth approval is based on the current conservation status rather than potential status changes. Currently, Baudin’s Cockatoo is listed as Endangered under the EPBC Act. Appropriately, the impact assessment has been conducted in accordance with the current conservation status of Baudin’s Cockatoo.</p>
4	Submitter 2	Verges not being properly maintained, resulting in indirect impacts on adjacent areas.	<p>Main Roads has a long history of managing its road verges in manner that ensures road-related indirect impacts on adjacent properties with high values does not occur.</p> <p>For example, the vegetation condition mapping for this project (360 Environmental 2020) identified that almost all areas of verge vegetation that adjoin nature reserves is in Very Good to Excellent Condition. Figure 1 below shows the verge vegetation condition adjacent to the Keaginine Nature Reserve and Figure 2 shows the verge vegetation condition adjacent to the Kwolyinine Nature Reserve. It should be noted that areas not rated as being in Very Good or Excellent condition in these adjacent verges are typically areas that have been directly impacted by historical clearing activities.</p> <p>The 360 Environment report is publicly available on the WA Department of Water and Environmental Regulation’s clearing permit webpage at https://ftp.dwer.wa.gov.au/permit/9838/CPS%209838-1%20-%20Supporting%20documentation%20-%20Flora%20and%20vegetation%20survey.PDF.</p>

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No.	Submitter	Submission	Main Roads response
			<div><div>Figure 2Vegetation Condition adjacent to Kwolyinine Nature Reserve</div><div></div></div>
5	Submitter 4	<p>The proposal will have an unacceptable significant residual and cumulative impact on Black Cockatoos.</p>	<p>Approximately 15 ha of Medium quality foraging habitat will be cleared to accommodate the upgrade of more than 11 km of Great Eastern Highway through Coates Gully.</p> <p>Although clearing is required, Main Roads has minimised its clearing footprint wherever possible, has positioned the alignment into disturbed areas to avoid better quality habitat and, although Black Cockatoos are not known to breed within the development envelope, the proposal will avoid all trees that contain hollows large enough to support Black Cockatoo breeding.</p> <p>To offset the loss of 15.7 ha of Medium quality foraging habitat, Main Roads has purchased an adjacent paddock with large isolated trees (Lot 704 Great Eastern Highway) and will be undertaking restoration works to create 29.1 ha of High quality Black Cockatoo foraging habitat using preferred foraging species.</p> <p>In addition to the foraging habitat to be created within the 29.1 ha former farm paddock, one hundred large trees with diameter at breast heights of 50 cm or more are also present on the offset site.</p> <p>When roads were built in the 19th and 20th centuries, because of the ease of access, large trees within road reserves were often targeted for road and bridge building materials. As such, the large trees can often be in lower numbers within road reserves. For the Coates Gully project, it is estimated that up to 400 suitable DBH trees will be cleared, at a density of just over 25 suitable DBH trees per ha. Of these 400 trees, only 28 had a DBH equal or greater than 1000 mm (or 700 mm or greater for wandoo), noting that typically larger trees are more likely to form hollows. Forty four (one stag, three flooded gums, six jarrahs, 15 marris and 19 wandoos) of the large trees within the offset site had a DBH of 1000 mm or greater (or 700 mm or greater for wandoo), with several having hollows of a suitable size for Black Cockatoo breeding.</p> <p>The large trees that have been protected through the acquisition of Lot 704 contain suitably sized hollows for Black Cockatoo breeding, addressing any potential short or medium term loss of breeding habitat. The long term loss of 400 DBH trees will be offset through the creation of foraging and breeding habitat within Lot 704, noting that it is expected that more than 5000 trees will be established within the 29.1 ha offset area. These established trees will be a mixture of largely <i>Corymbia calophylla</i>, <i>Eucalyptus marginata</i> and <i>Eucalyptus wandoo</i> species.</p>

No.	Submitter	Submission	Main Roads response
			<p>Breeding is not known to occur within or immediately adjacent to the DE, even though suitable hollows are present in the area, including within Lot 704. To assist with encouraging breeding in the area, Main Roads is proposing to install a permanent elevated drinking water station to provide birds with a consistent water supply throughout the year. The availability of permanent drinking water may result in the hollows in the local area, including those within the adjacent Kwolyinine Nature Reserve and Lot 704, potentially being more attractive to nest in.</p> <p>It is considered that the proposed offset to protect 100 large trees, restore more than 29 ha of foraging habitat and install infrastructure to encourage breeding and roosting in the local area will ensure the project does not have a significant impact on local Black Cockatoo s in the area.</p> <p>Regionally, more than 32,000 ha of foraging habitat is considered to be within 12km of the Proposal Area. The loss of approximately 15 ha of Medium quality foraging habitat for this proposal represents a loss in the order of 0.05% of regional foraging habitat. No other clearing activities are known to occur either locally nor regional that could potentially have a cumulative impact on Black Cockatoo habitat that should be considered here.</p>
6	Submitter 4	Offsets not providing sufficient additional short-term and long-term habitat for Black Cockatoo s.	<p>The offset strategy proposed by Main Roads when the Preliminary Documentation was published for public comment involved creating 23.5 ha of breeding, roosting and foraging habitat. Following consultation with DCCEEW on the adequacy of this offset amount, it has now been increased to 29.1 ha. The offset strategy proposed by Main Roads addresses the short term and long term loss of breeding, roosting and foraging habitat.</p> <p>Breeding Habitat</p> <p>There is no short term loss of breeding nor roosting habitat as no Black Cockatoo breeding or roosting has been recorded within the DE, nor has there been any evidence of either occurring.</p> <p>In addition to there being no breeding recorded within the DE and adjacent areas, no suitably sized hollows occur within the DE.</p> <p>Of the 400 suitable DBH trees that occur within the DE, only 28 had a DBH equal or greater than 1000 mm (greater than 700 mm for wandoo), noting that typically larger trees are more likely to form hollows. For example, of the 500 suitably sized trees within the impact and offset sites, suitably sized hollows were only found trees that had a DBH at or above 1000 mm (or 700 mm or above for wandoo). Within the offset site, 44 of the trees were considered very large (i.e. >700 mm/1000 mm).</p> <p>The protection of 44 very large trees on Lot 704, some of which actually contain suitably sized hollows, is considered to adequately offset the short term loss of 28 very large trees from within the DE. The medium to long term loss of 400 DBH trees will be offset by the >5000 trees to be established on the 29.1 ha offset site.</p> <p>Main Roads will also install a permanent elevated watering station to encourage breeding and roosting within local area.</p> <p>Roosting Habitat</p> <p>The quality of the roosting habitat within the DE is considered low given:</p> <ul style="list-style-type: none">the lack of tall trees (> 14 m in height) within the DEthe lack of roosting records recorded within the DEthe local Black Cockatoo populations are low in the area around Coates Gully area (Dr Peter Mawson pers. Comm, 2024). <p>The approach to protecting and creating breeding habitat will also adequately offset the loss of lower-quality roosting habitat, with the protection of large trees and planting of tree species known to grow to a height suitable for roosting. Although Black Cockatoos aren't currently known to roost with the offset property nor the adjacent Kwolyinine Nature Reserve, the availability of year-round drinking water may encourage roosting within the area.</p> <p>Foraging Habitat</p> <p>The Proposed Action will result in the loss of up to 15.7 ha of Carnaby's Cockatoo foraging habitat, as well as 15.6 ha of Baudin's Cockatoo and FRTBC foraging habitat.</p> <p>As Black Cockatoos are known to forage within the DE, without offsets, the loss of foraging habitat may have a short and long term impact on local Black Cockatoo foraging.</p> <p>To offset the short and long term loss of foraging habitat, as mentioned above, Main Roads has acquired a large farm paddock (Lot 704) immediately adjacent to the DE and will commence restoring foraging habitat across 29.1 ha of the property. Currently the paddock comprises completely degraded areas that were previously used for cropping, as well as approximately 100 large isolated paddock trees. The foraging habitat to be restored will include mid-storey species, as well as trees species that also provide breeding and roosting habitat.</p>

No.	Submitter	Submission	Main Roads response
			<p>Tree size plays a key role in fruit and seed production. Mawson (1995) found that the largest 2% of marri trees in jarrah-marri forest sites studied accounted for an estimated 85% of fruit and seed production. Small marri trees (<6 m tall) flower sparingly and set few seeds. Of the large trees present within Lot 704, more than a third are jarrah and marris, with more than twenty of these trees having diameters of 1000 mm or more. In comparison, there are only two live jarrah and two live marris trees within the DE that had a DBH of 1000 mm or more.</p> <p>The offset site contains approximately 100 large trees that currently provide foraging, breeding and roosting habitat. It is expected that the additional 29.1 ha of revegetation will start to provide foraging habitat after five years.</p> <p>Protecting a paddock that contains a large number of mature trees and revegetating it with mid-storey and upper storey foraging species provides both short term and long term benefits.</p> <p>Main Roads is aiming to achieve High quality foraging habitat by establishing a canopy cover of at least 40 % eucalypt woodlands, which is consistent with DCCEEW’s habitat quality scoring guidance for Black Cockatoo foraging quality. More than 5000 trees (at 300 trees per hectare) will be established within the 29.1 ha offset site, with jarrah and marri trees being the dominant tree species.</p> <p>Given the very high density of planting proposed at the site, there is a very high confidence that a eucalypt woodland canopy cover of at least 40 % will be obtained within 20 years of commencing the revegetation works at the offset property. Given the number of large foraging trees present on the recently purchased offset site and extent of foraging habitat projected to be present across the 29.1 ha offset site within 20 years, the offset will provide significant environmental benefit for Black Cockatoos.</p> <p>In addition to providing and protecting foraging habitat, Main Roads also proposes to install a permanent elevated drinking water station to provide birds with a consistent water supply throughout the year and further encourage foraging, breeding and roosting within local area. The permanent elevated drinking water station is also expected to provide a safer location to drink in a drying climate, avoiding on ground predators and the need to drink on the edge of roads.</p>

3 REFERENCES

360 Environmental (2020). Great Eastern Highway Coates Gully Project. Detailed Flora and Vegetation Report. Prepared for Main Roads WA. Available at <https://ftp.dwer.wa.gov.au/permit/9838/CPS%209838-1%20-%20Supporting%20documentation%20-%20Flora%20and%20vegetation%20survey.PDF>

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Appendix 1: Public Submissions Received

Submission 1

From: Nick Smith [REDACTED]
Sent: Friday, October 18, 2024 11:29 PM
To: Mick Adam <mick.adam@mainroads.wa.gov.au>
Subject: Great Eastern Highway Upgrades

Hello,

I am writing to provide feedback on the great eastern highway upgrades. My main feedback is that I greatly oppose all aspects of this.

Full external and independent environmental audit and evaluation needs to be conducted prior to any works. Clearing this land threatens already critically endangered bird species.

Once this habitat is gone, it's often gone forever.

Regards,
Nick Smith.

Submission 2

From: Leonie Stubbs [REDACTED]
Sent: Sunday, October 20, 2024 3:23 PM
To: Mick Adam <mick.adam@mainroads.wa.gov.au>
Subject: Coates Gully - Great Eastern Highway Upgrade Project, Western Australia - EPBC 2022/9151

Dear Sir,

I object to the current plans to clear native vegetation primarily due to its negative impact on the following species:

- Carnaby's Black Cockatoo (*Zanda latirostris* listed as *Calyptorhynchus latirostris*) (Endangered)
- Forest Red-tailed Black Cockatoo (*Calyptorhynchus banksii naso*) (Vulnerable)
- Baudin's Black Cockatoo (*Zanda baudinii* listed as *Calyptorhynchus baudinii*) (Endangered)

These birds face starvation. Clearing of their habitat is occurring on a daily basis on an ad hoc basis to the extent that the amount of quality foraging remaining will be insufficient for their survival.

There should be no further clearing of any Black Cockatoo habitat which includes breeding, foraging and roosting sites.

If this criteria was put in place then Main Roads would find other ways to improve our road system. For example, the level of clearing undertaken by Main Roads is often extreme when one views the completed project. If Main Roads was limited in its capacity to clear but instead was obliged to consider the threat to our threatened native vegetation and fauna I'm quite sure it would manage the challenge and come up with innovative ways which could actually improve outcomes for both the road users and other species.

Another feature of Main Roads road projects is the lack of funding for maintenance of road verges. This lack of action puts quality vegetation found in adjacent conservation reserves at risk due to weed invasion, and once again this has a significant deleterious impact on our native flora and fauna.

Yours faithfully,

Leonie Stubbs

Submission 3

From: [REDACTED]
Sent: Wednesday, October 23, 2024 9:13 AM
To: Mick Adam <mick.adam@mainroads.wa.gov.au>
Subject: Proposed Clearing of Native Vegetation Great Eastern Highway Copely WA

Great Eastern Highway (GEH) Upgrade Project WA. EPBC 2022/9151
Notification of Preliminary Documentation under the EPBC Act (Cwth) 1999

Dear Sir,

This submission/letter is directed to Main Roads WA expressing my family's disappointment re any proposed clearing of natural environment on GEH at Copely WA to be destroyed for extra traffic carriage lanes for GEH at that location over a distance of 11.4 kilometres of GEH.

Specifically our concerns are for the following listed birds:

Endangered Carnaby's White tailed Black Cockatoo,
Endangered Baudin's White Tailed Black Cockatoo,
& the Vulnerable Forest Redtail Black Cockatoo.

The cumulative loss of habitat and feeding grounds is what has led to the decline of these beautiful WA birds.

My family would particularly like Main Roads WA to note that the Baudin's White Tailed Black Cockatoo is listed as Critically Endangered under the IUCN (International Union for the Conservation of Nature) since 2021.

It is worthwhile noting that the status of critically endangered is the last category before "extinct"!

In making any decision on this matter, the Federal Government like Main Roads WA may not be aware that the Threatened Species status of Baudin's Cockatoo has already been upgraded to Critically Endangered under the IUCN & BirdLife International in 2021, as stated above.

Such a change is currently in process under State legislation with the species nominated for upgrade under the WA Biodiversity Conservation Act (2016), in November 2023; the same upgrade under EPBC would then follow.

This means the proposed land clearing at Copely to make way for the GEH upgrades, could likely be based on outdated information as the species has suffered further population decline in the last couple of years, placing emphasis on the importance of every piece of remaining habitat in its range, especially Marri trees (forest) of all ages that provide the (declining) population with critical food & nest sites.

A recent report in the WA Today On Line News, said that these birds are starving because of loss of foraging areas.

The only way to stop the decline is to maintain the foraging, roosting and habitat areas - not to see them further diminished.

Thank you for providing the opportunity to comment.

Yours Sincerely,

[REDACTED]

Submission 4

Conservation Council of WA (ABN 35982476107)
PO Box 883, West Perth, WA, 6872
T 08 6558 5155 | E conswa@ccwa.org.au



Submitted to: Main Roads Western Australia

By email: mick.adam@mainroads.wa.gov.au

**Great Eastern Highway Upgrade Project
Western Australia – EPBC 2022/9151
Public Comment**

Submission by Conservation Council of WA

24 October 2024

The Conservation Council of WA (CCWA) is the state's foremost non-profit, non-government conservation organisation representing close to 100 environmental organisations across Western Australia, with tens of thousands of engaged individuals state-wide. This broad collective of like-minded groups and individuals creates a vibrant and passionate community, dedicated to the conservation of our unique and diverse state.

CCWA has been a prominent and forthright voice for conservation for more than 50 years working directly with the government, media, industry, community groups, and political parties to promote a more sustainable WA and to protect our natural environment.

Background

Main Roads Western Australia (**the Proponent**) proposes to upgrade approximately 10.5 km of Great Eastern Highway between Straight Line Kilometre 56.4 and 67.8 (**the Proposal**). The Proposal includes the construction and operation of a two-way carriageway, intersection and other road infrastructure within a 11.4 km section of Great Eastern Highway. The Proposal is located in the Wheatbelt region, Western Australia, approximately 56 km east of Perth and 25 km south-west of Northam.

The total Proposal Area is 35.15 ha.

Proposed activities include:

- clearing of up to 15.7 ha of habitat for Carnaby's Black Cockatoo (*Zanda latirostris* – Endangered), Forest Red-Tailed Black Cockatoo (*Calyptorhynchus Banksii naso* – Vulnerable), and Baudin's Black Cockatoo (*Zanda baudinii* – Endangered) for the purposes of road widening and re-alignment

- constructing additional overtaking lanes
- improvement of intersections at Bodeguero Way, Wariin Road, Chedaring Road, Hawke Avenue, Inkpen Road, Coates Road and Oysten Road
- removal and relocation of rest areas/parking bays
- improvement of drainage, kerbing and culverts
- installation of a safety barrier

The Proposal environment

The Proposal is located in the Wheatbelt region of WA, an area that has been extensively cleared for agricultural purposes. The resulting fragmentation and isolation of this habitat makes it increasingly unviable for native species¹.

The Proposal includes the clearing of:

- 1.4 ha of high quality, 12.5 ha of medium quality and 1.8 ha of low quality foraging habitat for Carnaby's Cockatoo (totalling 15.7 ha)
- 1.4 ha of high quality, 12.5 ha of medium quality and 1.7 ha of low quality foraging habitat for Baudin's Cockatoo and the Forest Red-Tailed Black Cockatoo (totalling 15.6 ha)
- up to 400 trees with suitable diameter at breast height for Black Cockatoos
- potential breeding and roosting habitat

This submission was informed by the Preliminary Documentation and Referral of Proposal.

CCWA's submission points

CCWA presents the following grounds for its submission:

1. The Proposal will produce unacceptable impact to Matters of National Environmental Significance (MNES).
2. Habitat loss is inadequately addressed by offsets.

1. The Proposal will produce unacceptable impact to Matters of National Environmental Significance (MNES).

The Proposal seeks to clear the habitat of Carnaby's Black Cockatoo (*Zanda latirostris* – Endangered); Forest Red-Tailed Black Cockatoo (*Calyptorhynchus Banksii naso* – Vulnerable); and Baudin's Black Cockatoo (*Zanda baudinii* – Endangered).

This includes up to 16 ha of *Eucalyptus wandoo* Woodland over *Banksia*, *Corymbia calophylla* and *Eucalyptus marginata* Woodland, Grassland with isolated trees (mix of jarrah, marri and wandoo) and melaleuca shrubland. These trees make up important foraging and breeding habitat for black cockatoos, including suitable breeding hollows that show signs of current use, and 15.6 ha of potential roosting habitat. This may represent significant long-term habitat for black cockatoos, as breeding is known to occur within 5 km of the Proposal Area, and night roosts have been recorded 500 m from the Proposal Area.

This loss of habitat presents an unacceptable risk to threatened black cockatoos. The threatened species face decline due to extensive clearing, degradation and climate change, including the loss

¹ Hobbs, R. J. The wheatbelt of Western Australia. (2003). *Pacific Conservation Biology*, 9(9-11).

of 90% of Carnaby's cockatoo habitat in the Wheatbelt². These threats make the habitat within the Proposal significant.

Additionally, the Proposal will destroy trees that are necessary for long-term black cockatoo habitat. Maintenance of trees of all sizes and ages is critical to the longevity and recovery of black cockatoos, as it usually takes 200 to 300 years to develop suitable nesting hollows^{3,4}. By destroying the suitable nest hollows within the Proposal Area, the Proposal destroys future breeding habitat, and therefore poses an unacceptable risk.

Within WA, habitat for black cockatoos is facing significant decline from the cumulative impact of projects⁵. The Proposal will contribute to cumulative clearing of MNES habitat, therefore leading to the following significant impacts:

- a long-term decrease in the size of a population
- reduction in the area of occupancy of the species
- fragmentation of an existing population into two or more populations
- adverse effects to habitat critical to the survival of a species
- disruption of the breeding cycle of a population
- modification, destruction, removal, isolation or decrease in the availability or quality of habitat to the extent that the species likely to decline
- introduction of invasive species that are harmful to a critically endangered or establishment of endangered species in the endangered or critically endangered species' habitat
- introduction of disease that may cause the species to decline
- interference with the recovery of the species⁶

CCWA asserts that the Proposal will produce significant residual and cumulative impact to multiple protected matters, therefore producing unacceptable impacts.

2. Habitat loss is inadequately addressed by offsets.

The Proposal plans to address its significant residual impact to threatened species by:

- acquiring and revegetating 23.5 ha of suitable moderate to high quality black cockatoo foraging habitat;
- installing four artificial nest hollows within 50 km of the Proposal Area; and,
- installing a permanent elevated water station.

However, these offsets may not provide sufficient additional short-term and long-term habitat for black cockatoos. While revegetation of a paddock may provide additional long-term habitat, the acquisition of trees that already provide foraging habitat does not present sufficient short-term

² <https://visit.museum.wa.gov.au/boolabardip/carnabys-cockatoo#:~:text=Approximately%2090%25%20of%20Carnaby's%20cockatoo,200%20years%20since%20European%20settlement%20.>

³ Australian Government, Department of Parks and Wildlife. (2013). *Carnaby's Cockatoo (Calyptorhynchus latirostris) Recovery Plan*.

⁴ Threatened Species Scientific Committee (2018). *Conservation Advice Calyptorhynchus baudinii Baudin's cockatoo*. Canberra: Department of the Environment and Energy. Available from: <http://www.environment.gov.au/biodiversity/threatened/species/pubs/769-conservation-advice-15022018.pdf>.

⁵ Environmental Protection Authority (2019). *Carnaby's Cockatoo in Environmental Impact Assessment in the Perth and Peel Region*, EPA, Western Australia.

⁶ Australian Government, Department of the Environment (2013). *Matters of National Environmental Significance: Significant impact guidelines 1.1: Environment Protection and Biodiversity Conservation Act 1999*

habitat for the threatened species. Furthermore, the artificial hollows may not be effective in providing habitat for all black cockatoo species, as the efficacy is not known for species other than Carnaby's Black Cockatoo⁷. This poses an unacceptable risk, as the state of Baudin's Black Cockatoo is declining, as recognised at the state-level, where a nomination for critically endangered status is currently being considered⁸. The efficacy of artificial hollows for Baudin's Black Cockatoo must be certain to ensure sufficient short-term habitat is provided to the populations effected by the Proposal.

Outcomes sought

In view of the above points, CCWA recommends that:

- a. potential black cockatoo habitat is avoided;
- b. trees at suitable breast diameter height are retained;
- c. sufficient and adjacent short-term foraging and breeding habitat for black cockatoos is secured;
- d. the efficacy of artificial hollows in providing short-term habitat for Baudin's Black Cockatoo and Forest Red-Tailed Black Cockatoo is established.

Please do not hesitate to contact CCWA should you wish to discuss this submission further.

Yours sincerely

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⁷ Saunders, D. A., Dawson, R., Mawson, P. R., & Cunningham, R. B. (2020). Artificial hollows provide an effective short-term solution to the loss of natural nesting hollows for Carnaby's Cockatoo *Calyptrorhynchus latirostris*. *Biological Conservation*, 245 (108556). <https://doi.org/10.1016/j.biocon.2020.108556>

⁸ See <https://www.dbca.wa.gov.au/management/threatened-species-and-communities/nominations-listing>