



15 February 2019

Quinns Rocks Environmental Group Inc.
PO Box 27
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To whom it may concern,

Response to Submission: Yanchep Rail Extension Part 1 – Butler to Eglinton

Thank you for your submission on the Public Transport Authority's (PTA) Assessment of Referral Information with Additional Information for the Yanchep Rail Extension Part 1 – Butler to Eglinton (YRE Part 1) proposal. The PTA appreciates the input the Quinns Rocks Environmental Group (QREG) provided during consultation meetings in November 2017 and September 2018 and looks forward to continuing to engage regarding the Yanchep Rail Extension Part 1 and 2 proposals.

The following is a summary of the comments provided by QREG together with the PTA's response:

Lack of consideration of Banksia woodland TEC under the EPBC Act 1999

1. All but one of the listed assessments under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) were undertaken before the Banksia woodland Threatened Ecological Community (TEC) was listed. The existing EPBC approvals therefore did not consider the Banksia woodland TEC and the impacts of the YRE Part 1 proposal on its integrity and fragmentation of this TEC area in the proposal footprint.

PTA response: The PTA consulted with Department of Water and Environmental Regulation (DWER) Environmental Protection Authority Services (EPA Services) and Commonwealth Department of the Environment and Energy (DotEE) and obtained agreement to refer the YRE proposal in two parts. This included consultation regarding the PTA's intention to construct YRE Part 1 under six existing third party developer EPBC Act approvals. DotEE confirmed this approach, providing formal written endorsement in January 2019 (DotEE, 2019). The YRE

Part 1 Environmental Review Document (ERD) considers impacts to the Banksia woodland TEC as it is a subset of the State listed Banksia dominated woodlands of the Swan Coastal Plain IBRA Region Priority Ecological Community (PEC).

2. The entire YRE needs to be assessed under the provisions of the EPBC Act.

PTA response: The PTA consulted, and obtained agreement from, EPA Services and DotEE to refer the YRE proposal in two parts. As previously stated, YRE Part 1 has been assessed and approved by the Commonwealth in accordance with EPBC Act under six previous applications. The YRE Part 2 – Eglinton to Yanchep proposal has been referred to the DotEE and it has been determined that the proposal will be assessed as an accredited assessment by the EPA. The EPA will assess YRE Part 2 against the provisions of the EPBC Act on behalf of the DotEE.

3. The assessment in the Additional Information on Biological Factors report (GHD, June 2018) regarding TEC/PEC representation in conservation reserves is inappropriate as it is based on the percentage of remaining extent whereas it should be the percentage of the original extent. The percentage extents have been used to conclude that “there will remain a relatively high level of protection afforded to these TECs and PECs” which is contrary to the EPBC Endangered status of the Banksia woodland.

PTA response: The percentages of TEC/PECs within conservation areas are based on the current extent as provided by DBCA to provide an accurate overview of the total amount of TEC/PECs currently within conservation areas. This is in response to direct enquiries from the DWER/EPA Services. The statement “there will remain a relatively high level of protection” relates to the larger proportion of the mapped TEC/PECs which occur within conservation areas as compared to the amount to be cleared from within the YRE Part 1 development envelope. At a local 1km scale less than 10% of the Banksia PEC is within conservation reserves.

Impact of the proposed project on the parabolic dune within the Parks and Recreation reserve in Alkimos

4. It is unacceptable that cost is used as a reason for not protecting some of the few remaining portions of the Alkimos parabolic dune reserved in Parks and Recreation. It is recommended that the EPA upholds the reservation for conservation purposes the east-west ecological linkage and the geoheritage values within the Parks and Recreation reserve in Alkimos.

PTA response: The PTA has not identified cost as a barrier to the protection of the Alkimos parabolic dune in the Alkimos Parks and Recreation reserve (Alkimos PRR); however it is acknowledged that cost has been identified as a factor in proposing an at-grade railway rather than a tunnel option (in section 2.2.5 on page 14 of the ERD). A tunnel option was discounted due to the high cost of constructing and operating a railway in a tunnel. The railway cannot be realigned to completely avoid the dune system or Alkimos PRR as it extends west to Marmion Avenue and east to the future Mitchell Freeway reserve. The extent of the dune system is shown in Figure 8-2 of the ERD (ELA 2018).

5. Concern that the YRE Part 1 will form a barrier to the movement of people through the Parks and Recreation reserve in Alkimos and Bush Forever Site (BFS) 289. It is recommended that the railway alignment is re-designed to facilitate movement of people east-west within the Parks and Recreation Reserves.

PTA response: YRE Part 1 does not intersect Bush Forever Site 289, however this site is intersected by YRE Part 2. YRE Part 1 will form a barrier across the Alkimos PRR. The PTA has proposed the construction of a fauna underpass within the Alkimos PRR to allow east-west fauna movement within the reserve, and is willing to investigate whether the fauna underpass could be upgraded to also allow pedestrian access. The PTA will consult with the City of Wanneroo, Department of Biodiversity, Conservation and Attractions (DBCA), Bamford Consulting Ecologists and QREG regarding this. It should also be noted that pedestrian access across the railway will be provided at Alkimos Station which is less than 200m south of Alkimos PRR.

6. Concern that the railway will result in additional fragmentation of the Alkimos parabolic dune and damage by uncontrolled access.

PTA response: The PTA acknowledges that the YRE Part 1 will result in fragmentation of the Alkimos parabolic dune and that the presence of the railway and public shared path may increase uncontrolled access through the Alkimos dune system. The PTA will work with the City of Wanneroo and DBCA to identify options to reduce the likelihood of this occurring.

7. It is recommended that the railway under the Alkimos Town Centre be sunk to facilitate walkability and remove the need to cut into the dune system. It is recommended that the design of the railway is reconsidered to better facilitate formation of effective town centres.

PTA response: The PTA has designed the railway to be in a cutting through the Alkimos Town Centre, in consultation with the City of Wanneroo and the land developer. The purpose of this is to improve walkability and connectivity across the town centre and reduce noise emissions to future residents nearby. Sinking of the railway completely underground has been discounted as explained previously. Further, sinking of the railway would not entirely eliminate impacts to the dune system and there are likely to be significant surface impacts associated with the construction of underground infrastructure and tunnelling.

Lack of consideration of the railway project along its entire extended alignment

8. It is recommended that the EPA postpones its recommendations on YRE Part 1 until it has had an opportunity to assess YRE Part 2.

PTA response: As mentioned previously, the PTA consulted, and obtained agreement from, EPA Services and the DotEE to refer the YRE proposal in two parts. The YRE Part 1 and 2 referrals have been accepted by the EPA and the DotEE has accepted the referral of YRE Part 2. The Part 1 environmental impact assessment submission to the EPA considers the cumulative impact of the construction and operation of the YRE Part 1 project, in addition to the construction and operation of:

- *Part 2, so the environmental impact of the whole alignment is considered and assessed in its entirety by the EPA.*
- *The construction of all projected future urban and industrial development adjacent the entire alignment (Part 1 and 2) beyond 10 years (considered the worst-case scenario from a cumulative impact perspective).*

See section 2.5.1 on page 23 of the ERD (ELA 2018).

Similarly, the Part 2 environmental impact assessment submission to the EPA will consider the cumulative impact of the construction and operation of Part 2 in addition to the construction and operation of Part 1 and the construction of all projected (10+ years) future urban and industrial development adjacent the alignment.

Fauna management

9. It is recommended that the railway be redesigned to minimise the need for cut and fill through the Alkimos Parks and Recreation reserve. Fauna underpasses can be effective in facilitating movement of a range of terrestrial animals however many small birds will not fly over transport corridors. It is recommended that the PTA

revise the proposed approach to facilitating east-west movement of fauna to facilitate a broader range of species.

PTA response: The PTA will install a fauna underpass estimated to be 75 m long, within Alkimos PRR to maintain east-west local ecological linkage for fauna in this area. The fauna underpass will be designed in accordance with the advice provided in the Fauna Underpass Assessment for YRE Part 2 (Bamford Consulting Ecologists 2019a) and in direct consultation with Bamford Consulting Ecologists during the detailed design. This includes vegetating the underpass at both entry points and installing furniture. Bamford Consulting Ecologists (2019a) states that some native fauna, including Brush Wallaby, Quenda, Common Brushtail Possum, Echidna, Western Grey Kangaroos, large lizards and snakes and moaning frogs will readily use box culvert design fauna underpasses.

Bamford Consulting Ecologists (2019a) comments that some birds may be reluctant to fly across the rail (White-breasted Robin, Splendid and White-winged Fairy-wrens, White-browed Scrubwren) and with the exception of ducks will be unlikely to use underpasses. However, increasing the diameter, installing furniture and increase light availability may aid their movement and increase use of underpasses (Bamford Consulting Ecologists, 2019a). While the PTA recognises that a fauna underpass will not be used by all fauna within the area, the PTA will work with Bamford Consulting Ecologists to design and position the fauna underpass within the Alkimos PRR to best facilitate use by the highest number of species. The PTA will also consult with the DBCA and QREG regarding this.

Vegetation condition mapping

10. It is recommended that the vegetation condition mapping is reviewed as the classifications assigned to sections of the proposal's footprint do not seem to correspond with the site conditions.

PTA response: Vegetation condition assessments were undertaken by a number of experienced botanists (each with 10+ years of experience) over several survey seasons (including spring 2010, spring 2012, spring 2016, and autumn, winter and summer 2017) and in accordance with the EPA Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment. The PTA would be happy to arrange a site visit with QREG and one of the botanists to explain the vegetation condition mapping onsite.

Validity of some avoidance measures

11. The validity of the claim that impacts on Bush Forever Site 130 were avoided when the railway line was moved west from its previous alignment needs to be clarified.

PTA response: The potential impacts on Bush Forever Site (BFS) 130 discussed within the ERD (ELA 2018) were related to a potential construction access road, not to realignment of the railway. The access road was proposed to follow an Other Regional Roads Reservation (shown in dark blue in Figure 2-1 in the ERD (ELA (2018)) which would have cut through BFS 130 to provide heavy vehicle access between the railway alignment and Wanneroo Road.

Once again, thank you for providing comments on the YRE Part 1 proposal. We look forward to continue engaging with QREG as the YRE project continues.

Please contact Laura Zimmermann on 9326 3423 or laura.zimmerman@pta.wa.gov.au should you have any queries regarding this letter.

Yours sincerely



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