



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Applications Secretariat Section
Customer Services
ACTPLA
Ground Floor South
Dame Pattie Menzies House
16 Challis Street
Dickson ACT 2602
Via email

Mt Franklin Rd, Cotter Hut Rd and Smokers Trail fire trail upgrade

Thank you for the opportunity to comment on the above EIS. The National Parks Association of the ACT has a long standing interest in this proposed development because it is located in an area which is key to protecting the environmental and water values of Namadji National Park.

The National Parks Association of the ACT was formed in 1960 as part of a national movement to create a system of properly managed national parks and to promote environmental awareness, with a focus on the establishment and good management of a national park in the ACT, Namadji National Park. Since its gazettal in 1984 our members have been actively involved in the conservation of ACT's natural and cultural values and that of the Australian Alps National Parks system which shares a highly integrated ecological system with Namadji.

We are particularly concerned about the issues of fire management in Namadji because of its direct impact on the management of the water catchment of the ACT and the conservation of highly sensitive and vulnerable eco-systems in the national park. Members have played a very active role in developing the Strategic Bushfire Management plan for the ACT and have held seminars, conferences and published research related to fire management in the area. These comments on the Mt Franklin, Cotter Hut Road and Smokers Trail fire trail upgrade are therefore made against a sustained and informed involvement in fire management in the ACT.

General Comments on the EIS process

The EIS itself is an impressive document and those involved in its preparation are to be congratulated on its thoroughness and detail. Early consultation by the consultants gave some indication of the possible direction of the EIS which was good but this was not followed up on later in the process. Our experience has shown that development proposals of this size and complexity require a much longer public consultation period. Further, because the areas covered by the proposal are behind locked gates and inaccessible except by foot to the general

public, our task was made even more difficult. We would like to express our thanks for parks Conservation and Lands for making an inspection of these sites possible by ourselves and members of the Conservation Council of the ACT Region.

However, the three weeks consultation period was nowhere near enough time for a community groups such as ours to fully canvass all the issues it raises and we suggest that:

- I. ACTPLA should consider extending the period for comments in cases such as this where the document covers over one hundred disparate and dispersed sites in publicly inaccessible country.***

Key Issues

The key issues in upgrading these three trails are:

- A. Ensuring that the proposed developments are actually required for the purpose of fire management as set out in the Strategic Bushfire Management Plan (2009) and are fit for purpose. We are of the very strong view that the proposal to upgrade the full Mt Franklin/Cotter Hut road to float standard is not required under the SBMP and the fire management objectives of the SBMP can be met very successfully with the section between the Ginini carpark and Cotter Hut remaining at tanker standard.

- II. We strongly support the proposal that the MT Franklin Road after the Ginini carpark be maintained at tanker standard, not float standard.***

- III. We strongly support the proposal not to proceed with upgrading Cotter Hut Road between the Orroral Valley Gate and the intersection with Smokers Trail and substituting an upgrade of Smokers Trail to float standard.***

- B. Ensuring the proposed design solutions meet the operational requirements for fire management in these remote areas.
- C. Preventing any alteration to the effective functioning of the many different eco-systems in the areas affected, ranging from the large scale system functioning, eg the pattern of migrating birds across the areas down to the micro level, eg protection of individual habitat trees along the affected trails.
- D. In particular, the existing hydrological flow patterns must be protected and maintained and the effective operations of the wetlands, bogs and associated areas must be protected.
- E. There must be proper management of Aboriginal heritage sites during construction.
- F. Threats of weed dispersal between the different sites during construction. We observed different weed infestations at different sites and there is a real danger of cross-contamination from vehicles travelling between sites, including construction management vehicles.

- IV All necessary steps should be taken to prevent vehicles travelling between sites during construction spreading weeds.***

- G. Construction of the proposed project alone will not achieve the desired access for fire management and park administration purposes. The roads must be properly maintained to the standard required over the succeeding years in a manner which protects the environmental and cultural heritage values.
- H. The EIS addresses these issues and sets out protective measures to ensure the environmental values of the area are not compromised.

V It is essential that these measures are closely and fully followed and all risk mitigation actions are fully deployed during the construction phase.

Additional benefits from the works

Our inspection along the proposed route identified some additional benefits which could be incorporated into the works with no additional cost. These include:

- Construction of 1 metre deep watering points at two or three locations along the Stockyard Spur – Cotter Hut section of the road where culverts are to be re-constructed. This would increase the number of points available for quick re-supply of water to small fire units in the event of a fire in the area.
- More frequent and more effective drainage points along this section of the road which currently suffers from inadequate drainage.
- Stabilisation of road surfaces which threaten to collapse taking areas of sphagnum moss and associated eco-systems with it.
- The opportunity to re-distribute felled trees which have been left lying parallel to the road and pose a threat to any subsequent fire operations.

Specific Comments on the proposed design solutions for the Mt Franklin section of the proposal

On the whole the works proposed for this section of the road do meet the purpose for which they are designed and – with the mitigation strategies proposed – present an acceptable level of risk to the environmental and heritage values of the area.

1. Site 009: install guide posts on down slope inside corner.
2. With the issue of weed spread in this area, particularly sweet vernal grass, monitoring and control of weeds post work is essential.

Specific Comments on the proposed design solutions for Ginini car park to Stockyard Spur section the of the proposal

3. Site 019: the works proposed for Ginini carpark exceed requirements in that sufficient turn around for both float and tanker standard vehicles can be more readily found at the junction of the Mt Franklin Road and the road to the Mt Ginini air navigation facility. The Ginini car park can be modified with low impact works including embedded car space markers, removal of a few metres of the island area and some resurfacing to enable tanker turn around should it be required here in addition to the road junction a few hundred metres to the north.
4. Turning can be facilitated by paving over part of north end of the car park island and restricting public parking at north end of car park.

5. Car park boulders should not be moved unless absolutely necessary and swales built or moved only where essential.
6. We recommend against delineating parking bays with logs or sleepers which protrude above the surface as they will restrict vehicle movement when car park is empty – eg in an emergency situation when there is no public access.
7. Some signage or indication is needed that 90 deg. required
8. Signage on locked gate should read: “Please keep clear - 24 hour access for emergency vehicles
9. Again, there is a strong need for monitoring and control of weeds post work.

VI. We therefore strongly recommend that the additional works specified to construct the tanker turning area, including a concrete dish drain be removed from the plans and the replaced with the removal of a few metres of the island and some re- surfacing.

VII. We also urge that fill and road surfacing be sourced from inside the park and that use of blue metal is not acceptable because it is so obviously foreign to the area.

10. Sites 20-25: we note the works proposed for areas adjacent to the scree slopes and urge the utmost caution during construction.

Specific Comments on the proposed design solutions for the Stockyard Spur to Cotter Hut Road section of the proposal

11. Site 026 remediation is in an area of key environmental importance nevertheless we support careful and well-executed work to remediate the current un-drained area with a culvert.
 12. Site 027 is again an area of key significance but we accept the need to remediate the road surface and enable tanker standard vehicles to negotiate the corner. We support careful and well-executed work to re-align the road but urge the utmost caution be taken to protect the hanging bog on the slope above the road.
 13. Work on sites 028-031 must be managed carefully. The upslope end of culverts must not to extend into sphagnum bogs .
 14. Site 032 again presents the potential for road works to disturb the hanging bog on the high side of the road and extreme care must be taken not to disturb hydrology patterns and drain the hanging bog. Blue metal aggregate and rock has been used in the past on the road surface and in rubble drains and this should be removed from the national park and replaced with local material.
 15. Site 038 is similar but without the blue metal aggregate and rock. Again, while we accept the need for remedial work, extreme care must be taken not to affect the hydrology of the area which supports sphagnum bog.
- Sites 039-045 address similar issues. Sites 043, 044, 045, 051 are on permanent creeks and two sites could incorporate watering points It is here that additional watering points may be constructed if there is no increase in risk to ecological assets. Site 054 at McKeahnie Creek, adjacent to Laura Gap track already has a watering point which could be optimised when the site is upgraded.
16. No comment on additional sites on this section.

Specific Comments on the proposed design solutions for the Cotter Hut Road to Smokers Trail Section of the proposal

17. We note that this section of the road runs adjacent to De Salis Creek. Although the creek at this point is only seasonal and the creek bed is usually well grassed, care must be taken during the construction not to spread weeds, cause erosion or in any other way compromise the creek bed.
18. Bypassed existing road should be ripped along contours, tree trunks from felling carried out for road works or remaining from dangerous tree removal program could be placed across slope to disrupt runoff and provide favourable sites for revegetation.

Specific Comments on the proposed design solutions for the Smokers Trail section of the proposal

19. We accept that the SBMP requires float access to the upper Cotter Valley and that this is the only practical way to provide that access but the extent of road re-alignment is of considerable concern. While this area does not have the international significance of other sections of the upgrade, it is nevertheless a key part of the national park and contains valuable habitat and eco-systems which must be protected. Its close proximity to key habitats of the Orroral Valley and Smokers Gap areas, the steep and rocky terrain and the many creeks and water courses make this area difficult to alter without considerable compromise of its values particularly during the construction phase.
20. Site 010 at the Orroral River crossing the base downstream end of the culvert needs to be below the surface of water (no sill) for fish access to upper reaches of river.

VIII. We recommend that the construction work in this area, particularly the road realignment work be undertaken under close supervision, with extreme caution and in close co-operation with expert groups who can advise on the potential for adverse impacts eg on bird breeding and migration and fish movements.

Comments on the Recommendations (section 9)

In general the recommendations in this section are thorough and practical but to many people used to working in an urban setting, they may appear onerous and unnecessary. Similar work practices were imposed on construction work in Tidbinbilla Nature Reserve in 2008 and the site manager found that construction workers, contractors and suppliers needed additional training and reminding of the need for these specific actions throughout the period of the construction work.

VIII We recommend that additional care is taken to train construction workers, contractors and suppliers in the special requirements of working in this area and that information and training is reinforced throughout the life of the project.

Flora and Fauna

- We support all proposed actions under this heading Mount Franklin Scree Slopes.
- We support all proposed actions under this heading. Significant Trees.

- We support all proposed actions under this heading.

Retain habitat features.

- Felled trees and root balls from excavated stumps should be relocated away from drainage lines and the roadside. Where if the final position of a tree trunk is parallel to the road it should be cut into sections.

Soils and Soil Stability.

- We support all proposed actions under this heading.
- Instead of using staked synthetic textile for sediment control fences coir logs could be used and left in place when work is completed.
- We strongly support bypassed existing road sections being ripped along contours. Tree trunks from previous road works or from felling for the dangerous tree removal program could be placed across the slope to disrupt runoff and provide favourable sites for revegetation.
- Sections of felled trees could also be used to slow surface runoff on down slope batters and provide favourable sites for revegetation.
- Temporary stockpile sites should be free of weeds which may cause future problems.

Stormwater and Drainage

- We support all proposed actions under this heading.

Threatened Species and Ecological Communities.

- We support all proposed actions under this heading.
- Weed management practices must be rigorous and constantly monitored. Provision of adequate wash-down facilities is particularly important as is the need to clean vehicles and equipment before entering the areas of the park which are not open to private vehicles.
- Transfer of weeds between sites is also to be avoided as different weeds are present at different sites. This is particularly important for construction management traffic travelling between construction sites.

Traffic and transport.

- We support all proposed actions under this heading.

Toxic and Hazardous Waste - construction waste.

- We support all proposed actions under this heading.
- We assume "off site" means away from excavation site not away from Namadji National Park.

Excessive land clearing.

- We support all proposed actions under this heading
- Stockpiled soil should be sterilised before re-location to avoid transfer of weeds to sites previously uncontaminated.

Character- Change in Character of the Locale.

- We support a actions proposed under this heading but urge also that care is taken to inform the community about the changes especially the re-routing of Smokers trail in order to avoid unnecessary alarm.

Greenhouse Gas- Embodied Energy/Carbon Footprint.

- Supported

Air Quality- alteration of air quality due to construction.

- We support all proposed actions under this heading

Noise- Construction and Operation Noise Affecting Locale.

- We support all proposed actions under this heading but note that noise will not only be affecting humans but also animals and birds in the area.

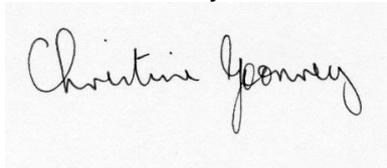
Heritage Social- Increased recreation access/usage.

- We support all statements and proposed actions under the above headings.

This EIS sets out the difficulties and challenges of working in this remote, beautiful and highly protected area. The level of rigour and detail in its specifications are to be commended and are essential if this work is to meet its specific purpose without causing damage to the natural and cultural values of the area. The added costs of meeting its requirements will be more than offset by the protection of the water quality and the environmental assets which the work will affect.

A summary of our major recommendations is at Attachment A. Thank you for the opportunity to comment.

Yours sincerely

A handwritten signature in cursive script that reads "Christine Goonrey". The signature is written in black ink on a light-colored, slightly textured background.

Christine Goonrey
President
18 December 2009

Attachment A: Summary of Major Recommendations

- I. ACTPLA should consider extending the period for comments in cases such as this where the document covers over one hundred disparate and dispersed sites in publicly inaccessible country.***
- II. All necessary steps should be taken to prevent vehicles travelling between sites during construction spreading weeds.***
- III. All necessary steps should be taken to prevent vehicles travelling between sites during construction spreading weeds.***
- IV. It is essential that the measures specified in the EIS are closely and fully followed and all risk mitigation actions are fully deployed during the construction phase.***
- V. We therefore strongly recommend that the additional works specified to construct the tanker turning area, including a concrete dish drain be removed from the plans and the replaced with the removal of a few metres of the island and some re- surfacing.***
- VI. We also urge that fill and road surfacing be sourced from inside the park and that use of blue metal is not acceptable because it is so obviously foreign to the area.***
- VII. We recommend that the construction work in this area, particularly the road realignment work be undertaken under close supervision, with extreme caution and in close co-operation with expert groups who can advise on the potential for adverse impacts eg on bird breeding and migration and fish movements.***
- VIII. We recommend that additional care is taken to train construction workers, contractors and suppliers in the special requirements of working in this area and that information and training is reinforced throughout the life of the project.***