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20 July 2015

General Manager Operations Douglas Shire Council Via email: <u>enquiries@douglas.qld.gov.au</u>

DRAFT COCONUT MANAGEMENT PLAN

I write on behalf of Douglas Shire Sustainability Group (DSSG), in response to the Draft Coconut Management Plan (the draft).

While noting the public debate about whether the coconut palm is 'indigenous' or not, and how the coconut palms came to be in some areas, DSSG supports the removal of coconut palms from areas of natural vegetation, particularly in world heritage areas north of the Daintree River.

DSSG is concerned about observed erosion at beaches in the Douglas Shire, and believes the impact of coconut palms on beach erosion should be examined and afforded greater priority, particularly in the context of global warming and rising sea levels.

DSSG understands the desire to minimise liability by removing coconut palms from streetscapes and urban areas where they pose a risk. We observe that the use of 'death' statistics in promoting the draft has not served to convince residents – the incidence of death being remote to personal experience in this region. A greater focus on risks to property and the harbouring of rats and disease bearing mosquitos may be more persuasive.

Similarly, statistics on current cost to maintain coconut palms have not been well received. Given the growth rate of fruit bearing palms, future projected costs may be more persuasive.

DSSG supports the maintenance of coconut palms in identified areas in Port Douglas, where the tourism/ aesthetic value is (arguably) highest. It is not so clear why the beaches at North and South Cooya have been identified as Class 1 and those at Newell, Oak, Pebbly and most areas on Four Mile have been identified as Class 2. The identification of these areas seems contradictory.

We assume it is based on an assessment of relative "occupancy". We note that while occupancy is described for purposes of risk assessment as constant, frequent, occasional or rare (page 17) it is described as high or low on the assessment tool /classifications (Table 1 and page 20).

Can you please advise us how the occupancy rate is determined and what 'occupancy' rate is required to meet Class 1 "high occupancy"?

We note that palms in the Class 2 sites (beach, foreshore, parks) will be subject to risk assessment and high risk palms will be removed and replaced with another tree, while low risk palms will be signed and thinned, and medium risk palms signed and either thinned or removed.

DSSG observes that the ISA Tree Risk Categorisation (Appendix 1) refers only to risk of falling branches/ fruit/ trees. It does not refer to other risks such as erosion, displacement of native species etc. How does Council propose to include those considerations in its risk assessment of coconut palms, particularly those in foreshore and beach locations?

DSSG again requests that Council conduct some information sessions for ratepayers. The public debate continues and it is clear most commentators have not accessed or understood the draft.

We recommend the focus on further consultation might be more on risks to environment, health and property; and on projected future costs of maintenance and public liability insurance.

Thank you for the opportunity to comment.

Yours sincerely

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Laurene Hull Secretary

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