

# **Albany Highway Bedfordale Hill section duplication**

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**Main Roads Western Australia**

**Report and recommendations  
of the Environmental Protection Authority**

**Environmental Protection Authority  
Perth, Western Australia  
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## Summary

This report provides Environmental Protection Authority (EPA) advice to the Minister for the Environment on the proposal by Main Roads Western Australia to reconstruct the Bedforddale Hill section of Albany Highway from two lanes to a four lane carriageway, as set out in the Consultative Environmental Review (Ecologia, 1996).

In the EPA's opinion, the following are the environmental factors relevant to the proposal:

- (a) flora and fauna;
- (b) riparian and phreatophytic vegetation; and
- (c) surface water.

The report sets out the EPA's environmental objectives, and its assessment of the proposal, for each of these factors.

The conditions and procedures, in the EPA's opinion, to which the proposal should be subject if implemented are in summary:

- (a) the proponent's commitments should be made enforceable;
- (b) the proponent should be required to implement an Environmental Management Plan; and
- (c) the proponent should be required to implement an environmental management system.

In addition the EPA has noted concerns expressed in submissions regarding risks and hazards associated with transport of hazardous materials. This matter is also discussed in the report.

The EPA submits the following recommendations:

### **Recommendation 1**

**That the Minister for the Environment note the relevant environmental factors and EPA objectives for each factor as set out in Section 3 of the report.**

### **Recommendation 2**

**That subject to the satisfactory implementation of the EPA's recommended conditions and procedures of Section 4 of the report, including the proponent's environmental management commitments, the proposal can be managed to meet the EPA's objectives.**

### **Recommendation 3**

**That the Minister for the Environment imposes the conditions and procedures set out in Section 4 of this report.**

### **Recommendation 4**

**That the Minister for the Environment advises the Minister for Health of the EPA's concerns relating to health issues associated with using Neerigen Brook as a potable water supply, and that the EPA considers the City of Armadale should routinely monitor the quality of water in the catchment and advise residents accordingly of its acceptability for use.**

### **Recommendation 5**

**That the Ministers for the Environment, Transport, and Mines undertake a risk study to integrate the road transport of dangerous and hazardous goods in the Perth greater metropolitan area, Mandurah and surrounding suburbs with environmentally sensitive areas such as wetlands and regionally significant vegetation.**

**The study should consider:**

- (a) primary risk of road accident and resultant spillages;**
- (b) secondary risk of release of the spill to the environment;**
- (c) tertiary risk of environmental impacts; and**
- (d) quaternary risk related to recovery;**

**with a view to selecting dedicated routes for the transport of dangerous and hazardous goods that result in acceptable levels of risk.**

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# 1. Introduction

This report provides Environmental Protection Authority (EPA) advice to the Minister for the Environment on the proposal by Main Roads Western Australia (MRWA) to reconstruct the Bedforddale Hill section of Albany Highway from two lanes to a four lane carriageway as set out in the proponent's Consultative Environmental Review (CER) (Ecologia, 1996).

Further details regarding the proposal are given in Section 2 of this report.

Section 3 discusses the environmental factors relevant to the proposal.

Conditions and procedures to which the proposal should be subject if the Minister determines that it may be implemented are set out in Section 4 and Section 6 presents the EPA's recommendations to the Minister.

Appendix 1 provides figures relating to the proposal. A list of people and organisations that made submissions is included in Appendix 2, and published information is listed in Appendix 3.

## 2. The proposal

Main Roads Western Australia proposes to reconstruct the existing two lanes into a four lane carriageway at the Bedforddale Hill section of Albany Highway between the end of the existing dual carriageway and the road train assembly area in the City of Armadale (the proposal). Figure 1 (Appendix 1) shows the location of the proposal.

The earthworks for the proposed carriageway encroach onto Bungendore Park which is part of System 6 Recommendation M80 - Darling Scarp (EPA 1983). The proposal also involves the deviation of Neerigen Brook in two locations.

In summary the components of the proposal, as indicated in the CER, are:

- (a) Length of proposal
  - 7.6 km between the end of the existing dual carriageway and the road train assembly area in the City of Armadale.
- (b) Carriageways
  - Reconstruction of the existing two lanes into a four lane divided highway.
- (c) Associated works
  - Dual use path (bicycle/pedestrian) along the western side of the highway south of Bedforddale Hill Road, extending to Springfield Road and on local roads to Topaz Court, associated underpass between Topaz Court and Triton Crescent.
  - Footpath on eastern side of highway north of Bedforddale Hill Road to Triton Crescent.
  - At-grade intersections at Waterwheel Road, Admiral Road, Springfield Road and Dmitrieff Road, and amended intersection at Bedforddale Hill Road to provide for left turn only to Albany Highway and right turn only from Albany Highway.
  - Provision of highway lighting at intersections.
  - Median breaks at 9 mid-block locations to provide for U-turns in addition to median breaks at intersections.
  - Deviation of Neerigen Brook and conduits for private water pipes for authorised residents.
  - Road drainage system.

- Changes to public utilities as required for the proposal.
  - Landscaping compatible with the existing character of Albany Highway including entry statement to Armadale at the bottom of Bedfordale Hill.
- (d) Drainage
- Fully contained road drainage piped to discharge into Neerigen Brook drain reserve. Overland drainage taken across the road through culverts.
  - No changes have been made to the proposal as a result of the assessment process therefore the proposal the subject of this report is also that described in detail in the CER (Ecologia, 1996).

### 3. Environmental factors

#### 3.1 Relevant environmental factors

In the EPA's opinion, the following are the environmental factors relevant to the proposal:

- (a) flora and fauna;
- (b) riparian and phreatophytic vegetation; and
- (c) surface water.

These relevant factors are discussed in the following Sections 3.2 - 3.4.

#### 3.2 Flora and fauna

##### Aspects of flora and fauna

Construction of the highway has potential to impact on flora and fauna. Conservation of flora and fauna is an important environmental factor in preserving biological diversity.

The earthworks of the proposed carriageway encroach onto Bungendore Park which is part of System 6 Recommendation M80 - Darling Scarp (EPA, 1983) (Figure 2, Appendix 1). Recommendation M80 relates to several areas in the Darling Scarp and recognises that one of the most important parts of M80 floristically, is the southern and western slopes of Bungendore Park (EPA, 1983, p.260). Bungendore Park also supports a rare species of dryandra, *Dryandra praemorsa*.

Several submissions raised concern regarding impacts of the proposal on flora and fauna, particularly the potential loss of the WA Christmas tree (*Nuytsia floribunda*), and of habitat of the Southern Brown Bandicoot (*Isodon obesulus*) which is listed on Schedule 1 of the Wildlife and Conservation Act 1950 and is therefore of State Conservation significance.

The proponent has indicated that if the proposal was to proceed it would lead to the clearing of only approximately 0.13% (0.68ha) of the park area (Ecologia, pers. comm., 8 Nov 1996) and will generally result in no net loss of vegetation after rehabilitation of batters. The vegetation type to be cleared is Marri *Eucalyptus calophylla* woodland (Ecologia 1996a) which is well represented throughout the park. The vegetation to be impacted is considered to be in poor condition due to a firebreak and the introduction of weeds (Ecologia, pers. comm., 8 Nov 1996).

The proponent has undertaken a DRF survey in accordance with its commitment. The results and mitigation measures are to be included in an EMP to the satisfaction of CALM in order to ensure that rare flora is protected in accordance with Wildlife and Conservation Act 1950. The proponent will also discuss with CALM and Bungendore Park Management Committee the feasibility of transplanting any WA Christmas Trees affected by the proposal.



The proponent considers that in view of the comparatively small area of the park affected, the proposal will not have a significant effect on fauna and that the vegetation impacted is unlikely to provide suitable habitat for the Southern Brown Bandicoot. The proponent will comply with the requirements of the *Wildlife Conservation Act 1950* with respect to protection of fauna.

Bungendore Park is vested in the City of Armadale. The Bungendore Park Management Committee (BPMC) is a community-based volunteer group reporting to the City of Armadale and assisting in managing the park.

Both the City of Armadale and BPMC have requested that the road batters, for the section of carriageway encroaching on the park be no flatter than 1.5:1 to limit intrusion into the park. The BPMC has also provided advice regarding protected fauna in the park, suitable species for rehabilitation, and measures for weed control.

### **Assessment**

The area considered for assessment of this environmental factor is Bungendore Park (Appendix 1: Figure 2). This is an identifiable unit which is part of the existing conservation estate and supports significant flora and fauna.

The EPA's objectives with regard to this environmental factor are:

- (a) "the proposal should be consistent with Environmental Protection Authority recommendations for System 6 Area M80";
- (b) "rare flora and fauna (if any) should be protected in accordance with the requirements of the Wildlife Conservation Act"; and
- (c) "regionally significant vegetation should be identified and protected".

The EPA notes that a dieback management plan will be undertaken by the proponent to the requirements of CALM and that the proponent has endeavoured to minimise the area of impact on Bungendore Park by considering three alternative alignments for the carriageway past the park. The proposed alignment was considered by the proponent to be the best balance between social and environmental impacts of the proposal.

In order to further reduce the impact on the park, the proponent has agreed to increase the batter gradients adjacent to the park from 3:1 to 1.5:1 consistent with the requests of the City of Armadale and BPMC. This decreases the encroachment from 70 metres to 24 metres (Appendix 1: Figure 3). The proponent has also made a commitment to reduce the extent of clearing by demarcation of the limit-of-works on construction drawings and ensuring that it is adhered to (Ecologia 1996a, p37), and has committed to rehabilitate the area of impact by revegetating the road batters with native species.

The EPA notes that the proponent has not made commitments specifically relating to Southern Brown Bandicoot habitat. It is considered, therefore, that a fauna survey should be undertaken to the satisfaction of CALM to determine if the area of impact includes Southern Brown Bandicoot habitat. The results and mitigation methods should be included in the EMP to the requirements of CALM.

Having particular regard to:

- (a) the comparatively small area of the park which will be affected by the proposal;
- (b) the proponent's commitments to carry out a DRF survey, to rehabilitate the affected areas, and consider the feasibility of transplanting any WA Christmas Trees affected by the work;
- (c) the proponent's commitment to carry out a dieback management plan to the requirements of CALM; and
- (d) the proponent's commitment to survey the area for Southern Brown Bandicoot to the satisfaction of CALM;

it is the EPA's opinion that the proposal can be managed to ensure that flora, fauna and habitat in the existing conservation estate is adequately protected, provided that flora and fauna surveys are undertaken, and mitigation measures included in the EMP, are to the satisfaction of CALM.

### **3.3 Riparian and phreatophytic vegetation**

#### **Aspects of riparian vegetation and phreatophytes**

Construction of the highway has potential to impact on riparian and phreatophytic vegetation along Neerigen Brook. Riparian vegetation and phreatophytes are an important environmental factor because of their integral role as part of the local riverine ecosystem and their local visual amenity value.

The potential impacts of the proposal on this environmental factor are that some riparian vegetation and phreatophytes will be removed during construction, and water flows may be altered as a result of the deviation of Neerigen Brook and alterations to drainage.

The proponent has demonstrated that only a limited area of riparian and phreatophytic vegetation will be affected, and that the affected vegetation type is broadly represented in other riverine ecosystems in the Darling Scarp Region (Ecologia, 1996).

Neerigen Brook will be deviated at two locations to permit construction of the road (Appendix 1: Figure 4). These are:

- (a) South of Bedforddale Hill Road: a new channel will be constructed 10 meters west of the existing channel, 250 meters in length to where the Brook crosses beneath Albany Highway; and
- (b) North of Admiral Road: Approximately 80 meters of the existing channel will be relocated 5 meters east of its existing alignment.

The Water and Rivers Commission (WRC) has general responsibilities for ensuring the conservation of rivers and waterways in the State and the allocation of water resources to the environment. The WRC has requested consultation in relation to rehabilitation of Neerigen Brook.

The proponent has committed to confirm the hydrological characteristics of Neerigen Brook, in order to design the sections requiring realignment in accordance with existing channel parameters, and will include pool and riffle sequences in stream rehabilitation (including revegetation) where possible. The proponent has agreed to consult with WRC with respect to these commitments and will amend the EMP for the proposal to accord with WRC requirements.

Public submissions requested more investigation of potential effects of significant floods in the brook, and the possible loss of catchment runoff due to the road.

In response to the issue of potential flooding effects, the proponent has indicated that stormwater calculations are in accordance with MRWA standards and criteria, for 1 in 20 year, 1 in 50 year, and 1 in 100 year rainfall events. Drainage management issues are discussed further in section 3.4 below.

The area of road prevented from contributing to the Neerigen Brook catchment above Bedforddale Hill Road (Appendix 1: Figure 1) as a result of the road works represents about 0.13% of the total catchment area (Ecologia, 1996), and it is therefore unlikely that the hydrology of Neerigen Brook will be significantly affected in relation to the diversion of road run off.

#### **Assessment**

The area considered for assessment of this environmental factor is the fringing vegetation of Neerigen brook between the road train assembly area on Albany Highway, and the confluence of Neerigen Brook and Canning River, as this is the area within which the vegetation may be impacted by construction of the highway (Appendix 1: Figure 1).

The EPA objective with regard to this environmental factor is: “to ensure that riparian and phreatophytic vegetation of Neerigen Brook is not significantly impacted by construction of the road or by alteration of flows in the brook”.

The EPA has noted the Water and Rivers Commission’s submission and its request to be consulted in design of the deviated sections of the brook, and preparation of rehabilitation plans. The proponent has agreed to consult with the Commission on these matters, and this is supported by the EPA.

Having particular regard to:

- (a) the limited area of vegetation which will be affected and its representation elsewhere;
- (b) the proponent’s commitments relating to the design and rehabilitation of the sections of brook which will be deviated, and to consult with the WRC; and
- (c) the fact that the loss of catchment as a result of the proposal is unlikely to result in a significant alteration in the hydrology of Neerigen Brook;

it is the EPA's opinion that the impact on riparian vegetation and phreatophytes due to the road construction and brook diversion is unlikely to compromise the EPA's objective.

### **3.4 Surface water**

#### **Aspects of surface water**

The surface water is an important element of the environment because it supplies:

- (a) riparian vegetation and phreatophytes, as discussed above;
- (b) drinking water supply and other domestic uses;
- (c) irrigation; and
- (d) passive recreation.

The quality of water in the brook could be affected by the discharge of drainage to it.

The proponent has made commitments to implement a drainage system which separates overland flow from road drainage flow in order to manage minor transport spillage and sediment as a result of erosion and slip failure of batter slopes, from entering the brook . Other erosion/siltation control measures relating to pool and riffle zones, batter design and rehabilitation will also be implemented.

The piped road runoff is discharged into Neerigen Brook where it becomes a designated drainage reserve. The proponent contends that the flow rate and volume of water at this point will ensure acceptable dilution of hydrocarbons from road run-off and will prevent the settling and sedimentation of minor pollutants at the discharge point. The proponent advised that reticulated scheme water is available in this area.

The drainage system has a manual locking gate mechanism in the exit pipe at the last manhole which allows the containment of any major transport spillage within the piping system. In the event of a spillage the piping system has enough storage capacity to contain a major spill in sumps until the locking gate is closed (Ecologia, pers comm, 2 Dec 1996).

Public submissions raised concerns regarding the drainage system, particularly in relation to maintaining the quality of domestic water supply for existing users and maintaining brook water quality generally where road run-off is discharged back into Neerigen Brook at the drainage reserve. Additional settling ponds and skimmers and the determination of existing levels of pollution as a base line for auditing were requested. The proponent considers that the drainage system is more desirable than a system of settling ponds as it has less social and environmental impacts because it requires less land and it is equally as effective.

The City of Armadale advised in its submission that “Neerigen Brook water is presently not of suitable quality to be used as a potable water supply when tested by the Health Department. Residents can use the water for irrigation purposes”.

The existing EPA policy relating to surface water quality is to ensure that the proponent meets the requirements of the draft Western Australian Water Quality Guidelines for Fresh and Marine Waters: Bulletin 711 (EPA 1993). These guidelines state that "when possible, raw water for drinking purposes should be protected by appropriate management of the catchment supply. Where water quality is less than specified in the guidelines, the preferred option is to improve catchment management practices so that water quality improves".

The WRC has specific responsibilities for ensuring the protection the water quality of state rivers and waterways. It has direct access to expert knowledge and resources to ensure that water quality is being appropriately managed by catchment management and other relevant means. The WRC has requested further consultation prior to implementation and the proponent has agreed to this.

### **Assessment**

The area considered for assessment of this environmental factor, surface water, is Neerigen Brook between the road train assembly area on Albany Highway, and its confluence with the Canning River (Appendix 1: Figure 1). In the opinion of the EPA, this is the area within which significant impact on beneficial uses of the brook's water could occur (for the purposes of this assessment beneficial uses will be limited to those uses identified above in this Section).

The EPA has noted that the proponent has committed to adopting a number of measures to manage the impacts of drainage on water quality in Neerigen Brook, and enable containment of spills.

The EPA supports the separation of the road runoff from overland flow. The EPA considers the management measures for the discharge of road runoff to Neerigen Brook, and particularly for the containment of spills, should be subject to review by the DEP and WRC prior to implementation. The zone of discharge to the brook should also be monitored by the proponent for a period of not less than five years in order to establish the impact of the proposal on surface water quality. The DEP and WRC should be consulted in development and implementation of the monitoring.

If monitoring determines that drainage discharge to the brook is having an unacceptable impact on quality, the proponent should be required to implement corrective measures.

Having regard to the proponent's commitments for design and management of the drainage system, and the requirements for the drainage system to be reviewed by the DEP and WRC and for monitoring to be undertaken, it is the EPA's opinion that the proposal can be managed to meet its objectives for water quality in Neerigen Brook.

It should be noted that the EPA shares the concerns of the City of Armadale relating to the health risks associated with using Neerigen Brook as a potable water supply and considers that the City should continue general monitoring in the Brook and routinely advise residents of the acceptability of the water for domestic use.

## **4. Conditions and procedures**

In the EPA's opinion, the proposal should be subject to the following conditions and procedures if implemented;

### **4.1 Proponents commitments**

The proponent's environmental commitments set out in the CER (Ecologia, 1996), should be made enforceable conditions.

## **4.2 Environmental management plan**

- (a) The proponent should be required to implement the EMP as detailed in the CER (Ecologia, 1996) subject to the following provisions:
- the results of Declared Rare Flora and protected fauna surveys undertaken by the proponent and associated mitigation measures, should be included in the CER and implemented to the satisfaction of CALM;
  - the details of Neerigen Brook deviations and rehabilitation, and erosion/siltation control should be included in the EMP and implemented to the satisfaction of the WRC;
  - the management measures for discharge of road runoff into Neerigen Brook and for the containment of spills should be reviewed and be to the satisfaction of the DEP and WRC; and
  - the zone of discharge to the brook should be monitored for a period of not less than five years, to the requirements of DEP and WRC.
- If monitoring detects unacceptable impacts on water quality in Neerigen Brook the proponent should be required to implement corrective measures.
- (b) The proponent should be required to report on the progress and performance of the EMP annually to the EPA.

## **4.3 Environmental management system**

The proponent should be required to prepare and implement an environmental management plan and environmental management procedures in order to implement the proposal and manage the relevant environmental factors to ensure the EPA's objectives (Section 3) are met. The plan should adopt quality assurance principles (such as those adopted in Australian Standards ISO 9000 series) and environmental management principles (such as those adopted in the voluntary Australian Standards ISO 14000 [int.] series), with appropriate monitoring and auditing.

## **4.4 Procedures**

The conditions and proponent's commitments should be audited by the DEP.

# **5. Other recommendations**

## **5.1 Transport risk and hazard**

A number of public submissions raised concerns relating to:

- (a) the need to redirect vehicles carrying hazardous substances away from residential areas due to the risk of contamination from spillage or explosion; and
- (b) the requirement for an emergency contingency plan for the spillage of hazardous substances.

The transport of hazardous goods is regulated by the Explosive and Dangerous Goods Divisions of the Department of Minerals and Energy. The Department of Transport and MRWA have responsibilities for planning and managing transport routes.

The EPA considers that this issue relates to strategic planning for transport of hazardous goods generally, rather than this proposal solely. On this basis the EPA provides the following comments and advice.

It is considered in the short term, that the proposal will reduce risk of accidents relating to the transport of hazardous goods as a result of increased safety standards of the road. However, if traffic volumes increase at the rate predicted in the CER (i.e. doubling by the year 2021), then

the proposal is likely to result in an increase in the number of vehicles transporting hazardous goods along the road. The risk could therefore increase beyond current levels.

The EPA has concerns regarding the use of Albany Highway Bedfordale Hill Section as a route for the transport of hazardous materials in the long term, and considers that further investigations should be undertaken into risk and hazard in order to determine appropriate routes, buffer requirements from residential and commercial properties, and considerations of environmental risk.

The EPA further considers that such investigations should be extended with a view to developing a dedicated road network for the safe transport of hazardous goods in the Perth metropolitan and surrounding areas. This view is consistent with comments made in its evaluation of the Transport of Sodium Cyanide Solution from Kwinana - Change to environmental conditions: Bulletin 772 (EPA 1995) in which it stated that "concerns about traffic safety (such as the likelihood of another " Greenmount incident") and the road train trials and associated potential impacts should be addressed by the Department of Transport and the Main Roads WA".

## **6. Recommendations**

The EPA submits the following recommendations:

### **Recommendation 1**

**That the Minister for the Environment note the relevant environmental factors and EPA objective for each factor as set out in Section 3 of the report.**

### **Recommendation 2**

**That subject to the satisfactory implementation of the EPA's recommended conditions and procedures of Section 4 of the report, including the proponent's environmental management commitments, the proposal can be managed to meet the EPA's objectives.**

### **Recommendation 3**

**That the Minister for the Environment imposes the conditions and procedures set out in Section 4 of this report.**

### **Recommendation 4**

**That the Minister for the Environment advises the Minister for Health of the EPA's concerns relating to health issues associated with using Neerigen Brook as a potable water supply, and that the EPA considers the City of Armadale should routinely monitor the quality of water in the catchment and advise residents accordingly of its acceptability for use.**

### **Recommendation 5**

**That the Ministers for the Environment, Transport, and Mines undertake a risk study to integrate the road transport of dangerous and hazardous goods in the Perth greater metropolitan area, Mandurah and surrounding suburbs with environmentally sensitive areas such as wetlands and regionally significant vegetation. The study should consider:**

- (a) primary risk of road accident and resultant spillages;**
- (b) secondary risk of release of the spill to the environment;**

**(c) tertiary risk of environmental impacts; and**

**(d) quaternary risk related to recovery;**

**with a view to selecting dedicated routes for the transport of dangerous and hazardous goods that result in acceptable levels of risk.**

<b>relevant factor</b>	<b>objective</b>	<b>proponent's commitments</b>	<b>EPA's opinion</b>
1. Flora and fauna	To ensure that flora, fauna and habitat in the existing conservation estate of Bungendore Park is adequately protected.	To undertake DRF survey and obtain necessary approvals.  Demarcate limit-of-works.	The proposal is unlikely to compromise the EPA's objective for this factor subject to the results of flora and fauna surveys and mitigation methods being incorporated in the EMP and implemented to the requirements of CALM.
2. Riparian and phreatophytic vegetation	To ensure that riparian and phreatophytic vegetation of Neerigen Brook is not significantly impacted by diversion construction of the road and diversion of the brook.	Confirm channel characteristics of deviated sections of Neerigen Brook and rehabilitate to maintain existing hydrological characteristics.	The impact on riparian vegetation and phreatophytes due to the diversion of Neerigen Brook at two locations, is not likely to compromise the EPA objective for this factor subject to deviation and rehabilitation methods being included in the EMP and implemented to the requirements of WRC.
3. Surface water quality	To maintain or improve the quality of surface water to ensure existing and potential beneficial uses are protected.	Implement erosion/siltation control measures and a drainage strategy to manage sediment and road run-off as per EMP.	The impact on surface water quality due to stormwater road run-off is unlikely to compromise the EPA's objective for this factor subject to erosion/siltation control measures and drainage methods being included in the EMP and implemented to the requirements of WRC.

**Table 1. Relevant environmental factors, objectives, proponent's commitments and EPA's opinion.**



# **Appendix 1**

## **Figures**



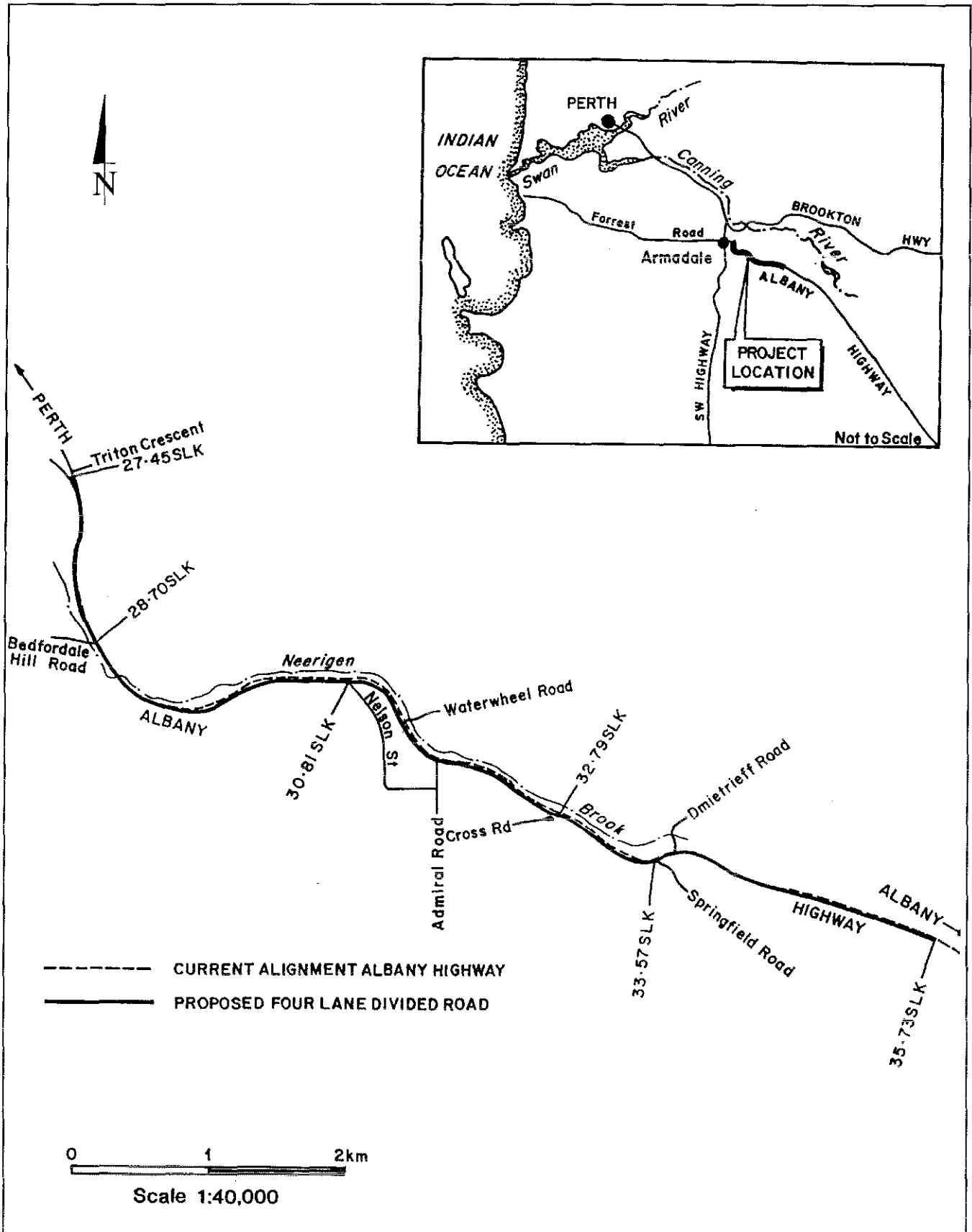


Figure 1. Albany Highway Bedforddale Hill duplication locality plan (Source: Ecologia, 1996).

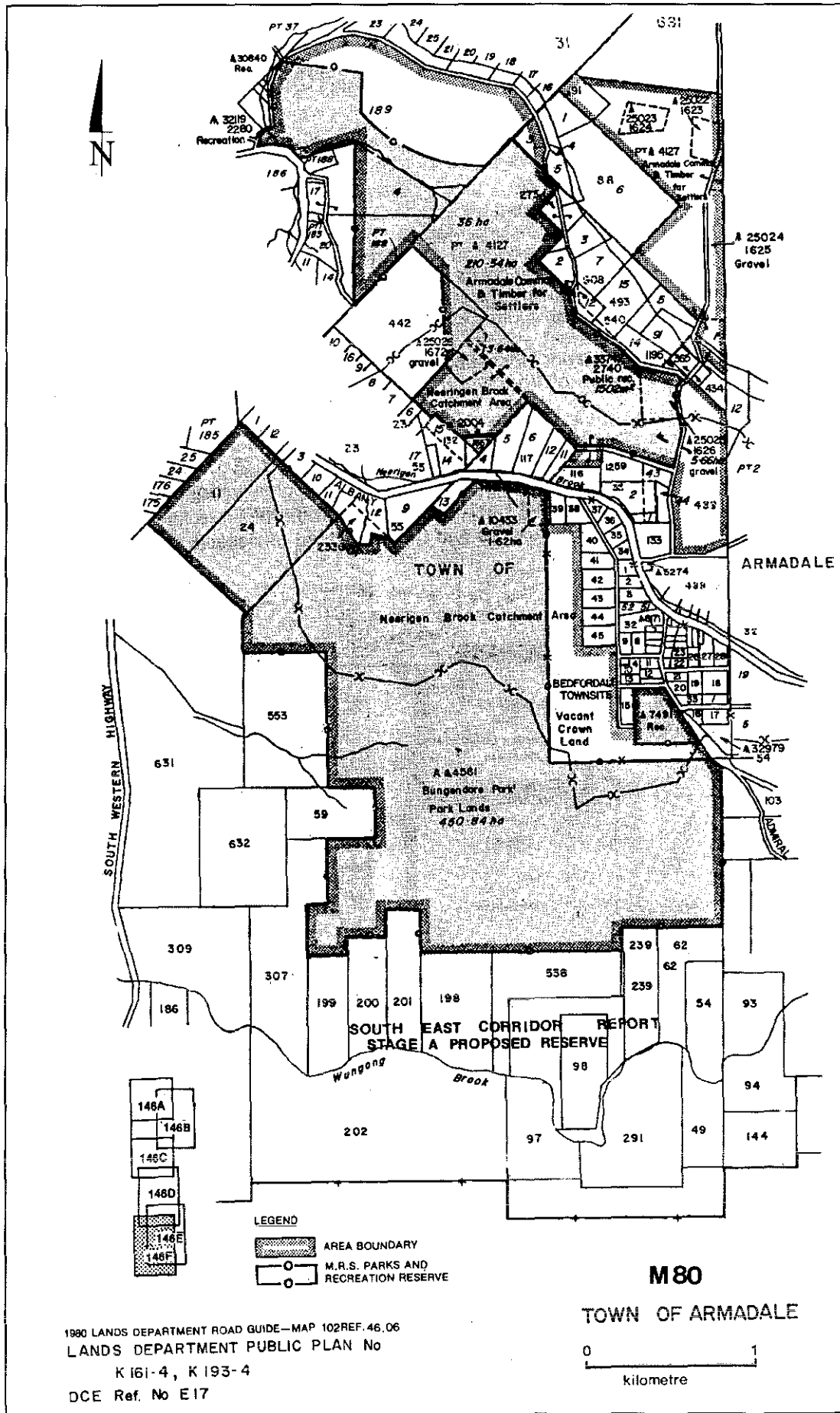


Figure 2. Bungendore Park — System 6 M80 (Source: EPA, 1983).

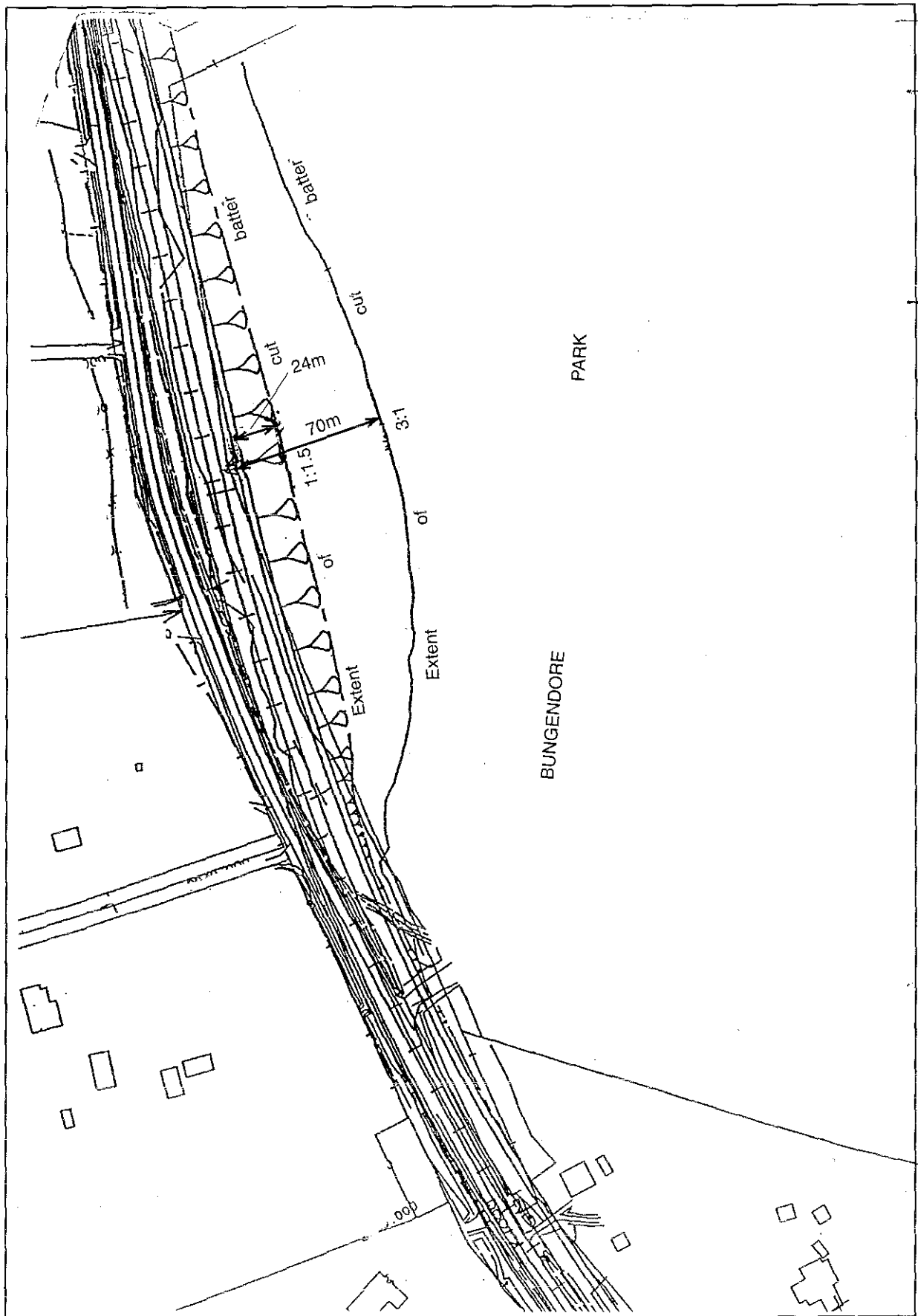


Figure 3. Extent of impact on Bungendore Park (Source: MRWA, 1996).

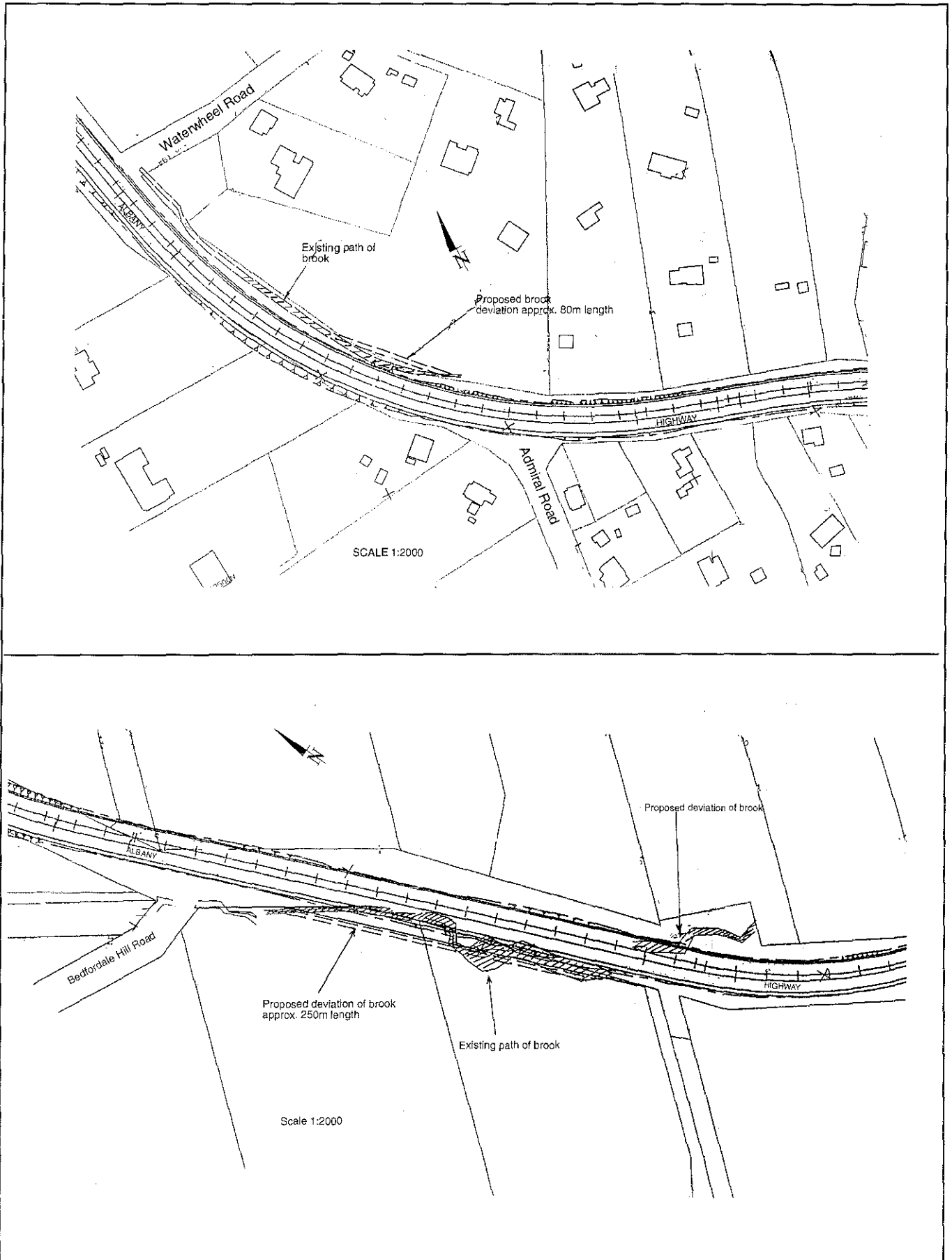


Figure 4. Extent of proposed deviation of Neerigen Brook (Source: MRWA, 1996).

## **Appendix 2**

### **List of People and Organisations that Made Submissions**





**State and local government agencies**

City of Armadale

Water and Rivers Commission

Department of Transport

**Other organisations and Committees**

Bungendore Park Management Committee

Armadale Wildflower Society

Neerigen Brook Advisory Committee

Conservation Council of WA

Bedforddale Residents Association

**Members of the public**

S and J Kelly

Mr C J Goldsmith



# **Appendix 3**

## **References**



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