



Scenic Rim Trail

Public Consultation Report

October 2017

For the purpose of EPBC 2016/7847

Gainsdale Pty Ltd ACN 008 971 499

Prepared on behalf of Gainsdale Pty Ltd
PO Box 108, Fortitude Valley, Qld, 4006

Qualifications

This report is prepared for the use of the parties named on the title page and only for the purpose outlined on the title page.

This report is current at the date on the cover only.

This report is to be read in its entirety and in association with other documentation submitted by or on behalf of Gainsdale Pty Ltd as part of EPBC 2016/7847.

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Contents

- 1. Introduction 2
 - Proposed Action..... 2
 - Response to request for further information..... 2
- 2. Public notification process 3
 - 2.1 Requirements for public notification..... 3
 - 2.2 Public notification period..... 3
 - 2.3 Publication of notices..... 4
 - 2.4 Availability of documentation..... 4
 - 2.5 Project website..... 5
 - 2.6 Proactive stakeholder notifications 5
 - 2.7 Public information day 5
- 3. Submissions 7
 - 3.1 Summary of public comments 10
 - 3.2 Summary of detailed submissions 16
- 4. Conclusion..... 44
- 5. Appendices 45

- Appendix A: Letter of Direction to Publish
- Appendix B: Public Notices
- Appendix C: Email to stakeholders
- Appendix D: Letter to stakeholders and Project Newsletter
- Appendix E: Public open day advertisement
- Appendix F: Information displays
- Appendix G: Public submissions

1. Introduction

This report presents a summary of the public notification and consultation process undertaken by Gainsdale Pty Ltd for the Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve, Queensland (the Project). The report includes a compilation of submissions and comment received throughout the process, and how they have been responded to.

Public notification and assessment of comments has been undertaken by Gainsdale in accordance with a Direction to Publish (20 September 2017) from the Department of Environment and Energy.

Proposed Action

Gainsdale Pty Ltd will establish a 53 kilometre multi-day walk from the privately-owned Thornton View Nature Refuge to the privately-owned Spicers Peak Nature Reserve, via the Main Range National Park and Gondwana Rainforests of Australia World Heritage Area. The walk is to be known as the Scenic Rim Trail, and will follow a series of existing tracks in the Park connected by Class 3-5 walking tracks to be established by Gainsdale Pty Ltd. Two Ecocamps will be erected in the National Park (one located outside of the World Heritage Area).

The Trail was proposed in response to a 2013 Queensland Government initiative to facilitate ecotourism in the State's National Parks and World Heritage Areas, and is being developed in conjunction with the Department of National Parks, Sport, and Racing (DNPSR).

On 16 December 2016, the Trail was referred to the Department of Environment and Energy (DoEE) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The referral was made following a detailed development proposal and environmental management plan which concluded that the Trail would not have significant impact on any Matters of National Environmental Significance (MNES), including threatened species and the integrity of the World Heritage and Natural Heritage values (Tony Charters and Associates 2016).

On 23 February 2017, DoEE determined that the Trail is a controlled action (section 75 EPBC Act) which will be assessed by preliminary documentation (section 87 EPBC Act).

Response to request for further information

On 30 March 2017, DoEE requested further information from Gainsdale to assess the impacts of the proposed action on specific MNES (section 95A(2) EPBC Act).

On 30 August 2017, Gainsdale submitted a report: *Assessment and Management of Potential Impact on Specific MNES*. The report responded to DoEE's information request and describes the potential direct and facilitated impact of the Trail on specific MNES, namely the endangered Hastings River Mouse (Koontoo; *Pseudomys oralis*), the endangered Fleay's Barred Frog (*Mixophyes fleayi*), and the integrity of this part of the Gondwana Rainforest of Australia World Heritage Area and National Heritage Place. It also identified specific actions that will be undertaken to avoid or mitigate potential impacts, and which will inform the Environmental Management Plan (EMP) for the Trail.

On 20 September 2017, Gainsdale was directed by DoEE to publish the preliminary documentation for public consultation. This report summarises responses received during the consultation period, with responses from Gainsdale on how matters have been addressed.

2. Public notification process

The project is a proposed action being assessed under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

2.1 Requirements for public notification

In response to a further information request from the Department of Environment and Energy (DoEE), public notification requirements were outlined in a Letter of Direction to Publish, dated 20 September 2017 (See Appendix 1). It included the following requirements:

Direction to publish

You are now required to publish the information you have provided on the proposed action.

This allows for public consultation on the potential impacts of your proposed action. The information must be available for comment for 15 business days and during this time any third parties can comment on the proposed action. Detailed directions on what information you need to publish and where to publish are attached to this letter. Public comments will come directly to you so that you have an opportunity to address any issues raised.

Procedure if comments received

If comments are received, you are required to provide us with:

- a copy of all public comments received*
- a summary of each of the comments received and how those comments have been addressed; and*
- a revised version of your documentation with any changes or additions needed to take account of the public comments received.*

Once you have provided us with this information, you will then need to publish (for information only-not for comment) the summary of comments received and your responses, together with the original documentation including any changes or additions made in response to the public comments, within 10 business days.

Procedure if no comments received

If no comments are received, you must provide us with a written statement to that effect.

This section outlines Gainsdale's compliance with the public notification requirements.

2.2 Public notification period

As directed, the notification period and the time frame for receiving comments was 15 days.

Public notice advertisements noted that the period for consultation was **Thursday 28 September to Thursday 19 October** 2017. During that period, a total of 13 responses were received. The responses have been summarised in this report. Copies of email and written submissions received are included in Appendix G.

2.3 Publication of notices

Public notice advertisements were placed as follows:

- Warwick Daily News, Wednesday 27 September. Print edition and online public notice.
- Gatton Star, Wednesday 27 September. Print edition and online public notice.
- The Courier-Mail, Wednesday 27 September. Print edition and online public notice.

A copy of the public notice is included in Appendix B.

2.4 Availability of documentation

Printed versions of the Assessment and Management of Potential Impact on Specific MNES report and associated technical reports were made available at the following locations for the duration of the public notification period:

Brisbane:

- 168 Knapp Street, Fortitude Valley. From 9am to 5pm, weekdays.
- Department of Environment and Heritage Protection, Level 3, 400 George Street, Brisbane. From 9am until 4pm weekdays.

Gatton :

- Gatton Library, inside the Lockyer Valley Cultural Centre, 34 Lake Apex Drive, Gatton. Open weekdays from 9am to 5pm, and Saturday 9am until Noon.

Warwick:

- Southern Downs Regional Council Warwick Administration Centre, 64 Fitzroy Street, Warwick, from 8am until 5pm weekdays.

Canberra:

- Department of the Environment and Energy, 51 Allara Street, Canberra.

A PDF version of the documentation was available online at:

<http://www.scenicrimtrail.com/environment-protection-and-biodiversity-conservation-response/>

There were no requests for assistance with documentation related to English being a second language, vision impairment etc.

2.5 Project website

The project website <http://www.scenicrimtrail.com/6-day-walk/> is updated periodically to coincide with major project milestones. Information on the public consultation was added to the website prior to the commencement of the public notification period.

This information, along with an email link for comments, was removed after the expiry of the public notification period. The reports and all previous documentation in relation to the application remain available on the website at <http://www.scenicrimtrail.com/environment-protection-and-biodiversity-conservation-response/>.

2.6 Proactive stakeholder notifications

A list of key stakeholders was developed prior to the consultation period based on known contacts and identified parties of interest. As part of the public consultation program, key stakeholders were emailed on Wednesday 27 September and provided with information about the public consultation period and key project details. Refer Appendix C.

A letter and printed copy of the Project Newsletter (see Appendix D) were sent to 33 recipients by standard post to provide key stakeholders with an understanding of the application and management of potential impacts on Matters of National Environmental Significance.

One organisation, Brisbane Bushwalkers, requested a presentation to its members. This is scheduled to take place at the group's November 2017 meeting.

For the purposes of the Aboriginal Cultural Heritage Act 2003 (Qld), the Aboriginal Party for the Project area is the Yuggera Ugarapul People. Gainsdale has been liaising with the Yuggera Ugarapul People's representatives, and consultation will continue in the future consistent with the acts Duty of Care Guidelines. Gainsdale is committed to a genuine engagement with the Yuggera Ugarapul people as the cultural interpretations of the walk will add an invaluable experience to the walkers of the trail.

2.7 Public information day

A public information day was held on Saturday 14 October, 9am-3pm, at the Cunningham's Gap car park, Main Range National Park.

The session was advertised in public notices published on Wednesday 4 October as listed below:

- Queensland Times. Print and online notices.
- Warwick Daily News. Print and online notices.

A copy of these advertisements is included in Appendix E.

At the open day, members of the project team and QPWS staff were present and provided members of the public with an overview of the project, the potential impacts and the proposed mitigations.

Approximately 12 people attended. People were particularly interested in learning more of the walk and what opportunities there were for public walkers to use the new trails.

A photograph of the information stall is provided in Appendix F.

In addition to the public information day, a static display was housed in the foyer of the primary Queensland Government building, at 1 William Street, Brisbane. A photograph of the display is also provided in Appendix F.

3. Submissions

A total of 13 submissions were received during the public notification period. Copies of all submissions received have been provided in Appendix G, with a summary of the comments received and responded to in Table 2.

Table 1 identifies who made a submission and what company/organisation was represented and Table 2 categorises the submissions to collective matters.

Table 1 – Public Submissions Received

SUBMISSION NUMBER	REPRESENTATIVE	COMPANY / ORGANISATION REPRESENTED
1	Rhonda Wood	Private submission
2	Pauline Garner	Private submission
3	Sheena Gillman, Project	Protect the Bush Alliance
4	Charlie Yarrow	Laidley Bushwalkers Club & Sunshine Coast Bushwalkers
5	Gary Chalmers	As above
6	Davida Allen	Private submission
7	Brenton Prescott, President	Gold Coast Bushwalkers Club Inc
8	Gavin Dale, President John Marshall, Vice President	Bushwalking Queensland Inc
9	Professor Nick Reid, Chair, Technical and Scientific Committee Dr Mahri Koch, Chair,	Gondwana Rainforests of Australia World Heritage Area
10	Laura Hahn, Conservation Officer	National Parks Association of Queensland
11	David Manager	Private submission
12	Roland Howlett	Private submission
13	Tanya Smith	Friends of Brisbane Valley Rail Trail

Table 2 – Summary matrix of public comments received

SUBMISSION NUMBER	REPRESENTATIVE	COMPANY / ORGANISATION REPRESENTED	Submission Matter										
			A. Diseases and biosecurity controls	B. Road access / vehicle movements	C. Impacts on fauna	D. Impacts on flora	E. Documentation	F. Use of National Park	G. Safety	H. EcoCamps and remote camp facilities	I. Operational	J. Process	
1	Rhonda Wood	Private submission											
2	Pauline Garner	Private submission		X					X				X
3	Sheena Gillman, Project Coordinator	Protect the Bush Alliance	X		X	X			X				
4	Charlie Yarrow	Laidley Bushwalkers Club & Sunshine Coast Bushwalkers		X				X	X				
5	Gary Chalmers	As above										X	
6	David Allen	Private submission			X	X			X	X			
7	Brenton Prescott, President	Gold Coast Bushwalkers Club Inc							X		X		
8	Gavin Dale, President John Marshall, Vice President	Bushwalking Queensland Inc							X		X	X	

SUBMISSION NUMBER	REPRESENTATIVE	COMPANY / ORGANISATION REPRESENTED	Submission Matter									
			A. Diseases and biosecurity controls	B. Road access / vehicle movements	C. Impacts on fauna	D. Impacts on flora	E. Documentation	F. Use of National Park	G. Safety	H. EcoCamps and remote camp facilities	I. Operational	J. Process
9	Professor Nick Reid, Chair, Technical and Scientific Committee Dr Mahri Koch, Chair, Community Advisory Committee	Gondwana Rainforests of Australia World Heritage Area	X	X	X	X		X		X	X	
10	Laura Hahn, Conservation Officer	National Parks Association of Queensland		X	X							
11	David Manager	Private submission									X	
12	Roland Howlett	Private submission					X					
13	Tanya Smith	Friends of Brisbane Valley Rail Trail									X	

3.1 Summary of public comments

Commentary received from the 13 responses has been compiled in Table 3. Submissions with similar comments have been grouped together for legibility. Each of the comments have been responded to.

Table 3 – Summary of public comments received

CONCERN RAISED		SUBMISSION NUMBER	RESPONSE
1. MNES related			
A. Diseases and biosecurity controls			
A1	Concern about suitability of hygiene practices to prevent introduction of pathogens via contaminated footwear	3, 9	Published scientific evidence provided in the documentation to DoEE suggests that boot sterilisation is probably ineffective and unnecessary for preventing the spread of chytrid fungus. However, Gainsdale is prepared to have walkers sterilise their boots at Mt Mistake, before entering the Park, and at Canopy EcoCamp, on leaving the Park, if required. Biosecurity measures for the management of this disease in publicly accessible National Parks are beyond the scope of Gainsdale.
B. Road access / vehicle movements			
B1	Concern about opening up logging road in relation to overall impact of National Park	2, 4, 9, 10	The re-opened Winder forestry track will not be accessible for public 4WD activities; however, it will be accessible for QPWS conservation management activities, e.g. feral pig control, negating the current necessity for making a large round trip to access both ends of the track.
B2	Vehicles are potential carriers of invasive plant species' seed, posing a threat to World Heritage values.	10	Gainsdale will have a dedicated vehicle for use in the Park, and this vehicle will be cleaned of dirt and seeds prior to entering the Park. The supporting documentation provided to DoEE notes that: <ul style="list-style-type: none"> • Weeds are present where there is no canopy, and that Gainsdale will not be affecting the canopy along the track • Gainsdale will make all efforts to reduce exposed disturbed soil with mulch during the Winder track construction

			<ul style="list-style-type: none"> • Gainsdale will conduct surveys to determine whether weeds have colonised following Winder track construction and SRT operation, allowing for targeted control • Gainsdale is developing a weed control strategy for its properties at both ends of the Scenic Rim Trail
C. Impacts on fauna			
C1	Impact on Hastings River Mouse	3, 6, 10	<p>The assessment provided to DoEE has identified potential areas of interaction between the Scenic Rim Trail and the threatened species. It has provided evidence that the presence and/or use of the trail presents a low risk to these populations.</p> <p>Management controls to address the risks, and trigger values with respect to the potential areas of vulnerability, are provided.</p>
C2	Impact on Fleay's Barred Frog	3, 6, 10	<p>The intact rainforest, riparian vegetation, and streams of Main Range National Park provide good quality habitat for Fleay's Barred Frog. Riparian vegetation and stream water quality are the key points of potential impact to the viability of this species in the Park, hence the management controls proposed include a relatively stable fixed crossing point that ensures no instream disturbance and no option for walkers to spread out into riparian vegetation, and careful track alignment to ensure that the natural rate of sediment movement into the streams during rainfall (excluding mass movement) is not increased by the presence of the tracks.</p> <p>The presence of tracks does not inhibit frog movement and may provide preferred foraging locations. Indeed, the existing Cascade circuit crosses the Dalrymple Creek (i.e. including breeding habitat) some 10 times. It is further noted that significantly more frogs were recorded along this track and stream than at Blackfellow Creek.</p>

			It is further noted that the proposed Class 5 track traversing and crossing Blackfellow Creek (“the short cut”) will average a 60cm width and will follow existing human or animal footpads where possible. Some groundcover vegetation or vines may be swept aside to create the track as necessary, and will have no impact on the habitat values of the rainforest for Fleay’s Barred Frog.
C3	Noted that Eastern Bristle Bird was not included as a species of concern	3, 9, 10	The population of bristlebirds previously known from Spicer’s Gap is believed to be locally extinct (Garnett <i>et al.</i> 2001). While habitat in Main Range National Park is suitable for bristlebird, surveys conducted by BAAM failed to find any birds. It is believed that up to 10 birds may still be present in Queensland, but mostly on private land (National Recovery Plan for Eastern Bristlebird (OEH 2012)).
D. Impacts on flora			
D1	Impact on World Heritage areas and rainforest species	6, 9	There will be no clearance of or impact on rainforest canopy trees along the Winder track or any of the Class 5 tracks. The proposed Ecocamp sites are in eucalypt-dominated forest and are not rainforest.
D2	Impact on hydrology	9	There will be no clearance of or impact on rainforest canopy trees along the Winder track or any of the Class 5 tracks. There will be limited tree clearance for establishment of the EcoCamps. These locations are not in rainforest, and are on relatively flat surfaces with good native grass cover. Sensitive drainage will be a key element of these sites.
D3	National Park fire management	3, 9	The National and World Heritage values of the Main Range National Park are subject to a range of threats that require action at a local, national, and global scale. The QPWS is responsible for managing local threats while ensuring and enabling public access to the Park. The assessment conducted by Gainsdale provides evidence that the effects of the

			Scenic Rim Trail are unlikely to increase the rate or scale of the identified threatening processes, and can contribute in some cases to reducing those threatening processes, e.g. enabling pest control and increased monitoring. Gainsdale notes that two EcoCamps are outside of the Main Range National Park, on private property.
CONCERN RAISED		SUBMISSION NUMBER	RESPONSE
2. Non-MNES related			
E. Documentation			
E1	Objection to use of the word 'trail' rather than 'track'	4	Noted
E2	Request for hard copy of document to be provided	12	Response provided. Noted and advised locations of printed copies of documentation for public review.
F. Use of National Park			
F1	Objection to private commercial enterprise within National Park	2, 3, 4, 6, 7, 8, 9,	Providing increased opportunities for sustainable ecotourism in National Parks is Queensland Government policy, and is provided for in the Nature Conservation Act. The Scenic Rim Trail including the new trail head and walking trails will be open and accessible to the public for free and independent walking, and new potential locations for bush campsites have been provided to QPWS.
F2	Objection to vehicle access	2, 9	The re-opened Winder forestry track will not be accessible for public 4WD activities; however, it will be accessible for QPWS conservation management activities, e.g. feral pig control, negating the current necessity for making a large round trip to access both ends of the track. QPWS staff are unable to efficiently access the northern end of the Main Range National Park where evidence of feral pig activity has been surveyed. Gainsdale will have a dedicated lightweight all-terrain vehicle for use in the

			Park, and this vehicle will be cleaned of dirt and seeds prior to entering the Park. There will be no vehicle use of the track during night time hours, except in case of emergency.
G. Safety			
G1	Safety of access crossing of Cunningham Highway at Mt Mitchell	6	Noted.
G2	GPS navigational opportunities	6	Noted.
H. EcoCamps and remote camp facilities			
H1	Relative close proximity of the two EcoCamps	9	The walkers guided by Gainsdale will be following trails between the camps that take a circuitous route. They will not be walking as the crow flies.
H2	Support for permanent structures rather than tents as a means of reducing trampling	8	Noted.
H3	Support for provision of remote bush camps	3, 7	Noted.
I. Operational			
I1	Query regarding ownership, liability and maintenance of facilities	9, 11	Providing increased opportunities for sustainable ecotourism in National Parks is Queensland Government policy, and is provided for in the Nature Conservation Act. The Scenic Rim Trail including the new trail head and walking trails will be open and accessible to the public for free and independent walking, and new potential locations for bush campsites have been provided to QPWS. QPWS is responsible for managing local threats while ensuring and enabling public access to the Park.
I2	Request for trail extension	8, 13	Noted.
I3	Endorsement of QPWS as Park Manager	8	Noted.
I4	Oppose limitations on north to south walk or sectional access	5, 8	The Scenic Rim Trail including the new trail head and walking trails will be open and accessible to the public for free and

			independent walking. There are no directional or sectional limitations proposed for independent walkers.
I5	Support for weed and feral animal management	3, 8	Gainsdale notes that feral animals and weeds provide the greatest immediate risk to MNES in the Main Range National Park, and that pest control by QPWS is required to address these risks.
I6	Cost (of private walk)	5	Noted.
J. Process			
J1	Perception of "done deal"	2	Gainsdale is responding in accordance with directions set out by DoEE (20 September 2017) Publication of information for assessment on preliminary documentation under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).
J2	Queried why consultation was being undertaken by proponent and not DoEE	2	
J3	Queried status of indigenous consultation	2	

3.2 Summary of detailed submissions

Detailed submissions were received from the Gondwana Rainforests of Australia World Heritage Committee, National Parks Association of Queensland and Protect the Bush Alliance.

Specific comments identified from these submissions have been outlined in Table 4, with a response as to how they have been addressed.

Table 4 – Detailed submissions

Gondwana Rainforests of Australia World Heritage Area Advisory Committee		
DoEE requirements	Submission Text	Gainsdale Comments
	The material presented does not appear to address whether the various developments (particularly of trails, roads and campsites) are likely to increase soil erosion, creek sedimentation and the consequences associated with these. It is clear that gullying, mass movement and sedimentation can potentially take place in these environments if disturbance crosses particular environmental thresholds. Given the scale of the proposed developments and their possible impact on the forest canopy, the question of soil erosion and sedimentation needs to be addressed as, once the hydrological system has been changed by erosion, it is effectively impossible to return the landscape to its original condition. The environmental consequences of such a shift may be dramatic. The following document may assist the proponent to address this issue: Thompson, B. (2007) <i>The distribution of erosion in the upper catchments of the Logan and Albert Rivers</i> . Report prepared by Land Resource Assessment and Management Pty Ltd. for Logan and Albert Catchment Assoc. Inc. and SEQ Catchments.	There will be <u>no</u> clearance of or impact on rainforest canopy trees along the Winder track or any of the Class 5 tracks. There will be limited tree clearance for establishment of the EcoCamps. These locations are not in rainforest, and are on largely flat surfaces. Sensitive drainage will be a key element of these sites.
	On the basis of the information provided in relation to matters of national environmental significance (threatened species and World Heritage values), it would be reasonable to conclude that the construction of a walking track (primarily a class 5 track) on the proposed alignment would, in itself, be	The re-opened Winder forestry track will not be accessible for public 4WD activities; however, it will be accessible for QPWS conservation management activities, e.g. feral pig control, negating the current

DoEE requirements	Submission Text	Gainsdale Comments
	<p>unlikely to adversely affect those matters. However, there are some associated components that have a capacity for damage over time and therefore should be addressed in more detail:</p> <ul style="list-style-type: none"> • The walking track is also a road. For much of its length inside the national park/World Heritage Area, the walking track follows what was previously a forestry road. The proposal involves continuing to use it as a road in order to service the facilities (designated as ecocamps) that are to be constructed inside the national park. (5.7 km of Class 5 track, and All Terrain 4WD access to the Ecocamps, via the retired section of the Winder forestry track.) • The tracks are to be maintained to a width of 2.5 metres, which provides sufficient room for 4WD access. • As far as can be determined, there will be vehicle access from the trailhead to the Ecocamps and this covers approximately two thirds of the whole walk. That portion of the World Heritage Area was previously State Forest. The forestry roads were being allowed to regenerate. Now they will once again be exposed to, and maintained for, vehicular access. • This road access adds a potentially damaging dimension. Vehicles are potential carriers of invasive plant species' seed, posing a threat to World Heritage values. 	<p>necessity for making a large round trip to access both ends of the track. Gainsdale will have a dedicated vehicle for use in the Park, and this vehicle will be cleaned of dirt and seeds prior to entering the Park. The supporting documentation provided to DoEE notes that:</p> <ul style="list-style-type: none"> • Weeds are present where there is no canopy, and that Gainsdale will not be affecting the canopy along the track • Gainsdale will make all efforts to reduce exposed disturbed soil with mulch during the Winder track construction • Gainsdale will conduct surveys to determine whether weeds have colonised following Winder track construction and SRT operation, allowing for targeted control • Gainsdale is developing a weed control strategy for its properties at both ends of the Scenic Rim Trail <p>Further, Gainsdale notes that the weeds likely to have a significant impact on the rainforest structure and composition are spread by animals. Weeds spread by vehicle are likely to be ruderal.</p>
<p>Provide a map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire</p>	<p>5.1 Provide a map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire project site. Figure 8, Page 46 Figure 9, Page 47.</p> <p>The survey guidelines in the EPBC Act for Fleay's Frog are designed for the purpose of determining the presence/absence of the species at a site. It is questionable whether these are adequate to address the</p>	<p>Section 5.2 of the submission to DoEE provides evidence that female Fleay's Barred Frog will forage in rainforest several hundred metres away from the nearest stream and will utilise tracks for foraging, while male frogs rarely move beyond 20 metres from the stream.</p>

DoEE requirements	Submission Text	Gainsdale Comments
<p>project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate methodologies.</p>	<p>referral requirements. There is no map of all Fleay's Frog habitat. The map provided is a buffer layer along the streams where transects were undertaken. The frogs move well into the rainforest habitats adjacent to the streams. This would require that the map should include stream and terrestrial habitat.</p> <p>To address the DoEE requirements, it would be necessary to map the breeding habitat (defined as sites where tadpoles occur in pools, and the riffle zones typically used in breeding – see Knowles et al {2013}). This would include mapping of the stream and smaller tributaries upstream and downstream of the proposed trail crossings. It is also necessary to include the terrestrial habitat in the map.</p> <p>To be able to understand the potential extent of the impact on Fleay's Frog it is necessary to also know the boundary to the habitat and where the frog does not occur. For example, it is necessary to have some understanding of whether the habitat is 20, 200 or 2000 Ha. It is also necessary to know its distribution with respect to the location of the trails and ecocamps. It is not possible for DoEE to assess whether the proposed developments will fragment the habitat of the frog without a map of the habitat.</p> <p>It is only with such intensity and attention to detail that it could be possible to apply in the future the necessary robustness to an assessment of impact or non-impact. Without suitable baseline information that is not possible. It is to the advantage of the applicant, and the necessary surety needed for Outstanding Universal Value and World Heritage integrity to be able to demonstrate that the frog population and its habitat is not impacted.</p>	<p>Providing a map of the rainforest in the Main Range National Park and calling it potential Fleay's Barred Frog habitat does not provide any information of use to the assessment of potential impact of the Project. As noted in the assessment, the point of potential population vulnerability with respect to this Project is the breeding habitat, i.e. riparian vegetation and the stream itself. This was discussed with DoEE and agreement was reached to focus on potential areas of impact with respect to the Project. Consequently, the new and existing tracks are mapped with respect to a riparian buffer zone in both catchments that corresponded to the full extent of breeding habitat for Fleay's Barred Frog in areas proximate to the Project trail and EcoCamps. A map of all Fleay's Barred Frog habitat more broadly in Main Range National Park was not requested by DoEE.</p> <p>As noted in the assessment, use of the two stream crossing points will not affect instream or riparian conditions for breeding frogs or tadpoles.</p> <p>As noted in the document, the movement and behaviour of Fleay's Barred Frog is not inhibited by the establishment or presence of tracks, nor will barriers be placed instream, consequently fragmentation of the habitat will not occur. Further, the proposed Ecocamps are not in rainforest.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>Survey methods to detect an animal and map its habitat require an unbiased survey technique. It is only using such methods that one can state with statistical support what is and what is not habitat. The presented report surveyed to determine where the frogs occurred, but not where they did not occur.</p> <p>There is no calculation of the area of Fleay’s Frog habitat “within and adjacent to the entire project site”. There is a difficulty here that is not addressed, and that is how the “project site” is defined. Following suitable guidelines provided in the World Heritage assessments it would be conservative to include a buffer of 50 m either side of the actual impact zone, which would be the linear track and around the ecocamps.</p> <p>There is a limited capacity to use the survey report as baseline for any future monitoring to test for impact. To be suitable it would require temporal replication of the survey area. The terrestrial area should be stratified and survey sites chosen randomly. Surveys of the stream and riparian zone (5 m either side of the centre of the stream) should also be based on replicated surveys across a suitable seasonal timeframe.</p>	<p>Relative abundance is a valid and internationally accepted measure of a population for conservation management purposes, particularly for monitoring population change over time (Hill <i>et al.</i> eds. 2005. Handbook of biodiversity methods. Survey, evaluation and monitoring. Cambridge University Press). While measuring absolute abundance/density of a population is the most useful approach to understanding population dynamics, it can be prohibitively expensive and is unnecessary for many management decisions.</p> <p>The guidelines advise that surveys for calling frogs should not be conducted during or immediately after rainfall. However, as noted in the technical report, the wet survey conditions were ideal for surveying foraging frogs. A survey of foraging frogs (which includes both males and females) is as appropriate if not a better survey method for assessing abundance as a survey for calling frogs (which include only males, since only breeding males call).</p> <p>The information provided by the surveys and published studies indicates that the risk of population level impacts as a consequence of the Project are low to non-existent, and the risks can be avoided or mitigated by the proposed management controls.</p>

DoEE requirements	Submission Text	Gainsdale Comments
<p>Provide an estimate of the abundance of Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p>	<p>5.3. Risk Assessment - Potential Impact of the Project on Fleay's Barred Frog The provided survey gives a count of Fleay's Frogs observed in stream transects and along several sections of walking track. This is not an estimate of abundance in the habitat identified in 5.1. To be ecologically meaningful and informative, so as to enable the assessment of impact or non-impact, it is necessary to replicate surveys in the defined area (identified habitat in item 5.1) and across a suitable seasonal time-frame (we would consider the time frame to be across a spring-summer-autumn period).</p> <p>Appropriate methodologies: The methods used to detect Fleay's Frog were appropriate. The lack of response to call playback is most likely an indication that the weather conditions were not appropriate. The guidelines advise that surveys should not be conducted during rainfall or immediately after rainfall, yet the report indicates that rain was falling during the day preceding the survey and at the time of the survey. Observations of the photographs of the 'riffle zone' in the creek line show a strong flowing current. This is not an appropriate time for survey calling by male Fleay's Frog.</p> <p>5.2.1.2 Dalrymple Creek At best, the survey method provides a one-off count of the number of frogs during one survey event of one night (2.5 hrs. on Blackfellows Ck and 2 hrs on Dalrymple Ck), and can only be used as a measure of relative abundance. A suitable method to determine population abundance would require a capture-mark-recapture approach with robust design (see White and Burnham 1999). Such a method could be repeated in future to assess impacts, and be capable of providing a statistically robust outcome.</p>	<p>Relative abundance is a valid and internationally accepted measure/estimate of a population for conservation management purposes (Hill <i>et al.</i> 2005). While understanding absolute abundance of a population is the most useful approach to understanding population dynamics, it can be prohibitively expensive and is unnecessary for many management decisions, including this assessment of potential impact.</p> <p>The information provided by the surveys and published studies indicates that the potential pathways to impact and the risk of population level impacts as a consequence of the Project are low to non-existent, and the risks can be avoided or mitigated by the proposed management controls.</p>
<p>Provide an assessment of the quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted</p>	<p>5.3.1. Re-opening Winder Forestry Track 5.3.1.2 Reduction in area of occupancy 5.3.1.3 Fragmentation of existing population Habitat quality is necessarily a measure of comparison. To provide useful information that may be used to assess the potential for impact from the</p>	<p>An assessment of breeding habitat quality, based on stream habitat condition, water quality, relative abundance of mature frogs and evidence of successful breeding, was provided. The quality of potential breeding habitat for Fleay's Barred Frog</p>

DoEE requirements	Submission Text	Gainsdale Comments
<p>in accordance with appropriate methodologies by a suitably qualified ecologist.</p>	<p>proposal, and as a possible measure at some time in the future of whether an impact has occurred or not, it is desirable to have the habitat quality compared with several other known sites (populations) of Fleay’s Frog. There is no such comparison in the report by which to measure the quality of the habitat.</p> <p>If the assumption is made that if the frog occurs there, then it must by definition be “quality habitat”, then there is no possible way to uncouple the observations made at one time and under those weather conditions from another survey. For example, if a comparative assessment of the quality of the habitat was made, it could provide information on which to base alternatives placement of the walking path, sites of stream crossings, or even the need to cross the stream. Thus for example, a conservation risk assessment may indicate that to traverse down the gully to Blackfellows Creek was not acceptable and that walkers would need to traverse between the Winder track and Mt Castle. The proposed trail that crosses Blackfellows Creek crosses the identified breeding habitat of Fleay’s Frog. It also traverses the forest identified as habitat used for foraging and sheltering by frogs. The potential impact is at the stream crossing and along the corridor of the proposed track through sub-tropical rainforest. From the perspective of dealing with an endangered species in a World Heritage Area the survey would be only the starting point of a base-line measure used to assess whether the proposal impacts the population or not. The proposed track to access the Amphitheatre View Ecocamp requires 2.5 km of track to traverse down a slope to a crossing of Blackfellows Creek. This track appears to be for convenience – reducing the length of walking to gain access to the proposed, and is not necessary. Potential impact on Fleay’s Frog could be avoided by not constructing this track.</p>	<p>was assessed as high quality. This assessment does not require comparison with other areas.</p> <p>The intact rainforest, riparian vegetation, and streams of Main Range National Park provide good quality habitat for Fleay’s Barred Frog. Riparian vegetation and stream water quality are the key points of potential impact to the viability of this species in the Park, hence the management controls proposed include a relatively stable fixed crossing point that ensures no instream disturbance and no option for walkers to spread out into riparian vegetation, and careful track alignment to ensure that the natural rate of sediment movement into the streams during rainfall (excluding mass movement) is not increased by the presence of the tracks.</p> <p>As noted previously, the presence of tracks does not inhibit frog movement and may provide preferred foraging locations. Indeed, the existing Cascade circuit crosses the Dalrymple Creek (i.e. including breeding habitat) some 10 times. It is further noted that significantly more frogs were recorded along this track and stream than at Blackfellow Creek.</p> <p>It is further noted that the proposed Class 5 track traversing and crossing Blackfellow Creek (“the short cut”) will average a 60cm width and will follow existing human or animal footpads where possible. Some groundcover vegetation or vines may be</p>

DoEE requirements	Submission Text	Gainsdale Comments
		swept aside to create the track as necessary, and will have no impact on the habitat values of the rainforest for Fleay's Barred Frog.
<p>Provide an assessment of the extent, nature, and severity of current threats (including the presence of Chytrid fungal disease and feral pigs) to Fleay's Frog in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist. Please demonstrate consideration of the Recovery plan for stream frogs of south-east Queensland 2001-2005 when assessing threats.</p>	<p>The report provides an assessment of the two identified threats, but the assessments are so minimal and without adequate quantification to be able to make any valuable contribution to mitigation proposals.</p> <p>Chytrid fungus: Sampling of five tadpoles from each of two streams to test for the occurrence of the disease is inadequate to obtain a valid estimate of the prevalence of the disease in the tadpole stage of the life cycle. The absence of any sampling from adult or juvenile frogs, such as those observed in the stream and trail transects is not explained. Detection probabilities for the occurrence of a disease in a population are related to the number to the number of individuals sampled. Statistical analysis shows that to achieve a probability of detecting a disease with a 5% prevalence it is necessary to sample at least 60 individuals. In the report the prevalence at one stream (Blackfellows Creek) was 4 of 5 individuals, which is a naïve prevalence of 80%, and in comparison, with values reported for other amphibian populations (see Woodhams and Alford (2005)) is high.</p> <p>Prevalence of the fungal pathogen in the tadpoles is normally only one of two measures used when investigating Chytrid infections in a population. The second measure is the number of zoospores (or zoospore equivalents) that are determined in a standard sample. If we assume that the sampling method was standardized – although that is not mentioned in the methods section – then it is important to know the intensity of the infection (i.e. the numbers of the pathogen), since that is a direct measure of the severity of the infection. This point is significant, since some recent studies have shown a reduction in important lifetime traits associated with infection. Early studies indicated that tadpoles do not die from the Chytrid infection. More recent studies provide evidence that it has an impact on life-time traits (Clulow et al., 2017).</p>	<p>The survey conducted for this assessment confirmed the existence of chytrid fungus in Fleay's Barred Frog tadpoles, and it is reasonable to assume that it continues to exist in the adults in the Park, as was noted in the Recovery Plan for Stream Frogs in SEQ (Hines <i>et al.</i> 2002).</p> <p>Identifying chytrid in four out of five tadpoles sampled suggests that the prevalence of the disease is greater than 5%, but agree that it would be naïve to assume that it is 80% without further sampling. However, it is not necessary to obtain a precise estimate for the purposes of this impact assessment. Chytrid fungus is present and continues to exist in the Main Range National Park frog population and further sampling is unnecessary.</p> <p>The supporting studies provided during the assessment, including those referred to by the respondent, support the conclusion that the construction and use of the SRT is highly unlikely to be additive to the existing risk posed by current visitor use and the chytrid fungus. The studies also indicate that boot sterilization is unnecessary and would be ineffective relative to the existing rates of frog-to-frog or instream transfer and infection. Nevertheless, boot sterilization could be</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>Several studies have demonstrated that specific amphibians have apparently evolved some capacity to deal with the Chytrid fungus (Newell et. al., 2015). Fleay's Frog is one such example. Early reports documented the disappearance of the Conondale Range population, starting as early as the 1980s (McDonald and Alford (1999), but there has been a return of a restricted population in recent years. Similarly, the population in the Eastern Border Ranges NP in NSW, at Lamington NP, Mount Warning NP and the Nightcap Range NP declined markedly in the 1990s and populations disappeared from lower altitude locations. A detailed study of one high altitude and one medium altitude population has shown a gradual recovery of the populations in the past decade, and the authors postulate the species has evolved some resistance to Chytrid (Conroy and Brook 2003). McDonald <i>et al.</i> (2005) suggested that <i>Chytrid</i> has now become endemic in north Queensland frog populations and that infection prevalence had declined. They noted that detection of <i>Chytrid</i> was significantly associated with season and altitude (greatest above 300 m during winter) and suggest that one species, <i>L. genimaculata</i>, had increased in abundance to pre-decline numbers, despite moderate prevalence rates (7.8%). Further research is required to determine if a shift in the host pathogen relationship has occurred. This would apply to several species including <i>M. fleayi</i>. Such shifts may be mediated either via changes in environmental conditions, decreased transmission and virulence, or the development of resistance and acquired immunity.</p> <p>While this is a positive story, it should be borne in mind that populations at some locations (e.g. Tamborine Mountain, and Mount Warning) have not been observed in the past decade and are presumed extinct. It is tempting to postulate that the impact of the disease in these possibly smaller populations led to their extinction. It is with this historical context and experience that Chytrid can have on small isolated populations, that every caution should be</p>	<p>implemented at Mt Mistake, before hikers enter the Main Range National Park.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>exercised when dealing with this pathogen.</p> <p>A note on the standardized method of field sampling of tadpoles: As mentioned above it is important to sample for the pathogen in a standardized manner so that the prevalence and intensity of infection can be compared among individuals and populations, and at different times. The report states that samples were obtained by “collecting swabs from the skin of tadpoles” (pg 2). This is surprising since the standard method for sampling from tadpoles is to swab the mouthparts, which are composed of keratin, which is the substrate upon which Chytrid resides. There is usually minimal keratin on the skin of tadpoles, so it is unclear to us where the samples were taken, and whether they followed a standardized method.</p> <p>Understanding the infection dynamics of the Chytrid pathogen in natural populations is one of the only means that conservation managers have of determining whether frogs are adapting to this pathogen or a periodically susceptible, and its impacts on important vital biological traits (e.g. fecundity, survival rate) is to have a robust understanding of its population prevalence and infection intensity. The report does not provide that information.</p> <p>The laboratory procedure used for testing for the occurrence of the pathogen was appropriate. It would be appropriate that samples that were equivocal should have been retested by serial dilution to test for inhibition.</p>	
	<p>5.3.1.4 Adversely affecting habitat (Pig Management)</p> <p>The consequences of pigs invading due to impact on critical habitat could be greater than moderate and should be rated as high. Fleay’s Frog breed in riffle zones and these are often dry but with dense soft vegetation (e.g. <i>Polia</i>) that are favoured sites for pig wallows and foraging. There is also the potential for direct impact by predation. Fleay’s Frog is relatively large (up to 70 mm in length) and would be predated if detected. The frogs shelter in the soft surface</p>	<p>The assessment considered whether the establishment of the tracks would create an <u>additional</u> likelihood of invasion of Fleay’s Barred Frog breeding habitat, and hence increased risk of impact on the population, when compared to the existing likelihood and risk.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>soil below leaf litter and it is possible that pigs would be able to detect them. Clearly, actions that aim to manage the pigs are favourable to the Qld NPWS and the proponent. And it would appear that more targeted actions would be a favourable outcome.</p> <p>Pigs are assumed to have a potential impact on <i>Philoria kundagungan</i> (Mountain Bog Frog). The moist boggy areas at the headwaters of the creek lines and in small tributary gullies provide the microhabitat used by this frog for breeding. This species is not listed under the EPBC Act, but has been assessed by IUCN criteria as "endangered" (Hero et al 2004), vulnerable in Qld and Rare in NSW. Although not a matter of MNES they form part of the Outstanding Universal Value since they are of Gondwanan origin.</p>	<p>It was considered that the likelihood of pig invasion in the absence of the proposed tracks is definite, and that the establishment of a Class 5 track at both sites is unlikely to be additive to this likelihood. It is recognised by the project proponent that pigs are a threat to Fleay's Barred Frogs and other rainforest values.</p> <p>The assessment of consequences as moderate applies the DoEE criteria with respect to the single track to and from both streams <i>viz.</i> isolated but substantial instances of environmental damage that could be reversed with intensive efforts.</p> <p>The risk of pigs invading and causing habitat destruction/population loss as a consequence of the project is therefore considered to be Low.</p>
	<p>5.3.1.6 Modifying habitat availability or quality Agreed minimal impact due to the small scale of the track relative to the habitat available, however is this the metric that should be used? What is the relative size of the rainforest habitat compared to open forest habitat in the region?</p>	<p>Gainsdale reiterates that a maximum of 1.5ha of regenerating groundcover and low shrub tier vegetation will be cleared to re-open the Winder track, and that no large trees and/or canopy providing trees and shrubs will be cleared.</p> <p>Further the pad area of Class 5 tracks is in the order of 0.6 ha in total, noting that this over-estimates the amount of ground cover vegetation that will be affected, as existing human or animal footpads will be followed where practicable.</p>
	<p>5.3.1.8 Introduction of disease</p>	<p>As noted in the references provided, including the background document for the chytrid threat</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>Diseases such as Chytrid and Phytophthora are carried in mud on the shoes of walkers. It is not necessary for a walker to pass through water to be carrying spores in mud on the soles of boots. The argument that the disease is already present in the forest (and on the Fleay's Frog tadpoles in the creek) and therefore there is little point in dealing with biosecurity does not hold up to scientific scrutiny. There are numerous genetic strains of the amphibian Chytrid, some of which are more virulent than others (Rosebum et al., 2013). The current situation is that tests in Australia indicate that only one strain is present and it is termed the global panzootic lineage. Furthermore, there are several reports of the impact of Chytrid occurring in waves (Laurence et. al., 1996; Rosebum et. a., 2013). Therefore it is wise to remain vigilant since there is so much unknown about the disease dynamics and transmission of this pathogen. The extensive distribution in Australia is testament to a process of rapid dispersal perhaps by means that we do not understand. The rainforests of eastern Australia are of particular significance to global amphibian declines because more than 10 stream-breeding frog species have declined or disappeared from these ecosystems since 1979 (Laurance, McDonald, and Speare (1996) McDonald and Alford (1999); Hines, Mahony, and McDonald (1999).</p>	<p>abatement management plan (Anon. 2006), there is no evidence that the fungus can survive outside of water bodies. As Phillott <i>et al.</i> (2010) note, sterilisation of boots is recommended as a precautionary measure only, and is unlikely to have any effect on the spread or non-spread of the disease.</p> <p>Biosecurity measures for the management of this disease in publicly accessible National Parks are beyond the scope of Gainsdale operations.</p>
	<p>5.3.2. Track Establishment 5.3.2.1 Long term decrease in population size The proposed track, particularly the tracks leading to the crossing on Blackfellows Creek is approximately 2.5 km long and a trail 2.5 m wide for this distance is a considerable amount of habitat removed and disturbed.</p>	<p>The track leading to and from Blackfellow Creek from the scarp is approximately 1.31km long, and will be a maximum of 60cm wide, not 2500cm. Minimal ground cover (mainly shield fern or gristle fern) will be affected and existing human or animal footpads will be followed where practicable.</p>
	<p>5.3.2.2 Reduction in area of occupancy It is not clear how this statement can be made when there are several kilometres of trail to be established that pass through habitat of Fleay's Frog. For example the trail to the constructed to cross Blackfellows Creek and to access Woodcutters Ecocamp, pass through and are within Fleay's Frog habitat.</p>	<p>The tracks leading to and from the Blackfellow and Dalrymple Creeks will be a maximum of 60cm wide. Minimal ground cover or understory vegetation will be affected or cleared. It is known that female Fleay's Barred Frog will preferentially forage on open</p>

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	Foraging and sheltering sites are habitat just as much as the stream that is used for breeding.	tracks. Vegetation, rocks, logs, and leaf litter outside of the track will not be affected.
Complete a detailed study mapping all habitat within and adjacent to the site, which includes an assessment of population abundance of Fleay's Barred Frog.	<p>5.3.2.4 Adversely affecting habitat</p> <p>It is not only the riparian vegetation and instream habitat that compose the habitat of Fleay's Frog. The floor of the forest is used for foraging and sheltering. It is an assumption that there will be no impact based on the size (extent) or rainforest to be removed, and it may be based on reasonably observations of the limited disturbance of the forest habitat. However, that assumption is untested, and this is one of the reasons why a detailed study (mapping of all habitat within and adjacent to the site, and an assessment of population abundance) is needed.</p>	<p>The area of rainforest that comprises foraging habitat for Fleay's Barred Frog is many orders of magnitude greater than the area of track. Gainsdale notes that up to 0.6 ha of groundcover vegetation (but not shrub or canopy tier vegetation) may be affected across the approximately 15 km of Class 5 tracks, and approximately 1.5 ha of groundcover and regenerating shrubs (but not canopy trees and shrubs) will be affected across 5.7 km of the re-opened Winder track.</p> <p>As previously noted, female frogs will preferentially forage on open tracks. Consequently, the risk of impacting the Fleay's Barred Frog population through adversely affecting the habitat is low to non-existent.</p>
	<p>5.3.3.7 Establishment of invasive species</p> <p>We would point out that it is an assumption that the "population has stabilised following initial infection, with immunity to the fungus now established in the population". The quoted studies did not include any population Chytrid testing, during the population observations reported. Indeed the authors provided several speculative explanations for the "return of the population at Brindle Creek in the Eastern Border Ranges NP" (Newell et al 2015). One of these explanations is that the fungus has become less virulent – a more likely evolutionary hypothesis since the number of generations for selection (a function of the number of generations) is much higher than the number of generations for selection within the frog which is assumed to be annual. A significant outcome is that invasion by virulent strains of the fungus is possible,</p>	<p>The Fleay's Barred Frog population continues to persist at these sites despite the presence of the fungus. The fungus may have become less virulent, and/or the population may have been naturally immune, and/or the population may have selected for immunity since first inoculation. Unravelling the hypothesis is scientifically interesting and may inform conservation management of frog species in the National Park, but is not relevant to this assessment.</p>

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	<p>as has been observed elsewhere in the world (Bales et al., 2013). There are aspects surrounding the observations that remain enigmatic. The Brindle Creek population investigated by Newell et. al., (2015) is at high altitude (above 800 m AHD) and is within cool and warm temperate rainforest. At the same time lower altitude populations have not returned , such as at Sheepstation Creek (about 400 m AHD) in the eastern Border Ranges, at Terania Creek in the Nightcap Ranges and at Breakfast Creek in Mount Warning NP. The observations at Brindle Creek are enigmatic since evidence from the Wet Tropics indicate that frog populations in warmer and drier habitats are able to persist with the disease (Alford 2008). Unfortunately, there is no information on the chytrid disease dynamics for the population of Fleay's Frog in the Main Range NP, or for the situation in co-occurring species that may harbor the disease.</p>	
<p>Provide a map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate methodologies. Provide an estimate of the abundance of</p>	<p>5.4. Environmental Management Measures - Avoidance and Mitigation of Potential Impacts on Fleay's Barred Frog 5.4.1. Performance Targets and Control Measures 5.4.2. Environmental Monitoring 5.4.3. Corrective Actions</p> <p>The DoEE requested information on habitat extent and population abundance. The field survey to determine the occurrence of Fleay's Frog was conducted over one field survey and consisted on 4.5 hours of active surveying (call playback and visual encounter along stream transects and walking track). This represents a very limited effort to address the requirements of DoEE.</p> <p>It is not appropriate to set trigger values after the event, and to base those triggers on qualitative measures. The requirement from the DoEE was to "Provide a map/s of all Fleay's Frog habitat, within and adjacent to the entire project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate</p>	<p>Providing a map of the rainforest in the Main Range National Park and calling it potential Fleay's Barred Frog habitat does not provide any information of use to the assessment of potential impact of the Project. As noted in the assessment, the point of vulnerability is the breeding habitat, i.e. riparian vegetation and the stream itself. This was discussed with DoEE and agreement was reached to focus on potential areas of impact with respect to the Project. Consequently, the new and existing tracks are mapped with respect to a riparian buffer zone in both catchments.</p> <p>The information provided by the surveys and published studies indicate that the risk of population level impacts as a consequence of the Project are</p>

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<p>Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p> <p>Provide an assessment of the quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p>	<p>methodologies" and "Provide an estimate of the abundance of Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist" and "Provide an assessment of the quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist."</p> <p>It is not possible to provide a map of "all Fleay's Frog habitat" with such a limited investigation. Such an approach places that consent authority in a difficult situation of making a recommendation based on limited information. Most importantly, it is not evident whether the two catchments investigated (Blackfellows Creek and Dalrymple Creek) are the only habitat of Fleay's Frog or whether the frog is present and abundant in other catchments along the Main Range. Surely, this is a primary piece of information needed to assess whether the placement of additional walking trails and camping sites are within the most sensitive habitats for Fleay's Frog. There are no surveys at the proposed ecocamp sites to determine whether they are locations of foraging or sheltering habitat of Fleay's Frog.</p> <p>The question must be asked why there is "no robust measure of the population size or population dynamics", and on what logic it is presumed to be suitable to first construct the track and camps, and then after the event seek to determine a robust measure of population size and/or population dynamics. Without appropriate pre-construction studies of the population size and dynamics it is not possible to uncouple the effect of development actions and ongoing practices on the Fleay's Frog population at the site. The most appropriate management actions for the pathogen – Chytrid fungus – is to follow the recommendations of the National Threat Abatement Plan (DoEE 2016).</p>	<p>low to non-existent, and the risks can be avoided or mitigated by the proposed management controls.</p> <p>The proposed Ecocamp sites are in eucalypt-dominated forest and are not rainforest. As such, they are not foraging habitat for female Fleay's Barred Frogs.</p>
	<p>6. Gondwana Rainforests of Australia World Heritage Property and National Heritage Place 6.1. World Heritage List Criteria</p>	<p>Noted.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p data-bbox="461 228 1335 300">6.2. Threatening Processes to World and National Heritage Values and Integrity</p> <p data-bbox="461 308 1440 683">We note that in several sections on the upper slopes and tableland of the Main Range that the extent of rainforest is less than 2 km wide and in most locations no more than 4 km. Recent experience at Werrikimbee NP (2105-16), and historically at Washpool NP, demonstrates that wild fire can at times burn deeply into rainforest. Our consideration is that the buffering of rainforest by adjacent wet and dry sclerophyll forest communities is very important for the long-term protection of the rainforest. However, we do not see that there should be a reduction in buffering or resilience related to the current application, except for the possibility of human initiated fire potential related to the construction on new campsites.</p>	
	<p data-bbox="461 699 1417 810">6.4. Environmental Management Measures – Avoidance and Mitigation of Potential Impact of the Project on the World and National Heritage Values of the Gondwana Rainforests of Australia</p> <p data-bbox="461 818 857 850">6.4.2. Environmental Monitoring</p> <p data-bbox="461 858 1440 1121">This is a major difficulty: requesting approval without having a detailed understanding of the distribution and abundance of nationally threatened species that are identified in the local area. This approach is based on an implicit assumption that the impact will be minimal or nil. However, this assumption is flawed since the base-line ecological work has not been conducted to determine the population estimate, map the habitat, or provide a comparative view of alternative actions.</p> <p data-bbox="461 1129 1440 1393">The incapacity to assess the potential impact because of the inability to compare alternatives is not acceptable. For example, if a more extensive study of the distribution of Fleay's Frog in the local area (i.e. defined as within 10km of the study site, or perhaps defined as within the Main Range NP) found that the population is restricted to the upland sections of Blackfellows Creek and Dalrymple Creek, and that there are few other catchments supporting a population, then the appropriateness of constructing a walking track and</p>	<p data-bbox="1469 699 2112 1002">The risk assessment considers potential pathways to impact and uses survey data and published information to determine the risk of the Scenic Rim Trail to the local population. The likelihood of the Project interacting with the local population in a way that causes impact, irrespective of the population size, is low and the risk of impact can be avoided or mitigated by the management controls.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>crossing of Blackfellows Creek would be placed in a different context. Should robust populations be found in other catchments that are not affected by the proposal and are removed from other human impacts then it provides DoEE and the committees with information that the resilience of an endangered species is not likely to be affected by the proposal. It is not possible to have that confidence without the base-line information.</p>	
	<p>6.4.3. Corrective Actions Trigger values are quantitative because the proponent has not complied with the requirements to provide, “map/s of all Fleay’s Frog habitat, and a calculation of the area of Fleay’s Frog habitat, within and adjacent to the entire project site; an estimate of the abundance in the habitat identified, and an assessment of the quality of the mapped habitat”. Each of these requirements includes the caveat “based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist”. We do not question the qualification of the ecologist, or the field methods used to make observations of Fleay’s Frog. We do question why those methods were not applied in a suitably robust survey design to address each of the DoEE requirements. In the view of the committees, it is not possible to provide maps of all Fleay’s Frog habitat without a larger spatial scale of investigation (e.g. at least several other identified catchment in Main Range NP), and a survey methodology that account for the use of terrestrial habitat away from the riparian zone (e.g. the importance of mid-slope rainforest habitats for foraging and shelter). Similarly, an estimate of abundance requires far greater application of ecological theory than a count derived from several transects on one night of survey. Furthermore, an estimate of habitat quality can only be obtained by comparison with other known sites. We emphasise that without these measures it is not possible for the committees to make a valid assessment of the potential impact of the proposal on threatened species and on the integrity of the World Heritage</p>	<p>As has been noted, <u>all</u> rainforest in the Main Range National Park is potential foraging habitat for female Fleay’s Barred Frog. It is possible to assess the likelihood of activities associated with establishing the Scenic Rim Trail impacting on the Frogs using the criteria established by the EPBC Act for MNES, e.g. effect on habitat extent or quality, and applying the survey data, published information, and the assumption that frogs are present everywhere. The assessment of risk remains the same.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	values. It is also not valid to make any comparisons with measures taken post construction.	
	<p>6.4.4. Residual Risk Assessment</p> <p>We welcome the approach to co-funding pest management. We would wish to point out that linking pest-management actions to “mortality rates” for any target threatened species is difficult. It is more likely that a reduction in the population of the target threatened species would be related to the destruction of habitat rather than direct predation. Triggers for pest management are more likely to be successful if focused on precise habitat observations (e.g. number of pig ruts).</p>	Noted. The triggers for pest control and the measures of success of pest control with respect to the value being protected are likely to be two different things.
	<p>7. Facilitated Impacts on the World and National Heritage Values of the Gondwana Rainforests of Australia Property</p> <p>The assessment recognises that “The resistance and resilience of a plant community or ecosystem may vary over time due to weather or seasonal variability. For example, there is likely to be more soil erosion or compaction, and more vegetation damage during wet conditions than during dry conditions.” We agree that this can be a problem, and must be subject to careful consideration. There seems to be little appreciation that the proposed walking track passes through sensitive vegetation communities (subtropical and warm temperate rainforest) that are not extensive along the ridge of the Main Range. Indeed the mapping of the warm temperate rainforest shows that it occupies less than 20 hectares, and the proposed trail passes through the middle of this community (Proposed scenic Rim Trail – between Amphitheatre View Wilderness Ecocamp and Woodcutters Ecocamp).</p> <p>We will discuss below the habitat requirements of <i>Phyllorhina kundagungan</i>, a Gondwanan terrestrial frog that utilises boggy situations on the rainforest floor. We consider that the placement of the trail through these sensitive rainforest vegetation communities provides unacceptable risk to damage of the upper soil layer leading to erosion and damage to boggy habitats.</p>	There are limited options for passage along the scarps that comprise warm temperate rainforest. The alignment of the SRT largely coincides with the path of least resistance followed by bushwalkers over the years. However, extreme care will be taken to avoid or deflect passage away from sensitive sites identified by project ecologists. As previously noted, the average width of these tracks will be 60cm.

DoEE requirements	Submission Text	Gainsdale Comments
	<p>7.1.3. Pathogens – Dispersal by Walkers</p> <p>The means of widespread transmission are a matter of scientific investigation. In the face of this uncertainty and the critical nature of the Chytrid pathogen (8 endemic species extinct and as many as 30 threatened, and over 120 species of amphibians extinct worldwide), the National Threat Abatement Plan list quarantine (biosecurity) must be the first action in the plan. To open access to an area where the pathogen is known to increased human access is counter to the adopted Threat Abatement Plan. What is not considered is that the pathogen may be transported from the Main Range NP and distributed to other areas where the infection has not been identified. Quarantine is a matter of preventing movement of pathogens both in and out of an area. For example, the isolated population of the rainforest endemic from <i>Assa darlingtoni</i> on Mt Ballow/Mt Nothofagus has been found to be highly susceptible to Chytrid in laboratory test (Moses 2015, unpublished), but there is no evidence of Chytrid infection in the wild population. There is no reason to provide additional stress to a system that is already under considerable stress. This is the application of the Precautionary Principle.</p>	<p>Gainsdale notes that Blackfellow Creek and Dalrymple Creek catchments are already accessible to the public, i.e. access is not being opened in a currently inaccessible place. For example, the existing Cascade circuit track crosses the Dalrymple Creek some ten times.</p> <p>As noted in the documentation provided to DoEE, Main Range National Park is renowned for off-track walking and camping. The likely unintended consequence of the submission would be the restriction or quarantining of all public access to these areas.</p>
	<p>7.3.2.4 Cause long-term reduction in rare, endemic, or unique species</p> <p>This narrative is based on untested assumptions. It is not possible to assign “no risk” to an activity without having adequate regard to the potential for long-term reduction in rare, endemic and unique species. The committees appreciate that monitoring of long-term impacts is a very involved and requires sensitive indicators of change. Press events (e.g. gradual changes in population abundance or distribution) are always more difficult to measure than pulse events (acute environmental event). There is growing evidence from several fields of ecology (e.g. fundamental niche modelling) that high altitude rainforests are at great risk of extinction due to climate warming. And there is evidence that pulse events, such as historically unusual periods of hot and dry weather are occurring more often. The Main Range is identified as being at considerable risk since it is such a narrow band of upland rainforest,</p>	<p>The National and World Heritage values of the Main Range National Park are subject to a range of threats that require action at a local, national, and global scale. The QPWS is responsible for managing local threats while ensuring and enabling public access to the Park. The assessment conducted by Gainsdale provides evidence that the effects of the Scenic Rim Trail are unlikely to increase the rate or scale of the identified threatening processes, and can contribute in some cases to reducing those threatening processes, e.g. enabling pest control and increased monitoring.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>with a lower annual rainfall than rainforests to the east on the McPherson Range because there is lower orographic rainfall (effect of daily inversion that brings precipitation nearer to the coast) resulting in cloud stripping which is likely to be a significant contribution to moisture in these environments (Hutley et al. 1997). We consider that there is already great concern for the resilience of this rainforest habitat and that any additional stress should be carefully scrutinised, and unless there is proof that no impact will occur then the World Heritage Universal Values and integrity should be protected.</p>	
	<p>7.4. Environmental Management Measures – Avoidance and Mitigation of Potential Facilitated Impacts on World Heritage and National Heritage Values 7.4.1. Performance Targets and Control Measures</p> <p>The committees consider that it is not appropriate to assess the potential impacts of a proposal without the base-line information that was requested by the DoEE. Furthermore, we consider that research, survey and monitoring – while being a real contribution to understanding the ecology and adaptive management of the MNES and integrity of the World Heritage Area – will require evaluation of a secondary round of monitoring and research documents that require review. We are aware that timeliness is an issue with research and monitoring. By comparison no building would be approved on the basis that structural engineers would monitor suitability after the event. It seems ludicrous that the risk of harm to environmental values would be treated by a lower standard, especially when the matter deals with the integrity of World Heritage Values.</p>	<p>The surveys and supporting scientific information provided for the assessment provide adequate information for assessing the risks of the Scenic Rim Trail to the MNES. The proposed management controls and remedial measures will avoid or mitigate risks, and address any residual risks.</p> <p>Gainsdale notes that feral animals and weeds provide the greatest immediate risk to MNES in the Main Range National Park, and that pest control by QPWS is required to address these risks. Gainsdale also acknowledges climate change as a threatening process, but notes that activities associated with the SRT are irrelevant to addressing this (Gainsdale notes however, that the Ecocamps will supply their own energy from renewable sources).</p>
	<p>Gondwanan animals not directly addressed in the “Assessment and Management of Potential Impact on Specific MNES”: <i>Phyllorhina kundagungan</i> is a terrestrial frog of Gondwanan origin (Knowles et al 2004), that is known to occur in the Main Range NP (Atlas of Living Australia – Knowles et al 2004). This species is a habitat specialist with breeding sites located in wet boggy rainforest areas and near seepages in headwater streams.</p>	<p>This species is mostly restricted to small soaks in rainforest (Vanderduys 2012) and was found at two sites during the surveys for the initial Development Proposal and Environmental Management Plan. Neither site was on the proposed track alignment. The proposed track alignment largely follows</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>Outside of the breeding season, chance observations indicate that adults move widely across the rainforest floor presumably to forage. This frog is known only from rainforest vegetation communities. Assessment of the distribution and abundance of populations of the closely related <i>Phyloria richmondensis</i> found that populations are typically small and associated with high moisture in the environment (Willacy et al 2015).</p> <p>A conservation assessment of this frog using the IUCN process and categories is provided by Hero et. al., (2004) and the outcome was “Endangered B1ab(iii) ver 31. The reason for this assessment was “Extent of occurrence is less than 5,000 km2, distribution is severely fragmented, and there is continuing decline in the extent and quality of its habitat in Queensland and NSW, Australia.’ Included in major threats the authors listed “disturbance upstream that affect hydrological process and/or water quality may threatened this species”. This frog is listed as Rare in Queensland and Vulnerable in New South Wales.</p> <p>The proposed construction of trails, especially those that traverse mid-slopes, and creek crossing pose a significant risk to the habitat of this frog. Specifically, the redirection of run-off water from tracks may change sites of seepages upon which the species relies.</p> <p>Frogs in the genus <i>Phyloria</i> are a group of regionally endemic habitat specialists restricted to the headwater ecosystems of montane Gondwanan rainforests of eastern Australia, with the exception of <i>Phyloria frosti</i> (Knowles et al. 2004; Mahony 2006), and possess traits consistent with those of declining frogs in upland areas of eastern Australia (restricted ranges, low clutch size and stream association) (Hero et al. 2005, 2006). Climate change impacts including increasing temperatures, decreasing precipitation (Sherwood & Fu 2014) and a lifting cloud base are likely to negatively affect <i>Phyloria</i> which are expected to have a narrow range of physiological tolerance to temperature (Brattstrom</p>	<p>ridgetops along the escarpment edge and avoids wet boggy areas suitable for <i>Phyloria kundagungan</i> except at the Blackfellows Creek and Dalrymple Creek crossings, where suitable habitat for <i>Phyloria kundagungan</i> may occur. Management of potential impacts on this species at these creek crossings are as per those for Fleay’s Barred Frog.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>1970) and require high and consistent moisture levels for their terrestrial breeding strategy (Knowles et al. 2004). Having low reproductive output and dispersal potential means they are also less likely to recover from extreme events (Hagger et al. 2013), such as disease epidemics or high-intensity storm events (Willacy et al 2015).</p> <p>We believe that it is necessary for the proponent to demonstrate that the location of proposed trails do not impinge on the habitat of this species, and that the same requirements for habitat mapping and calculating the habitat area, and population estimate applied to Fleay's Frog are minimal requirements to ensure that on-going monitoring of potential impacts on this species are possible. In particular, mapping of the sites of soaks used for breeding and an estimate of the abundance of the population is necessary.</p>	
National Parks Association of Queensland		
	<p>NPAQ acknowledges the efforts Gainsdale has taken to: 1) respect the majority of values of national park land; 2) utilise experienced and capable ecologists; and 3) minimise the majority of impacts, however, there are still a number of outstanding concerns regarding the Gondwana Rainforest World Heritage Area Values and EPBC listed Endangered species.</p>	Noted
	<p>Our understanding is that this Proposal is likely to be part of a larger track network, potentially connecting to an existing New South Wales multi day walk. Proposal scopes are fundamental to effective approvals at all levels of government. If this Proposal is part of a wider scope, the associated impacts need to be considered at this stage.</p>	<p>As stated in the Development Proposal and Environmental Management Plan and the supporting documentation provided to DoEE, this application and environmental assessment is for the development of the Scenic Rim Trail, as defined in the documentation.</p>
	<p>The quality and presentation of mapping is ineffective, at best¹. For example, tenure maps must clearly identify the location of all existing (e.g. black) and proposed or upgraded (e.g. red) infrastructure, including both service access tracks, in relation to the World Heritage Area, National Park and threatened</p>	<p>Gainsdale did take the feedback from NPAQ and others on board, regarding the contrast of the maps and has made every effort to sharpen them up while retaining background and foreground information.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>species habitat. While NPAQ appreciates the complexities of mapping the Proposal, someone unfamiliar with the Proposal should be able to understand the abovementioned context, at a glance, and not have to spend significant time, reading several maps to understand.</p> <p>While ideally NPAQ would have provided this feedback at the initial EPBC referral stage, Gainsdale did not engage with NPAQ either immediately before or during the referral notification stage, despite NPAQ being the Queensland's premier independent national park stakeholder. Also, the EPBC referral was notified over the Summer/Christmas Holidays, restricting comments to only the mandatory two-week comment period. This decision on timing was unfortunate.</p> <p>Since May 2017, Gainsdale has regularly engaged with NPAQ and provided notice of this follow up phase. Gainsdale also provided a presentation to members and supporters on 26 June 2017. NPAQ raised concerns at the June meeting that the mapping was very dark and hard to follow. Unfortunately, Gainsdale has not taken this feedback on board and/or underestimated its importance. Until the public can truly understand the Proposal clearly, effective consultation and a real assessment of impacts – including by the regulator and the public – is extremely difficult, if not impossible, and therefore the EPBC approval should not be granted.</p>	<p>Gainsdale contends that the maps provided in the supplementary information to DoEE contain appropriate levels of detail and information at relevant scales allowing the reasonable reader to understand the proposal. These in conjunction with the supporting information provided in the documentation allow a real assessment of potential impact.</p>
	<p>There is currently an existing four-wheel drive access track to the area proposed for the Amphitheatre EcoLodge². NPAQ estimates present vehicle movements to be limited to several times a year for park monitoring and pest and fire management. Approval of the development would result in that existing, rarely used track, being upgraded and frequently used. Initially the track would be used multiple times per day during construction (i.e. workforce mobilisation, delivery of construction materials, removal of construction wastes) and periodic maintenance then several times a week during operations (i.e. mobilisation of</p>	<p>Noted</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>staff, delivery of bags/groceries/linen, delivery of water occasionally during extended drought, removal of solid wastes and removal of liquid wastes). Note, each proposed EcoLodge is expected to be used by 1,500 clients and staff/year (from year four).</p> <p>NPAQ strongly objects to introducing any new motorised activity (servicing a proposed new EcoLodge) into the Gondwana Rainforest World Heritage Area, especially for non-essential purposes. Movement of an all-terrain vehicle (even limited twice a week – four movements) will undermine the integrity of the Gondwana Rainforest World Heritage Area. It will subject independent walkers to motorised transport on the trail for purposes which are not “in the interest of the Public”. Subjecting independent walkers to four all-terrain vehicle movements a week is also not fair and equitable (as vehicle movements would be scheduled to avoid commercial walkers under routine operations).</p>	
	<p>Alternatives to the Proposal have not been addressed in the referral follow up / supplementary information. Alternatives should be considered to avoid impacts on: 1) the integrity of the Gondwana Rainforest World Heritage Area, which is known for its off-track camping by low visitor numbers; and 2) the Endangered species. The original referral (Section 2.2 Alternative to the Proposal states “No alternatives were considered...”3) also did not address alternatives to the proposal to preserve the integrity of the Gondwana Rainforest World Heritage Area. Alternative to be considered should include:</p> <ul style="list-style-type: none"> • Placement of the EcoLodges outside the National Park boundary (e.g. immediately west of the park boundary to avoid unnecessary vehicle traffic through known habitat of the Endangered Hastings River Mouse). OR Consider the use of two EcoLodges located outside the National Park - each for two days of walking. Hikers could be transported back to base at night (without having to repack) and then get transported to the start of the walk the following day. This option avoids the need for construction of 	<p>Gainsdale was not asked to consider alternatives by the DoEE in its letter of 30 March seeking further information.</p> <p>Gainsdale notes that two Camps are outside of the Main Range National Park, on private property.</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>commercial infrastructure within the National Park while still providing an overnight bush camping experience for the walkers, but with less disturbance.</p> <ul style="list-style-type: none"> • Placement of the track towards the western part of the National Park given the area along the Ramparts are arguably the best intact area of the park and views can still be enjoyed from the lookouts to the south and north. 	
	<p>The location of the proposed Woodcutter's EcoLodge is effectively surrounded on three sides by the Endangered Hastings River Mouse habitat, as shown in Figure 6, and the proposed direct disturbance area is only about 250 m from where one mouse was caught.</p> <p>The QPWS Trail proposed to service the Woodcutters EcoLodge bisects the Endangered Hastings River Mouse habitat, as shown on the inset of Figure 6, and no assessment has been provided on the impacts on lodge traffic. With an introduced service requirement for 1,500 clients and staff staying each year, traffic will arguably increase by hundreds of times.</p>	<p>As noted in the supporting documentation, the EcoCamp site is not Hastings River Mouse habitat. The design controls proposed will avoid the very minimal risk to this species posed by the EcoCamp.</p> <p>The Hastings River Mouse is a nocturnal species, i.e. active only after dark. There will be no vehicle use of the track during night time hours, except in case of emergency. Consequently, there will be no interaction between vehicle use of the track and the mouse.</p>
	<p>The disposal of liquid waste has not been clarified as requested during the NPAQ/Gainsdale June 2017 Information Session. The September Newsletter from Gainsdale suggests onsite treatment. This must be clarified and the impacts on Matters of National Environmental Significance assessed.</p>	<p>Gainsdale is exploring the most appropriate means of treating and disposing of treated wastewater in conjunction with QPWS and the local Council. Gainsdale is committed to applying leading edge sustainable technological solutions and addressing the issue at the same site where its customers will be accommodated.</p>
	<ul style="list-style-type: none"> • Is the Amphitheatre EcoLodge located outside of the GRAWHA? • Would the Sylvester's trail linking Sylvesters' Lookout and Bare Rock be a new trail? It was not identified on the map as "existing". • Why is feedback at this stage directed to the proponent and not sent directly to the Environmental Assessment Branch? 	<ul style="list-style-type: none"> • The Amphitheatre EcoCamp is within the GRAWHA boundary, but is not within rainforest. It is located in Least Concern open Eucalypt forest.

DoEE requirements	Submission Text	Gainsdale Comments
	<ul style="list-style-type: none"> • Why propose two accommodation nodes within 2.5 km of each other (as the crow flies)? • Were ecological specialists involved in any revised risk assessment that specifically considers the change in use of the track to a significant service road (that bisects the Endangered River Mouse habitat and potentially isolating the northern portion of the proven habitat). • What is the trigger for changes to the development (e.g. fewer visitors or removing the development) if it is shown to be having a negative impact? For example, a demonstrated decline in population (e.g. no follow up capture of Hastings River mouse or a defined decline in Fleay's frog abundance). 	<ul style="list-style-type: none"> • The Sylvester link trail is proposed as a bypass to allow independent walkers to continue south rather than wading around the Cascade Trail, etc. Gainsdale intends to formalise the existing informal track currently used by bush walkers. • Gainsdale is responding in accordance with directions set out by DoEE (20 September 2017) Publication of information for assessment on preliminary documentation under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) • The walkers guided by Gainsdale will be following trails between the camps that take a circuitous route. They will not be walking as the crow flies. • The supplementary documentation to DoEE provides evidence that the presence of a track is unlikely to inhibit the movement of Hastings River Mouse throughout its habitat. Further, the Hastings River Mouse is a nocturnal species, i.e. active only after dark. There will be no vehicle use of the track during night time hours, except in case of emergency. Consequently, there will be no interaction between vehicle use of the track and the mouse. • The assessment provided to DoEE has identified potential areas of interaction between the Scenic Rim Trail and the threatened species. It has provided evidence that the presence and/or use of the trail presents a low risk to these

DoEE requirements	Submission Text	Gainsdale Comments
		populations. Management controls to address the risks, and trigger values with respect to the potential areas of vulnerability, are provided.
Protect the Bush Alliance		
	<p>Protect the Bush Alliance has received advice from members expressing concern for what is perceived a precedent of a private development in National Parks which were created for the overriding need to protect Nature. Points of concern are:</p> <ul style="list-style-type: none"> • Introduce exclusivity of use into what was previously an entirely publicly accessible space. This constitutes a direct threat to the very principles that underpin national parks, and represents a dangerous precedent that could easily be argued should be replicated in other NPs. National Parks are a public asset and should not be colonised by commercial interests. • Compromise tenure; It may be better if such investments were excised from the NP (i.e. re-gazetted Regional or Conservation Park). • Compromise the management of the national parks they are sited within. In instances of similar investment proposals (either interstate or overseas), management effort gets redirected towards protecting the new asset/development in the National Park. The classic example is fire, with ecological fire management regimes being altered to protect newly developed infrastructure, with the conservation of biodiversity being all the poorer for the redirection of effort and resources. 	<p>Providing increased opportunities for sustainable ecotourism in National Parks is Queensland Government policy, and is provided for in the Nature Conservation Act.</p> <p>The Scenic Rim Trail will be open and accessible to the public for free and independent walking, and new potential locations for bush campsites have been provided to QPWS.</p>
	<p>We are certainly aware of the Gainsdale Group’s conservation interests and standards and acknowledge their association with Queensland National Parks management to:</p> <ul style="list-style-type: none"> • Monitor and reduce feral animals. • Create discreet camp environments supportive of a standard appropriate for this form of outdoor recreation. • Provide parallel services for the public wishing to access some part of the development. 	Noted

DoEE requirements	Submission Text	Gainsdale Comments
	<ul style="list-style-type: none"> • Limit noise, light and other intrusive elements in the design of the facilities. • Working with NPRS in the monitoring of threatened species. • Avoiding ecologically sensitive areas. 	
	<p>We are confident organisations such as the National Parks Association of Queensland and Wildlife Queensland, will assume an ongoing involvement as these facilities develop and become available to hikers. The nature of the development and its location we understand, are not likely to attract high visitor numbers which will in itself reduce potential adverse impacts.</p> <p>There exists already, significant trail and bush camp facilities within the Main Range National Park which particularly in summer months, host a considerable number of visitors. Therefor the presence of recreation within the park is not new nor is the risk management associated with litter and misuse of the park environment.</p>	Noted
	<p>In addressing MNES; we agree species such as Hastings River Mouse and Fleay's Barred Frog seem tolerant of the parks visitor numbers at present. These species likely exist well beyond the scope of the fauna surveys conducted by BAAM for the purpose of this development. We encourage conscientious hygiene practises from tour guides and their guests, to prevent the introduction of pathogens by contaminated foot wear; similarly, product delivered to the camps.</p>	<p>Gainsdale will be taking explicit care to control against the introduction of feral rodents to the EcoCamps. Published scientific evidence provided in the documentation to DoEE suggests that boot sterilisation is probably ineffective and unnecessary for preventing the spread of chytrid fungus. However, Gainsdale is prepared to have walkers sterilise their boots at Mt Mistake, before entering the Park, and at Canopy EcoCamp, on leaving the Park, if required.</p>
	<p>Surprisingly, Eastern Bristlebird <i>Dasyornis brachypterus monoides</i>, has not been included as a species of concern in addressing MNES. This species in Queensland is listed as Endangered under Commonwealth legislation. The Main Range has been one of two strongholds of EBB in Queensland with most territories occurring along National Park tracks. Observation of this species beyond known locations has been troubled by both access to remote areas of</p>	<p>The population of bristlebirds previously known from Spicer's Gap is believed to be locally extinct (Garnett <i>et al.</i> 2001). While habitat in Main Range National Park is suitable for bristlebird, surveys conducted by BAAM failed to find any birds. It is believed that up to 10 birds may still be present in Queensland, but</p>

DoEE requirements	Submission Text	Gainsdale Comments
	<p>the park and to habitat on neighbouring properties. With the re-opening of the Winder Track and approved access through montane heath vegetation north of Bare Rock, there exists the possibility walkers and guides may identify Eastern Bristlebirds. Staff members at Spicer’s Peak Resort are aware of EBB and have recently reported a possible sighting. In conjunction with staff at Hidden Vale research facility, there exists the opportunity to contribute to the northern recovery program for EBB.</p>	<p>mostly on private land (National Recovery Plan for Eastern Bristlebird (OEH 2012)).</p>
	<p>In the great scheme of ‘Caring for our Country’, increasing awareness of the ecological sensitivities and the processes of nature’s contribution to our wellbeing is of paramount importance. Getting people from all walks of life engaged in this caring, must be encouraged.</p> <p>We trust all efforts will be initiated by The Gainsdale Group to limit impacts and to encourage along the way, a sense of pride and awareness that a very special environment is being provided for the greater good. It is likely this development will receive considerable scrutiny as it evolves.</p> <p>We also trust the Queensland Department of Environment’s Threatened Species Unit and National Parks management will maintain essential engagement to steer this project towards a genuine example of eco-tourism, respecting the privilege of access to Main Range National Park.</p>	<p>Noted</p>

4. Conclusion

This report outlines the extent of comments received during public consultation. The majority of comments have been responded to in this report.

Gainsdale is not of the view that the issues raised require further assessment beyond the documentation provided as part of its application.

5. Appendices

Appendix A: Letter of Direction to Publish



Mr Ben O'Hara
General Manager – Land and Environment
Gainsdale Pty Ltd
PO BOX 108
FORTITUDE VALLEY QLD 4006

Dear Mr O'Hara

Direction to publish preliminary documentation and revised fee schedule—Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve, Queensland

I am writing to you in relation to the above proposed action which is currently being assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Thank you for your draft response to our further information request and for payment of the associated cost recovery fee. We have reviewed the draft response and consider it is adequate for publication.

Direction to publish

You are now required to publish the information you have provided on the proposed action. This allows for public consultation on the potential impacts of your proposed action. The information must be available for comment for **15 business days** and during this time any third parties can comment on the proposed action. Detailed directions on what information you need to publish and where to publish are attached to this letter. Public comments will come directly to you so that you have an opportunity to address any issues raised.

Procedure if comments received

If comments are received, you are required to provide us with:

- a copy of all public comments received; and
- a summary of each of the comments received and how those comments have been addressed; and
- a revised version of your documentation with any changes or additions needed to take account of the public comments received.

Once you have provided us with this information, you will then need to publish (for information only—not for comment) the summary of comments received and your responses, together with the original documentation including any changes or additions made in response to the public comments, within 10 business days.

Procedure if no comments received

If no comments are received, you must provide us with a written statement to that effect. Once you have provided that statement, you will then need to publish the original documentation again (for information only—not for comment) within 10 business days.

Please be aware that the notices to publish the documentation first for public comment and then again for information following the public comment period must be approved by the Department before they are published.

Cost recovery fees

Please find attached a revised fee schedule and note that these fees have been reduced owing to the provision of adequate information for the proposed action. An invoice for Stage 3 and Stage 4 of the assessment is also attached. The fee for Stage 3 must be paid before the Department can review the finalised preliminary documentation and the fee for Stage 4 must be paid before the Department can decide whether the proposed action can be approved or not. These fees can be paid together should you wish to do so.

If you disagree with the fee schedule provided, you may apply under section 514Y of the EPBC Act for reconsideration of the method used to calculate the fee. The application for reconsideration must be made within 30 business days of the date of this letter and can only be made once in relation to a fee. Further details regarding the reconsideration process and an application form to apply for a reconsideration can be found on the Department's website at: <http://www.environment.gov.au/epbc/cost-recovery>.

Next steps

The assessment process will commence once we have received any public comments and your responses to them or a written statement that no public comments were received. A decision on whether the proposed action can be approved or not would generally be expected within 40 business days of that time, unless further information is required.

If you have any questions about the assessment process or this decision, please contact the project manager, Ben Phillips, by email to Ben.Phillips@environment.gov.au or by phone on 07 3837 3442 and quote the EPBC reference number at the top of this letter.

Yours sincerely



James Barker
Assistant Secretary
Assessments and Governance Branch

20 September 2017

**Publication of information for assessment on preliminary documentation under the
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)**

Information to be published:

- (a) Specified information included in the referral to the Minister of the proposal to take the action—this includes the referral and all of its attachments received by the Department on 16 December 2016.
- (b) Specified information relating to the action that was received in response to the Minister's request under subsection 95A(2) of the EPBC Act—this includes the response to the further information request and all of its attachments received by the Department on 8 September 2017.
- (c) An invitation for anyone to give Gainsdale Pty Ltd, within the period specified in the direction (being **15 business days**), comments in writing relating to the information or the action.

As the material is more than 200 words, a notice may be published instead.

The published notice must **invite public comments** and state:

- (a) the provision of the EPBC Act that requires the material to be published:
section 95A(3);
- (b) the identification number for the action, allocated by the Department:
EPBC 2016/7847;
- (c) a descriptive title for the action: Scenic Rim Trail – Thornton Trailhead to Spicers
Canopy Nature Reserve;
- (d) the location of the action: Main Range National Park, Queensland;
- (e) the name of the person intending to take the action: Gainsdale Pty Ltd;
- (f) each matter protected by a provision of Part 3 of the EPBC Act: World Heritage
properties (sections 12 and 15A); National Heritage places (sections 15B and 15C);
listed threatened species and communities (sections 18 and 18A);
- (g) where a copy of the material may be viewed or obtained:
 - (i) in electronic and hard copy form; and
 - (ii) at a reasonable cost or without charge.
- (h) the final date for providing comment;
- (i) that persons with special needs (i.e. for whom English is a second language or who
has a vision impairment) may contact a designated person for assistance in
accessing the material.

The notice must be approved by the Department before it is published.

Where to be published:

- (a) at a suitable location on the internet;
- (b) in a national or state daily newspaper that circulates in the state or territory in which the action occurs; and
- (c) if practical, in regional newspapers that circulate in any regions of Australia where the action is likely to have a significant impact on a matter protected by a provision of Part 3 of the EPBC Act.

The designated proponent must:

- (a) give 2 copies of the material to:
 - (i) at least 1 local authority, or at least 1 local or regional library, for the area where the action is likely to have a significant impact on a matter protected by a provision of Part 3 of the EPBC Act;
 - (ii) a state government authority responsible for environmental protection, or a state library, in the state where the action is likely to have a significant impact on a matter protected by a provision of Part 3 of the EPBC Act;
 - (iii) the Department.
- (b) ask the authority or library to display the material publicly.

Appendix B: Public Notices

**Notification for Publication of Draft Preliminary Documentation
under the *Environmental Protection and Biodiversity
Conservation Act 1999 (EPBC Act)***

Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve

The following notice is published pursuant to section 95A(3) of the EPBC Act.

Gainsdale Pty Ltd (ACN 008 971 499) is seeking approval (EPBC 2016/7847) to establish a multi-day walk from the privately-owned Thornton View Nature Refuge to the privately-owned Spicers Peak Nature Reserve, via the Main Range National Park and Gondwana Rainforests of Australia World Heritage Area. The walk is to be known as the Scenic Rim Trail and will follow a series of existing tracks in the National Park, connected by Class 5 walking tracks to be established by Gainsdale Pty Ltd. Two eco-camps will be erected in the National Park (outside of the World Heritage Area).

The proposed action is determined to be a 'controlled action' under the EPBC Act, with preliminary documentation level of assessment. The relevant controlling provisions under the EPBC Act are sections 12 and 15A (World Heritage properties), sections 15B and 15C (National Heritage Places) and sections 18 and 18A (Listed threatened species and communities).

Interested persons and organisations are invited to comment in writing on the requested preliminary documentation, including an Assessment of Risk to Specific Matters of National Environmental Significance. Copies of the documentation will be available for a period of 15 business days from Thursday 28 September to Thursday 19 October at the following locations:

- **Brisbane** – 168 Knapp Street, Fortitude Valley. From 9am to 5pm, weekdays.
- **Brisbane** – Department of Environment and Heritage Protection, Level 3, 400 George Street, Brisbane. From 9am until 4pm weekdays.
- **Gatton** – Gatton Library, inside the Lockyer Valley Cultural Centre, 34 Lake Apex Drive, Gatton. Open weekdays from 9am to 5pm, and Saturday 9am until Noon.
- **Warwick** – Southern Downs Regional Council Warwick Administration Centre, 64 Fitzroy Street, Warwick, from 8am until 5pm weekdays.

A PDF version of the documentation can be downloaded from <http://www.scenicrimtrail.com/environment-protection-and-biodiversity-conservation-response/>

If you are a person with special needs (i.e. for whom English is a second language or who has vision impairment) and require assistance, please contact enquiries@scenicrimtrail.com

Comments should be sent via email to enquiries@scenicrimtrail.com or mailed to **Scenic Rim Trail Project, PO Box 108, Fortitude Valley, Qld 4006.**

All comments must be received by 5pm on Thursday 19 October, 2017.

Above: Public notice. Published in the Warwick Daily News, Gatton Star and Brisbane Courier-Mail, Wednesday 27 September 2017

Appendix C: Email to stakeholders

27 September 2017

Good morning,

On behalf of Gainsdale Pty Ltd, I am pleased to advise that draft preliminary documentation for the Scenic Rim Trail project – a proposed action under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) – has been published for consultation.

The proposed action (EPBC 2016/7847) is to establish a multi-day walk from the Turner Family's Thornton View Nature Refuge, traverse the Main Range National Park and Gondwana Rainforests of Australia World Heritage Area, and link-up with Spicers Peak Nature Reserve.

The trail would follow a series of existing tracks in the National Park, connected by new Class 5 walking tracks, with two eco-camps for commercial use to be erected in the National Park (outside of the World Heritage Area).

Gainsdale also proposes to upgrade the trailhead car park and toilet facilities, and install two new public-access remote bush camps adjacent to the trail. These camps would be managed by Queensland Parks and Wildlife Service to provide for independent walkers and improve camp management.

The Scenic Rim Trail will add to Queensland's offering in nature-based activity tourism, with opportunities to highlight cultural heritage as part of a regional showcase.

I invite you to review the draft preliminary documentation and provide a written response, should you wish, by 5pm on Thursday 19 October 2017.

The project documentation is available online [here](#). Alternatively, hard copies can be viewed at the following locations during the public consultation period:

- Brisbane - 168 Knapp Street, Fortitude Valley. From 9am to 5pm, weekdays.
- Brisbane - Department of Environment and Heritage Protection, Level 3, 400 George Street, Brisbane. From 9am until 4pm weekdays.
- Gatton - Gatton Library, inside the Lockyer Valley Cultural Centre, 34 Lake Apex Drive, Gatton. Open weekdays from 9am to 5pm, and Saturday 9am until Noon.
- Warwick - Southern Downs Regional Council Main Administration Centre, 64 Fitzroy Street, Warwick, from 8am until 5pm weekdays.

Should you wish to make a submission, please ensure that your comments are sent via email to enquiries@scenicrimtrail.com or mailed to:

Scenic Rim Trail Project
c/o PO Box 108
Fortitude Valley, Qld 4006.

If you have any specific questions, or would like to meet to discuss the proposal, please contact me directly on 0407 899 546.

Yours sincerely,

Ben O'Hara
Gainsdale Pty Ltd

Appendix D: Letter to stakeholders and Project Newsletter

<<Date>>

<<Name>>

<<Address>>

<<Address>>

<<Address>>

*Re: Draft preliminary documentation for Scenic Rim Trail – Thornton Trailhead to Spicers Canopy
Nature Reserve, Queensland (EPBC 2016/7847)*

Dear <<Name>>

On behalf of Gainsdale Pty Ltd, I write to advise that draft preliminary documentation for the Scenic Rim Trail project – a proposed action under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) – has been published for consultation.

The proposed action (EPBC 2016/7847) is to establish a multi-day walk from the Turner Family's Thornton View Nature Refuge, traverse the Main Range National Park and Gondwana Rainforests of Australia World Heritage Area, and link-up with Spicers Peak Nature Reserve.

The trail would follow a series of existing tracks in the National Park, connected by new Class 5 walking tracks, with two eco-camps for commercial use to be erected in the National Park (outside of the World Heritage Area).

Gainsdale also proposes to upgrade the trailhead car park and toilet facilities, and install two new public-access remote bush camps adjacent to the trail. These camps would be managed by Queensland Parks and Wildlife Service to provide for independent walkers and improve camp management.

The Scenic Rim Trail will add to Queensland's offering in nature-based activity tourism, with opportunities to highlight cultural heritage as part of a regional showcase.

I am pleased to invite you to review the draft preliminary documentation and provide a written response, should you wish, by 5pm on Thursday 19 October 2017.

The documentation is available online at <http://www.scenicrimtrail.com/environment-protection-and-biodiversity-conservation-response/>

Alternatively, hard copies can be viewed at the following locations during the public consultation period:

- Brisbane - 168 Knapp Street, Fortitude Valley. From 9am to 5pm, weekdays.
- Brisbane - Department of Environment and Heritage Protection, Level 3, 400 George Street, Brisbane. From 9am until 4pm weekdays.
- Gatton - Gatton Library, inside the Lockyer Valley Cultural Centre, 34 Lake Apex Drive, Gatton. Open weekdays from 9am to 5pm, and Saturday 9am until Noon.
- Warwick - Southern Downs Regional Council Main Administration Centre, 64 Fitzroy Street, Warwick, from 8am until 5pm weekdays.

Should you wish to make a submission, please ensure that your comments are sent via email to enquiries@scenicrimtrail.com or mailed to:

Scenic Rim Trail Project
c/o PO Box 108
Fortitude Valley, Qld 4006.

I have enclosed a copy of the Scenic Rim Trail project newsletter, for your information. If you have any specific questions, or would like to meet to discuss the proposal, please contact me directly on 0407 899 546.

Yours sincerely,



Ben O'Hara

A VISION FOR AUSTRALIA'S

next great walk

SCENIC RIM TRAIL - SIX DAY WALK

Scenic Rim Trail, to be operated by Spicers, is owned by the Turner Family, whose tourism experience is matched by their love of the Australian bush.

THE PROPOSAL

Central to the Scenic Rim Trail proposal is a deep appreciation of and desire to conserve the area's World Heritage values. In keeping with this commitment, expert ecological advice has informed careful design and operational modifications to avoid or minimise potential environmental impacts.

Features:

- 58km multi-day, guided small-group bushwalking experience sharing Queensland's natural beauty
- Combination of existing track and trails with new or improved track
- Starts and finishes on private nature conservation reserves
- Traverses Main Range National Park
- Two new eco-camps for overnight stays
- Public benefits including:
 - New northern trail head, toilets and car park
 - 5.7km of public track on private land
 - New remote campsites



The project's commitment to protecting and maintaining natural and cultural values will carry through to all stages of implementation and operation of the Scenic Rim Trail by:

- Limiting the size and number of walking groups, with operations scaled back in the summer months (peak growing season)
- Involving specialists in natural and cultural heritage assessment, ecotourism planning and development, sustainable architecture, fire management and heritage interpretation
- Integrating with the Hidden Vale UQ Wildlife Centre to support conservation of key species such as the Eastern Bristlebird, Brush-tailed Rock Wallaby and Hasting River Mouse
- Contributing to ongoing monitoring, management and maintenance

A VISION FOR AUSTRALIA'S

next great walk

SCENIC RIM TRAIL - SIX DAY WALK



A VISION FOR AUSTRALIA'S

next great walk

SCENIC RIM TRAIL - SIX DAY WALK

THE TRAIL

The proposal includes a long-range walking track, made up of:

- 20.1km of existing Class 3 and 4 National Park walking track
- 17.2km of Class 5 track to be established within the National Park
- 5.6km of existing National Park management roads and fire trails
- 4.5km of existing Class 5 track on the proponent's land
- 5.7km of new Class 5 track on the proponent's land

The trail takes in sub-tropical rainforests, tall eucalypt forests, mountain heathlands, waterfalls and spectacular views.



MAIN RANGE NATIONAL PARK

- Located on the western part of the Scenic Rim, about 83km south-west of Brisbane
- Covers 29,730ha managed by the Queensland National Parks and Wildlife Service (QPWS)
- Includes the northernmost of 42 reserves that make up the Gondwana Rainforests of Australia World Heritage Area
- Features rugged mountain peaks, spectacular views and rare wildlife



PROTECTING THE ENVIRONMENT

Working closely with QPWS and the Commonwealth Department of Environment and Energy (DoEE), important wildlife survey work and management planning has been undertaken to ensure that the Scenic Rim Trail project complements and protects the natural environment.

Proposed environmental management initiatives include:

- Working with QPWS to monitor and reduce existing feral animals
- Rodent-proof eco-camps and strict pack procedures for hikers
- Noise and light limiting construction materials at eco-camps to reduce disturbance
- Working with QPWS to protect populations of Fleay's barred-frog and other vulnerable or endangered species
- Avoiding ecologically sensitive areas
- Onsite waste treatment

A VISION FOR AUSTRALIA'S

next great walk

SCENIC RIM TRAIL - SIX DAY WALK

CULTURAL HERITAGE

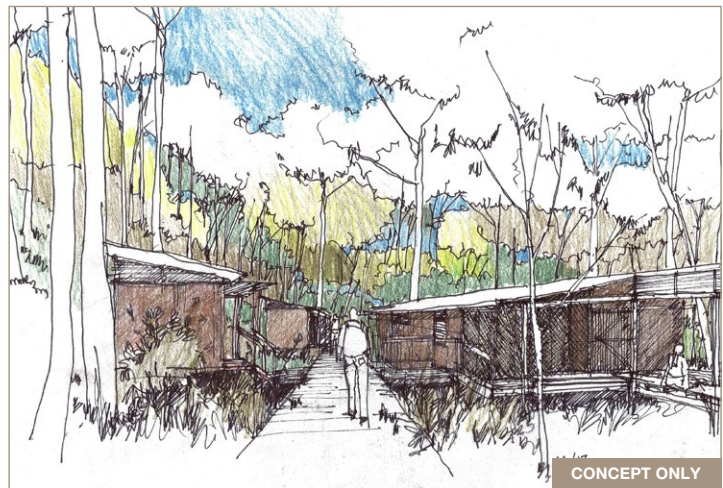
Scenic Rim Trail is working with Indigenous representatives to ensure that cultural heritage is respected and honoured through the project. There will be opportunities to share the cultural history of the region with visitors, and employment of interpretive guides.

ACCOMMODATION

Under the proposal, two overnight eco-camps will be built within the National Park for Scenic Rim Trail guests and guides, with two further accommodation facilities on freehold land owned by the proponent.

The eco-camps are designed to reflect the surrounding natural and cultural landscape. They will be fully self-sufficient through a combination of solar and gas power, with water sourced from roof capture. Waste will be treated and managed on-site.

New remote campsites will be provided for free and independent use.



Local Queensland firm Arkistruct has been selected to build the modular eco-camps as part of the proposed Scenic Rim Trail.

The Brisbane-based firm is experienced in delivering modular designs offsite, which will ensure a low environmental footprint with reduced building material wastage and on-site construction time.

PUBLIC ACCESS

Existing and new sections of the trail within Main Range National Park will be open to public use, regulated by QPWS with a monitoring, management and maintenance contribution from Scenic Rim Trail.

The expanded trail network will provide new opportunities for the public to access remote sections of the National Park.

TIMING

Subject to approvals, the Scenic Rim Trail Six Day Walk is expected to open in early/mid 2018.

Appendix F: Information displays



Above: Information Display at 1 William Street, Brisbane



Above and below: Public Information Display, Cunningham's Gap



Appendix G: Public submissions

SUBMISSION NUMBER	REPRESENTATIVE	COMPANY / ORGANISATION REPRESENTED
1	Rhonda Wood	Private submission
2	Pauline Garner	Private submission
3	Sheena Gillman, Project	Protect the Bush Alliance
4	Charlie Yarrow	Laidley Bushwalkers Club & Sunshine Coast Bushwalkers
5	Gary Chalmers	As above
6	Dauida Allen	Private submission
7	Brenton Prescott, President	Gold Coast Bushwalkers Club Inc
8	Gavin Dale, President John Marshall, Vice President	Bushwalking Queensland Inc
9	Professor Nick Reid, Chair, Technical and Scientific Committee Dr Mahri Koch, Chair,	Gondwana Rainforests of Australia World Heritage Area
10	Laura Hahn, Conservation Officer	National Parks Association of Queensland
11	David Manager	Private submission
12	Roland Howlett	Private submission
13	Tanya Smith	Friends of Brisbane Valley Rail Trail

1

Dear Whomsoever, Having perused the email about proposed corporate intervention in the main range walking area and collaboration with National Parks, I am going to make a journey into the DEH this week to see your plans.

I know enough about corporatisation of our National Parks to be hyperaware of how access by the general public gets restricted.

The Upper Noosa River Campsite 3 is out of bounds to the general public, for instance. It is the preserve of a corporate entity and this is quietly hidden from public knowledge.

National Parks do precious little to encourage use by individuals, and it is a worrying trend to contemplate.
yours faithfully, Rhonda Wood

From: pauline garner <laureltree11@gmail.com>
Sent: Thursday, 12 October 2017 10:48 AM
To: yourenvminister
Subject: MC17-019575 - proposal to establish a multi-day walk-BCD

Contact your Minister request notification

Contact your Minister for the Environment and Energy webform submitted on 12/10/2017, 11:47

Minister name: Josh Frydenberg

Title: ms

First name: pauline

Last name: garner

Email: laureltree11@gmail.com

Organisation:

Address: 11 sinclair street, Ipswich, QLD, 4305, Australia

Phone: null

Subject: regarding a proposal to establish a multi-day walk

Comments:

REGARDING THE PROPOSAL TO ESTABLISH A MULTI-DAY WALK FROM Thornton trailhead via Main Range National Park and linking up with Spicers Peak Lodge. I have a number of concerns for the proposal and feedback process. Firstly, the significant amount the amount of work already completed on the proposal conveys the impression that it is a 'done deal'. This is reinforced by the fact that feedback is being monitored by Spicers rim trail enquiry line. Given this is a public asset shouldn't the Government be running the consultation process to ensure an equitable feedback process? Where is the indigenous consultation?

National Parks in Queensland is a precious resource which cover an area of only around 5%. The remaining Parks should be protected and conserved to the highest possible standard for all. Why is a

private commercial enterprise being given permission to build exclusive accommodation for profit?
National Parks are a precious asset for all Queenslanders – not just those who can afford to pay.

The opening of a previously closed logging road for vehicle access for the Spicers accommodation huts. This road is a previous logging road with 40 years of regrowth in a World Heritage area. Roads and infrastructure in National Parks aren't consistent with the cardinal principle under the Nature Conservation Act. Are they trying to exploit the lesser provisions around eco-tourism? The proposal for opening a road is completely unacceptable.

I am not opposed to anyone using Parks for recreation. There are already existing trails for people to use and anyone is able to walk through the Parks anytime. I believe people should be able to get out and enjoy the beautiful country we have, but I don't think people should be given privileged access and allowed to modify the Park to suit a hedonistic lifestyle which benefits a commercial enterprise.

Yours Sincerely,

Pauline

Attachments: 0 file(s) attached.



PO Box 1040
Milton, QLD 4064

14th October 2017

Ben O'Hara

Scenic Rim Trail Project
C/o PO Box 108
Brisbane Qld 4006

Dear Ben,

Protect the Bush Alliance (PTBA) is an alliance of 24 NGOs and community groups in Queensland and Australia representing over 30,000 people. Our goal is to implement ways of preventing the continuing loss of areas of high conservation values to inappropriate development. Members of PTBA have had, and will continue to have, close association with communities when developments strategically impact on areas of biological significance and diversity of concern to that community.

We thank you for the opportunity to comment on the establishment of the Scenic Rim Trail from Thornton View Nature Refuge to Spicer's Peak Resort in the Main Range.

Protect the Bush Alliance has received advice from members expressing concern for what is perceived a precedent of a private development in National Parks which were created for the overriding need to protect Nature. Points of concern are:

- Introduce exclusivity of use into what was previously an entirely publicly accessible space. This constitutes a direct threat to the very principles that underpin national parks, and represents a dangerous precedent that could easily be argued should be replicated in other NPs. National Parks are a public asset and should not be colonised by commercial interests.
- Compromise tenure; It may be better if such investments were excised from the NP (i.e. re-gazetted Regional or Conservation Park).
- Compromise the management of the national parks they are sited within. In instances of similar investment proposals (either interstate or overseas), management effort gets redirected towards protecting the new asset/development in the National Park. The classic example is fire, with ecological fire management regimes being altered to protect newly developed infrastructure, with the conservation of biodiversity being all the poorer for the redirection of effort and resources.

We are certainly aware of the Gainsdale Group's conservation interests and standards and acknowledge their association with Queensland National Parks management to;

- Monitor and reduce feral animals.
- Create discreet camp environments supportive of a standard appropriate for this form of outdoor recreation.
- Provide parallel services for the public wishing to access some part of the development.

- Limit noise, light and other intrusive elements in the design of the facilities.
- Working with NPRS in the monitoring of threatened species.
- Avoiding ecologically sensitive areas.

We are confident organisations such as the National Parks Association of Queensland and Wildlife Queensland, will assume an ongoing involvement as these facilities develop and become available to hikers. The nature of the development and its location we understand, are not likely to attract high visitor numbers which will in itself reduce potential adverse impacts.

There exists already, significant trail and bush camp facilities within the Main Range National Park which particularly in summer months, host a considerable number of visitors. Therefore the presence of recreation within the park is not new nor is the risk management associated with litter and misuse of the park environment.

In addressing MNES; we agree species such as Hastings River Mouse and Fleay's Barred Frog seem tolerant of the parks visitor numbers at present. These species likely exist well beyond the scope of the fauna surveys conducted by BAAM for the purpose of this development. We encourage conscientious hygiene practises from tour guides and their guests, to prevent the introduction of pathogens by contaminated foot wear; similarly product delivered to the camps.

Surprisingly, Eastern Bristlebird *Dasyornis brachipterus monoides*, has not been included as a species of concern in addressing MNES. This species in Queensland is listed as Endangered under Commonwealth legislation. The Main Range has been one of two strongholds of EBB in Queensland with most territories occurring along National Park tracks. Observation of this species beyond known locations has been troubled by both access to remote areas of the park and to habitat on neighbouring properties. With the re-opening of the Winder Track and approved access through montane heath vegetation north of Bare Rock, there exists the possibility walkers and guides may identify Eastern Bristlebirds. Staff members at Spicer's Peak Resort are aware of EBB and have recently reported a possible sighting. In conjunction with staff at Hidden Vale research facility, there exists the opportunity to contribute to the northern recovery program for EBB.

In the great scheme of 'Caring for our Country', increasing awareness of the ecological sensitivities and the processes of nature's contribution to our wellbeing is of paramount importance. Getting people from all walks of life engaged in this caring, must be encouraged.

We trust all efforts will be initiated by The Gainsdale Group to limit impacts and to encourage along the way, a sense of pride and awareness that a very special environment is being provided for the greater good. It is likely this development will receive considerable scrutiny as it evolves.

We also trust the Queensland Department of Environment's Threatened Species Unit and National Parks management will maintain essential engagement to steer this project towards a genuine example of eco-tourism, respecting the privilege of access to Main Range National Park.

Once again, thank you for the opportunity to provide this submission.



Sheena Gillman

Project Coordinator PTBA.

Email: sheenagillman@gmail.com Tel: 07 3201 1982 Mb: 0409 268 076

Community Comment- Scenic Rim Trail

Response 1

The present proposal for the Scenic Rim Trail as indicated in the EPBC document 2017, looks very impressive but raises some key concerns. Having had the opportunity of walking extensively in this unique Scenic Rim and Mt Mistake region, I believe it is imperative to maintain the true integrity of this landscape.

A significant issue of concern is that public funding is used to acquire as well as maintain National Parks and therefore new projects need to reflect broad based public accountability. In saying this, service provision in National Parks has an obligation to maintain relatively low-income access to a “wilderness trail experience”. Please note that the word “trail” is an American construction in this context and should be replaced by the word ‘track’ which is more compatible with an Australian bushwalking audience. The general public and displaced indigenous custodians of the Scenic Rim region are entitled to have access to wilderness tracks which are not dependent upon client wealth or different government alliances.

Given that commercial interest is now regarded as compatible in National Parks, and this is questionable, it then should equate that the “wilderness experience” should rest within the defined concept initially designed by the QPWS. From a historical perspective, minimal impact cabins or basic shared camp facilities such as a composting toilet and tent sites, have been the benchmark for the collective bush track experience. The promotion of “glamour camping” supported by a road system and vehicle support within the Gondwana Rainforest National Park is inconsistent with the core values of the QPWS.

The true value of a multi-day bush walk in National Parks is a wilderness experience where walkers separate themselves from their worldly attachments and connect with nature. The concept of packaging a “wilderness experience” implies that the environment becomes a commodity to sell, rather than to be observed. If clients request a “wilderness experience” which compromises core QPWS values, perhaps an innovative virtual reality experience of the Scenic Rim Trail may be a better option.

Charlie Yarrow
Laidley BWC & Sunshine Coast BW

Response 2

The proposal for the construction of a multi-day walking track from Thornton to Spicers Canopy Nature Reserve is a great idea and has my full support. It appears that a full study has been completed so as to reduce the impact on the environment by utilising existing walking tracks the National Parks, re-opening the old Winder Track used by the Timber Loggers a number of years ago and negotiating suitable routes for new tracks on private property.

My only concerns with this proposal are as follows:-

- (1) The cost of the undertaking this walk. Will it be controlled by the owners of Spicers Peak resort meaning that the cost to undertake these walks will be too much for the normal bushwalkers who are members of bushwalking clubs.
- (2) It appears that the walks can be only done in one direction
- (3) I would like to see an opportunity to do a section of the walk only so that bush walking clubs can do this in sections on the week-end and not have to do the full 53kms over three days

Regards Gary Chalmers



Objection

to the proposed development of the Gondwana Rainforest north of Cunningham's Gap, Gainsdale Pty Ltd Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve, QLD (EPBC 2016/7847).

The Proponent
Scenic Rim Trail Project
Gainsdale Pty Ltd
Attention Mr Ben O'Hara General Manager, Land and Environment
c/o PO Box 108
Fortitude Valley Qld 4006
enquiries@scenicrimtrail.com

Tuesday 17 October 2017

Dear Mr O'Hara,

RE: Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve, QLD (EPBC 2016/7847)

I am writing to express my opposition to the proposed Scenic Rim Trail – Thornton Trailhead to Spicers Canopy Nature Reserve.

I refer the Proponent to the United Nations Educational, Scientific and Cultural Organization (UNESCO) Selection Criteria for World Heritage listing, which states “To be included on the World Heritage List, sites must be of outstanding universal value and meet at least one out of ten selection criteria”. Number seven of those ten selection criteria is “to contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance”.¹

Even if the UNESCO criterion seven was not relied on to gain World Heritage listing for the Gondwana Rainforest of Australia, it is applicable to Gainsdale’s development application and the impartial consideration of the area’s future.

The Proponent wishes to commercialise the area’s exceptional natural beauty and aesthetic importance. Yet it does not appear to have commissioned any report on the impact the proposed development will have on the area’s beauty over time. I suggest one reason for this is because it would be impossible for any reputable authority to conclude that the outcome would be anything other than disastrous over the next century.

My credentials

I am an internationally recognized visual artist, film maker, published writer and conservationist. I won the Archibald Prize for portraiture in 1986 and my paintings are held in public and private collections in Australia, New Zealand and the United States. My film represented Australia at the Venice film Festival in 1990. In 2004 I was bestowed an honorary doctorate for my contribution to art from Griffith University. For the last 15 years my landscape paintings have been inspired by the outstanding natural

beauty of World Heritage areas. I exhibit at the Philip Bacon Gallery in Brisbane and recently sold a painting of the Gondwana forest for \$75,000. I was also instrumental in the acquisition of the Cocoon Point National Park on the Capricorn Coast in 2006.

I started bushwalking reluctantly at 19 years of age (when a flight of stairs presented a challenge!) when I joined a family of bushwalkers. After 47 years experience bushwalking in South East Queensland and Tasmania and professional participation in the art world I feel qualified to provide an assessment of an action that will threaten a landscape containing outstanding natural beauty.

In May this year I walked with my husband for 25 days along the Little Liverpool Range south of Laidley, gained ascent of the Main Range north of Cunningham's Gap, proceeded south to the Queensland – New South Wales border and followed it along the McPherson Range to O'Reilly's.

The Gondwana Rainforest contains exceptional natural beauty and aesthetic importance.

Of all the landscapes I have visited this Gondwana Rainforest (north of Cunningham's Gap between Sylvester's Lookout and Bare Rock) is the most pristine and beautiful. It is an outstanding open rainforest devoid of undergrowth and the impediment of wait-a-while (*Calamus australis*). Because of the open nature of the forest, one can easily traverse the landscape without a track. On my May visit to the site I saw no traces of human visitation, especially because no track has evolved, despite the area being visited by bushwalkers over the years. The area known as "The Ramparts" is sited on the top of the 1000 metre Main Range that emerges spectacularly from coastal South East Queensland. The views The Ramparts provide of the Eastern Plains are framed by stunning strangler figs (*Ficus watkinsiana*) and are of particular aesthetic value.

The construction of a trail in this area is an action that will have a significant impact on the value of the declared World Heritage property because there is every likelihood that its intended, increased human visitation will degrade the area's exceptional natural beauty. The trail is designed to allow foot traffic and areas of vehicular access to the accommodation areas.

Issues put forward as "low risk" today become significant impacts over time.

The Proponent and I both clearly prize the aesthetic value of this location. Yet Gainsdale's Proposal to construct a trail through the World Heritage listed rainforest sadly follows the tradition of other commercial activities that inevitably destroy an area's natural beauty.

Ecotourism is currently a socially fashionable and Queensland State Government encouraged commercial activity. It has replaced the industries of native timber harvesting and gold exploration that defined certain areas of the Queensland economy in the past. It is not without its side-effects on the very environment it utilises and the

companies who pursue it successfully today are as precariously positioned in global markets as the logging mills of yesterday.

One only needs to look at the Great Keppel Island Resort on the Capricorn Coast to see an extreme example of what can go wrong on a state government level with the change of tourism ownership of a site of extraordinary natural beauty. I also refer the Proponent to look at the almost complete degradation of the rainforest in Rum Jungle at Mt Barney. The rainforest has been destroyed by excessive human visitation up the south ride track.

The construction of a trail from Thornton Trailhead to Spicers Canopy Nature Reserve will do nothing but diminish the World Heritage area's natural beauty; if not this decade or the next, then with absolute certainty by the end of the century.

Let me expand a little on this; part of the thrill of the encounter with areas of outstanding natural beauty is often enhanced by the "wilderness experience". This intangible quality is usually eroded by evidence of human interference. For example, you are unlikely to experience it driving on the highway through the Gondwana Rainforest in Cunningham's gap, nor will you experience it walking on a well worn, human made trail through a degraded rainforest.

Opening up the Gondwana Rainforests of Australia World Heritage Area to ecotourism would obviously increase the value of the current Gainsdale property portfolio and increase their revenue. With all respect to the Turner family and their generous philanthropy, it is extremely unlikely that Gainsdale will still be in existence in 100 years time. If it follows a similar course to most companies, its assets are likely to be sold if not resold within 2 lifetimes. Commercial companies deal in precarious variables.

My aspiration for the World Heritage area is that its heritage is timed in centuries not decades. World Heritage protection is designed to bestow the land with a sense of timelessness insofar as it protects landscapes and their fauna and flora from the fashions and drivers of commercial enterprises – be it logging, mining or tourism. World Heritage protection is meant to be as pristine a gift as is possible to future generations.

Increased human visitation will inevitably cause significant impact on the World Heritage value of the area.

All the potential environmental risks presented by Gainsdale have, unsurprisingly, been assessed by their commissioned experts as "low risk". There is unfortunately no time line on each of these assessments. I suggest that what might be low risk over the next decade becomes some risk over the next 20 years and inevitable risk over the next century.

It is widely recognized that aesthetic degradation and loss of habitat inevitably occurs to natural landscapes where human visitation is encouraged and the area becomes very easily accessible. This occurs despite the good intentions of the majority of people who

use National Parks and the management plans that exist to protect them. I have seen the following examples of aesthetic degradation in National Parks:

- littering of tissues, plastic wrappers, toilet paper, aluminium foil, drink bottles and cans (the track to Blue Lake, North Stradbroke Island),
- tracks eroding and growing wider than they were initially constructed and directly contributing to the destruction of the landscape's conservation and natural beauty (South Coast Tasmania track),
- wanton clearing of vegetation with machetes, knives and axes alongside tracks (track to Tweed Trig from the Border Ranges National Park),
- graffiti – the most common form being carved initials into the trunks of trees (Blue Lake, North Stradbroke Island),
- theft of low lying epiphytes (such as the attractive staghorn shown in the Gainsdale proposal, “Map and Elevation Profile of Reopened Winder Road Section 2”.² (Western Ridge Mt Huntley Main Range National Park);
- introduction of noxious weeds and pests (the abandoned rabbit fence on the area east of Mt Gipps on the McPherson Range is degraded by massive quantities of stinging nettle (*Urtica dioica*), lantana (*Lantana camara*) and foreign grasses, and I have seen fox scat, cane toads and European rats.
- fire ants (the North East Ridge of Mt Flinders is already marked with government Fire Ant nest indicators).

The Gainsdale Proposal will degrade the habitat of the Hastings River Mouse (*Pseudomys oralis*) and Fleay's Barred Frog (*Mixophyes fleayi*).

An intrinsic part of the natural beauty of the area is the knowledge that the region is home to the endangered Hastings River Mouse (*Pseudomys oralis*) and Fleay's Barred Frog (*Mixophyes fleayi*). It is also the most northern habitat of the Albert's Lyrebird (*Menura alberti*).

I suggest it would actually be impossible to preserve the outstanding natural beauty of this habitat should a trail be constructed to increase human visitation. I refer the Proponent to R. John Hunter's study, “World Heritage and Associative Natural Values of the Central Eastern Rainforest Reserves of Australia”, which states, “Existing threats to rainforest vegetation and constituent plant and animal species include” [...] “increased visitation and associated infrastructure”.³

The World Heritage listed area supports the Hastings River Mouse (*Pseudomys oralis*), listed as vulnerable in Queensland and endangered nationally. The Queensland Department of Environment and Natural Heritage Protection websites states, “Few people have the privilege of seeing this animal because of its secretive behaviour and nocturnal lifestyle”.⁴ It is of particular concern that the Gainsdale submission of September 2017 shows the Hastings River Mouse was only caught at the area the Proponent is calling Woodcutters Ecocamp, and wishes to develop commercially, and which is situated some metres outside the World Heritage area.

The area is also habitat to the Fleay's Barred Frog (*Mixophyes fleayi*), listed as endangered in Queensland and nationally.⁵ The amount of counted Fleay's Barred Frogs listed in the Gainsdale submission is to be celebrated. As Hunter suggested in

2004, “The decline of frogs in recent years has received some attention. The species affected include some that are attributes of the World Heritage values of the property.

At the same time, I believe that research of captive species cannot compensate for the alteration of the native environment in which the Fleay’s Frog and Hastings River Mouse have proved to be in existence. I refer the Proponent again to Hunter’s study of the “World Heritage and Associative Natural Values of the Central Eastern Rainforest Reserves of Australia”, in which he writes, “It should also be recognized that the property includes all or most of the habitat for some of these species and management should adopt the precautionary principal and aim to minimize or exclude human impacts from those habitats”.⁶

Safety Concerns about the proposed trail

The Proponent has not explained how walkers would safely cross the Cunningham Highway to gain access to Mt Mitchell as part of the proposed trail. The area in question is particularly dangerous because it is close to a bend in the highway that does not allow visibility of oncoming traffic, including semitrailers travelling at considerable speed.

Furthermore, when I walked the proposed new section of trail between Sylvester’s track and the Dalrymple Creek I came across a 70 metre steep, scree slope at map reference 382 039. To allow a safe descent and avoid rock falls considerable engineering would be required. This is not mentioned in the Gainsdale proposal.

GPS Navigation technology revolution

The preservation of this World Heritage area is proportionate to the lack of visitor infrastructure, particularly the lack of designated trails and close accommodation. The relatively small number of individual, wilderness adventurers who currently access the area on foot can access the Global Positioning System (GPS) by their smart phone or another device. The GPS will become more sophisticated and accurate every year. The future bushwalker will inevitably utilise a GPS navigation device making them completely independent of marked or constructed tracks. This revolution will allow selective visitation with the most minimal impact.

A viable, alternative trail of a similar length already exists that can accommodate increased visitation

There is already a trail in the Scenic Rim that could easily support larger numbers of walkers. Please see the attached map. This trail offers spectacular views and access to a waterfall. It is of similar length to the trail proposed by Gainsdale for their commercial enterprises, yet without the environmental impacts. It is the cleared 5 metre wide service track between the agricultural fence and the rabbit fence running from Collins Gap (Mt Lindsay) to Richmond Gap (The Lions Road) – being the actual Queensland – New South Wales border. This track is already maintained by the Rabbit Board at

considerable cost, for its entire 500 kilometre span. This trail will easily support a visitation of 20 to 30 people per day.

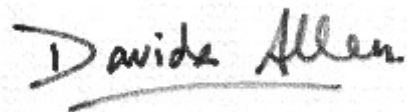
Conclusion

Gainsdale has provided no specific timeframe in which it guarantees that the Gondwana Rainforests of Australia World Heritage Area it seeks to develop will be immune from significant impact. Environmental history proves over and over again that issues deemed “low risk” today, if accepted, have every chance of becoming significant. There is no visitation strategy, infrastructure or captive research facility that could adequately compensate for the damaging effect that would be caused by higher levels of human foot traffic and the introduction of wheeled traffic to this landscape.

The construction of a trail from Thornton Trailhead to Spicers Canopy Nature Reserve presents too great a risk to the survival of the vulnerable Hastings River Mouse and endangered Fleay’s Barred Frog. The trail would also be viewed by future generations as a scar on the landscape and so a notable alteration to its natural beauty. GPS navigation moreover makes anachronistic the construction of a hard trail into this extraordinary and sensitive environment.

I ask the Proponent to reconsider their proposal because the construction of a trail through the World Heritage Gondwana Rainforest north of Cunningham’s Gap will notably alter the universal value of the area’s outstanding and exceptional natural beauty and aesthetic importance.

Yours sincerely,

A handwritten signature in black ink that reads "Davida Allen". The signature is written in a cursive style and is underlined with a single horizontal line.

Davida Allen.

Email: davidamanager@bigpond.com

cc. The Hon Josh Frydenberg, Minister for the Environment and Energy;
The Hon Dr Steven Miles, Minister for Environment and Heritage Protection and
Minister for National Parks and the Great Barrier Reef;
Dr Mahri Koch, Chair of the Community Advisory Committee for the Gondwana
Rainforests of Australia;
Mr Graeme Bartrim, President National Parks Association of Queensland;
Ms Laura Hahn, Conservation Officer, National Parks Association of Queensland;
Mr Jon Krause MP, Member for Beaudesert, Shadow Minister for Tourism Sport and
Racing;
Mr Ian Rickuss MP, Member for Lockyer.

References

1. “The Criteria for Selection”, United Nations Educational, Scientific and Cultural Organization, available at <http://whc.unesco.org/en/criteria/> , accessed 16 October 2017.
2. Gainsdale Proposal, Unnumbered photograph on left, “Map and Elevation Profile of Reopened Winder Road Section 2, Scenic Rim Trail – Thornton Trailhead to Canopy Ecocamp; available at http://www.scenicrimtrail.com/wp-content/uploads/2017/09/2016-7847-EPBC-Response-Sep-2017-03-Annex-2-part-1_OPT.pdf , accessed 16 October 2017).
3. R. John Hunter, December 2004, “World Heritage and Associative Natural Values of the Central Eastern Rainforest Reserves of Australia”, NSW National Parks and Wildlife Service, available at <http://www.environment.nsw.gov.au/protectedareas/CERRAvaluesreport.htm> , accessed 13 October 2017), page 35.
4. “Hasting River Mouse”, Queensland Government Department of Environment and Heritage Protection Endangered animals, available at http://www.ehp.qld.gov.au/wildlife/threatened-species/endangered/endangered-animals/hastings_river_mouse.html, accessed 16 October 2017.
5. “Fleay’s barred frog”, Queensland Government Department of Environment and Heritage Protection Endangered animals, available at http://www.ehp.qld.gov.au/wildlife/threatened-species/endangered/endangered-animals/fleays_barredfrog.html, accessed 16 October 2017.
6. Hunter, Op cit., page 126.



Existing Scenic Rim trail running from Collins Gap (Mt Lindsay) to Richmond Gap (The Lions Road). The trail follows the border between Queensland and New South Wales. It is maintained by the Rabbit Board and will easily support a visitation of 20 to 30 people per day.

Ben O'Hara

From: Katherine Barclay
Sent: Wednesday, 18 October 2017 5:08 PM
To: Ben O'Hara; Cheryl Gray
Subject: Fwd: Scenic Rim Trail

Categories: To Follow Up

----- Forwarded message -----

From: **Brenton Prescott** <docprescott@netspace.net.au>
Date: Wed, Oct 18, 2017 at 4:53 PM
Subject: Scenic Rim Trail
To: enquiries@scenicrimtrail.com

Ben O'Hara

Gainsdale Pty Ltd,

The management committee of The Gold Coast Bushwalkers discussed your proposals for the Scenic Rim Trail at our meeting last night and we would like to offer our strong support for your proposals. We appreciate the upgrading of public access facilities and the provision of remote bush camps and we have no problems with the eco-camps for commercial use. We wish you success with your proposals and future endeavors.

Brenton Prescott

President

Gold Coast Bushwalkers Club Inc

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>



Bushwalking Queensland Inc.

ABN 30 351 665 169

PO Box 12884,

GEORGE STREET QLD 4003

Email - secretary@bushwalkingqueensland.org.au

Web - <http://www.bushwalkingqueensland.org.au>

Submission on the proposed Scenic Rim Trail

Bushwalking Queensland Inc. (BWQ) is the peak body representing 25 affiliated bushwalking clubs throughout Queensland as well as promoting the pastime of bushwalking to the public at large. We welcome the opportunity to comment on Gainsdale's Scenic Rim Trail proposal. This submission is made from a bushwalkers' perspective and deals with the section between Cunninghams Gap and Laidley Gap (Thornton trailhead).

Gainsdale deserves some commendation for the carefully considered detail on the proposal, which examines both the recreational aspects and environmental impacts of the project.

Historical background of bushwalking in the area

The Mistake Mountains have been a low-key but long-term destination for bushwalking in south-east Queensland, starting in the 1930s when the Queensland National Parks Association blazed a trail from Mt. Cordeaux to Sylvesters Lookout and the Goomburra Valley. The popularity of multi-day bushwalks carrying full camping equipment (traditionally called "throughwalks" by local bushwalkers) increased during the 1960s and 1970s in particular, with most throughwalkers heading north from Cunninghams Gap to Sylvesters Lookout then either to the Hole-in-the-Wall and Mt. Castle or continuing to the Winder and along the crest to eventually reach Laidley Gap. The latter version approximates what Gainsdale is proposing for its walk north of Cunninghams Gap.

In the 1990s usage began to decrease with the forestry road north of the Winder no longer being maintained and becoming thickly overgrown. When what the Gainsdale proposal calls "Mt. Mistake Farmhouse" was established bushwalkers were no longer welcome on the freehold land north of the national park boundary and organised bushwalking north of the Winder thereafter ceased almost entirely.

Gainsdale's proposal to facilitate bushwalking access to the area between Laidley Gap and the Winder is therefore of considerable interest to the bushwalking community and is supported in principle.

Comments on proposed trail and facilities

In general, our preference would be for the Queensland Parks and Wildlife Service to provide visitor facilities such as walking tracks in national parks. This is even more the case where permanent built structures are involved. However, it is acknowledged that the track construction proposed is relatively low-key, generally class 5, and existing or former roads would be used where possible. In the case of the campsites within the National Park, it is noted that they would be small and in more open forest areas to minimise removal of trees and other significant vegetation. We suggest however it might be better to have permanent structures in this situation as an alternative to continually erecting and removing tents, as it reduces trampling damage.

We agree with the basic alignment of the trail between Cunninghams Gap and Laidley Gap, and welcome the offer by Gainsdale to construct a short section of track along the crest to

bypass access to one of the company's camps. This would have the mutual benefit of keeping all of the company's camps private whilst enabling bushwalkers to avoid the unnecessary extra distance and altitude loss involved in following the access tracks to the camp.

We support the proposal to establish two public water points along the way, as most of the route is close to the crest of the range and there are few accessible creeks. (There are only two useful creeks along the way – one on the western side of the crest slightly south of the Winder and reached by an old forestry road, and the other which the Winder road crosses north of the Mt. Castle Lookout. Both can be seasonally dry.)

Possible trail extension

An enhancement of the walk which Gainsdale may wish to consider is a side track to Point Pure, a very spectacular lookout point on the western side of the range. This was once popular with throughwalkers but appears to be little used now because the old logging tracks through the rainforest west of the Winder road, which once facilitated access, have now become thickly overgrown. The terrain itself between the range crest and the Point is relatively easy, and the only difficulty in putting a trail through would be cutting through the regrowth until the open forest further west was reached. The total distance is only about 2 km, one way.

Administration of camping

BWQ agrees with Gainsdale's proposal that the QPWS administer the permit system for private walkers. It would be expected that all bush camping would take place in the national park and it would set a most undesirable precedent for any private organisation to control visitor use there.

Walking north to south only

The proposal is written in such a way as to suggest that other well-known bushwalking tracks in Australia, such as the Larapinta Trail and South Coast Track, can be walked in only one direction. Although the commercial walks on the cited tracks operate one way only, the reality is that it is only on central parts of the Overland Track and some sections of the Three Capes Walk that the public is required to do so as well.

BWQ is opposed to the suggestion that all walkers, including private ones, should be limited to walking north to south. The main justification given is to avoid walkers encountering one another. However, with private bushwalkers being only in small, infrequent groups, we would expect this to be a negligible problem. (Although Gainsdale proposes to allow as many private walkers as paying guests to use the track, in practice it would be expected the number of throughwalkers to be well below the limit of 32 per week.)

There are several reasons for objecting to the requirement. One is that it is a long distance by road between Cunninghams Gap and Laidley Gap, which can cause logistical problems requiring flexibility to resolve. (This is of course not a consideration for paying guests, who have transport provided for them.) One consideration is the risk involved in leaving vehicles parked overnight at Cunninghams Gap. Private walkers accordingly may elect to complete the Trail in segments over time, and starting point and directional flexibility would be preferred to facilitate this.

Another reason is that, outside the winter months, it can be unpleasantly hot carrying a full pack from Laidley Gap up onto the Mistake Mountains. (Again, this is not so important for the guided walkers who will only be carrying light packs.) South-east Queensland has very few long-distance walks which are pleasant to do in the hotter months, these being restricted mostly to rainforest routes in Lamington National Park. A walk from Cunninghams Gap to Laidley Gap, mostly in high elevation rainforest apart from the descent in open forest at the end, would be a new opportunity. It is also for this reason that BWQ is against closing the track to private walkers for 3 months over summer, even though Gainsdale may suspend its operations over that time. A closure would achieve little from an environmental point of view given the expected light private usage. The company can theoretically close the trail on the

private land at the northern end, but we would certainly not expect the QPWS to be a party to a closure within the national park. Bushwalkers have long opposed the suspension of bush camping in Lamington National Park during December and January irrespective of weather conditions, believing it is of little benefit. It is even less justified in the case of the Main Range as severe wet weather is less likely.

Another reason for allowing south to north walking, when Gainsdale may wish to consider even for its own clients, is the improved quality of the experience. The descent from the Mistake Mountains to Laidley Gap is spectacular, with walkers "walking into the view" rather than facing the mountain slope when toiling uphill in possibly hot conditions.

Contribution to park management

BWQ welcomes Gainsdale's offer to contribute to management of the national park in their operational area by way of weed and feral animal control. QPWS funding for these essential activities has been inadequate in recent years and has contributed to a degradation of the conservation estate in a number of areas, including the Main Range.

A handwritten signature in blue ink, appearing to read "G Dale".

Gavin Dale
President BWQ

John Marshall
Vice President BWQ

17-Oct-17

Submission on referral 2016/7847 Thornton’s Trailhead to Spicers Canopy Nature Reserve, Queensland

Joint submission by the Gondwana Rainforests of Australia World Heritage Area Technical and Scientific Advisory Committee and Community Advisory Committee



Background

The Gondwana Rainforests of Australia World Heritage Area (Gondwana Rainforests) is a serial cross-jurisdictional World Heritage property, listed for its value to the global community, meeting the following criteria for listing:

Criterion viii: to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;

Criterion ix: to be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals;

Criterion x: to contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

The Gondwana Rainforests advisory committees (a Technical and Scientific Advisory Committee and a Community Advisory Committee), provide advice to the ministers with responsibilities for World Heritage management and protection.

Summary

Members of the Gondwana Rainforests advisory committees have reviewed the documentation for referral number 2016/7847 Thornton’s Trailhead to Spicers Canopy Nature Reserve, Queensland.

There is continuing concern that, given the precedent that the proposed activity will set if approved coupled with the risk of cumulative impacts, approval may result in significant impact on the outstanding universal value of the Gondwana Rainforests of Australia World Heritage Area including values, management and integrity.

Specifically there is concern that the activity may:

- *“fragment, isolate or substantially damage habitat important for the conservation of biological diversity in the [the Gondwana Rainforests of Australia World Heritage Area]” and / or,*
- *reduce or modify the diversity the composition of plant or animal species in all or part of the [Gondwana Rainforests of Australia World Heritage Area]” (p.16, Significant Impact Guidelines 1.1, Commonwealth of Australia, 2013).*

Consistent with the Australian World Heritage Management Principles, as outlined in the EPBC Act, the primary purpose of management of a World Heritage property **must be** the protection and management of World Heritage values. All activities within a World Heritage Area must be consistent with this. It therefore must be demonstrated that the proposed activity will not significantly impact World Heritage values. The material to date does address the information requests from the Department of Environment and Energy (DoEE) and does not allay concerns about the potential for significant impacts. In particular:

- The material presented by the proponent in response to specific questions about *Mixophes fleayii* is inadequate and not of the detail required to either determine impact or identify mitigation measures.
- The material presented about the prevalence and risk from amphibian chytrid fungus is inadequate and insufficient to determine the current threat from the disease or the risk of spread.
- The impacts on *Phyloria kundergungan*, another Gondwanan species, have not assessed and need to be included.
- The walking track component is not likely to be a threat to MNES. The ecocamps are unnecessary as permanent facilities, and are potential threats, a situation that is exacerbated by the use of the walking track as a road for servicing the ecocamps and, presumably, the walkers (by carrying their gear).
- The arrangement to lease part of a national park (and part of a World Heritage Area) to a private company is also of concern with regard to the attributing of responsibilities for ongoing maintenance and management of the World Heritage Area.

Key impacts on hydrology and soils in the World Heritage property

The material presented does not appear to address whether the various developments (particularly of trails, roads and campsites) are likely to increase soil erosion, creek sedimentation and the consequences associated with these. It is clear that gullying, mass movement and sedimentation can potentially take place in these environments if disturbance crosses particular environmental thresholds. Given the scale of the proposed developments and their possible impact on the forest canopy, the question of soil erosion and sedimentation needs to be addressed as, once the hydrological system has been changed by erosion, it is effectively impossible to return the landscape to its original condition. The environmental consequences of such a shift may be dramatic. The following document may assist the proponent to address this issue:

Thompson, B. (2007) *The distribution of erosion in the upper catchments of the Logan and Albert Rivers*. Report prepared by Land Resource Assessment and Management Pty Ltd. for Logan and Albert Catchment Assoc. Inc. and SEQ Catchments.

Key impacts on fauna in the World Heritage property

The material presented to date in relation to key World Heritage values does not provide information of sufficient detail or scientific rigour to allay the Advisory Committees' concerns with regard to the following issues:

- When dealing with the integrity of World Heritage values, the standard of the investigations and documentation should meet that required by the regulator, which may often exceed what would normally be expected in a development application. The Department of Environment and Energy requested specific information about the distribution and abundance of *Mixophes fleayii*. The material presented by the proponent does not provide this information.
- Approval is requested without a detailed understanding of the distribution and abundance of nationally threatened species that are identified in the local area. This approach is based on an implicit assumption that the impact will be minimal or nil. However, this assumption is flawed since the base-line ecological work has not been conducted to estimate population size, map the habitat, or provide a comparative view of alternative actions.
- The inability to assess varying degrees of potential impact because of the lack of alternatives is unacceptable. For example, if a more extensive study of the distribution of Fleay's Frog in the local area (i.e. defined as within 10 km of the study site, or perhaps defined as within the Main Range NP) found that the population is restricted to the upland sections of Blackfellows Creek and Dalrymple Creek, and that there are few other catchments supporting populations, then the appropriateness of constructing a walking track and crossing Blackfellows Creek would need to be considered in this light.
- Should robust populations be found in other catchments that are not affected by the proposal and are distant from other human impacts, then it would provide DoEE and the committees with information that the endangered species is not likely to be affected by the proposal. It is not possible to have that confidence without the base-line information.
- The committees believe that it is necessary for the proponent to demonstrate that the location of proposed trails does not impinge on the habitat of species (including *Phyllorhina kundagungan*), and that the requirements for habitat mapping and calculating the habitat area, and population estimate are applied as minimal requirements to ensure that on-going monitoring of potential impacts on all frog species is possible. In particular, mapping of the sites of soaks used for breeding and an estimate of the abundance of the populations is necessary.
- The committees consider that it is not appropriate to assess the potential impacts of a proposal without the base-line information requested by the DoEE.

Key impacts on the management of the World Heritage Area

- The committees are concerned that, as has occurred in numerous other locations, management effort will be redirected towards protecting the proposed new assets in the World Heritage Area. This is of particular concern where ecological fire management regimes are altered to protect new infrastructure, with the conservation of biodiversity becoming a secondary objective.

- On the basis of the information provided in relation to matters of national environmental significance (threatened species and World Heritage values), it would be reasonable to conclude that the construction of a walking track (primarily a class 5 track) on the proposed alignment would, in itself, be unlikely to adversely affect those matters. However, there are some associated components that have a capacity for damage over time and therefore should be addressed in more detail:
 - The walking track is also a road. For much of its length inside the national park/World Heritage Area, the walking track follows what was previously a forestry road. The proposal involves continuing to use it as a road in order to service the facilities (designated as ecocamps) that are to be constructed inside the national park. *(5.7 km of Class 5 track, and All Terrain 4WD access to the Ecocamps, via the retired section of the Winder forestry track.)*
 - The tracks are to be maintained to a width of 2.5 metres, which provides sufficient room for 4WD access.
 - As far as can be determined, there will be vehicle access from the trailhead to the Ecocamps and this covers approximately two thirds of the whole walk. That portion of the World Heritage Area was previously State Forest. The forestry roads were being allowed to regenerate. Now they will once again be exposed to, and maintained for, vehicular access.
 - This road access adds a potentially damaging dimension. Vehicles are potential carriers of invasive plant species' seed, posing a threat to World Heritage values.
- Once vehicle access has been authorised, the chances of ever closing it, or limiting access, are slim. Off-road bikes, pedal and motorised, may follow with attendant erosion issues. There is a need for such possibilities, and how they would be dealt with, to be addressed prior to the issuing of any development approval.
- The proposed establishment of two ecocamps within such short distance of each other appears to be superfluous. It is difficult to reconcile this sort of arrangement with genuine long-distance walking. Long-distance walkers in similar circumstances elsewhere would be expected to carry food with them and cater for themselves.
 - Comments have been made by the proponents that this is what is provided in Tasmania. This loses sight of the fact that some shelter is required in Tasmania because of the frequent occurrence of extreme weather conditions (i.e. snow, blizzards). These conditions do not occur in Queensland where normal camping facilities are sufficient for such exercises.
 - These ecocamps are approximately 2.5 km apart in a straight line and approximately 7.5 km apart by track, no more than 3 hours walk apart, exposing the park to all the issues associated with such facilities – water requirements, sewage disposal, road access, fire control, when no case has been made for them to be regarded as essential to a walking exercise. The Gainsdale document refers to one or both of these facilities being outside the World Heritage property. If they are outside the World Heritage Area, then they are likely to be only metres outside. Regardless of location, if they have an impact on the World Heritage property, they have to be considered.

- Details are needed on how issues such as fire, water and sewage associated with these facilities will be managed.
- While not an issue relating to MNES, the ecocamps can only be used by Gainsdale clients. This may contravene the test of being “in the public interest” under the *Nature Conservation Act 1992*.
- Other matters associated with the ecocamps , and the walking track to be constructed by Gainsdale, that need explanation are:
 - Who will own the facilities?
 - Who will be responsible for public liability insurance?
 - Who will undertake maintenance?
 - What happens if the company folds?

An annexure tabling a summary of further points addressing elements within the proponent’s reports is attached to this submission for your attention.

The Gondwana Rainforests of Australia Advisory Committees appreciate the opportunity to provide advice on aspects of the proposal, and would be happy to provide further clarification or advice, as required.

Yours sincerely,

Professor Nick Reid

Chair, Technical and Scientific Advisory
Committee
Gondwana Rainforests of Australia World
Heritage Area
02 6773 2017
nrei3@une.edu.au

Dr Mahri Koch

Chair, Community Advisory Committee
Gondwana Rainforests of Australia World
Heritage Area
02 6734 4257
kochmahri@gmail.com

Submission on referral 2016/7847 Thornton’s Trailhead to Spicers Canopy Nature Reserve

Joint submission by the Gondwana Rainforests of Australia World Heritage Area Technical and Scientific Advisory Committee and Community Advisory Committee



GONDWANA RAINFORESTS OF AUSTRALIA

ANNEXURE: This annexure addresses elements within the proponent’s two reports (Assessment and Management Of Potential Impact On Specific MNES Scenic Rim Trail - Thornton Trailhead To Spicers Canopy Nature Reserve, QLD EPBC 2016/7847 Gainsdale Pty Ltd; Fleay’s Barred Frog (*Mixophyes Fleayi*) Baseline Survey April 2017, Scenic Rim Trail, Prepared for Gainsdale Pty Ltd Biodiversity Assessment and Management Pty Ltd).

To enable cross-referencing between the documents, the section numbering of the proponent’s reports is provided in blue in the right hand column.

Responses are made only to sections where there is some question about the veracity of the claims, or where questions need to be raised for clarification.

DoEE Requirements	Comments for Consideration
<p>Provide a map/s of all Fleay’s Frog habitat, and a calculation of the area of Fleay’s Frog habitat, within and adjacent to the entire project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate methodologies.</p>	<p>5.1 Provide a map/s of all Fleay’s Frog habitat, and a calculation of the area of Fleay’s Frog habitat, within and adjacent to the entire project site. Figure 8, Page 46 Figure 9, Page 47.</p> <p>The survey guidelines in the EPBC Act for Fleay’s Frog are designed for the purpose of determining the presence/absence of the species at a site. It is questionable whether these are adequate to address the referral requirements. <u>There is no map of all Fleay’s Frog habitat.</u> The map provided is a buffer layer along the streams where transects were undertaken. The frogs move well into the rainforest habitats adjacent to the streams. This would require that the map should include stream and terrestrial habitat.</p> <p>To address the DoEE requirements, it would be necessary to map the breeding habitat (defined as sites where tadpoles occur in pools, and the riffle zones typically</p>

used in breeding – see Knowles et al {2013}). This would include mapping of the stream and smaller tributaries upstream and downstream of the proposed trail crossings. It is also necessary to include the terrestrial habitat in the map.

To be able to understand the potential extent of the impact on Fleay's Frog it is necessary to also know the boundary to the habitat and where the frog does not occur. For example, it is necessary to have some understanding of whether the habitat is 20, 200 or 2000 Ha. It is also necessary to know its distribution with respect to the location of the trails and ecocamps. It is not possible for DoEE to assess whether the proposed developments will fragment the habitat of the frog without a map of the habitat.

It is only with such intensity and attention to detail that it could be possible to apply in the future the necessary robustness to an assessment of impact or non-impact. Without suitable baseline information that is not possible. It is to the advantage of the applicant, and the necessary surety needed for Outstanding Universal Value and World Heritage integrity to be able to demonstrate that the frog population and its habitat is not impacted.

Survey methods to detect an animal and map its habitat require an unbiased survey technique. It is only using such methods that one can state with statistical support what is and what is not habitat. The presented report surveyed to determine where the frogs occurred, but not where they did not occur.

There is no calculation of the area of Fleay's Frog habitat "within and adjacent to the entire project site". There is a difficulty here that is not addressed, and that is how the "project site" is defined. Following suitable guidelines provided in the World Heritage assessments it would be conservative to include a buffer of 50 m either side of the actual impact zone, which would be the linear track and around the ecocamps.

There is a limited capacity to use the survey report as baseline for any future monitoring to test for impact. To be suitable it would require temporal replication of

	<p>the survey area. The terrestrial area should be stratified and survey sites chosen randomly. Surveys of the stream and riparian zone (5 m either side of the centre of the stream) should also be based on replicated surveys across a suitable seasonal timeframe.</p>
<p>Provide an estimate of the abundance of Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p>	<p>5.3. Risk Assessment - Potential Impact of the Project on Fleay's Barred Frog The provided survey gives a count of Fleay's Frogs observed in stream transects and along several sections of walking track. This is not an estimate of abundance in the habitat identified in 5.1. To be ecologically meaningful and informative, so as to enable the assessment of impact or non-impact, it is necessary to replicate surveys in the defined area (identified habitat in item 5.1) and across a suitable seasonal time-frame (we would consider the time frame to be across a spring-summer-autumn period).</p> <p>Appropriate methodologies: The methods used to detect Fleay's Frog were appropriate. The lack of response to call playback is most likely an indication that the weather conditions were not appropriate. The guidelines advise that surveys should not be conducted during rainfall or immediately after rainfall, yet the report indicates that rain was falling during the day preceding the survey and at the time of the survey. Observations of the photographs of the 'riffle zone' in the creek line show a strong flowing current. This is not an appropriate time for survey calling by male Fleay's Frog.</p> <p>5.2.1.2 Dalrymple Creek At best, the survey method provides a one-off count of the number of frogs during one survey event of one night (2.5 hrs. on Blackfellows Ck and 2 hrs on Dalrymple Ck), and can only be used as a measure of relative abundance. A suitable method to determine population abundance would require a capture-mark-recapture approach with robust design (see White and Burnham 1999). Such a method could be repeated in future to assess impacts, and be capable of providing a statistically robust outcome.</p> <p>5.3.1. Re-opening Winder Forestry Track 5.3.1.2 Reduction in area of occupancy 5.3.1.3 Fragmentation of existing population Habitat quality is necessarily a measure of comparison. To provide useful information that may be used to assess the potential for impact from the proposal, and as a possible</p>
<p>Provide an assessment of the quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted in accordance with appropriate</p>	<p>5.3.1. Re-opening Winder Forestry Track 5.3.1.2 Reduction in area of occupancy 5.3.1.3 Fragmentation of existing population Habitat quality is necessarily a measure of comparison. To provide useful information that may be used to assess the potential for impact from the proposal, and as a possible</p>

<p>methodologies by a suitably qualified ecologist.</p>	<p>measure at some time in the future of whether an impact has occurred or not, it is desirable to have the habitat quality compared with several other known sites (populations) of Fleay's Frog. There is no such comparison in the report by which to measure the quality of the habitat.</p> <p>If the assumption is made that if the frog occurs there, then it must by definition be "quality habitat", then there is no possible way to uncouple the observations made at one time and under those weather conditions from another survey. For example, if a comparative assessment of the quality of the habitat was made, it could provide information on which to base alternatives placement of the walking path, sites of stream crossings, or even the need to cross the stream. Thus for example, a conservation risk assessment may indicate that to traverse down the gully to Blackfollows Creek was not acceptable and that walkers would need to traverse between the Winder track and Mt Castle. The proposed trail that crosses Blackfollows Creek crosses the identified breeding habitat of Fleay's Frog. It also traverses the forest identified as habitat used for foraging and sheltering by frogs. The potential impact is at the stream crossing and along the corridor of the proposed track through sub-tropical rainforest. From the perspective of dealing with an endangered species in a World Heritage Area the survey would be only the starting point of a base-line measure used to assess whether the proposal impacts the population or not.</p> <p>The proposed track to access the Amphitheatre View Ecocamp requires 2.5 km of track to traverse down a slope to a crossing of Blackfollows Creek. This track appears to be for convenience – reducing the length of walking to gain access to the proposed, and is not necessary. Potential impact on Fleay's Frog could be avoided by not constructing this track.</p>
<p>Provide an assessment of the extent, nature, and severity of current threats (including the presence of Chytrid fungal disease and feral pigs) to Fleay's Frog in the habitat</p>	<p>The report provides an assessment of the two identified threats, but the assessments are so minimal and without adequate quantification to be able to make any valuable contribution to mitigation proposals.</p> <p>Chytrid fungus: Sampling of five tadpoles from each of two streams to test for the occurrence of the disease is inadequate to obtain a valid estimate of the prevalence of the disease in the tadpole stage of the life cycle. The absence of any sampling from adult or</p>

identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist. Please demonstrate consideration of the Recovery plan for stream frogs of south-east Queensland 2001-2005 when assessing threats.

juvenile frogs, such as those observed in the stream and trail transects is not explained. Detection probabilities for the occurrence of a disease in a population are related to the number to the number of individuals' sampled. Statistical analysis shows that to achieve a probability of detecting a disease with a 5% prevalence it is necessary to sample at least 60 individuals. In the report the prevalence at one stream (Blackfellows Creek) was 4 of 5 individuals, which is a naïve prevalence of 80%, and in comparison with values reported for other amphibian populations (see Woodhams and Alford (2005)) is high.

Prevalence of the fungal pathogen in the tadpoles is normally only one of two measures used when investigating Chytrid infections in a population. The second measure is the number of zoospores (or zoospore equivalents) that are determined in a standard sample. If we assume that the sampling method was standardized – although that is not mentioned in the methods section – then it is important to know the intensity of the infection (i.e. the numbers of the pathogen), since that is a direct measure of the severity of the infection. This point is significant, since some recent studies have shown a reduction in important lifetime traits associated with infection. Early studies indicated that tadpoles do not die from the Chytrid infection. More recent studies provide evidence that it has an impact on life-time traits (Clulow et al., 2017).

Several studies have demonstrated that specific amphibians have apparently evolved some capacity to deal with the Chytrid fungus (Newell et. al., 2015). Fleay's Frog is one such example. Early reports documented the disappearance of the Conondale Range population, starting as early as the 1980s (McDonald and Alford (1999), but there has been a return of a restricted population in recent years. Similarly, the population in the Eastern Border Ranges NP in NSW, at Lamington NP, Mount Warning NP and the Nightcap Range NP declined markedly in the 1990s and populations disappeared from lower altitude locations. A detailed study of one high altitude and one medium altitude population has shown a gradual recovery of the populations in the past decade, and the authors postulate the species has evolved some resistance to Chytrid (Conroy and Brook 2003). McDonald et al. (2005) suggested that Chytrid has now become endemic in north Queensland frog populations and that infection prevalence had declined. They noted that detection of Chytrid was significantly associated with season and altitude (greatest above 300 m during winter) and suggest that one species,

L. genimaculata, had increased in abundance to pre-decline numbers, despite moderate prevalence rates (7.8%). Further research is required to determine if a shift in the host pathogen relationship has occurred. This would apply to several species including *M. fleayi*. Such shifts may be mediated either via changes in environmental conditions, decreased transmission and virulence, or the development of resistance and acquired immunity.

While this is a positive story, it should be borne in mind that populations at some locations (e.g. Tamborine Mountain, and Mount Warning) have not been observed in the past decade and are presumed extinct. It is tempting to postulate that the impact of the disease in these possibly smaller populations led to their extinction. It is with this historical context and experience that Chytrid can have on small isolated populations, that every caution should be exercised when dealing with this pathogen.

A note on the standardized method of field sampling of tadpoles: As mentioned above it is important to sample for the pathogen in a standardized manner so that the prevalence and intensity of infection can be compared among individuals and populations, and at different times. The report states that samples were obtained by “collecting swabs from the skin of tadpoles” (pg 2). This is surprising since the standard method for sampling from tadpoles is to swab the mouthparts, which are composed of keratin, which is the substrate upon which Chytrid resides. There is usually minimal keratin on the skin of tadpoles, so it is unclear to us where the samples were taken, and whether they followed a standardized method.

Understanding the infection dynamics of the Chytrid pathogen in natural populations is one of the only means that conservation managers have of determining whether frogs are adapting to this pathogen or a periodically susceptible, and its impacts on important vital biological traits (e.g. fecundity, survival rate) is to have a robust understanding of it population prevalence and infection intensity. The report does not provide that information.

The laboratory procedure used for testing for the occurrence of the pathogen was appropriate. It would be appropriate that samples that were equivocal should have been retested by serial dilution to test for inhibition.

	<p>5.3.1.4 Adversely affecting habitat (Pig Management) The consequences of pigs invading due to impact on critical habitat could be greater than moderate and should be rated as high. Fleay's Frog breed in riffle zones and these are often dry but with dense soft vegetation (e.g. <i>Polia</i>) that are favoured sites for pig wallows and foraging. There is also the potential for direct impact by predation. Fleay's Frog is relatively large (up to 70 mm in length) and would be predated if detected. The frogs shelter in the soft surface soil below leaf litter and it is possible that pigs would be able to detect them. Clearly, actions that aim to manage the pigs are favourable to the Qld NPWS and the proponent. And it would appear that more targeted actions would be a favourable outcome. Pigs are assumed to have a potential impact on <i>Phyloria kundagungan</i> (Mountain Bog Frog). The moist boggy areas at the headwaters of the creek lines and in small tributary gullies provide the microhabitat used by this frog for breeding. This species is not listed under the EPBC Act, but has been assessed by IUCN criteria as "endangered" (Hero et al 2004), vulnerable in Qld and Rare in NSW. Although not a matter of MNES they form part of the Outstanding Universal Value since they are of Gondwanan origin.</p>
	<p>5.3.1.6 Modifying habitat availability or quality Agreed minimal impact due to the small scale of the track relative to the habitat available, however is this the metric that should be used? What is the relative size of the rainforest habitat compared to open forest habitat in the region?</p>
	<p>5.3.1.8 Introduction of disease Diseases such as Chytrid and Phytophthora are carried in mud on the shoes of walkers. It is not necessary for a walker to pass through water to be carrying spores in mud on the soles of boots. The argument that the disease is already present in the forest (and on the Fleay's Frog tadpoles in the creek) and therefore there is little point in dealing with biosecurity does not hold up to scientific scrutiny. There are numerous genetic strains of the amphibian Chytrid, some of which are more virulent than others (Roseburn et al., 2013). The current situation is that tests in Australia indicate that only one strain is present and it is termed the global panzootic lineage. Furthermore, there are several reports of the impact of Chytrid occurring in waves (Laurence et. al., 1996; Roseburn et. a., 2013). Therefore it is wise to remain vigilant since there is so much unknown about the disease dynamics and transmission of this pathogen. The extensive distribution in Australia is testament to a process of rapid dispersal perhaps by means that we do not understand. The rainforests of</p>

	<p>eastern Australia are of particular significance to global amphibian declines because more than 10 stream-breeding frog species have declined or disappeared from these ecosystems since 1979 (Laurance, McDonald, and Speare (1996) McDonald and Alford (1999); Hines, Mahony, and McDonald (1999).</p>
	<p>5.3.2. Track Establishment 5.3.2.1 Long term decrease in population size The proposed track, particularly the tracks leading to the crossing on Blackfellows Creek is approximately 2.5 km long and a trail 2.5 m wide for this distance is a considerable amount of habitat removed and disturbed.</p>
	<p>5.3.2.2 Reduction in area of occupancy It is not clear how this statement can be made when there are several kilometres of trail to be established that pass through habitat of Fleay's Frog. For example the trail to the constructed to cross Blackfellows Creek and to access Woodcutters Ecocamp, pass through and are within Fleay's Frog habitat. Foraging and sheltering sites are habitat just as much as the stream that is used for breeding.</p>
<p>Complete a detailed study mapping all habitat within and adjacent to the site, which includes an assessment of population abundance of Fleay's Barred Frog.</p>	<p>5.3.2.4 Adversely affecting habitat It is not only the riparian vegetation and instream habitat that compose the habitat of Fleay's Frog. The floor of the forest is used for foraging and sheltering. It is an assumption that there will be no impact based on the size (extent) or rainforest to be removed, and it may be based on reasonably observations of the limited disturbance of the forest habitat. However, that assumption is untested, and this is one of the reasons why a detailed study (mapping of all habitat within and adjacent to the site, and an assessment of population abundance) is needed.</p>
	<p>5.3.3.7 Establishment of invasive species We would point out that it is an assumption that the "population has stabilised following initial infection, with immunity to the fungus now established in the population". The quoted studies did not include any population Chytrid testing, during the population observations reported. Indeed the authors provided several speculative explanations for the "return of the population at Brindle Creek in the Eastern Border Ranges NP" (Newell et al 2015). One of these explanations is that the fungus has become less virulent – a more likely evolutionary hypothesis since the number of generations for selection (a function of the number of</p>

<p>Provide a map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate methodologies.</p> <p>Provide an estimate of the abundance of Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p> <p>Provide an assessment of the</p>	<p>generations) is much higher than the number of generations for selection within the frog which is assumed to be annual. A significant outcome is that invasion by virulent strains of the fungus is possible, as has been observed elsewhere in the world (Bales et al., 2013). There are aspects surrounding the observations that remain enigmatic. The Brindle Creek population investigated by Newell et. al., (2015) is at high altitude (above 800 m AHD) and is within cool and warm temperate rainforest. At the same time lower altitude populations have not returned , such as at Sheepstation Creek (about 400 m AHD) in the eastern Border Ranges, at Terania Creek in the Nightcap Ranges and at Breakfast Creek in Mount Warning NP. The observations at Brindle Creek are enigmatic since evidence from the Wet Tropics indicate that frog populations in warmer and drier habitats are able to persist with the disease (Alford 2008). Unfortunately, there is no information on the Chytrid disease dynamics for the population of Fleay's Frog in the Main Range NP, or for the situation in co-occurring species that may harbor the disease.</p>
	<p>5.4. Environmental Management Measures - Avoidance and Mitigation of Potential Impacts on Fleay's Barred Frog</p> <p>5.4.1. Performance Targets and Control Measures</p> <p>5.4.2. Environmental Monitoring</p> <p>5.4.3. Corrective Actions</p> <p>The DoEE requested information on habitat extent and population abundance. The field survey to determine the occurrence of Fleay's Frog was conducted over one field survey and consisted on 4.5 hours of active surveying (call playback and visual encounter along stream transects and walking track). This represents a very limited effort to address the requirements of DoEE.</p> <p>It is not appropriate to set trigger values after the event, and to base those triggers on qualitative measures. The requirement from the DoEE was to "Provide a map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire project site. Please ensure maps and area of habitat calculations are based on field surveys conducted by a suitably qualified ecologist in accordance with appropriate methodologies" and "Provide an estimate of the abundance of Fleay's Frogs in the habitat identified in item 5.1, based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist" and</p>

<p>quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.</p>	<p>“Provide an assessment of the quality of Fleay's Frog habitat mapped from item 5.1 based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist.”</p> <p>It is not possible to provide a map of “all Fleay's Frog habitat” with such a limited investigation. Such an approach places that consent authority in a difficult situation of making a recommendation based on limited information. Most importantly, it is not evident whether the two catchments investigated (Blackfollows Creek and Dalrymple Creek) are the only habitat of Fleay's Frog or whether the frog is present and abundant in other catchments along the Main Range. Surely, this is a primary piece of information needed to assess whether the placement of additional walking trails and camping sites are within the most sensitive habitats for Fleay's Frog. There are no surveys at the proposed ecocamp sites to determine whether they are locations of foraging or sheltering habitat of Fleay's Frog.</p> <p>The question must be asked why there is “no robust measure of the population size or population dynamics”, and on what logic it is presumed to be suitable to first construct the track and camps, and then after the event seek to determine a robust measure of population size and/or population dynamics. Without appropriate pre-construction studies of the population size and dynamics it is not possible to uncouple the effect of development actions and ongoing practices on the Fleay's Frog population at the site. The most appropriate management actions for the pathogen – Chytrid fungus – is to follow the recommendations of the National Threat Abatement Plan (DoEE 2016).</p>
	<p>6. Gondwana Rainforests of Australia World Heritage Property and National Heritage Place</p> <p>6.1. World Heritage List Criteria</p> <p>6.2. Threatening Processes to World and National Heritage Values and Integrity</p> <p>We note that in several sections on the upper slopes and tableland of the Main Range that the extent of rainforest is less than 2 km wide and in most locations no more than 4 km. Recent experience at Werrikimbee NP (2105-16), and historically at Washpool NP, demonstrates that wild fire can at times burn deeply into rainforest. Our consideration is that the buffering of rainforest by adjacent wet and dry sclerophyll forest communities is very important for the long-term protection of the rainforest. However, we do not see that there should be a reduction in buffering or resilience related to the current application, except for the possibility of human initiated fire potential related to the construction on new campsites.</p>

	<p>6.4. Environmental Management Measures – Avoidance and Mitigation of Potential Impact of the Project on the World and National Heritage Values of the Gondwana Rainforests of Australia</p> <p>6.4.2. Environmental Monitoring</p> <p>This is a major difficulty: requesting approval without having a detailed understanding of the distribution and abundance of nationally threatened species that are identified in the local area. This approach is based on an implicit assumption that the impact will be minimal or nil. However, this assumption is flawed since the base-line ecological work has not been conducted to determine the population estimate, map the habitat, or provide a comparative view of alternative actions.</p> <p>The incapacity to assess the potential impact because of the inability to compare alternatives is not acceptable. For example, if a more extensive study of the distribution of Fleay's Frog in the local area (i.e. defined as within 10 km of the study site, or perhaps defined as within the Main Range NP) found that the population is restricted to the upland sections of Blackfollows Creek and Dalrymple Creek, and that there are few other catchments supporting a population, then the appropriateness of constructing a walking track and crossing of Blackfollows Creek would be placed in a different context. Should robust populations be found in other catchments that are not affected by the proposal and are removed from other human impacts then it provides DoEE and the committees with information that the resilience of an endangered species is not likely to be affected by the proposal. It is not possible to have that confidence without the base-line information.</p>
	<p>6.4.3. Corrective Actions</p> <p>Trigger values are quantitative because the proponent has not complied with the requirements to provide, "map/s of all Fleay's Frog habitat, and a calculation of the area of Fleay's Frog habitat, within and adjacent to the entire project site; an estimate of the abundance in the habitat identified, and an assessment of the quality of the mapped habitat".</p> <p>Each of these requirements includes the caveat "based on field surveys conducted in accordance with appropriate methodologies by a suitably qualified ecologist". We do not question the qualification of the ecologist, or the field methods used to make observations of Fleay's Frog. We do question why those methods were not applied in a suitably robust survey design to address each of the DoEE requirements. In the view of the committees, it is not possible to provide maps of all Fleay's Frog habitat without a</p>

	<p>larger spatial scale of investigation (e.g. at least several other identified catchment in Main Range NP), and a survey methodology that account for the use of terrestrial habitat away from the riparian zone (e.g. the importance of mid-slope rainforest habitats for foraging and shelter). Similarly, an estimate of abundance requires far greater application of ecological theory than a count derived from several transects on one night of survey. Furthermore, an estimate of habitat quality can only be obtained by comparison with other known sites.</p> <p>We emphasise that without these measures it is not possible for the committees to make a valid assessment of the potential impact of the proposal on threatened species and on the integrity of the World Heritage values. It is also not valid to make any comparisons with measures taken post construction.</p>
	<p>6.4.4. Residual Risk Assessment</p> <p>We welcome the approach to co-funding pest management. We would wish to point out that linking pest-management actions to “mortality rates” for any target threatened species is difficult. It is more likely that a reduction in the population of the target threatened species would be related to the destruction of habitat rather than direct predation. Triggers for pest management are more likely to be successful if focused on precise habitat observations (e.g. number of pig ruts).</p>
	<p>7. Facilitated Impacts on the World and National Heritage Values of the Gondwana Rainforests of Australia Property</p> <p>The assessment recognises that “The resistance and resilience of a plant community or ecosystem may vary over time due to weather or seasonal variability. For example, there is likely to be more soil erosion or compaction, and more vegetation damage during wet conditions than during dry conditions.” We agree that this can be a problem, and must be subject to careful consideration. There seems to be little appreciation that the proposed walking track passes through sensitive vegetation communities (subtropical and warm temperate rainforest) that are not extensive along the ridge of the Main Range. Indeed the mapping of the warm temperate rainforest shows that it occupies less than 20 hectares, and the proposed trail passes through the middle of this community (Proposed scenic Rim Trail – between Amphitheatre View Wilderness Ecocamp and Woodcutters Ecocamp).</p> <p>We will discuss below the habitat requirements of Philoria kundagungan, a Gondwanan</p>

	<p>terrestrial frog that utilises boggy situations on the rainforest floor. We consider that the placement of the trail through these sensitive rainforest vegetation communities provides unacceptable risk to damage of the upper soil layer leading to erosion and damage to boggy habitats.</p>
	<p>7.1.3. Pathogens – Dispersal by Walkers</p> <p>The means of widespread transmission are a matter of scientific investigation. In the face of this uncertainty and the critical nature of the Chytrid pathogen (8 endemic species extinct and as many as 30 threatened, and over 120 species of amphibians extinct worldwide), the National Threat Abatement Plan list quarantine (biosecurity) must be the first action in the plan. To open access to an area where the pathogen is known to increased human access is counter to the adopted Threat Abatement Plan. What is not considered is that the pathogen may be transported from the Main Range NP and distributed to other areas where the infection has not been identified. Quarantine is a matter of preventing movement of pathogens both in and out of an area. For example, the isolated population of the rainforest endemic from <i>Assa darlingtoni</i> on Mt Ballow/Mt Nothofagus has been found to be highly susceptible to Chytrid in laboratory test (Moses 2015, unpublished), but there is no evidence of Chytrid infection in the wild population. There is no reason to provide additional stress to a system that is already under considerable stress. This is the application of the Precautionary Principle.</p>
	<p>7.3.2.4 Cause long-term reduction in rare, endemic, or unique species</p> <p>This narrative is based on untested assumptions. It is not possible to assign “no risk” to an activity without having adequate regard to the potential for long-term reduction in rare, endemic and unique species. The committees appreciate that monitoring of long-term impacts is a very involved and requires sensitive indicators of change. Press events (e.g. gradual changes in population abundance or distribution) are always more difficult to measure than pulse events (acute environmental event). There is growing evidence from several fields of ecology (e.g. fundamental niche modelling) that high altitude rainforests are at great risk of extinction due to climate warming. And there is evidence that pulse events, such as historically unusual periods of hot and dry weather are occurring more often. The Main Range is identified as being at considerable risk since it is such a narrow band of upland rainforest, with a lower annual rainfall than rainforests to the east on the McPherson Range because there is lower orographic rainfall (effect of daily inversion that brings</p>

	<p>precipitation nearer to the coast) resulting in cloud stripping which is likely to be a significant contribution to moisture in these environments (Hutley et al. 1997). We consider that there is already great concern for the resilience of this rainforest habitat and that any additional stress should be carefully scrutinised, and unless there is proof that no impact will occur then the World Heritage Universal Values and integrity should be protected.</p> <p>7.4. Environmental Management Measures – Avoidance and Mitigation of Potential Facilitated Impacts on World Heritage and National Heritage Values</p> <p>7.4.1. Performance Targets and Control Measures</p> <p>The committees consider that it is not appropriate to assess the potential impacts of a proposal without the base-line information that was requested by the DoEE. Furthermore, we consider that research, survey and monitoring – while being a real contribution to understanding the ecology and adaptive management of the MNES and integrity of the World Heritage Area – will require evaluation of a secondary round of monitoring and research documents that require review. We are aware that timeliness is an issue with research and monitoring. By comparison no building would be approved on the basis that structural engineers would monitor suitability after the event. It seems ludicrous that the risk of harm to environmental values would be treated by a lower standard, especially when the matter deals with the integrity of World Heritage Values.</p>
	<p>Gondwanan animals not directly addressed in the “Assessment and Management of Potential Impact on Specific MNES”:</p> <p><i>Phyloria kundagungan</i> is a terrestrial frog of Gondwanan origin (Knowles et al 2004), that is known to occur in the Main Range NP (Atlas of Living Australia – Knowles et al 2004). This species is a habitat specialist with breeding sites located in wet boggy rainforest areas and near seepages in headwater streams. Outside of the breeding season, chance observations indicate that adults move widely across the rainforest floor presumably to forage. This frog is known only from rainforest vegetation communities. Assessment of the distribution and abundance of populations of the closely related <i>Phyloria richmondensis</i> found that populations are typically small and associated with high moisture in the environment (Willacy et al 2015).</p> <p>A conservation assessment of this frog using the IUCN process and categories is provided</p>

by Hero et. al., (2004) and the outcome was “Endangered B1ab(iii) ver 31. The reason for this assessment was “Extent of occurrence is less than 5,000 km², distribution is severely fragmented, and there is continuing decline in the extent and quality of its habitat in Queensland and NSW, Australia.’ Included in major threats the authors listed “disturbance upstream that affect hydrological process and/or water quality may threatened this species”. This frog is listed as Rare in Queensland and Vulnerable in New South Wales.

The proposed construction of trails, especially those that traverse mid-slopes, and creek crossing pose a significant risk to the habitat of this frog. Specifically, the redirection of runoff water from tracks may change sites of seepages upon which the species relies.

Frogs in the genus *Philoria* are a group of regionally endemic habitat specialists restricted to the headwater ecosystems of montane Gondwanan rainforests of eastern Australia, with the exception of *Philoria frosti* (Knowles et al. 2004; Mahony 2006), and possess traits consistent with those of declining frogs in upland areas of eastern Australia (restricted ranges, low clutch size and stream association) (Hero et al. 2005, 2006). Climate change impacts including increasing temperatures, decreasing precipitation (Sherwood & Fu 2014) and a lifting cloud base are likely to negatively affect *Philoria* which are expected to have a narrow range of physiological tolerance to temperature (Brattstrom 1970) and require high and consistent moisture levels for their terrestrial breeding strategy (Knowles et al. 2004). Having low reproductive output and dispersal potential means they are also less likely to recover from extreme events (Hagger et al. 2013), such as disease epidemics or high-intensity storm events (Willacy et al 2015).

We believe that it is necessary for the proponent to demonstrate that the location of proposed trails do not impinge on the habitat of this species, and that the same requirements for habitat mapping and calculating the habitat area, and population estimate applied to Fleay’s Frog are minimal requirements to ensure that on-going monitoring of potential impacts on this species are possible. In particular, mapping of the sites of soaks used for breeding and an estimate of the abundance of the population is necessary.



To:

**Scenic Rim Trail Project
Gainsdale Pty Ltd
Fortitude Valley Qld 4006
enquiries@scenicrimtrail.com**

Attention: Mr Ben O'Hara General Manager, Land and Environment

**Referrals Gateway
Environment Assessment Branch
Department of the Environment
Canberra ACT 2601**

Email: enquiries@scenicrimtrail.com and epbc.referrals@environment.gov.au

19th October 2017

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National Parks Association of Queensland

Submission to

Gainsdale Pty Ltd and Environment Assessment Branch

EPBC Referral No 2016/7847 Gainsdale Scenic Rim Trail

- Follow up information on a controlled action

Thank you for the opportunity to comment on the Gainsdale Scenic Rim Project EPBC Referral 2016/7847 follow up /supplementary controlled action process.

The National Parks Association of Queensland (NPAQ) is dedicated to promoting the preservation, expansion, good management and presentation of national parks in Queensland.

Established in 1930, NPAQ is an independent, not-for-profit, membership-based organisation. The association has played a pivotal role in the establishment of many national parks in Queensland. NPAQ's purpose is achieved through advocating for the protection, expansion and good management of the protected area estate in Queensland; fostering the appreciation and enjoyment of nature through a bushwalking and outdoor activities program; undertaking on-ground conservation and monitoring work; educating the community about national parks and their benefits; and supporting the development and application of scientific and professional knowledge in advancing national parks and nature conservation.

NPAQ supports ecotourism in national parks and other protected areas **only** in the context of a realistically funded and regulated system with a long-term commitment to expand the parks estate providing it: a) does not compromise or negatively impact the cardinal purpose of parks to conserve nature; b) is in the public interest; and c) is primarily focused on fostering an understanding, appreciation and conservation of the area and its natural and cultural values. NPAQ believes, commercial infrastructure on national park land is inconsistent with the purpose of national parks land tenure.

Submission

Gainsdale Scenic Rim Trail Proposal

NPAQ acknowledges the efforts Gainsdale has taken to: 1) respect the majority of values of national park land; 2) utilise experienced and capable ecologists; and 3) minimise the majority of impacts, however, there are still a number of outstanding concerns regarding the Gondwana Rainforest World Heritage Area Values and EPBC listed Endangered species.

NPAQ has concerns with the Gainsdale Proposal, as described in EBPC referral follow up/supplementary information, as follows:

- Our understanding is that this Proposal is likely to be part of a larger track network, potentially connecting to an existing New South Wales multi day walk. Proposal scopes are fundamental to effective approvals at all levels of government. If this Proposal is part of a wider scope, the associated impacts need to be considered at this stage.
- The quality and presentation of mapping is ineffective, at best¹. For example, tenure maps must clearly identify the location of all existing (e.g. black) and proposed or upgraded (e.g. red) infrastructure, including both service access tracks, in relation to the World Heritage Area, National Park and threatened species habitat. While NPAQ appreciates the complexities of mapping the Proposal, someone unfamiliar with the Proposal should be able to understand the abovementioned context, at a glance, and not have to spend significant time, reading several maps to understand.

While ideally NPAQ would have provided this feedback at the initial EPBC referral stage, Gainsdale did not engage with NPAQ either immediately before or during the referral notification stage, despite NPAQ being the Queensland's premier independent national park stakeholder. Also, the EPBC referral was notified over the Summer/Christmas Holidays, restricting comments to only the mandatory two-week comment period. This decision on timing was unfortunate.

Since May 2017, Gainsdale has regularly engaged with NPAQ and provided notice of this follow up phase. Gainsdale also provided a presentation to members and supporters on 26 June 2017. NPAQ raised concerns at the June meeting that the mapping was very dark and hard to follow. Unfortunately, Gainsdale has not taken this feedback on board and/or underestimated its importance. **Until the public can truly understand the Proposal clearly, effective consultation and a real assessment of impacts – including by the regulator and the public – is extremely difficult, if not impossible, and therefore the EPBC approval should not be granted.**

¹ Specifically, tenure maps are very dark and unclear, the location of proposed EcoLodges can be misinterpreted in many maps, the service access tracks are not marked, no attempt to document nearby existing and historic tracks has been made, and the relative location of infrastructure (as a whole and individually) to World Heritage, National Park, Threatened species habitat and tracks is not clear.

- There is currently an existing four-wheel drive access track to the area proposed for the Amphitheatre EcoLodge². NPAQ estimates present vehicle movements to be limited to several times a year for park monitoring and pest and fire management. Approval of the development would result in that existing, rarely used track, being upgraded and frequently used. Initially the track would be used multiple times per day during construction (i.e. workforce mobilisation, delivery of construction materials, removal of construction wastes) and periodic maintenance then several times a week during operations (i.e. mobilisation of staff, delivery of bags/groceries/linen, delivery of water occasionally during extended drought, removal of solid wastes and removal of liquid wastes). Note, each proposed EcoLodge is expected to be used by 1,500 clients and staff/year (from year four).

NPAQ strongly objects to introducing any new motorised activity (servicing a proposed new EcoLodge) into the Gondwana Rainforest World Heritage Area, especially for non-essential purposes. Movement of an all-terrain vehicle (even limited twice a week – four movements) will undermine the integrity of the Gondwana Rainforest World Heritage Area. It will subject independent walkers to motorised transport on the trail for purposes which are not “in the interest of the Public”. Subjecting independent walkers to four all-terrain vehicle movements a week is also not fair and equitable (as vehicle movements would be scheduled to avoid commercial walkers under routine operations).

- Alternatives to the Proposal have not been addressed in the referral follow up / supplementary information. Alternatives should be considered to avoid impacts on: 1) the integrity of the Gondwana Rainforest World Heritage Area, which is known for its off-track camping by low visitor numbers; and 2) the Endangered species. The original referral (Section 2.2 Alternative to the Proposal states “No alternatives were considered...”³) also did not address alternatives to the proposal to preserve the integrity of the Gondwana Rainforest World Heritage Area. Alternative to be considered should include:
 - Placement of the EcoLodges outside the National Park boundary (e.g. immediately west of the park boundary to avoid unnecessary vehicle traffic through known habitat of the Endangered Hastings River Mouse). OR
Consider the use of two EcoLodges located outside the National Park - each for two days of walking. Hikers could be transported back to base at night (without having to repack) and then get transported to the start of the walk the following day. This option avoids the need for construction of commercial infrastructure within the National Park while still providing an overnight bush camping experience for the walkers, but with less disturbance.
 - Placement of the track towards the western part of the National Park given the area along the Ramparts are arguably the best intact area of the park and views can still be enjoyed from the lookouts to the south and north.
- The location of the proposed Woodcutter’s EcoLodge is effectively surrounded on three sides by the Endangered Hastings River Mouse habitat, as shown in Figure 6, and the proposed direct disturbance area is only about 250 m from where one mouse was caught.

The QPWS Trail proposed to service the Woodcutters EcoLodge bisects the Endangered Hastings River Mouse habitat, as shown on the inset of Figure 6, and no assessment has been provided on the impacts on lodge traffic. With an introduced service requirement for 1,500 clients and staff staying each year, traffic will arguably increase by hundreds of times.

- The disposal of liquid waste has not been clarified as requested during the NPAQ/Gainsdale June 2017 Information Session. The September Newsletter from Gainsdale suggests onsite

² Use of the term “Ecocamp” in the Proposal is inappropriate as this would better describe a group of temporary structures given the Queensland climate does not require fixed structures for survival (unlike Tasmania where Huts are warranted for human safety).

³ Again, ideally NPAQ would have provided this feedback at the initial EPBC referral stage but this was not possible given the lack of notice and the timing of the referral.

treatment. This must be clarified and the impacts on Matters of National Environmental Significance assessed.

NPAQ also has the following questions:

- Is the Amphitheatre EcoLodge located outside of the GRAWHA?
- Would the Sylvester's trail linking Sylvesters' Lookout and Bare Rock be a new trail? It was not identified on the map as "existing".
- Why is feedback at this stage directed to the proponent and not sent directly to the Environmental Assessment Branch?
- Why propose two accommodation nodes within 2.5 km of each other (as the crow flies)?
- Were ecological specialists involved in any revised risk assessment that specifically considers the change in use of the track to a significant service road (that bisects the Endangered River Mouse habitat and potentially isolating the northern portion of the proven habitat).
- What is the trigger for changes to the development (e.g. fewer visitors or removing the development) if it is shown to be having a negative impact? For example, a demonstrated decline in population (eg no follow up capture of Hastings River mouse or a defined decline in Fleay's frog abundance).

Thank you for the opportunity to provide comment.

Yours sincerely



Laura Hahn
Conservation Officer
National Parks Association of Queensland

(07) 3367 0878

----- Forwarded message -----

From: **David Manager** <davidamanager@bigpond.com>

Date: Sat, Oct 7, 2017 at 8:51 AM

Subject: bushwalker enquiry

To: enquiries@scenicrimtrail.com

I presume the Lease has already been given to Gainsdale Pty.Ltd. What date is on that Contract. .From ? to ?.

When is the new track and eco huts going to be built?

From: **Roland Howlett. Anne-Majella McFadyen.** <jackjnr71@bigpond.com>
Date: Thu, Oct 5, 2017 at 8:15 PM
Subject: Scenic Rim Trail Project
To: enquiries@scenicrimtrail.com

The Project Manager,

Is it possible to obtain a hard copy of the documents (last submission) relative to this project.

Regards,

Roland Howlett
[44 Isaac St](#)
[Spring Hill, Q 4000](#)



Ben O'Hara

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to Katherine, me

Hi

Text below

Good Morning Roland

Thanks for making contact with us at the Scenic Rim Trail. As you can appreciate the documents are quite large and we have provided printed copies of the submissions lodged under the Environmental Protection and Biodiversity Act so that they can be viewed at the following locations:

- [Brisbane – Level 3, 400 George Street, Brisbane](#) from 9:00am, to 4:00pm weekdays
- [Brisbane – 168 Knapp Street, Fortitude Valley](#). From 9:00am to 5:00pm, weekdays.
- Gatton – Gatton Library, inside the Lockyer Valley Cultural Centre, [34 Lake Apex Drive, Gatton](#). Open weekdays from 9:00am to 5:00pm, and Saturday 9am until Noon.
- Warwick – Southern Downs Regional Council Main Administration Centre, [64 Fitzroy Street](#), Warwick, from 8:00am until 5:00pm weekdays.

A PDF version of the documentation can be downloaded from <http://www.scenicrimtrail.com/environment-protection-and-biodiversity-conservation-response/>

Regards

Ben O'Hara
0407 899 546 ben.ohara@gainsdale.com.au

[168 Knapp Street](#) / PO Box 108
Fortitude Valley, Qld 4006

From: **Tanya Smith** <tsmith1979@hotmail.com>
Date: Tue, Oct 10, 2017 at 11:17 AM
Subject: Fw: Scenic Rim Trail Proposal.
To: "ben.ohara@gainsdale.com.au" <ben.ohara@gainsdale.com.au>,
"enquiries@scenicrimtrail.com" <enquiries@scenicrimtrail.com>

Good morning,

My name is Tanya Smith & I am a member of the Ipswich Bushwalkers (affiliated with Bushwalking QLD) & President of the Friends of Brisbane Valley Rail Trail (BVRT).

With regards to the proposed Scenic Rim Trail - would there be a possibility of integrating, or re-booting, the pre-existing Boonah to Ipswich (BIT) Trail Project as part of this proposed 53km Scenic Rim Trail at Main Range National Park at all?

The BIT was a former State Govt asset & project that unfortunately lost impetus after the project was mothballed by an incoming change of Govt in 2012. Prior to its decommissioning, there had been interpretive signage installed along part of the sections & it was to join up with the Dugandan Pathway at Dugandan & part of the Fassifern Rail Trail in Boonah.

Ipswich City Council still currently looks after approximately 19kms of the BIT within its Council boundaries (from Hardings Paddock to just south of Flinders Plum Recreational Area). The remaining approximately 50kms of the Trail is then partially overseen/managed by SEQ Water in & around the Wyaralong Dam precinct. The closer the Trail is to Boonah township in the Scenic Rim however, is not developed & people/cyclists/horse-riders cannot move through.

Having been involved with the BVRT as a community volunteer since approximately 2010, when the former State Govt Trail Manager for both the BVRT & BIT, Melanie Doheny, was overseeing the Regional Trails Program that had been initiated by the Bligh Govt, the BIT was one of three major Regional Trails that were being spear-headed by the existing State Govt at the time; the other two being the Brisbane Valley Rail Trail & the Maroochy River Canoe Trail.

Can we somehow work to incorporate the BIT into this new Scenic Rim Trail proposal, for a 'super-Trail', if you will, that would connect the Main Range National Park of the Warwick area, to Boonah & Ipswich, via the BIT. All the BIT needs is a re-vamp & maintenance. It would be a wonderful opportunity. The burgeoning intensive housing estates in the nearby suburbs of Ripley, Deebing Heights, New Beith, Greenbank & even Springfield, will require this asset for recreational use & it makes sense to earmark the connection & re-boot the former BIT Project to provide these natural areas for people to exercise & 'get-away' & partake in recreational activities at.

Would this be possible? And/or could this be something that Gainsdale might look into?

Regards, Tanya Smith

President - Friends of BVRT Inc

www.bvrt.org.au

0434 722 345.

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