



COTERRA  
ENVIRONMENT

Level 1, 98 Colin Street  
West Perth WA 6005

T (08) 9381 5513

[www.coterra.com.au](http://www.coterra.com.au)  
[info@coterra.com.au](mailto:info@coterra.com.au)

Our Ref: SOYYOR01

Date: 08 October

Attention: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Department of Climate Change, Energy, the Environment and Water

Via email: [REDACTED]

Dear [REDACTED]

**Response to Submission received on the Preliminary Documentation for the York-Tammin Road Widening Project (EPBC 2023/09446)**

On behalf of the Shire of York, and further to your direction to publish dated 29 August 2024, I am writing to advise that the Preliminary Documentation for the above project was publicly advertised and available for comment for 10 business days from the 11<sup>th</sup> to the 27<sup>th</sup> of September 2024.

One submission was received during the public comment period on 12<sup>th</sup> September. This submission, as well as a response to each of the items raised in the submission is herein enclosed at Attachment 1. No amendment to the Preliminary Documentation has been undertaken.

We trust that this information enables the department to progress the assessment of this referral.

Yours sincerely

William Oversby  
Lead Scientist

*Attachment 1: Proponent Response to Submission*

## Attachment 1 – Proponent Response to Submission

Public Submission	Matter Raised	Proponent Response
Anon 1	<p>As a member of the public and a Shire of York resident for the past 29 years I make the following submission to your proposal to clear potential black cockatoo habitat in order to improve the 'historically poor safety record' along seven kilometres of the York-Tammin Road.</p> <ol style="list-style-type: none"> <li>You have made an effort to not make the public notice of this proposal too public! The ad in the West Australian (11 Sept 2024) does not show the Shire logo and on the website the proposal is not on the main opening page where it should be, but hidden under Community Engagement. All very much legal of course, but not genuinely inviting and facilitating public input.</li> </ol>	<p>The Shire of York welcomes the opportunity for public consultation on all of its projects. As a part of the Preliminary Documentation assessment process under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act), the Shire of York adheres to clear guidance from the department on the means by which public comment is invited. This includes the form and content of the public notice (which requires approval from a delegated officer), the location at which the Preliminary Documentation can be reviewed, and the duration of public advertisement. Delegate approval for the public notice was received on 6<sup>th</sup> September 2024.</p> <p>In addition to advertising the Preliminary Documentation in the West Australian newspaper and via the Shire's Community Engagement webpage, the proponent made available physical copies at both the State Library of Western Australia, and the Shire of York Public Library.</p> <p>Public comment was also sought on the proposal as a part of the Native Vegetation Clearing Permit assessment process under Part V of the <i>Environmental Protection Act 1986</i> (EP Act). Public comment was sought by the Department of Water and Environmental Regulation over a period of 21 days in 2022, and no submissions were received.</p>
	<ol style="list-style-type: none"> <li>The Coterra document is 370 pages of technical data. How do you expect any member of the public to digest this and make a meaningful submission by 27 September 2024? For example I would like to know a little bit more about the approximately seven serious injuries were recorded on the York-Tammin Road between 2018 and 2022: why approximately? What are serious injuries? What was the cause of the accidents? Was the physical state of the road a factor or was driver error, negligence, carelessness etc. the reason? What proof is there of the 'historically poor safety record' of this road? To get answers to these questions I would need to do an FOI to the Road Safety Commission or Police and that takes much longer than the 12 business days you allow for submissions.</li> </ol>	<p>The Shire of York recognises that the environmental documentation prepared to support the proposal is extensive, however every effort has been made to ensure that each of the department's 46 requests for additional information have been appropriately addressed, consistent with the department's letter dated 19 June 2023.</p> <p>Road safety statistics which have been provided with the Preliminary Documentation are publicly available, and the websites where this information can be found are included in the references section of the document. Additional relevant publicly available statistics for the same period include:</p> <ul style="list-style-type: none"> <li>• People Killed or Seriously Injured (KSI) were most often injured in: <ul style="list-style-type: none"> <li>▪ Hit object crashes (47%)</li> <li>▪ Non-collision crashes (25%)</li> <li>▪ Head on crashes (10%)</li> </ul> </li> <li>• People KSI were most often in crashes on: <ul style="list-style-type: none"> <li>▪ 110 km/h sections of road (75%)</li> <li>▪ 50 km/h sections of road (6%)</li> <li>▪ 100 km/h sections of road (6%)</li> <li>▪ 90 km/h sections of road (4%)</li> </ul> </li> <li>• Contributing behavioural factors: <ul style="list-style-type: none"> <li>▪ 24% of people KSI were in crashes where speed was suspected to be a contributing factor</li> <li>▪ 9% were in crashes where inattention was suspected to be a contributing factor</li> <li>▪ 24% were in crashes where fatigue was suspected to be a contributing factor</li> <li>▪ 7% of motor vehicle occupants KSI were not wearing a seatbelt</li> <li>▪ 2% of motorcyclists KSI were not wearing a helmet.</li> </ul> </li> </ul> <p>Based on the above, a significant portion of relevant road safety information is publicly available, and has been appropriately referred to in the Preliminary Documentation. Therefore, no amendments to the Preliminary Documentation have been made.</p>
	<ol style="list-style-type: none"> <li>It appears that Wheatbelt shires pay lip service to Black Cockatoo survival, but at every opportunity opt to clear what very little native vegetation the birds still have. Why is it such a priority for the Shire of York to upgrade a short stretch of York-Tammin Road? I would like to know how many cars travel that road daily. It won't be many... and I certainly hope that my rates don't contribute to this upgrade, when I live on a gravel road that probably gets twice the daily traffic compared to the sealed York-Tammin Road.</li> </ol>	<p>The Shire of York is committed to its role as a responsible custodian of the environment, and so has employed all steps in the mitigation hierarchy in order to reduce environmental impacts to the fullest extent practicable. Alternatives to the proposed action have been considered at section 3.3.1 of the documentation, and a detailed approach on how impacts will be mitigated is presented at section 3.3.2 (Avoidance), and section 3.3.3 (Minimisation). Further, a dedicated Environmental Management Plan has been prepared specifically for the project, which will be implemented for the duration of clearing and construction activities.</p> <p>Funding for the proposed upgrades was provided to the Shire from the Regional Road Group funding pool, in recognition of the need for the upgrades (Section 1.1).</p>
	<ol style="list-style-type: none"> <li>The statistics and data in the Coterra report are in my view outdated. Consider this: <u>for the first time in 29 years</u> we have had a flock of between 2 and 3 dozen black cockatoos hang around our property from January to early August 2024. They roosted on a neighbour's property and came for their daily drink to our water troughs. They left us when the rains started. Just to say that our environment is changing and these cockatoos probably lived in the forest west of us, but due to the forest drying and collapsing now have had to move</li> </ol>	<p>The Shire of York recognises that some information on publicly available databases can be outdated. To address this, two dedicated black cockatoo habitat assessments have been undertaken of the site, including by Del Botanics in 2022 and most recently Bamford Consulting Ecologists in 2024. The outcomes of these recent and contemporary surveys have provided the basis for the environmental impact assessment presented in the Preliminary</p>

Public Submission	Matter Raised	Proponent Response
	<p>eastwards to our area. If you are going to clear more trees, that compromises their survival. You should be planting trees! Imagine how beautiful York-Tammin Road could be if you restore the vegetation.</p>	<p>Documentation. The key finding of these surveys is that Carnaby's Black Cockatoo is likely to be an irregular, non-breeding visitor (or possibly vagrant) to the project area at most.</p> <p>The above notwithstanding, the Shire has nominated an environmental offset approach which includes the planting of native tree species (including 12 new Wandoo and Salmon Gum trees) within retained vegetation in the project area, as well as the installation of two artificial black cockatoo nest hollows within Wallaby Hills Nature Reserve, which is no more than 300 m from the project area. To this end, the proposed upgrades are anticipated to have a net positive environmental outcome.</p>
	<p>5. I hope the Federal Government cares more about our endangered species than what the Shire of York does.</p>	<p>Noted.</p>