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SUBMISSION: Wangetti South (Palm Cove to Wangetti) Preliminary Documentation Response to Information Request (Ref: EPBC 2020/8722)

The Cairns and Far North Environment Centre (CAFNEC) received a week extension on the feedback for this EOBC Referral, and this submission represents the view of CAFNEC, the Douglas Shire Sustainability Group and the Sunshine Coast Environment Council.

We would like to register our disquiet with the opportunities for feedback and input in regards to this proposal. CAFNEC is the key stakeholder for the conservation sector in Far North Queensland and as this project is proposed in protected areas, we have a clear interest. The community only had 10 days to process an incredible amount of information that had been prepared over the period of a year. We do not believe that the proponent is providing enough time for true community consultation.

Walking tracks are a popular recreation across the Wet Tropics region, with many residents pursuing walks in nature. At this stage there are many tracks across the region that are not well resourced or managed. While it is attractive to have a multi-day walk, there is a question left about how the ongoing maintenance of the track will be funded. At this stage there is no long term funding model that has been made publicly available for the Wangetti Trail. The trail is proposed in areas of high environmental significance, and it is imperative that funding for its ongoing management is available. The proponent has proposed many different management actions and maintenance, however, not demonstrated how these will be funded. There must be accountability to the ongoing management of this trail.

The conservation community is unsatisfied with the community consultation process and does not believe that the consultation report is a true reflection of what occurred. Consultation with the community was not transparent, and was insufficient. Notifications were not provided to key stakeholders, the website has had insufficient information for community consumptions. These issues were regularly communicated with the proponent, who did not respond. Between 2019 and 2021, the Cairns and Far North Environment Centre had only two communications with the team managing the project. Once after a year of requesting communication, and another at the Cassowary Recovery Team meeting. An important part of understanding the effectiveness of consultation is how the community feels their feedback was considered. Certainly the conservation community does not agree that it was positively engaged or heard.

Eco-accommodation needs to be properly described or removed from this proposal.

Throughout community consultation, we have been informed that the Southern section of the Wangetti Trail will not include eco-accommodation. However this documentation clearly indicates that it will be. The word accommodation is mentioned in the preliminary documentation 37 times and has created a clear precedent for this development at private campsites. The intent of the proponent should be clear and transparent. If there is not to be eco-accommodation in the Southern section of the trail (as the community was told), then any mention of it should be removed.

Amongst the mentions of eco-accommodation, the following statement was made.

Campsites will include Eco-accommodation infrastructure (provided by private sector), including replacement costs every 10 years. "Report for Department of State Development, Tourism and Innovation - Wangetti South Section (Wangetti to Palm Cove), 4132458 | 219"

The inclusion of eco-accommodation in the proposal for the Southern section of the trail is in contradiction to what has been previously stated to the community and should be removed

from the proposal. If it is not removed from the proposal, much more detail regarding the procurement, permitting and impacts need to be provided.

Impacts to the Cling Goby

The environmental management plan states that "Opal cling gobies are listed as critically endangered under the EPBC Act and therefore steps need to be taken to protect their highly favourable habitat located along short, steep coastal streams in the Wet Tropics."

Appendix C shows there are 5 creeks that the Northern End of the trail will cross. Appendix K, — Opal cling goby assessment, states that bridges will be built over a number of creeks in the Southern Section to reduce impacts. However in the Northern section where the track crosses several creeks mapped for Cling Goby Habitat, there are no bridges mapped.

The Cling Goby is a threatened species, the management plan for reducing the impacts to the species is inadequate. We have not seen studies of the individual creeks, and the control measures introduced to reduce impacts. Each creek mapped as Cling Goby habitat should be individual assessed, and a suitable steam crossing formed to reduce impacts.

2.3.7 Public Amenity and Health

The environmental management plan identifies the residential communities within Palm Cove and Wangetti may be affected by the proposed works associated with the trail. Yet apart from informing the community that they will be disturbed there doesn't seem to be a clear plan for reducing these impacts. The Wangetti community particularly has noted it's alarm about the potential impacts to the culture of their community, and these have not been addressed in the plan. Below is a quote from wangetti residents about their experience:

We are unhappy with the community consultation process which was questionable, inadequate and not transparent. Full information about the Trail and the changed Trail alignment was not given beforehand and could not be seen on any maps until after the consultation process closed and tenders were called. There was no targeted consultation with Wangetti residents around concerns with the Trail's proximity to their residential area, as there was eg with Oak Beach residents.

Campsites. The proposal lists 5 public and 4 private campsites. There is little description of the campsites and how they will be developed. While the footprint is described, any detailed

information about the construction and map of the campsite is unavailable. More information needs to be provided about the campsites.

Although not completely clear in the mapping, it appears that the Dark Jungle campsite is sited in 'potential preferred habitat' of endangered and vulnerable species including the native moth orchid, Cooktown orchid, velvet jewel orchid and dark stemmed antler orchid. Campsites should not be made in areas of high significance.

Natural Hazard Risks.

Climate Change models predict that Far North Queensland will experience less frequent, but more intense cyclones, and more severe heat events and fires. There is a significant lack of any risk assessment for these natural hazards. The Mcalistar range is exposed to the coast, and therefore impacts potential future cyclones. Additionally the Macalister Range has the potential to experience severe wildfire if not properly managed.

Lack of fire management plan. There is currently a complete absence of a fire risk assessment or management and prevention protocols. Wildfire poses a major risk if members of the public are caught unaware. Traditional Owners across our region have expressed an explicit desire to practice traditional burning practices to manage Country and prevent extreme wildfire. The proponent must create a management plan to deal with the fire risks, which should be led by First Nations people and traditional burning practice.

Lack of Cyclone management plan. Additionally there is no management plan for cyclone risk. The Far North is regularly exposed to cyclones, which are predicted to become more intense with climate change. Our region has a history of development being seriously affected by cyclones, and without any management plan, clean up doesn't happen, and the infrastructure is left unmanaged and clean ups often do not occur. Without a cyclone management plan, there is no plan to ensure that walker/riders are not exposed to cyclonic hazard, additionally there is no plan for clean up and restoration of the facilities post cyclone. The proponent must include a cyclone management plan that ensures any cyclone impacts don't result in an impact to the environment, or see infrastructure left unmanaged in the environment.

Shared mountain biking and walking trail. While many different community members are excited about the Wangetti Trail, there is a fundamental issue that many community members are concerned about and that is a shared mountain biking and walking trail. While both users are interested in having multi-day trails to experience, the two sports are not easily compatible. Compounding this is the zig-zag nature of the track to account for the steepness of the track. Switchbacks like this can suit mountain bikers, but certainly hikers will find it incredibly frustrating and are more likely to use in-appropriate shortcuts. Additionally, with so many switchbacks, hikers and mountain bikers may have collisions due to reduced visibility.

Cassowary Management Plan and Offsets

The proponent has included the Recovery Plan for the Southern Cassowary in documentation. The plan provided is about to be replaced and the Cassowary Recovery Team is soon to finalise a new Recovery Plan. The proponent has not consulted with the Cassowary Recovery Team for the proposed management plan. The Cassowary Recovery Team had a last minute presentation provided by the EcoTrails team shortly before this referral was put out for broad public consultation. The proponent must work with the Recovery Team to ensure that the management plan is appropriate. Additionally this project should be completed in alignment with the new Cassowary Recovery plan, as its development will be completed at the time when the new plan is relevant, not the expiring plan which is included in the documentation.