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04 09 11

Dept of Sustainability, Environment,
Water, Population and Communities

Dear Officer,

RE: ENERGEX LOGANLEA TO JIMBOOMBA & MATTER OF NATIONAL SIGNIFICANCE – SPOTTED TAIL QUOLL (Logan City Council QLD)

The **Logan and Albert Conservation Association** would like to bring to the Federal Government's attention the current proposal by Energex to upgrade a 110 kV corridor from the suburbs of Loganlea to Jimboomba. The proposed corridor will include Logan Reserve Rd (underground) to the Logan River (5 river crossings) , cross at Anzac Ave (over Geoff Philip Bridge over the Logan River near Logan Village) and proceed south along Waterford – Tamborine Rd and then veer south-west to Camp Cable Rd and the west to be hooked up to the Jimboomba Substation. There is currently a corridor along Logan Reserve Rd, none along the Logan River, none along Waterfrod Tamborine Rd, and an existing 33 kV powerline to service local residents on the southern side of Camp Cable Rd east of the Jimboomba substation. See details on the proposal online on http://www.energex.com.au/building-and-maintaining-the-network/major-projects/loganlea-to-jimboomba-network-upgrade
(see attachments with this email for proposed Loganlea to Jimboomba Corridor Map 1 and Map 2)

As part of this powerline corridor investigation, LACA has participated in the various community consultations to date that began in November 2008 with a Corridor Selection Report. The Final Assessment Report has been submitted to the Minister for Energy and Water Utilities in 2011 for consideration of the project, prior to designation and construction approval. **Energex has Community Infrastructure Designation and has conducted a self assessment for EPBC Act Protected Matters (see Appendix H4 of the Loganlea to Jimboomba Community Infrastructure Designation Final Initial Assessment Report June 2010 and the attachments provided with this email). The Minister Mr Stephen Robertson has still made no decision in relation to this proposed powerline corridor.**

LACA believes that matters of national significance in relation to the spotted tail quoll have not been sufficiently considered to date, and Energex has made very little attempt to ground truth the likelihood of spotted taill quolls in the corridor area or the surrounding habitat. No quoll specific surveys have ever been conducted along or in the adjacent areas along this corridor. Please see the documents attached with this email which come from the Final Assessment Report prepared by AURECON for Energex.

LACA and other community groups believe that other alternatives may exist that will reduce the loss of habitat and reduce the length of this corridor. However, to date Energex has not been willing to seriously consider these alternative options. One of these alternatives is a substation to be located at Yarrabilba . The northern end of Yarrabilba is located to the east of the

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intersection of Waterford-Tamborine Rd and Camp Cable Rd. Yarrabilba is an urban footprint area under the **South –east Queensland Regional Plan** that is planned to accommodate between 60 000 and 90 000 people in the future. The local authority Logan City Council, and the major developer of Yarrabilba – Delfin, both support the alternative concept of a substation especially in the light of future development proposed for the area.

STATE BIOREGIONAL CORRIDOR IMPACTS

1. LACA is extremely concerned that the proposed powerline easement of 23.2 km will run approximately 22.2 km through 3 state government bioregional corridors –

- Logan River Bioregional Corridor
- north and south of Camp Cable Rd - the Camp Cable Rd vegetation forms important connectivity to the Birnam Range to the south.
- east to west across Waterford Tamborine Rd – the vegetation along Waterford Tamborine Rd forms important linkages to Plunkett Reserve to the east.

2.The Logan River is a critical bioregional and ecological corridor in the Mt Lindesay North Beaudesert Area, extending 1 km either side of the Logan River (personal communication EPA 2009).
3.The Logan River is important for its connectivity to the surrounding landscape and habitat areas in a broader SE Queensland context, as it links and intersects with other significant bioregional corridors.
4. The Energex Final IAR acknowledges that there is the potential for the proposed powerline to result in impacts to bioregional corridors.

5. The Energex Final IAR (p 3-5 and p 4-46) inaccurately claims that a current easement of 20-30 metres has been cleared for existing infrastructure (e.g. an 33 kV powerline easement on the southern side of Camp Cable Rd). This claim is not true as much of the proposed corridor would be acquisition of new powerline easements. The only existing powerline corridors for this route exist along Logan Reserve Rd and on the southern side of Camp Cable Rd there is a 33 kV easement that has been cleared to 8 -15 metres. This means that an additional 25-35 metres along the length of the proposed corridor will still need to be cleared through remnant vegetation, regrowth vegetation, essential habitat, essential regrowth habitat and areas of high and medium koala habitat value.

6. The Energex Final IAR acknowledges the high biodiversity and the lack of background information and previous studies available for the Mt Lindesay North Beaudesert Area (Final IAR p 11-3). This is why it is critical for Energex to ensure that rigorous ecological assessment is conducted. There is a particular lack of fauna information collected for this region and without this, accurate biodiversity assessment cannot be conducted.

QUOLLS
The precautionary principle must be applied in relation to the possibility of the presence of spotted quolls listed as endangered under the Environment Protection and Biodiversity Conservation Act and Vulnerable under the Nature Conservation Act (see Appendix 1).

1. LACA has concerns about the one off target survey that AURECON conducted on behalf of Energex over such a short period of time and possibly in the wrong season to optimize sightings of general fauna species and not any survey that was specifically targeting spotted tail quolls.

2. LACA is concerned at the statement in the Energex Final IAR that the 1 sighting of a spotted quoll approximately 1 km due west of the Geoff Philip Bridge on Anzac Avenue (Dr Scott Burnett's community sighting survey of quolls) west of the proposed powerline corridor along the Logan

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River "was most probably a transient individual" (Final IAR Figure 11.4 see this as an attachment with this email).

3. **LACA believes that this concluding statement cannot be made at this time and that the precautionary principle must be applied in relation to possiblility of the presence of this species within the Logan River and Camp Cable Rd area. No quolls specific surveys have ever been undertaken in the field to confirm of refute the presence of spotted tail quolls in any area of the Mt Lindesay North Beaudesert Study Area or along or adjacent to the proposed Loganlea to Jimboomba powerline corridor.**

4. In 2006, **Dr Scott Burnett** (previously Wildlife Preservation Society of Queensland and now at Sunshine Coast University) conducted a survey of community sightings of quolls through Spring Mountain, Greenbank, Munruben, North Maclean and Chambers Flat with funding from Beaudesert Shire Council. Despite numerous community sightings that were reported and extensive follow up in the field, there were no confirmed sightings of quolls (see Figure 11.4 Threatened Species in the Final IAR that records these community sightings). However, **confirmed scat was found at Jerry's Downfall** Reserve (Chambers Creek) near Chambers Flat west of the Logan River (see Map 1 which shows the location of Jerry's Downfall Reserve immediately south of the label Park Ridge South). The closest quoll sighting to the proposed powerline corridor that was recorded in Dr Scott Burnett's survey was approximately 1 km west of the Geoff Philip Bridge on Anzac Avenue (see Final IAR Figure 11.4).

3. As quolls are rare and highly migratory (moving up to 21 km in one night) the examples here indicate that a one off survey as conducted by AURECON for Energex would most likely not achieve confirmed sightings of quolls.

4. Timing of surveys
The community sightings of quolls from 2003 to 2006 recorded by Dr Scott Burnett indicated that the greatest number of community sightings were recorded for the months of July and August ("during a time when juvenile males would be dispersing" Burnett 2007) see Table 1. The quoll target survey conducted by AURECON for Energex was conducted in September 2009 during a different month and season to when the most community sightings were previously recorded for the Park Ridge South and Chambers Flat area.

Table 1 - QUOLL SIGHTINGS – MONTHS OF YEAR (Current to 14/08/06)

MONTHS	2006	2005	2004	2003	TOTAL
January					
February	2				2
March	2				2
April	2				2
May	1	1			2
June	0	1		winter*	1*
July	3	2	1	winter*	6*
August	1	1	1	winter*	4*
September					
October					
November		2			2
December		2	1		3
TOTAL	11	9	3	1*	24

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Source: Dr Scott Burnett's data from Community Quoll Sightings conducted in 2006 for Beaudesert Shire Council

NOTE:
* 1 sighting reported as winter 2003 and not by individual month

EXCLUDED:
1. Year only results reported for 4 sightings have not been included in table.
2. 1 sighting reported over a period 6/2005 – 1/2006 has not been included.

5. Location of Survey
The locations surveyed for fauna by AURECON for Energex, were restricted to only the southern survey sites along Camp Cable Rd. No specific locations along the Logan River were targeted during these September surveys despite one prior Wildnet community sighting approximately 1 km west of Anzac Avenue near the Logan River. Figure 11.4 (Final IAR see attached Map 1 and 2 with this email) records the quoll sightings reported from the study by Dr Scott Burnett to the north of the Logan River at Chambers Flat and one sighting approximately 1 km west of Anzac Avenue at Logan Reserve. There were also sightings recorded to the west of the Logan River at St Aldwyn Rd at North Maclean that were reported in the study. **This highlights the need for locations along the Logan River to have been included in the target quoll surveys, however, they were not.**

The evidence above, indicates the inadequacies of the short term survey method, seasonal timing and location of sites that have been used in the fauna surveys that were intended to target fauna in general and were not specifically designed to target quolls surveys.

QUOLL SIGHTINGS POST 2006
A local resident Ms Leigh O'Gorman (ph 07 5547 7295) who rents a property at 341 – 351 Camp Cable Rd reported a night time quoll sighting from 2007 to Ivell Whyte who was assisting Dr Scott Burnett with his community survey of quolls sightings in 2006 . This property borders Edelsten Reserve which is located along a disused rail line on the corner of Edelsten Rd and Camp Cable Rd. Ms O'Gorman reported an animal with spots being up a tree near her house and that it definitely was not a possum. Ms O'Gorman used to work with officers from NPWS in the Northern Territory. Ms O'Gorman is willing to sign a statutory declaration to confirm what she has seen. Ms O'Gorman did send a submission into Energex as part of the community consultation in relation to her concerns about the impact of the proposed powerline corridor on fauna species and habitat.

This property at 341 -351 Camp Cable Rd is a directly affected property in the proposed powerline corridor on the southern side of Camp Cable Rd. One of the fauna survey sites was located on Edelsten Reserve immediately south of Ms O'Gorman's property. Ms O'Gorman had several conversations with the people who came out to do the fauna surveys for AURECON.

2. A local resident (Scott Eipper ph 0419 328 251) who is a frog and reptile specialist has reported two quoll sightings from Flesser Rd Reserve (to the south of Jerry's Downfall Reserve) and very close to Chambers Flat Rd . One sighting was about 8 months ago and the other was about 12 months ago. One was a day time sighting , the other was a night time sighting.

SURVEY METHODOLOGY CONCERNS
1. Seasonal Variation
Fauna surveys were conducted over a consecutive 6 day period during March 2009 (IAR H1 p 3). "*Best practice for ecological assessments is to conduct surveys during different seasons to obtain a better understanding of species using the area. One survey is insufficient and a more detailed assessment is needed because the high biodiversity evident in the Mount Lindesay North Beaudesert area."* (LACA *submission July 2009)*

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2. The Final IAR claims that an additional fauna survey was conducted in September 2009 to take account for seasonal variations (Final IAR Executive Summary p 9) and "*determine the presence , or otherwise, of the spotted tailed quoll, wallum froglet and green thighed frog"* (Final IAR Executive Summary p 9) . The length of this survey was not specifically stated in the IAR. However, although a target survey for these species was conducted in September 2009, these species were not targeted in the March 2009 survey period. Hence, seasonal variations could not be determined by a one off survey.

3. Different survey types and techniques were used at different sites in March 2009 compared to September 2009. For example, no pitfall trapping was required in the second survey in September 2009 (Appendix H 1 p 5). This method does not enable seasonal variations to be accounted for and this is not best practice as was requested by LACA in their submission in July 2009. LACA's submission in July 2009 raised concerns about fauna survey studies conducted in one time period and for one season and for one year. This matter has still not been addressed by Energex (see later sections on Koalas and Quolls).

Best practice is to conduct surveys over a long term, with seasonal variations. Consequently the fauna surveys conducted for the Final IAR do not account for seasonal variation as claimed and do not demonstrate best practice.

4. Not all representative habitats and vegetation along the complete proposed route have been assessed and a more thorough ecological assessment would be expected by this stage for such a proposal if it was known that limited ecological information was available. The methodology stated that it "i*ncluded undertaking a detailed literature review of previous studies completed within the vicinity of the proposed development area. Due to the limited amount of ecological investigations that have been conducted in the area in the past it was deemed appropriate to undertake a high level assessment of the proposed development area by selecting target areas that were considered to be representative of the habitats and vegetation communities within the proposed development area*." LACA does not believe that a high level of assessment has taken place and the sites assessed for fauna and RVT taxa like quolls were very limited .

6. No detailed fauna surveys have been conducted east or west of the Logan River area for the areas of Waterford West, Loganlea, Logan Reserve, Waterford, Buccan, Chambers Flat, Logan Village, Stockleigh despite significant sightings of Endangered, Vulnerable and Rare taxa like the spotted tail quoll, koalas, green thighed frog and other species in these areas. The Final IAR cannot be described as a detailed, comprehensive or high level of assessment in this regard.

7. In Figure 11.4 (Final IAR Chap 11 **see Map 1 and 2 attached with this email**) there are numerous spotted tail quoll sightings west of the Logan River in the Chambers Flat area, with the closest sighting less than 1 km west of the Logan River near Anzac Avenue. The season with the highest number of reported sightings for quolls in this area was from June to August as young males disperse at that time (Burnett 2006). Despite this information being communicated in LACA's submission in July 2009, the additional surveys that were to potentially target quolls were conducted in September 2009 and would have not been the optimum time for collecting information in relation to a federally endangered species (EPBC Act) and a vulnerable species (NC Act). (See section on quolls).

LACK OF DATA FOR MT LINDESAY NORTH BEAUDESERT AREA

It is critical to note that historically there is a lack of fauna data for the Mount Lindesay North Beaudesert Area where this powerline corridor is proposed for. This, however, does not mean that EVR taxa do not inhabit this area. Rather in the absence of data, the **precautionary principle** needs to be applied. As best practice, more thorough and rigorous ecological assessment of this

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region is still urgently needed. Long term rather than one off short term studies as conducted for Energex in this Final IAR are needed before conclusions can be made about the likelihood of whether EVR taxa are present or not.

THREAT TO BIODIVERSITY

1. The Final IAR acknowledges that "*The project area is rich in biodiversity*" (p11-21) . It also acknowledges that "*vegetation clearing within the southern portion of the project has the greatest potential to create barrier effects within the project area*" (Final IAR p 8-20) and that "*vegetation removal has the capacity to reduce biodiversity levels and habitat values, impair habitat connectivity and increase erosion, sedimentation and weed proliferation"* (Final IAR p 8-14). The IAR confirms edge effects were prominent from existing linear infrastructure and that "*vegetation clearing associated with the Project is likely to extend these edge effects* ". Yet Energex intends a business as usual approach and is persisting with this corridor investigation, rather than reviewing its proposed location and route for the corridor.

2. The Final IAR states that " *Flora and fauna can be particularly susceptible to disruptions in habitat connectivity if the species has small, extinction –prone populations, low reproduction rates, poor recolonsing ability in modified habitats and a high bias towards habitat specialization"*. The areas around the proposed powerline corridor indicate numerous rare and threatened species such as the spotted tailed quoll that have not be adequately accounted for in the field surveys conducted so far. Rarer species are inherently more difficult to find and need greater effort and longer term studies to determine their presence or lack of presence in an area . The fauna surveys conducted so far have not achieved this. The **precautionary principle** needs to be applied.

Cumulative Impacts

1. South-east Queensland Regional Plan – Yarrabilba

The section of the proposed powerline corridor that follows the area near the intersection of Waterford-Tamborine Rd and Camp Cabe Rd is in the vicinity of the future urban ara of yarrabilba planned to accommodate between 60 000 to 90 000 people. The proposed Loganlea to Jimboomba upgrade to 110 kV line is planned only to service existing developments and populations. This means that in the near future a substation will also need to be provided for the Yarrabilba area.

If the alternative of a substation was to be considered, this would reduce the need for the powerline corridor to follow the Logan River (from Logan Reserve Rd to Anzac Ave) and may make it affordable to underground the powerline from the substation at Yarrabilba along Camp Cable Rd and to the Jimboomba substation. This would reduce the amount of habitat that would need to be cleared. Logan City Council and Delfin (the developers at yarrabilba) are both supportive of the substation being brought forward. Logan City Council has conducted their own investigations into where they believe a suitable location would be and they have identified an area they believe is suitable close to an existing Powerlink easement at the Yarrabilba site.

2. Exisiting Powerlink Easements (275 kV)

There are several Powerlink easements that currently are located to the **north of Camp Cable Rd**, and **south-east of the intersection of Waterford-Tamborine Rd and Camp Cable Rd intersection**. In this area there seems to be a criss crossing effect of Powerlink easements. LACA does not know if there are any future plans to upgrade these corridors.

LACA is concerned that there is already significant fragmentation of habitat and regrowth vegetation as a result of poor planning and lack of co-location for powerline and road easements in this general area. LACA is not in favour of further fragmentation and loss of habitat as is being

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proposed by Energex. This poses significant threats to **spotted tailed quolls** and other fauna species

3. Future Upgrades of Roads - Chambers Flat Rd, Waterford-Tamborine Rd, Camp Cable Rd
Any future proposed upgrades of the local roads (from 2 lanes to 4 lanes) or major roads (Main Roads e.g. Waterford-Tamborine Rd) in the vicinity of the proposed powerline corridor constitute major threats to habitat loss and fragmentation across the whole region of Mt Lindesay North Beaudesert area. This poses significant threats to **spotted tailed quolls** and other fauna species.

3. New Southern Freight Corridor Road Route
A new road has been identified as part of the Queensland Government's South-east Queensland Regional Plan to connect Greater Flagstone and Yarrabilba to Yatala. Although no specific corridor has yet been declared to the community, there have been community consultation documents that have identified a possible corridor in the vicinity of Camp Cable Rd e.g. north of Camp Cable Rd. This will create yet another significant linear infrastructure corridor with more habitat loss and fragmentation for this region, in addition to what currently exists.

LACA believes that there has been very little forward planning conducted in relation to the cumulative impacts for this area in relation to past and current infrastructure corridors and development. In the light of what is proposed as possible future development for this area, it is critical to have the best science to inform the best outcomes. We do not believe that Energex has adequately assessed the environmental values of the proposed powerline corridor, especially in relation to the spotted tail quoll as a matter of national significance.

LACA requests the Federal Government's assistance in the **urgent investigation** of these issues raised. Please do not hesitate to contact me for any further information.

Yours sincerely,

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Since its inception in 1989, LACA has worked with our community, council, industry, and government to develop understanding, commitment and actions for more sustainable living.

LACA aims...

- *To play an active role in the protection and enhancement of the environment.*
- *To promote the concept of environmental sustainability as an essential criterion of planning for development.*
- *To educate and inform the community on all aspects of conservation.*
- *To research and report on current and proposed activities likely to affect the local environment.*
- *To encourage the widest possible public consultation and informed debate on matters of conservation and environmental importance to the local community.*

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