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**CONSERVATION BRANCH**  
**INTRA DEPARTMENTAL ADVICE**  
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**TO:** Darren Walsh  
**SUBJECT:** Hopetoun Townsite Residential Development Project Vegetation and  
Flora Survey  
**FROM:** Sandra Santich/ Nick Woolfrey  
**DATE:** 16 March 2001

*N Woolfrey* 15/3/01

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*Please could I be provided with a copy of your final advice. Thank you.*

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Our branch has provided comments in regards to the Hopetoun Townsite Residential Development Project Vegetation and Flora Survey previously to the Ministry for Planning and these comments are attached.

It is noted that vegetation mapping was as described in methodology but is not included in the document you provided. There is a reference to a vegetation map in the text, it is referred to as Figure 4, however as this figure was also not provided with the documentation received from the Ministry for Planning as well it is unclear whether the map is missing or was left out of the original document. As mentioned by Karen Clarke in her comments to MfP the report is considered incomplete without the vegetation map.

Also

- The limitations of a December survey are not explained.
- The report on the survey does not identify the significance of the impacts on the priority flora to be impacted (i.e. how many plants affected, what proportion of the population/s, what effect on the conservation status of each taxon)
- No analysis of the actual or predicted impact on affected plant communities: makes evaluation of the significance of the impact difficult.
- Flora list (table) should identify taxa of conservation significance
- The condition of the vegetation has not been adequately described with reference to either a recognised rating scale or to the condition of other affected plant communities elsewhere
- The survey report or EIA document (or referral) should adequately determine the significance of the affected area in terms of the presence of threats such as phytophthora dieback in the area and the degree to which similar disease free areas are found elsewhere, ~~has not been described~~

- The document does not answer the question of what will the effect of the proposal be on the spread of diseases such as *Phytophthora cinnamomi* and how might these threats be managed

The above points are not criticisms of the report per se. rather they indicate that although descriptive information has been provided and some recommendations made, the info provided falls short of enabling the EPA to make an adequate evaluation of the impact of the proposal on biodiversity.

Karen Clarke

From: Karen Clarke  
Sent: Thursday, 15 February 2001 18:37  
To: 'Beardmore, Kieron'  
Cc: Gary Whisson; Darren Walsh  
Subject: RE: Botanical survey HopeToun

KIERON,  
I READ THE HOPETOUN TOWNSITE RESIDENTIAL DEVELOPMENT PROJECT VEGETATION AND FLORA SURVEY REPORT LATE LAST NIGHT (11.00PM) AND TALKED TO GARY THIS MORNING. HE SUGGESTED TALKING TO DARREN WALSH TO SEE WHETHER ITS COME IN HERE ALREADY, WHICH IT HAS AS PART OF DARREN'S DEALINGS WITH THE DEPT OF RESOURCE DEVELOPMENT OVER THE SHIRE OF RAVENSTHORPE PLANNING STRATEGY/SCHEME. DARREN WILL PROBABLY CONTACT YOU.

THE COPY OF THE VEGETATION & FLORA REPORT COURIERED OVER IS MISSING FIGURES AND PLATES INCLUDING THE VEGETATION MAP! THEREFORE , THE FOLLOWING COMMENTS ARE BASED ON MY READING OF THE INCOMPLETE REPORT. IT SEEMS TO HAVE COVERED ALL THE BASICS REQUIRED FOR A BOTANICAL ASSESSMENT BUT DOES NOT ADDRESS A NUMBER OF CRITICAL BROADER ISSUES. FOR EXAMPLE, CLEARING OF REMNANT VEGETATION WITHIN THE RAVENSTHORPE SHIRE IN LINE WITH THE EPA'S CURRENT POSITION STATEMENT ON CLEARING IN AGRICULTURAL AREAS AND BIODIVERSITY CONSERVATION IN ONE OF THE WORLD'S MOST BIODIVERSE REGIONS. THE REPORT IS PROBABLY ADEQUATE FOR A PRELIMINARY ASSESSMENT AND OF A HIGH STANDARD SCIENTIFICALLY WITHIN ITS NARROW LIMITS. HOWEVER, IT DOES NOT ADEQUATELY ADDRESS INTERNATIONAL, NATIONAL AND REGIONAL SIGNIFICANCE ISSUES AND THE CONDITION OF THE EXISTING VEGETATION HAS NOT BEEN COVERED ADEQUATELY (MAY NOT HAVE BEEN PART OF THE BRIEF). ALSO ITS CONCLUSIONS AND RECOMMENDATIONS SEEM TO IGNORE A NUMBER OF KEY STATEMENTS MADE IN THE BODY OF THE REPORT AND SO DO NOT ADEQUATELY REPRESENT THE REPORT CONTENT.  
FOR EXAMPLE - 1. NO DECLARED RARE FLORA WERE FOUND BUT THIS DOES NOT MEAN NONE ARE PRESENT GIVEN THE TIME OF YEAR OF THE SURVEY AND METHODOLOGY USED.  
2. THE PREFERRED HABITAT OF THE PRIORITY 2 SPECIES CALOCHILUS SP. HOPETOUN (H TAYLOR SN) (AFF. CAMPESTRIS) IS WELL REPRESENTED IN THE DEVELOPMENT ZONE. WHILE NO SPECIMENS WERE FOUND THIS IS MOST LIKELY DUE TO SEASONAL VARIATION AND CURRENT FIRE AGE OF THIS HABITAT. THEREFORE, THE RIDGE-FRUITED MALLE (E. ANGULOSA) -SIVER MALLEE (E. FALCATA) - E. CONGLOBOTA NEEDS TO BE CONSERVED.  
4. CANKER DISEASES ARE PRESENT. THE EFFECT OF DEVELOPMENT ON THE SPREAD OF CANKER DISEASE AND SUBSEQUENT SURVIVAL OF PROTEACEOUS DOMINATED COMMUNITIES AND VETERBRATE AND INSECT POLLINATORS NEEDS TO BE ADDRESSED.  
5. THE PRIORITY 3 SPECIES SPYRIDIUM OLIGOCEPHALUM IS PRESENT IN THE MALLEE SHRUB COMMUNITY (IT IS NOT CLEAR WHETHER THIS WILL BE ADEQUATELY PROTECTED WITHIN THE WILDLIFE CORRIDOR PROPOSED).

THE LIMITATIONS OF THE REPORT WITH RESPECT TO METHODOLOGY HAVE NOT BE DETAILED. 170 SPP FOR AN AREA SUCH AS THIS IS LOW. THIS IS BY NO MEANS A DETAILED VEGETATION AND FLORA SURVEY AND SHOULD NOT BE REPRESENTED AS SUCH.

DARREN INTENDS TO SEEK CONSERVATION BRANCH ADVICE ON THE ODP SO DEP WILL BE LOOKING AT IT FURTHER. IT WOULD BE APPRECIATED IF YOU COULD ARRANGE FOR A FULL COPY OF THE VEGETATION AND FLORA REPORT TO BE FORWARDED TO GARY.

HOPE THIS IS USEFUL.  
CHEERS, KAREN.

PS. MY COMPUTER WON'T DO ANYTHING BUT ALL CAPS TODAY!

-----Original Message-----

From: Beardmore, Kieron [mailto:Kieron.Beadmore@planning.wa.gov.au]  
Sent: Wednesday, 14 February 2001 16:54  
To: 'Karen Clarke'  
Subject: RE: Botanical survey HopeToun

Karen

Couried over as discussed this am - if you could do a quick review it would be appreciated - noting to comprehensive and just have they touched all necessary botanical bases and info sources etc