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25 November 2022

Walker Group email: engage@toondah.com

Cc Minister for the Environment: Minister.Plibersek@dcceew.gov.au

Dear Walker Group,

RE: Comments on Draft EIS – Proposed Toondah Harbour Development - EPBC 2018/8225

1. Our group is providing comment on Walker Group's draft Environmental Impact Statement (EIS) for its proposed Toondah Harbour development (the Proposed Action), referral EPBC 2018/8225. We hold serious concerns about the Proposed Action's impacts on the Toondah koala population as well as migratory shorebirds and the Moreton Bay Ramsar Site. We oppose the Proposed Action on the grounds that these impacts are significant and unacceptable.
2. The Koala Action Group Qld Inc. (KAG) was established 35 years ago in response to community concerns about the long term survival of the large number of koalas living in the Redlands area. Since that time KAG has accumulated much knowledge in koala habitat usage, assisted scientists with koala surveys, restored habitat and carried out a program of public awareness of koala issues. Most important of all is KAG's record of strategic tree planting in partnership with the Redland City Council (RCC). Some 50,000 trees have been planted by KAG and plantings are still continuing. Individual members have gained valuable experience working with sick and injured koalas on the Council and State run Koala Ambulance and by rearing orphaned koalas.

Recent research confirms the worrying decline of some of the most genetically viable koala populations in South East Queensland and Northern New South Wales and has led to the declaration of these koala populations as Endangered under the EPBC Act. Even though the main focus of KAG is koalas, its members are vitally concerned about other potential fauna impacts of the Toondah Harbour development and the effect on ecosystems as a whole.

The Proposed Action should not be approved

for the reasons outlined below.

A. Relevant Impacts of the Proposed Action on the local koala population

(a) Significance of the Toondah koala population

Ever since koala sightings have been first recorded, the Redlands has been recognised as a population stronghold for koalas¹. The population has been well studied since the early 1990s and recent studies show serious declines coinciding with the urbanisation of large areas and subsequent loss of habitat².

¹ Biolink, 2019. Redlands Koala Habitat & Population Assessment. Report to Redlands City Council April 2019

² DERM (2009). *Decline of the Koala Coast Population: Population Status in 2008*, Department of

This decline is not unique to the Redlands and has led to the populations of QLD, NSW and the ACT being declared Endangered under the EPBC Act.

The draft EIS (EIS) asserts that because the Toondah Harbour application was made before this declaration, it will be assessed under the previous status.

The EIS describes Toondah koalas to be:

*a component of the Koala Coast population and form part of a collection of local populations of the urban koalas of the eastern Redlands suburbs of Cleveland, Thornlands, Victoria Point and Redland Bay to the south, and Ormiston and Wellington Point to the north, where links to the bushland populations of the Koala Coast are present through the urban matrix, but increasingly tenuous.*³

While agreeing that the linkages are becoming increasingly tenuous (and in need of strengthening), KAG has a different view, and sees Toondah koalas as a highly significant population that may even hold the key for koala survival in South East Queensland (SEQ). These koalas could be of great scientific interest because they are not only persisting in an urban environment but appear to be holding their own, in sustaining their breeding rate and being relatively healthy.

There are three groups of koalas that seem to be resisting the trend of decline in the Redlands: coastal Cleveland, Wellington Point and Ormiston.

These areas share several features:

1. Located on the coast
2. The koala habitat is at the 'end of the road' being on the coast and thus does not have through traffic, the roads being relatively quiet
3. The food trees are on fertile soils (the red kraznozems that give the 'Redlands' their name, previously supporting market gardens)
4. The habitat is dominated by *Eucalyptus tereticornis*, highly sought after by koalas and with generally, excellent leaf quality

The importance of leaf quality is highlighted in a recent paper from the Australian National University, 2021:

*Similarly, food tree preferences, although often associated with specific tree species, are actually driven by the nutritional quality of the foliage which can vary both within and between tree species. Some tree species do tend to have foliage of relatively high nutritional quality across most of their range (e.g. ribbon gum (*Eucalyptus viminalis*), forest red gum and river red gum (*E. tereticornis* [sic] and *E. camaldulensis*)).*⁴

For many years, it was assumed that koalas living in the bushland areas were the source of the many koalas seen in the urban areas. However, this did not stand up to scientific scrutiny with almost the opposite being asserted in DERM 2009⁵:

In the absence of conserving a viable urban koala population, adjacent bushland koala populations will continue to decline with consequences for the viability of the entire Koala Coast koala population.

Environment and Resource Management, Brisbane.

³ EIS, Chapter 15, Terrestrial Ecology, page 19.

⁴ Australian National University, 2021. A review of koala habitat assessment criteria and methods. Sourced from EPBC Act website.

⁵ DERM, 2009. Decline of the Koala Coast Population: Population Status in 2008. Department of Environment and Resource Management, Brisbane.

The inference which may be drawn from this, is that the major roads leading into and out of the Redlands that have increased traffic exponentially in the last 30 years or so, have severed the links between the bushland and urban koalas to the detriment of the bushland koalas.

The EIS correctly quotes sources saying the density of koalas in the Cleveland area was found in 2015 to be double that of bushland areas.⁶ However the EIS then goes on to quote Rhodes *et al.*, also in 2015:

*that koala densities increase around some sites due to the crowding of koalas in areas when local habitat loss occurs and where low amounts of habitat are present in the surrounding landscape.*⁷

This does not explain the above normal koala density in the Toondah situation as urbanisation occurred there over one hundred years ago (unlike many other parts of the Redlands) and there has been little habitat loss in recent times. They have survived so well and so long there because of the lack of through traffic and the excellent leaf quality of the food trees.

Another aspect that makes the Toondah habitat conducive to long-term koala persistence is its resistance to climate change. The Redland coastal area is well-known to its human inhabitants at least, to have a pleasant local climate, cooler in summer and warmer in winter than other areas in South East Queensland. Droughts are not as severe and the urban koalas at least, are not affected by the increase in bushfires elsewhere.

The forecasts for the contraction of koala habitat in Queensland because of climate change are very worrying. The following is quoted in the Conservation Advice for Koala under the EPBC Act:

*The bioregions predicted to be most heavily impacted by climate change included the Mulga Lands (100 percent of climatically suitable koala habitat lost by 2030), the Desert Uplands (100 percent loss by 2030) and the Central Mackay Coast (57 to 96 percent loss by 2030).*⁸

Presumably, a koala population that is somewhat buffered from the worst examples of climate change is surely worth preserving.

(b) Threats to the survival of the Toondah koala population

Traffic

As has been hinted at in the previous section, the greatest immediate threat to the survival of the Toondah koalas is vehicular strike. Koalas have managed to survive in Toondah because they have been protected from the worst of the devastation that traffic has caused to the rest of the Koala Coast koalas. This is correctly identified in the EIS:

*Koala vehicle strike from the PDA and surrounds is lower than in other locations in the suburb of Cleveland*⁹

However, this is set to change with the Toondah Harbour development. Construction traffic and eventual residential traffic movements will profoundly change the present circumstances. Shore Street East will become a conduit for the northern part of this development which will become operational in only five years after the beginning of construction. The scenario is for a local road that presently has an average of 315 trips per day to become the only exit and ingress for 650 extra residences with an estimated 4,097 trips per day plus 543 peak hour.¹⁰ This will not be survivable for the many koalas that presently cross Shore Street East.

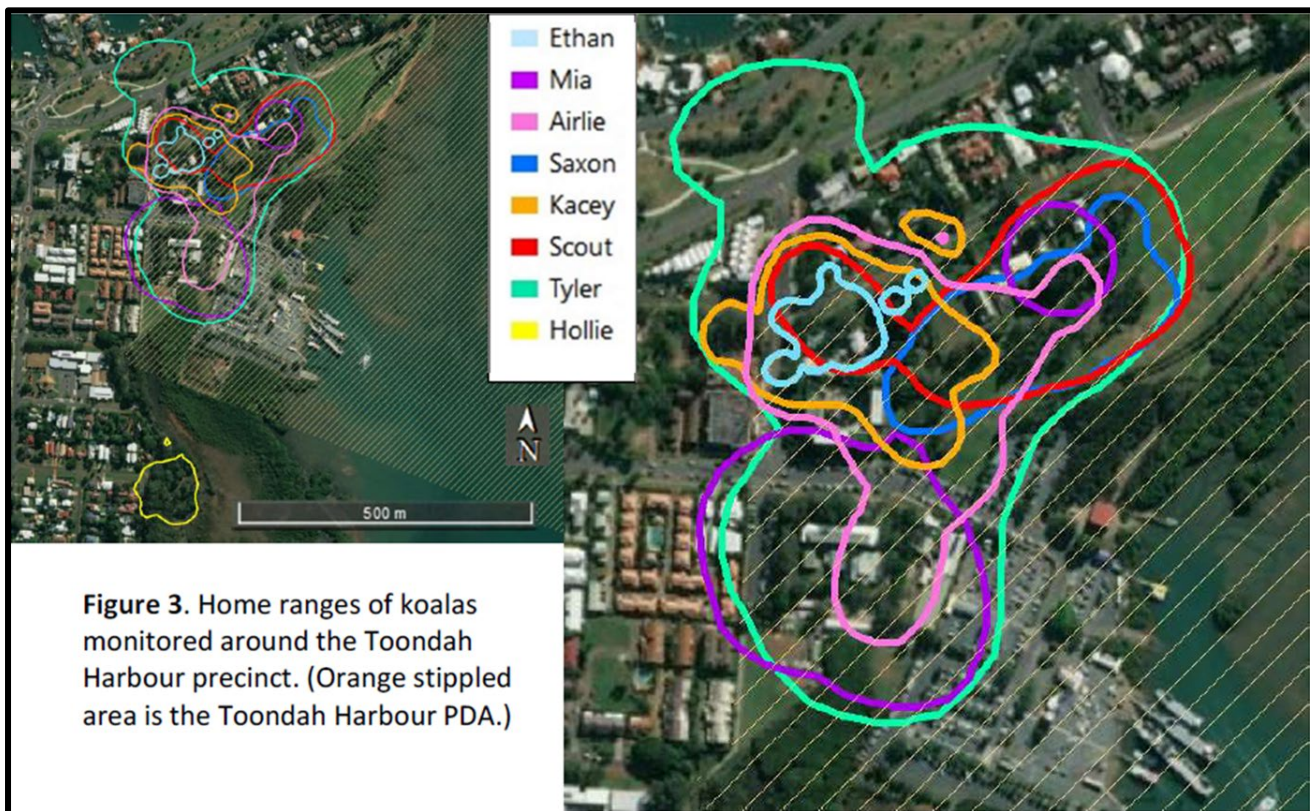
⁶ EIS, Chapter 15, Terrestrial Ecology, page 27.

⁷ Rhodes, A., Hawthorne, B., Preece, H. and McAlpine, C. 2015. South East Queensland Koala Population Modelling Study. Uniquist, Brisbane, Australia.

⁸ Adams-Hosking C, Grantham HS, Rhodes JR, McAlpine C & Moss PT (2011). Modelling climate-change-induced shifts in the distribution of the koala. *Wildlife Research* 38,122-130.

⁹ EIS, Chapter 15, Terrestrial Ecology, page 23

¹⁰ EIS, APPENDIX 1 – N TRAFFIC GENERATION REPORT page 8



(From the Toondah Harbour Tracking Project 2019)¹¹

The figure above clearly shows Shore Street East to be centre of the majority of the home ranges and the most frequently crossed road during the tracking project.

The EiS Traffic Generation Report makes the assumption that:

90% of traffic generated from stages 1-6 will travel in/out of the development at Shore Street East and 10% at Middle Street;¹²

The suggested mitigation measures in the EIS include there to be no construction traffic using Shore Street East¹³. This is difficult to imagine as there are plans to upgrade Shore Street East, a new road built through GJ Walter Park (with a roundabout), marina and 650 residential apartments out in the bay (see Figure 3-4: Fauna Crossing Location and Concept Design below)¹⁴. Is this to be done without any construction traffic? The important point is that the ongoing traffic is the lasting legacy of the development.

As the EIS reports, there have been no koala vehicle strikes reported on Middle Street between January 2015 and June 2021.¹⁵ This is remarkable because Middle Street services the barge and ferries and in consequence has higher traffic volumes (3,370 per day)¹⁶. This could be explained by the traffic

¹¹ de Villiers, Deidré, Debbie Pointing, Ken Rawlins, Jo Loader and Jon Hanger. 2019 Toondah Harbour Koala Tracking Project, 2018,.Accessed from Koala Action Group website <http://koalagroup.asn.au/>

¹² EIS, Appendix 1 – N Traffic Generation Report, page 9

¹³ EIS, Chapter 15, Terrestrial Ecology, page 61.

¹⁴ EIS, Chapter 3, Operations and Uses.

¹⁵ EIS, Chapter 15, Terrestrial Ecology, page 23.

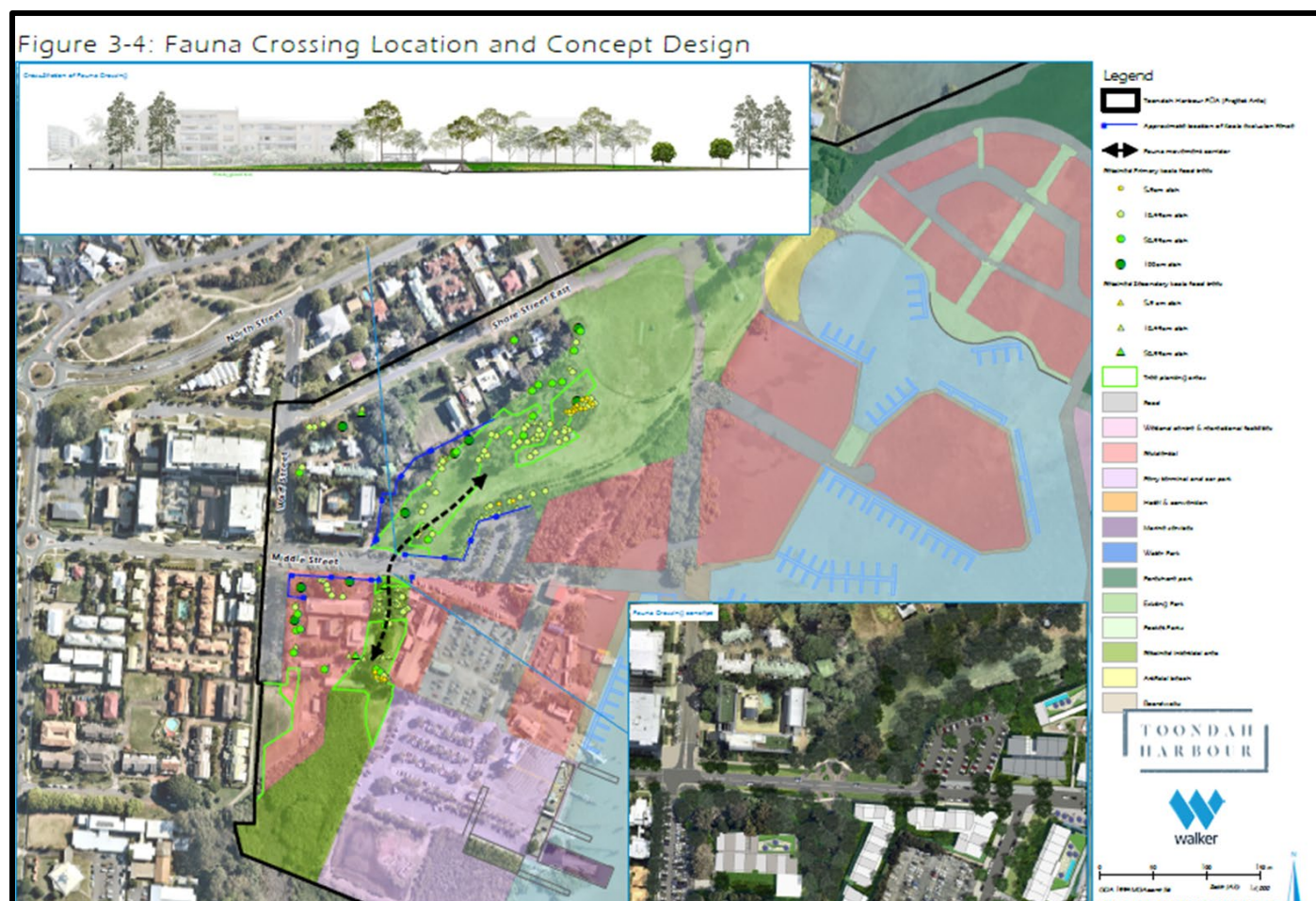
¹⁶ EIS, Appendix 1 – N Traffic Generation Report, page 3.

According to the EIS, Middle Street will carry most of the construction traffic and future residential traffic:

15,827 vehicles per day in the ultimate year and approximately 1,642 vehicles in the AM and PM peak hours. As outlined previously, Middle Street has a current daily traffic volume of 3,370 vehicles¹⁷.

An additional 400 trips per day for construction workers and approximately 520 construction related trips per day at peak construction are also expected.

KAG supports the use of traffic controllers to control traffic during construction.¹⁸ However KAG has serious doubts about the efficacy of the proposed underpass in Middle Street pictured below¹⁹.



The exclusion fencing (marked in royal blue in the figure) which is essential to ensure the usage by koalas, is limited in urban situations by driveways and pedestrian usage. This is shown in the proposal

¹⁷ EIS, Appendix 1 – N Traffic Generation Report, page 9.

¹⁸ EIS, Volume 2-L Appendix Terrestrial Ecology Technical Report, page 68.

¹⁹ EIS, Chapter 3, Operations and Uses.

where there is no fencing on the northern side of Middle Street between the park and Wharf Street. This means that koalas using habitat in Wharf Street from Shore Street East habitat will still cross towards the Trades College and have to negotiate a fence when they get there.

However, the Terrestrial Ecology report claims to be able to address this problem:

To guide koala movement at this location where there are no opportunities to isolate koala habitat within the Project footprint due to surrounding roads, pedestrian footpaths and driveways for private properties, it is intended to create a barrier to koala movement across the surface of Middle Street between its intersection with Wharf Street and the eastern edge of the road interface with GJ Walter Park.²⁰

Unfortunately, there is no information about how this seemingly impossible task may be accomplished. It is hard to imagine a barrier to koalas that is also not a barrier to pedestrians and vehicles. Besides, even if blocked, koalas become confused and disoriented when they cannot reach their accustomed trees.

The other major defect in this plan is the exclusion fence in GJ Walter Park along the rear of the properties fronting Shore Street East. This is the koalas' much-used route to reach their favourite trees along Shore Street East. The Toondah radio-tracking study showed the intensive use of the backyard trees in this area, many of which were their preferred shelter trees (and usually not food trees) in hot weather. With this scenario they would effectively be blocked from using this essential habitat. In reality, the exclusion fence will make life more difficult for koalas and cause them confusion by blocking their usual paths. Once again, there are mixed messages in Terrestrial Ecology report as figure 15.11 (reproduced on page 8 in this document) shows that the identified koala movement patterns go right through the area to be blocked by exclusion fencing.

Other mitigation measures mentioned include:

- Planting of koala habitat trees in GJ Walter Park through to Nandeebie Park;
- Fauna friendly and koala exclusion fencing if required to guide fauna to the underpass – the extent and location of any fencing to be designed in consultation with RCC;
- Climbing structures and refuge poles;
- Intersection, signage, landscape and pavement treatments to reinforce slow speed/shared environment; and
- Community awareness and driver education programs.²¹

These measures are not dependent on the Toondah Harbour development going ahead. Some of these are already happening as RCC initiatives in their Koala Plan and there is no reason for others not to continue to occur with normal road upgrades.

Loss of habitat

The EIS claims to be only removing one primary food tree of the 215 koala food trees and 18 secondary food trees recorded within the PDA²². KAG questions the number (215) of food trees as it only seems to include the trees on some road reserves and some private properties. Figure 15.1 clearly shows the PDA including significant trees along the road reserve both sides of Shore Street East²³.

²⁰ EIS, Chapter 15, Terrestrial Ecology, page 47.

²¹ EIS, Chapter 3, Operations and Uses, page 14.

²² EIS Chapter 23 Summary of Direct and Indirect Impact Assessment, page 4.

²³ EIS, Chapter 15, Terrestrial Ecology.

Figure 15-1: Toondah Harbour Existing Terrestrial Features



Yet in Figure 15.2 of the same document, many of these trees do not seem to have been included. There is some doubt as there does not appear to be a legible figure in the EIS that shows the 215 koala food trees. Ground truthing has shown many trees that are not marked on figure 15.2, such as street trees along Shore Street East (see photographs following page *none of which appear on the figure below*). The figure is also very selective that the significant tree on private property at the unit complex on Shore Street East is marked when few others on private property are shown, even when readily seen from the habitat in the dog park.

Figure 15-2: Toondah Harbour Vegetation Communities and Koala Resources





Mature *Eucalyptus tereticornis* outside 68 Shore St. East



Mature *Eucalyptus tereticornis* in front of 62 Shore St East



***Eucalyptus microcorys* corner Shore St. East and Wharf St.**



Mature *Eucalyptus tereticornis* rear of 67 Shore St East



Koala photographed in Shore St. East 25.11.2022

Mature *Eucalyptus tereticornis* at rear of 67 Shore Street East

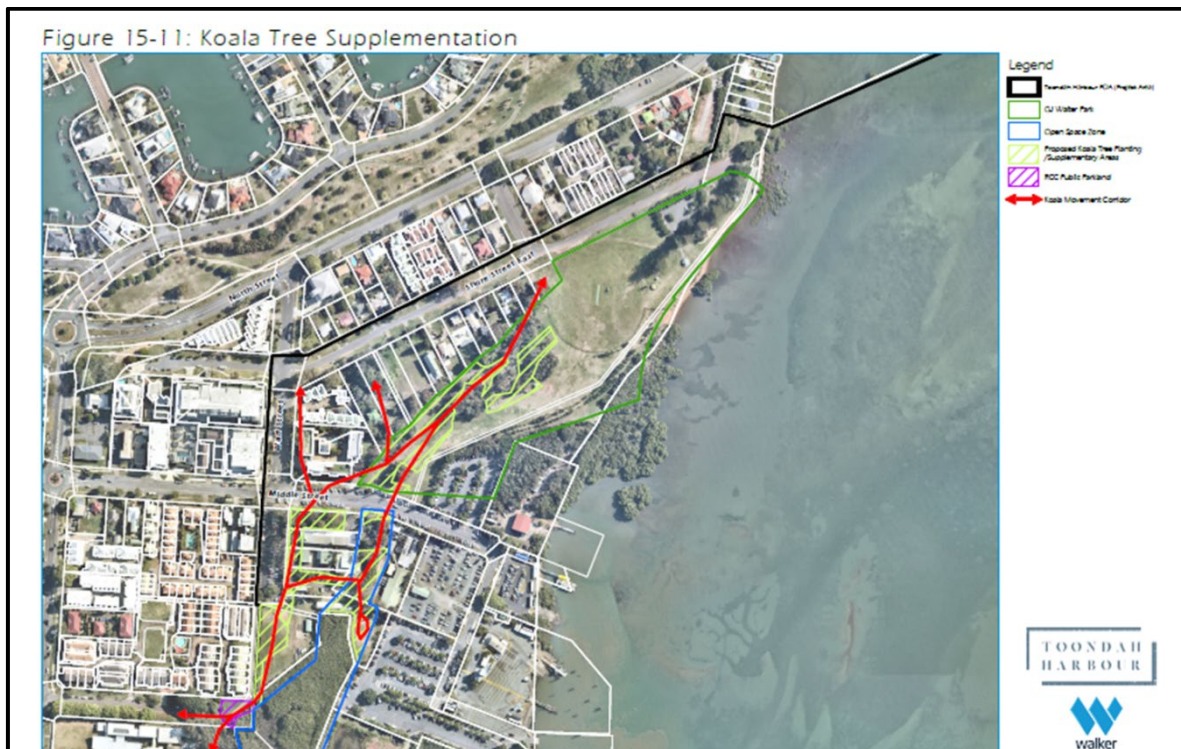


GJ Walter Park – the way we want it to remain. All photos taken 25.11.2022

Proposed mitigation

The EIS claims that 1,000 koala food trees will be planted in GJ Walter Park to compensate for the removal of “one primary food tree and 18 secondary food trees....over an area of 1ha **within** GJ Walter Park”.²⁴ (Our emphasis). This is plainly improbable given that most plantable areas are already treed. The density of planting 1,000 trees in an area of 1 ha would be very close – approximately 3 metres apart which does not allow for existing tree shade and root area.

The “within GJ Walter Park” statement seems to be contradicted by figure 15-11 which appears to broaden the replanting area to other parts of the PDA²⁵.



Not only does the yellow hatched area showing proposed tree supplementation areas in GJ Walter Park show the tree cover already in this area and the futility of planting more trees in this area, but most of the other areas are also similarly densely treed. The exception is one small area in the southernmost part of the hatched area. It is unlikely that the promised 1,000 trees will ever become reality.

There is another claim made in the EIS that the “mitigation measures proposed for the Project will double available food resources for the local Koala population”²⁶. There is no mention of a time frame but it is generally accepted that koala tree plantings will not be useful for about 10 years and by that time it is unlikely there will be any koalas left to benefit from the plantings if the Toondah development goes ahead with its greatly increased traffic. The “double available food resources” claim is also unrealistic in that we have shown that it is unlikely many planted trees will grow vigorously in the areas shown because of competition with the existing trees. Besides, the leaf mass of the existing mature trees is many times the mass of newly planted trees, especially the 9 identified *Eucalyptus tereticornis* that have a diameter greater than 100cm, as well as the unrecognised large food trees.

Loss of genetic diversity

The EIS Terrestrial Ecology report quotes the National Recovery Plan for Koalas in which the genetic health of a population is mentioned:

²⁴EIS Chapter 23 Summary Of Direct and Indirect Impact Assessment, page 4.

²⁵ EIS, Chapter 15, Terrestrial Ecology, page 46.

²⁶ EIS Appendix 2 – L Terrestrial Ecology Technical Report, page 84.

- *Increased and sustained patch isolation may lead to inbreeding, reducing genetic health of isolated populations, ultimately reducing fecundity.*
- *Loss of connectivity reduces natural movement such as the ability of individuals to disperse safely, therefore reducing gene flow and health levels of genetic exchange among adjacent populations.²⁷*

KAG is in complete agreement with the necessity to have corridors or links connecting these smaller patches of habitat such as Toondah, to allow genetic flow. Most of our plantings have had habitat connectivity in mind. As mentioned in the EIS Terrestrial Ecology Technical Report, the RCC Wildlife Connections Plan:

maps Cleveland Point to the mouth of Eprapah Creek as a coastal foreshore corridor, linking core habitat (predominantly saltpan and mangrove with fringing woodland vegetation) via Nandeebie foreshore and Thornlands foreshore and meeting established corridors at Thornlands and Victoria Point. Gaps in the corridor have been identified between Nandeebie foreshore and Cleveland Point – which includes parts of the PDA. Stepping-stone corridors are also identified linking Cleveland Point to Wellington Street Bushland Refuge via Raby Bay, William Ross Park, Donald Simpson Park and Ross Creek Corridor and an east-west corridor linking Donald Simpson Park to Nandeebie Park.²⁸

Wildlife Connections Plan – Foreshore Corridor  **approximate position of PDA). The green line shows the centre of the corridor.**



The Coastal foreshore corridor is a vital corridor for koala connectivity as it is not crossed by major roads. It also links the creek corridors which come down from large areas of protected bushland habitat.

Besides planting many of the trees within GJ Walter Park in 1989 and the early 1990s (see newspaper clipping next page), KAG is well aware of the need for corridors. Our group has planted the parkland corridor between the Toondah precinct and Cleveland Point as we recognised decades ago the importance of this corridor to koala movement opportunities.

The proposed Toondah Harbour development would sever this link irreparably with their high-volume roads coming from the populated area of 6,000 or more residents in addition to the traffic generated by the proposed uses.

²⁷ DAWE 2022, National Recovery Plan for the Koala *Phascolarctos cinereus* (combined populations of Queensland, New South Wales and the Australian Capital Territory).

²⁸ EIS Appendix 2 – L Terrestrial Ecology Technical Report, page 53.

THE REDLAND TIMES, Wednesday, August 16th, 1989 — 5

Lobby groups join forces to plant eucalypts for koalas

A successful tree planting exercise was held earlier this month at the G.J. Walter Park, Cleveland.

The ceremony was organised by Save Toondah's Invaluable Resources (STIR) with the assistance of the Koala Action Group.

Redland Shire Council donated 62 eucalypt trees to provide food for the koalas in the Toondah area.

Division Two councillor Wayne Yeo organised the stakes and about 10 children helped plant the trees.

Southern Districts Landscapes at Thornlands donated the top soil and Organic Industries, Hemmant, provided the mulch.

STIR would like to thank those people who supported the tree planting.



□ CHRISTINE and Marion Beeby, Lynn and Kerry Roberts, Enid Brown and Esme Whitby doing their bit for Toondah koalas.

B. Relevant Impacts of the Proposed Action on RAMSAR habitat

We join with the Birdlife groups to protest about the use of RAMSAR habitat for private developer gain and agree with the following points:

- Most of the Project's footprint is within the boundaries of the Moreton Bay Ramsar Site, and the Project would result in the permanent and irreversible destruction of over 40 hectares of the Moreton Bay Ramsar site.
- The Project would clearly result in a significant area of the Moreton Bay Ramsar Site, including areas that form part of the ecological character of the wetland (e.g. migratory shorebird foraging habitat), being destroyed or substantially modified through land reclamation.
- Moreton Bay performs a critical, and irreplaceable role for the migratory birds of the East Asian-Australasian Flyway. There is no alternative site for these migratory shorebirds in the event of significant impacts to the Moreton Bay Ramsar Site.
- Typically, the need to avoid wetland losses is identified as an imperative. Unavoidable losses should be mitigated and offset. (Ramsar Convention Global Wetland Outlook: State of the World's Wetlands and their Services to People. 2018). The destruction of the Ramsar wetlands at Toondah Harbour are avoidable as there are low-impact alternatives that can upgrade the ferry terminal and local infrastructure.
- It is not possible to mitigate the impacts on the ecological character of the Moreton Bay Ramsar site where the components of the wetland, including foraging habitat for migratory shorebirds, is permanently destroyed through land reclamation and construction of the marina.
- The draft EIS claims that good practices for integrating urban development and wetland conservation will be applied including:
 - avoiding impacts on sensitive areas such as high tide roost sites through siting and design of development and public realm features;
 - including wetlands into the urban environment as part of a water sensitive urban design (WSUD) approach; and
 - incorporating an education centre and signage to support community education and public awareness raising about the importance of wetlands and species that use the MBRS.

However, the Project does not avoid impacts on sensitive areas as it will destroy feeding habitat for endangered and critically endangered migratory shorebirds and the Moreton Bay Ramsar Wetland. Furthermore, building an education and awareness centre for wetlands on top of reclaimed land that destroys the very wetlands that the centre is designed to improve awareness and education about is incongruous with good practices of urban development and wetland conservation.

- The draft EIS claims that the destruction caused by the Project equates to only a fraction of a percent of the entire Moreton Bay Ramsar Site. This justification is erroneous. The Moreton Bay Ramsar boundary was recently assessed through the Queensland Department of Science, the body responsible for managing the Ramsar Site (Ramsar Information Sheet Ramsar Site 631. Moreton Bay – Australia. 2019). The boundary was confirmed, including the Toondah Harbour area meaning it contributes to ecological character of the Ramsar Site and all of its components, including those at Toondah Harbour, should be conserved under national legislation and obligations under the Ramsar Convention.
- Furthermore, this cynical justification has created the conditions in which the state of Australia's environment is in serious decline. Destroying matters of national environmental significance, no matter the scale, is incongruous with the objectives of the Environmental Protection and Biodiversity Conservation Act 1999. Cumulatively, these acts of destruction that are described by proponents as insignificant or "fractions of a percent" of the system, can lead to "death by

one thousand cuts” equating to the destruction of thousands of hectares of environmentally sensitive areas.

- The draft EIS fails to address the cumulative impacts resulting if the Project is approved. It would set a dangerous precedent for similar developments in scope and scale within Moreton Bay and Australia’s 65 other Ramsar Wetlands contributing to the “death by one thousand cuts” and further declination and degradation of the world’s wetlands. Furthermore, other wetlands that do not meet criteria for international importance but are environmentally important nationally and locally could see increases in development proposals within their boundaries.

C. Alternative Options to the Proposed Action

The EIS maintains that the development needs the reclamation of the dredged material to efficiently dispose of the amount from essential deepening and widening of the ferry channel.²⁹ However, an assessment by Redlands2030 revealed that there was no pressing reason to widen and deepen the channel:

*Queensland’s Department of Marine Safety confirmed in 2020 that no upgrade to the current marine channel at Toondah is necessary to achieve safety requirements for current usage of Toondah Harbour.*³⁰

It is apparent that the present channel is perfectly adequate and fit for purpose just with the normal dredging for maintenance. This is a ferry terminal, not for cruise liners or charter boats. Giving over publicly owned RAMSAR area to enable a private company to reclaim land that would be worth billions of dollars for non-essential dredging is absolutely unacceptable.

The most pressing problem with the terminal is the lack of parking whereby the nearby streets are overflowing into residential areas from people parking (at no cost) for however long they like. The proposed development, with the loss of the ambience of a much-loved local park and the innumerable other environmental costs is to give the community a grand total of an extra 300 car parks! This is no more than the overflow that we see on any busy weekend!

There is no dispute that the present barge and ferry terminal needs a facelift. There is a need for a user-pays multi-storey car park that would cater more efficiently for the numbers of cars using the area. This would provide room for an apartment building similar to what is allowable in Cleveland. There is room for new cafes and restaurants on the waterfront within the footprint of the present area.

On the land already in public ownership to the northeast of Middle Street, there may be the opportunity for a tourism office that perhaps showcases the attractions of Minjerribah including Indigenous cultural awareness and a short tour of the koalas of Toondah for those waiting for their ferry / barge could be offered. This would complement their journey rather than compete with what is to be found on Minjerribah. Toondah is the gateway to North Stradbroke Island (Minjerribah), not a destination.

Lynn Roberts BSc (AES)

Vice-president Koala Action Group

²⁹ EIS Appendix 1 – E Alternate Options Assessment, page 1.

³⁰ <https://redlands2030.net/who-wants-a-bigger-ferry-channel-at-toondah-harbour/>