

TAMBORINE MOUNTAIN PROGRESS ASSOCIATION INC.

“Protecting the quality of living on Tamborine Mountain”

Referral Business Entry Point, EIA Policy Section (EPBC Act)

Approvals and Wildlife Division

Department of the Environment, Water, Heritage and the Arts

G PO Box 787 Canberra ACT 2601

Email: epbc.referrals@environment.gov.au

30-10-2015

Dear Sir/Madam,

Re: 2015/7588 “Guanaba Experience” Mountain Bike Trails, Ziplines, Camping and Dining. Guanaba, Queensland.

Tamborine Mountain Progress Association Inc. considers that the development proposed in this referral will have significant direct and indirect impacts on the values and qualities of the natural environment on this site, including an area of Lowland Rainforest of Subtropical Australia, as well as on the adjoining National Park and Guanaba Indigenous Protected Area. For these reasons the Minister should consider rejecting the application. The natural values of this site are such that the State Government attempted to purchase it to add to the National Parks estate but the attempt was rejected by the then owner.

Tamborine Mountain Progress Association Inc.

Tamborine Mountain Progress Association Inc. is a one hundred year old organization. Today, TMPA is a registered Community Purpose organization with a tradition of community involvement. To protect the community’s broad interests TMPA monitors adherence to relevant Planning Schemes. For over three decades, TMPA has provided input into the drafting of local Planning Schemes and has alerted residents to actions with the potential to become significant breaches of those Planning Schemes. Meetings are open and over the years many serious problems have been tackled simply by people coming along and expressing their concerns.

Development Application MCBd14/053

During the Public Notification phase of this Development Application TMPA, 565 local residents and 187 from elsewhere made submissions against it. Of the 777 submitters in support only 21 were from Tamborine Mountain. The grounds for opposing the application included:

- conflicts with the relevant Planning Scheme for the Tamborine Mountain Zone and its Escarpment Protection Precinct;

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- the dangers to wildlife arising from speeding bikes, 4WD motor vehicles, noise, lights and campfires, loss of habitat and the increased potential for bushfires;
- the inevitable erosion on unsealed bike tracks and 4WD trails allowing sediment to run to the creeks;
- the lack of formal documentation about the built structures for the ziplines and suspension bridges;
- the intention to use portable showers and toilets for an indefinite period;
- the anticipated noise levels (e.g. from exhilarated zipline users, increased traffic to the site and 4WD vehicles onsite);
- the increased traffic on narrow, rural Kaiser Road to the entrance and
- the reliance on a yet-to-be-established bore for potable water and firefighting purposes.

Scenic Rim Regional Council, (SRRC), approved the development with conditions, 5-2, with the local area councillors, who were much more aware of the impacts of the proposal, voting against an approval.

To assess its prospects if it filed an appeal in the Planning and Environment Court, TMPA sought the opinions of experts in ecology and bushfire management, (David Francis and John Delaney of Cardno-Chenoweth), as well as in traffic, acoustics, need and town planning. As the reports highlighted deficiencies and problems with both the application and Council's assessment, TMPA, strongly supported by local residents, filed a Notice of Appeal in the Planning and Environment Court – Appeal No. 3796/15 on 28th September 2015.

The description of the proposal contained in the referral does not wholly match the proposal which SRRC approved. An instance is the intended reduction of campground zones to one when three have been approved. Any significant increase in the proposal e.g. the number of campsites (14- 25?) and campers (56 -100) within Campground Zone 2 should require a new application to SRRC.

A modified plan of development taking into consideration all the conditions placed on the development by SRRC and State agencies would need to be approved by SRRC before any works or use of the site could commence.

The Tamborine Mountain Escarpment

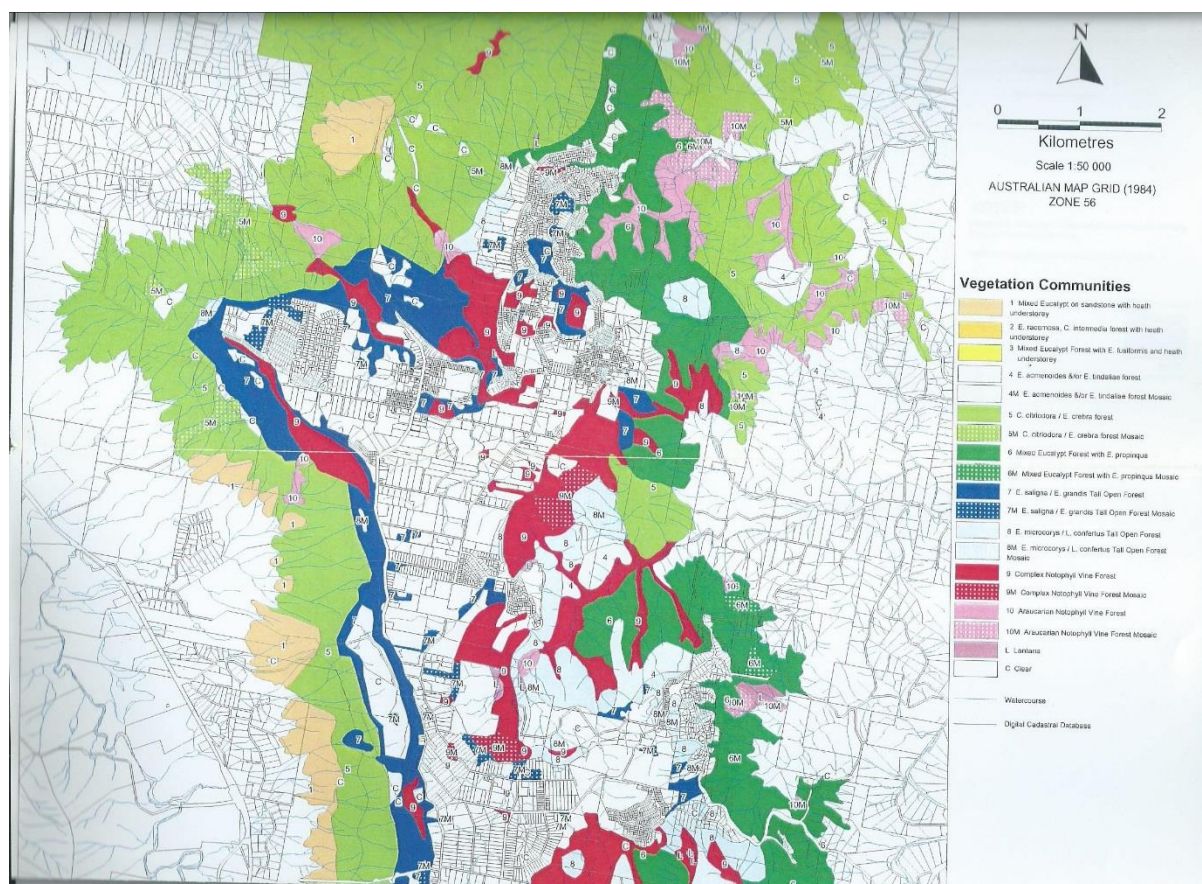
Due in part to its steep and relatively inaccessible geography much of the Tamborine Mountain Escarpment still retains areas of the original ecosystems that once covered the mountain.

A Natural Heritage Trust grant enabled intensive surveys over a short period in 2000 resulting in the Tamborine Mountain Escarpment Flora and Fauna Report¹,

¹ Tamborine Mountain Escarpment Flora and Fauna Report for the Steering Committee of the Tamborine Mountain Escarpment Management Project Chenoweth Environmental Planning and Landscape Architecture in association with Glen Leiper Graham McDonald Tim Low. 2000

followed by the Tamborine Mountain Escarpment Management Strategy prepared by Graham Watson September 2001². Smaller surveys continue to the present day. In a suboptimal time period associated with drought the study added 159 plant species to the existing records with the expectation that the records are not complete and there is a strong likelihood that other significant species are yet to be discovered.

The vision for the Tamborine Mountain Escarpment Management Strategy included that the escarpment would be recognised as a valuable adjunct to the World Heritage forests of Lamington and the Border Ranges National Parks and that sustainability of the natural assets and processes of the escarpment zone would be ensured. **This site is central to that vision.** The integrity of the ecosystems of the Escarpment relies on the buffering, interconnectedness and corridor effects of the retained vegetation. It is not sufficient to preserve only those areas identified as being of National Environmental Significance.



Central section of Map3.1 Vegetation Communities - TM Escarpment Flora and Fauna Report - illustrating how central the site is to environmental protection.

² Tamborine Mountain Escarpment Strategy prepared by Graham Watson for the Tamborine Mountain Escarpment Management Strategy Project Steering Committee September 2001

Excerpt from Executive Summary TM Escarpment Flora and Fauna Report

The Escarpment is a diverse complex of ten ecosystems, with 945 species of plants and 211 terrestrial vertebrate fauna and is the stronghold for several species that are rare and threatened. 48 significant plant species were identified for the Escarpment - those of particular significance include Jointed baloghia *Baloghia marmorata*, Spiny gardenia *Randia moorei*, Tamborine zieria *Zieria collina*, Macadamia *tetraphylla*, Long-leaf tuckeroo *Cupaniopsis newmanii*, *Cordyline congesta*, *Westringia blackeana*, Matchheads *Comesperma esulifolium* and the Southern corynocarpus *Corynocarpus rupestris*.

Although only four of the fourteen Regional Ecosystem Types are considered 'Of Concern' and one as 'Endangered' within the South east Queensland bioregion, application of the Common System of Conservation Classification indicated that the entire interconnected Escarpment habitat of remnant native forest communities is of State significance for nature conservation, and the smaller and more isolated remnant pockets of forest on the plateau top are of high local significance as a network of habitat links.

The Flora and Fauna Study mapped the Escarpment vegetation (Map 3.1 in Appendix 3) and habitat, but these maps should be regarded as the starting point for further and ongoing investigation. Parts of the Escarpment are relatively inaccessible and could not be surveyed within the available time and budget, and have been classified mainly from air photo interpretation. It should also be noted that the boundaries of vegetation communities are dynamic, especially in the Tamborine Mountain environment. A range of factors including fire, land clearing, weed invasion, land rehabilitation and natural succession influences vegetation boundaries.

The Tamborine Mountain Escarpment supports a diverse fauna, which is representative of a wide cross-section of the more extensive assemblage of the *Southeast Queensland* bioregion. The fauna assemblage includes 36 mammal, 28 reptile, 15 amphibian and 132 bird species. Of these twelve species listed as rare, threatened or culturally significant under *Nature Conservation Legislation Amendment Regulation (No.2) 1997*.

The field survey program provided records for 159 species of plant and 6 species of terrestrial vertebrate animal which have not previously been recorded within the study area. These comprise the Eastern Cave Bat *Vespudelus troughtoni*, Eastern Chestnut

Mouse *Pseudomys gracilicaudatus*, Wood Gecko *Diplodactylus vittatus*, Copper-backed Broodfrog *Pseudophryne raveni*, Spotless Crake *Porzana tabuensis* and the rare Lewin's Rail *Rallus pectoralis*.

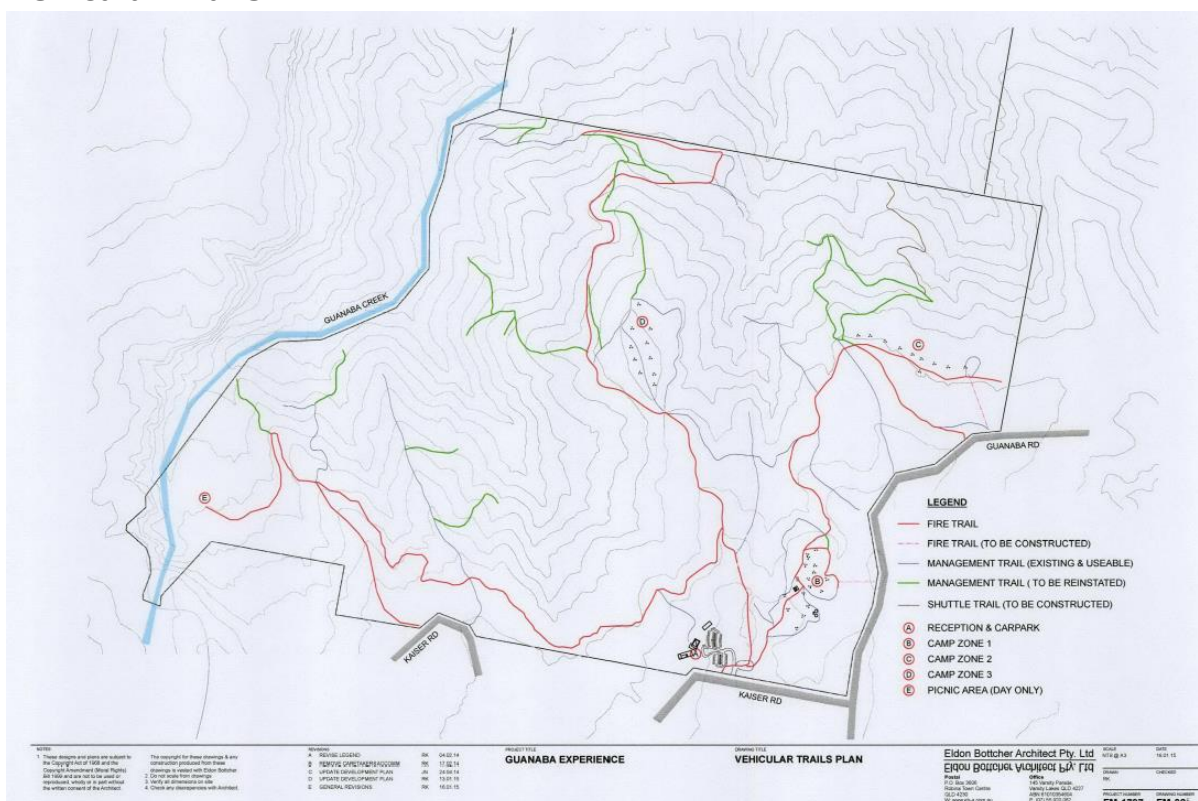
MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE

Lowland Rainforest of Subtropical Australia

The referral concentrates on the effects of the development proposal within the threatened ecological community of Lowland Rainforest of Subtropical Australia but the whole site is important to sustaining that threatened community through its connections to the functioning of the broader ecosystems. The activities on the site outside the Lowland Rainforest of Subtropical Australia onsite are highly likely to have significantly negative impacts on it.

Impacting factors on this site as a whole.

A. Vehicular Trails.



Vehicular Trails – Fire Trails, Management Trails and Shuttle Trails

p57 of Response to Bushfire Management Issues 23/01/2015.

- (i) Clearing: The referral summary, p1, does not include the vehicular trails but under **Vehicle Access**, p7, it seems the total length of vehicular trails will be 30.82km of which 15.2k will generally be grassed over. With a minimum cleared width of 6m this represents at least an additional 18ha of impacted area.
- (ii) Fragmentation³: Each area of Lowland Rainforest of Subtropical Australia as mapped in Figure 6 p13 of the referral is almost surrounded by Vehicular

³ Letter and article from Professor Laurance, JCU.

Trails – Fire Trails, Management Trails and Shuttle Trails, as mapped in Vehicular Trails Plan.

(iii) Responses to Bushfire Risk Management:

As required by the FIRE MANAGEMENT REPORT FM 1797,

3.10 Minimum Vehicular Fire Trail Standards

The Fire/Maintenance trail has:-

- 3.10.1 A minimum cleared width of 6m
- 3.10.2 A minimum formed width of 4m where possible.
- 3.10.3 A maximum gradient of 16% or one that has been satisfactorily test driven with the type of Fire Service Appliance that would be utilised on the site during a fire event with adequate drainage to prevent soil erosion and minimise ongoing trail maintenance
- 3.10.4 Turning /passing areas at a maximum of 500m with a maximum gradient of 5%
- 3.10.5 Where dead ends occur, turning circles or T turning areas are to be provided to comply with the requirements of the Bush Fire Code.

3.13 Fire trail and Fire Break Maintenance

- 3.13.1 The fire trails are to be kept mowed to a maximum of 50mm at all times and to be kept in a manner suitable for 4WD Fire Vehicles and to the satisfaction of the Fire Brigade.

These requirements are likely to cause impacts such as:

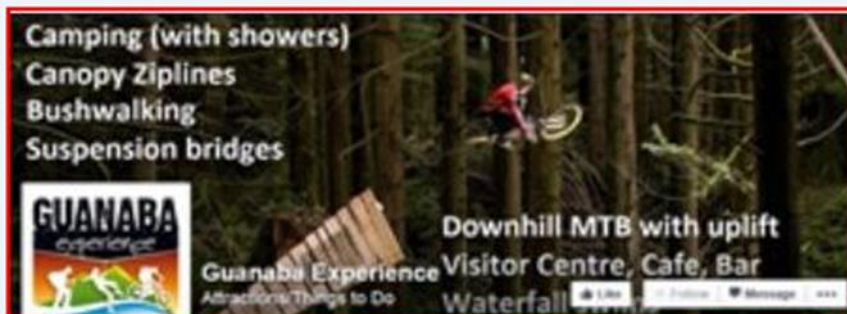
- Side effects: Clearing for trails opens areas to the trail-side effects of reduced canopy cover and increased light, with the potential for changes such as the proliferation of weed species which might then require management techniques such as herbicide use.
- Grazing opportunities: The mown areas would be likely to encourage wildlife into the open for grazing opportunities, putting them at increased risk of predation and danger from bicycles and vehicles.
- Erosion: The mown areas would be susceptible to erosion if there is insufficient cover to cope with heavy rain after prolonged dry periods. The intensity of use would compact the soil, permanently reducing ground cover and increasing runoff.

B. Bicycle Tracks.

The proposal anticipates 29.47km of bike tracks covering 5.38ha. The gradients of the tracks are planned to vary between <5% to 13% descending from the

administration area to low points where riders and their bikes will be picked up by the shuttle service.

- (i) Fragmentation: The proposal has been marketed largely to members of mountain bike clubs interested in the extreme end of the sport.



In the Phase 1 Trails and Shuttles map in the Preliminary Development Proposal Plans,⁴ the Advanced Trails form the major proportion of tracks and run diagonally through the centre of the site with a self-shuttle uplift requiring an extensive 4WD route down and back to the administration centre.



- (ii) Damage to flora species: Erosion and compaction lead to the exposure of tree roots and consequent damage. Over time this could kill trees and open up the canopy. Applying materials such as gravel or additional soil to combat erosion would introduce new risk factors.
- (iii) Danger to wildlife: Riders on fast descending bicycles could have difficulty avoiding animals on the tracks, such as reptiles, lyrebirds, koalas,

⁴ Phase 1 Trails and Shuttles map Attachment 3

wallabies and pademelons. If the tracks are used at night on occasions, as has been proposed, the danger would be increased.

- (iv) Erosion: Tamborine Mountain soil structure is such that constant wear and intermittent heavy rainfall combine to erode surfaces and wash sediment into the creeks. The creeks on this property run into Guanaba Creek and within days the water enters into the RAMSAR declared wetland.
- (v) Bridge: There is no indication of what track treatment would be used to replace bridge 5 which was removed "due to its potential impact on sensitive vegetation found on site".
- (vi) Side effects: as for the wider 4WD trails the bicycle tracks also create openings for edge effects and the proliferation of weed species.

C. Camp ground.

The conditions of approval allow for three camp grounds with a maximum of 38 individual campsites. These were to be spread across the three camp grounds. The developer has indicated in this referral that he only intends to develop Camp Zone 2. The preliminary planning and approval for this camp ground allowed for 56 campers over 14 campsites, 4 of which did not have direct access to parking. The campground is only accessible by 4WD vehicles.

An application for an amendment to the planning approval would be required for additional campsites and camper numbers in this campground. Toilet facilities were not included in the original plan but are a requirement of the approval conditions. Neither was the infrastructure and clearing necessary to comply with the Bushfire Risk Management included in the preliminary planning.

- (i) Bushfire Risk: Despite compliance with all the precautions required a bushfire risk remains. This risk would be heightened by the unpredictable actions of campers.
- (ii) Compliance risks: The campground is away from the administration area and staff supervision.
 - Ensuring campers comply with the no smoking, no alcohol, no domestic pets requirements would be difficult.
 - The campsite can be accessed from Guanaba Road without going through the administration area so that extra visitors could "sneak" in without the formality of cleaning bicycles and vehicles to guard against Chytrid fungus being introduced and affecting frog populations.
 - Initially, there would not be onsite management staff at night to ensure against excessive lights, noise and fires.
- (iii) Noise, light and smoke: Sounds would interfere with animals using echolocation. Camp site lights and camp firelight would disrupt the natural

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life patterns of a wide variety of creatures, including moths and their predators, and dusk, dawn and night feeding animals.

D. Ziplines.

The technical and structural requirements of the ziplines have not been adequately described but given that they can receive building permits it is anticipated the sounds from excited and exhilarated users would extend beyond the property boundaries in some directions.

- (i) The sounds and movement would impact negatively on fauna and avifauna, disturbing their natural life patterns.

E. Walking Track. There is no mention of the method of accessing the walking track, Amended in Red by DNRM 13/2/2015, on the map Mountain Bike Trail Mapping, dated 18/06/2015. Will it only be accessible by bicycle and 4WDs or will walkers share tracks and trails with vehicles? Does the developer hope to have access from the end of the unformed section of Kaiser Road? Are all tracks and trails open to use by hikers?

F. Bridges. There is no definition of the description "Tibetan suspension bridges" and no description of their anchoring requirements. The bridges on the bicycle tracks are to protect the creek crossings but one has been removed from the plans without a description of what is to replace it. The track is still marked.

G. Wildlife. In the referral it is anticipated that wildlife will relocate as a result of disturbance caused by the felling of trees. Wildlife cannot necessarily "relocate" if the available niche areas are already taken by others of their kind.

- (i) Human presence: The presence of many noisy, active people across the site would be enough to cause stress and disrupt the natural life patterns of many of the species on site.
- (ii) Koalas: Koalas are predicted to use much of the site outside the Lowland Rainforest area. See attached map⁵. They are also known to move across neighbouring properties.
- (iii) Alberts lyrebird, whilst not considered nationally endangered, is an iconic bird of the region and is likely to have its natural life patterns disrupted.

SUMMARY

⁵ Koala Habitat in South East Queensland map Attachment 4

Tamborine Mountain Progress Association Inc. considers the development proposal, as best it can be understood, poses a significant threat to the ecologically and environmentally significant Lowland Rainforest of Subtropical Australia and the buffering ecosystems which surround and support it. The natural environment, now largely confined to the escarpment areas of Tamborine Mountain, is small in total area but extremely biodiverse. It is dependent on contiguous connections, corridors and intactness to maintain and sustain it. The effects of fragmentation are difficult to reverse and the natural environment here should be protected to the greatest degree possible for the sake of its wildlife inhabitants and for the enjoyment of generations to come. This is the vision that sustains residents in their efforts to care for it.

Please accept this submission in the knowledge that it represents the voices of many residents.



Jennifer Peat
Hon. Sec. TMPA
Attachments

1. Letter - Professor Laurance, James Cook University
2. Article: "Habitat fragmentation and its lasting impacts on Earth's ecosystems"
3. Phase 1 Trails and Shuttles map in the Preliminary Development Proposal Plans,
4. Map of Koala Habitat in South East Queensland centred on this site.
5. Timeline: Concern for Tamborine Mountain Escarpment.
6. Photos of a Gold Coast City Council bicycle track on Tamborine Mountain.
7. The site relative to Tamborine Mountain plateau and escarpment.

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