

MICHAEL BERKMAN MP

Queensland Greens Member for Maiwar



19 December 2018

Assessment Officer
Referrals Gateway Assessment & Governance Branch
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601
Via email: epbc.comments@environment.gov.au

Mount Coot-tha Zip Line - EPBC Reference Number: 2018/8331

To the Assessment Officer,

I am writing today to submit my comments on the "Mt Coot-tha Zipline" project proposed by Brisbane City Council. As the local member for Maiwar, this development has naturally been in my orbit for more than a year. I have met with hundreds of locals to discuss it, as well as hosted forums, met with the decision makers and talked about it in Parliament. The community has come together to oppose this development like no other I have seen in this area.

Ultimately I believe this Project was ill-conceived from the very beginning - Mt Coot-tha is not an appropriate location for such a development. I would urge your department to ensure this project receives full EIS assessment.

In reviewing the referral submission documents made by Brisbane City Council to the Department of Environment and Energy, I am concerned that the impacts assessment has not acknowledged the sustained and much broader impact that introducing the development would have on the ecological character and threatened species that inhabit the Mt Coot-tha reserve and, at very least, it requires comprehensive environmental assessment under the EPBC Act.

Impacts on the natural environment

The natural environment is one aspect of the Mt Coot-tha reserve that is most valued by the community in and around Brisbane, and the impacts on the natural environment are key to a vast number of community concerns.

Vegetation clearing

The extensive loss of vegetation on Mt Coot-tha remains a very real concern, despite BCC's representations to SARA that less than the maximum authorised area would be cleared, and SARA's acceptance of this taking account of the proposed conditions.

The survey methodology does not take into account the clearing of trees with diameter of less than 150mm, which undermines any comfort that might be taken from suggestions that only 217 trees will be removed and 186 trees will be 'pruned'. To consider only trees of 150mm diameter or more is arbitrary and it is plainly misleading of the Lord Mayor to state that "[a]round 200 trees in total will be removed for the Mt Coot-tha

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zipline project”¹. In reality, taking into account those mature trees with diameter of 149mm or less, a vastly greater number of trees will be cleared, but the assessment material gives no indication of how many trees, and in turn, how much habitat will actually be lost.

Impacts on Koalas

As you are aware, the koala (*Phascolarctos cinereus*) is listed as “vulnerable” under the EPBC Act and is a matter of national environmental significance. Any significant impact on koala populations must be referred and assessed under our national environment laws.

Koala populations in South East Queensland have been dropping rapidly, and Queensland government actions to halt this decline have failed. Reports in 2016 found that koalas were in danger of becoming regionally extinct, and the situation has continued to deteriorate. The recommendations of the Queensland government’s Koala Expert Panel from 2017 have not yet been implemented, while the Queensland Environment Minister waits to establish a new Koala Advisory Council to oversee their implementation.

There is concerning inconsistency between the Revised Planning Report and the supporting material, which undermines confidence in any conclusions regarding the potential impacts of the Project on koalas.

The Revised Planning Report concludes that “[t]he proposed development is separated from known and mapped Koala habitat.” Yet the Ecological Assessment Report clearly refers to koala sightings and other findings that suggest Koala habitat extends throughout the study area.

“Koala scats were detected in the Study Area within the vicinity of Cloud Station 7 of the Treetop Canopy Tour. It is expected that the Koala may utilise eucalypt forest throughout the entire Study Area. An individual was also observed during tree surveys to inform the VMP along the proposed route of the Treetop tour.”²

Through the development submission process, BCC received a number of other individual submissions that refer to Koala sightings at various locations around Mt Coot-tha. All this information, along with recent early-stage studies around Mt Coot-tha, makes clear that this is significant koala habitat, but this is not properly reflected in the development application and supporting material.

BCC’s blithe assertion in the referral material that there is no significant impact on Koalas “because the project footprint is small, and connectivity will be maintained” completely neglects the impacts of additional noise and light from the project, which affect a much larger area than just the ‘footprint’ of the ziplines. This understatement of potential impacts is typical of BCC’s assessment under Qld’s Planning Act, and demonstrates the need for a fulsome assessment of the impacts on MNES under the EPBC Act.

Conclusion

I appreciate the Department’s time in reviewing submissions from the public regarding the EPBC referral number: 2018/8331 relating to the Brisbane City Council’s application for the Mount Coot-tha Zip Line. I trust that the DoEE will consider the potential environmental impact of the project, as well as the impact to the community and other values in addition to the views expressed in this and other submissions, and the referral itself.

¹ See Brisbane Times article, available online at:

<https://www.brisbanetimes.com.au/national/queensland/controversial-mt-coot-tha-project-gets-state-s-zip-of-approval-20181212-p50lv0.html>

² Appendix E, page 29.

In light of the rapid decline in koala populations in SEQ, the significance of the Mt Coot-tha reserve as expansive potential habitat, and the very limited assessment undertaken to date, this should be determined to be a controlled action and BCC should be required to undertake a full EIS for assessment of the project under the EPBC Act.

Please do not hesitate to contact my office on 07 3737 4100 if I can provide any further assistance or you would like to discuss this matter in more detail.

Kind regards,

A handwritten signature in black ink, appearing to read 'M Berkman', with a long horizontal flourish extending to the right.

Michael Berkman MP