

## Federal Golf Club Development - Environmental Impacts Grossly Understated

The development applications claim the retirement village proposal at FGC will achieve excellent environmental outcomes for the community yet produce no data to demonstrate this claim.

While it is recognised the Umwelt is a respected operator in the environmental consulting field, the Environmental Report used in the applications is carefully crafted to highlight the 'least worst' aspects of the ecological impacts of the development and provides insufficient consideration of the irreversible damage to the local ecology and the wider impact on the regional ecology. For example, it frames the removal of 4.08 hectares of native vegetation and over 600 trees including hollow bearing trees in such a way as to deliberately downplay the impact: "total impacts to native vegetation and HBTs [that] are less than included in the EPBC Referral and ESO."

The information upon which the Commonwealth Department of the Environment concluded that the Environment Protection and Biodiversity Conservation (EPBC) Act was not triggered was referred by the applicant several years ago and well prior to the detailed design and siting plans that are the subject of this application. The information in that referral was incomplete and insufficient given the information in this application. The applicant should be required to re-submit the development as now proposed to the Commonwealth for an updated assessment prior to the application being approved.

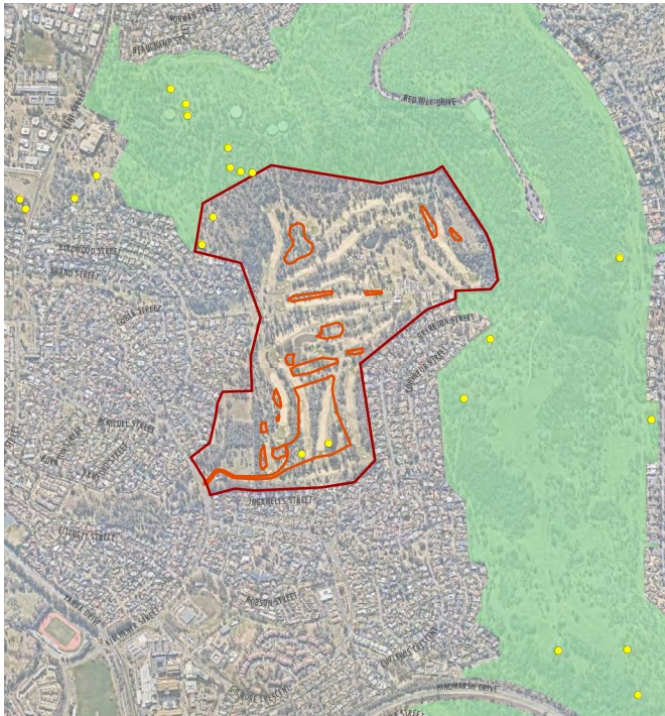
With respect to the endangered Gang-gang Cockatoo (*Callocephalon fimbriatum*), the proximity of planned buildings in this application to known Gang-gang breeding sites is too close and a more precautionary approach with greater distance ought to be taken. Contrary to claims made in the application, the science of tracking Gang-gang nesting behaviours is very new and incomplete. Much of the 'data' and insight relies on unpublished views of a small group of citizen scientists who have been observing breeding habits for just a few years.

The recognised science on this species can be found in the Australian Government's Conservation Advice for *Callocephalon fimbriatum* (Gang-gang Cockatoo) which tells us that Gang-gang Cockatoo numbers fell 69% in the decade to 2019. In the year after the 2019-2020 bushfires, mortality and habitat loss saw another 21% decline and poor recovery rates will lead to an estimated further decline of up to 52% three generations post-fires. It further states that land clearing is one of the major threats to the survival of the species. The proposed development will result in actions that directly contravene the Australian Government's Conservation Advice to cease all land clearing of habitat critical to the survival of Gang-gang Cockatoo and retain hollow-bearing trees in all known Gang-gang Cockatoo nesting areas.

A previous assessment by the developer's environmental consultant (Umwelt Appendix A - Assessments of Significance, 8 April 2022, Page 21) concluded that *"it must be assumed that development in proximity to these trees will probably deter the breeding pair in the short term at least...However, it is unclear whether Gang-gang Cockatoo will still utilise the nest trees near the 6th and 7th fairways once the nearby residential development proceeds. There are many hollows within a few hundred metres of these trees that gang-gang cockatoo have in the past been observed inspecting or entering and it is possible that the pair(s) may move to another nearby hollow (M. Mulvaney, pers comm)."*

It must be remembered that this is an endangered species and the spatial distribution of known nesting sites suggests the proposed location for this application represents one of only eight clusters of breeding sites in the area (known breeding sites indicated by yellow dots on the image below). The lack of certainty around the species' response to the development is evident in the use of words

like “probably” and “possible” in the environmental reports. The Community Consultation Report also acknowledges it cannot be certain that there will be no impact on the Gang-gang breeding habits with respect to these trees. Given the species’ endangered status, this uncertainty demands a more precautionary approach than is evident in this application. At a bare minimum, these nesting sites should be afforded the same exclusion zone of 50 metres as is being provided across the broader conservation corridor. Given that two known nesting trees sit on the boundary of the development footprint this would require minimal re-design.



As well, the wider tree removal plan is unclear. The development involves the destruction of irreplaceable old growth trees across an unacceptably large area. Australia is the only ‘developed’ country on the list of global deforestation hotspots. Another four hectares of vegetation removed is another bite out of our unique environment gone.

That notwithstanding, there is a lack of evidence in the application to demonstrate compliance with the Conservation Advice for *Callocephalon fimbriatum* which states that:

*“When considering habitat loss, alteration, or degradation to habitat in any part of the Gang-gang Cockatoo’s range, including in areas where the species ‘may occur’, surveys for occupancy at the appropriate times of year, and identifying preferred foraging species remain an important tool in refining the understanding of an area’s relative importance for the Gang-gang Cockatoo. In addition, it is also important to note that Gang-gang Cockatoos opportunistically use areas depending on food availability. This means that birds may not utilise areas that constitute habitat critical to the survival in any one year. This pattern of habitat use means that in order to assess the relative importance of a local area or region for Gang-gang Cockatoos, species occurrence data must span a number of seasons and years, so as to capture the seasonal and inter-annual movements of the species.”*

Further, the developer’s Environment Report focusses on ‘Gang-gang suitable hollows’ for breeding and nesting, and does not adequately consider the value of trees for foraging and roosting. This is also relevant to wider parrot and cockatoo species.

In correspondence to the ACT Conservator of Flora and Fauna dated 6 March 2024, former director of the CSIRO's Australian National Wildlife Collection and Past Honorary President of the International Ornithologists' Union, Dr Richard Schodde, stated that:

*Those wooded corridors and margins [on the golf course] are the primary roosting site for arguably the majority of Canberra's populations of cockatoos and lorikeets including Sulphur-crested Cockatoos, Corellas (two species), Galahs, Rainbow Lorikeets and Gang-gangs, the ACT's wildlife emblem and today a gazetted endangered species. Groups of Yellow-tailed Black Cockatoos also use the corridors for roosting from time to time...*

*The area is almost unique because all the conditions cockatoos like for roosting – stretches of close woodland, fringing open space and accessible water – are found together in this location. Those conditions are not common together at all, across our region.*

*If the planned development goes ahead at Federal in the proposed location, it will fragment the roost sites and make them un-usable, denying the cockatoos vital sleeping trees. Tree replanting won't work because it takes the trees 30-40 years of growth to mature sufficiently to serve as roosts – far too long. The likely end result would have a serious affect on Canberra's high profile parrot populations and add yet another cut to the thousands across the continent that are continuing to send too much of the nation's wildlife slowly down paths of extinction.”*