

Submission to the Department of National Parks, Sport and Racing regarding the proposed motor sports complex in the Meridan Plains section of Beerwah State Forest.

I object to the proposed facility being built at the stated location on the following grounds:-

### UNSATISFACTORY PROCESS

At no stage has there been any opportunity provided for the local community to have a say in regard to this proposal. The first the local community heard of this proposal was when Minister Dickson announced that he was calling for expressions of interest to develop and operate the facility. Currently the Meridan Plains section of the Beerwah state forest functions as a multiple use forest. Apart from the incompatible, unsustainable, unmanaged and often illegal motor cross riding, a diverse range of relatively compatible activities currently occur in this forest. These include apiary, foliage harvesting, sustainable timber harvesting, bush walking, mountain bike and horse riding, jogging, bird watching etc. These user groups have not been consulted about the proposed change in use, where will they go if the facility is built? These sustainable uses could continue to occur alongside the natural processes of the forest that provide important ecosystem services through such valuable natural assets as the palustrine and riverine wetlands that occur in the forest.

The proposal to change the status of this forest to a 'recreation park' in favour of one minority user group at the expense of all the above listed users without ANY consultation with local residents and communities is simply put -UNACCEPTABLE.

Previous community consultation that engaged all the major stakeholders through the SEQ regional forestry agreement process recommended that this area to be transitioned from timber harvesting to conservation estate in light of this areas' considerable ecological values. This process was inclusive, transparent and backed by science.

This is a large parcel of publicly owned open-space that maintains much of its original natural attributes, our local community deserves the right to have a say in how and for what it is used into the future.

### WISE USE OF TAX PAYER FUNDS?

At a time when the Queensland government has made it clear that new infrastructure cannot be afforded until publicly owned assets are sold off, this proposal seems to mysteriously buck the trend.

The business model proposed for the construction of this facility is dependent on the significant injection of tax payer's dollars at the establishment stage. I fail to see how a novelty sporting facility rates as a higher priority for the use of scarce public funds compared with the sorely needed upgrades to health, education and transport infrastructure on the Sunshine Coast.

With this proposal we the local residents and our local environment will be the losers while one fortunate business will receive a windfall of public funds to establish their private venture on public land.

#### FALSE PREMISE

I reject the premise that building this facility will stop illegal trail bike riding in our local state forests and National Parks. This can only be achieved by enforcing the existing law and it could be achieved right now if the Minister simply authorises the policing of known areas of illegal riding.

Some riders will use the facility, many will not. Faced with a choice many will choose to ride unregulated and for free in areas closer to home, such as the Glasshouse Mountains National Parks. Transporting unregistered bikes to the venue and paying entry fees will not be an option available to many young unlicensed riders.

#### AREA CONTAINS SIGNIFICANT ECOLOGICAL VALUES

The proposed development occurs in an area of native forest that contains significant ecological values. These values are recognised in Commonwealth law, state law as well as in various state and local planning and policy documents.

There appears to have been a deliberate attempt by the government to downplay the ecological values of the site, for example the tender document (Expressions of interest, Development and operation of an off-road motorcycling facility in the Mooloolah logging area, Beerwah State Forest) in the property information section lists the various vegetation communities found within the site. However it neglects to mention that any rainforest occurs on the site. This is despite the fact the government's own vegetation mapping (Regional ecosystems) shows large areas of regional ecosystems 12.9-10.16 (Rainforest) and areas of 12.3.1 (Gallery rainforest).

The tender documents also fail to mention the fact that numerous threatened species (listed under both state & federal legislation) occur in the forest. Furthermore in an attempt to downplay the ecological values of the area Minister Dickson has on numerous occasions referred to the site as the 'degraded' (sic) Mooloolah Logging area'.

Matters of National Significance EPBC Act (1999). - there are a number of matters of national significance that will be adversely impacted should this proposal proceed. The presence of these matters requires the proponent to refer this development to the Commonwealth government for assessment according with the requirements outlined in the EPBC Act (1999). The relevant matters are as follows:-

- Presence of and likely impacts on a critically endangered ecological community -Lowland subtropical rainforest.
- Presence of and likely impacts on the vulnerable listed Koala (*Phascolarctos cinereus*) population.
- Presence of and likely impacts on the vulnerable listed Wallum sedge frog (*Litoria olongburensis*) population.
- Presence of likely impacts on the local population of endangered Giant-barred frogs (*Mixophyes iteratus*)
- Presence of and likely impacts on feeding habitat for the vulnerable Grey-headed flying fox

Matters of state significance - there are also a number of matters of state significance that will be adversely impacted should this proposal proceed and require compliance with the Nature Conservation Act (1994). These are as follows:-

- Tusked frog (*Adelotus brevis*)
- Wallum froglet (*Crinia tinnula*)
- Green-thighed frog (*Litoria brevipalmata*)
- Elf Skink (*Erotoscincus graciloides*)
- Richmond Birdwing Butterfly (*Ornithoptera richmondia*) and host vine (*Pararistolochia praevnosa*)
- Glossy-black cockatoo (*Calyptorhynchus lathami*)
- Grey Goshawk (*Accipiter novaehollandiae*)
- Square-tailed kite (*Lophoictinia isura*)

Other matters of ecological significance

- State government mapping identifies areas of essential habitat with this forest.
- There is an abundance of old growth habitat trees in the forest that provide habitat for both sedentary and seasonal hollow dependent fauna. These are an ecological asset of regional significance. Even if the majority of them are retained the noise and disturbance levels will severely limit their viability as ongoing breeding sites.

- This site is mapped as having very high nature conservation management priorities (SEQ NRM Regional Plan).
- This site is mapped as having high ecological significance for terrestrial and wetland areas (QLD Government HES mapping)

According to Biodiversity Planning Assessment (v3.5) this remnant forest:-

- Forms part of a bioregional corridor
- Contains a regional ecosystem that is one of the largest of its type in the SEQ bioregion
- Has ecosystem diversity in the top third quartile
- & contains core habitat for priority taxa

#### ENVIRONMENTAL IMPACTS

Remnant vegetation clearing associated with new track construction; track widening and facility construction will result in significant habitat loss and ongoing disturbance to the species listed above as well as the many other 'non-threatened' animal & plant species that occur in the area. The construction and operation of this facility will result in the ongoing disturbance to both the habitats and species that occur throughout the site. Even if 'buffer zones' are instated, edge effects, noise disturbances, erosion and sediment impacts will result in a spiraling decline in forest health and carrying capacity of these habitats.

#### CUMULATIVE IMPACTS

The impacts of this proposal on the forest cannot be viewed in isolation. The current layout for the proposed upgrade of the Bruce Highway/Caloundra Road interchange and realignment of the Steve Irwin Way will result in significant habitat loss in the area immediately adjacent to this facility. Recent road widening's and upgrades of the Steve Irwin Way and Caloundra road have already resulted in significant habitat loss for a number of the threatened species described above. The cumulative impact of these proposals will result in a number of these populations becoming locally extinct in the near future.

#### INSUFFICIENT INVESTIGATION

No environmental impact assessment appears to have been undertaken for this development, a development that will impact over 500 hectares of remnant forest.

#### EROSION AND SEDIMENT CONTROL ISSUES

This area is already subject to some significant impacts through the current level of unregulated trail bike activity. Soil erosion is evident on many gully crossings. Impacts resulting from the sedimentation of low energy waterways are causing a noticeable decline in canopy health of some vegetation, especially palm forests. An intensification of this use as proposed will only exacerbate these currently unmanaged impacts.

The susceptibility of the sandy soils to erosion is a major management issue for motor vehicle use in this area. If tracks are developed for various types of motorbike sports the impacts will be significant. Track viability is likely to be short term as old tracks become progressively eroded, unusable and/or unsafe. Experience shows that this causes riders to keep taking an ever-wider path, incrementally increasing clearing the footprint. Even if a management requirement is to rest old tracks and build new ones, this process still results in the exponential increase of the disturbance footprint and adverse impacts on vegetation communities/wildlife habitats.

#### NOISE IMPACTS

The operation of tens or potentially hundreds of trail bikes and other motor vehicles generates significant noise (especially 2-stroke bikes). Nearby residents and businesses on Old Caloundra Road, Steve Irwin Way and Hapgood roads will suffer significant noise impacts. Depending on wind direction, residents and businesses as far away as Glenview, Mooloolah Valley, Palm View and Landsborough will also be subjected to regular noise pollution.

#### LOSS OF AMENITY

The forest-lined Steve Irwin way from the Caloundra Road interchange to Landsborough provides a natural backdrop for this popular tourist drive. It underlines the clean green image of, and forms the gateway to the Sunshine Coast hinterland. Any development that erodes this scenic amenity will detract from the appeal of the Sunshine Coast hinterland as a nature based tourism destination. People come here to escape the noise and fast pace of the city, to experience nature at its best, not to see trail bikes tearing through the bush.

#### AIR QUALITY ISSUES

Dust clouds generated from intensive motor sport activity will also have an impact both on the natural environment and local residents and communities. This will be especially problematic during the dry months of the year.

#### OPERATOR TO ENSURE COMPLIANCE WITH SPRP'S DURING DEVELOPMENT AND OPERATION

I have serious concerns that the responsibility for protecting the environmental values of this site and managing the potential impacts will largely be the responsibility of the operator. This self-regulatory approach is simply unacceptable. Management actions to achieve compliance will often be cost inhibitive. The temptation will always be to avoid costly compliance works such as erosion and sediment control works in order to improve the profitability. The values of this site are too important to risk. What actually happens in the event of non-compliance with state planning regulatory provisions? What bond is the proponent willing to give up to the community to ensure that this irreplaceable natural asset is not irreversibly damaged?

#### BETTER LOCATIONS ARE AVAILABLE.

Alternative, less sensitive, more suitable sites are available throughout the region. Many are better suited and have more compatible physical and geographical attributes for such a facility.

In the local area numerous alternative sites that are significantly less sensitive in terms of environmental issues exist. For example:-

- The pine plantation area immediately to the south of the proposed site.
- The pine plantation area north of Roys Road.
- The pine plantation areas contained in Beerburrum east State forest (east of the Bruce highway).

BUILD IT.....JUST NOT HERE!