



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Ms Julie Pearson
Project Manager
Brown Consulting (ACT) PTY Ltd
15 Hall Street, Lyneham ACT 2602

Dear Ms Pearson

Comments on proposals for four new fire trails Namadgi National Park by National Parks Association of the ACT

Thank you for providing the opportunity for us to comment on the proposed four new fire trails in Namadgi National Park. Our comments are as follows.

The Consultation Process

NPA has some serious concerns about the process of public consultation for the development of Environmental Impact Statements:

1. The relevant material was not available on-line but could only be viewed by travelling out to Namadgi Visitors Centre until NPA ACT arranged to have it put up on its website.
2. The period of public display was very short 28 April to 6 May and it was not generally known that comments could be made up to 18 May..
3. Some information about the proposed roads was available only from 3.00pm – 7.00 pm on 2 May. This information gave details of road construction, elevations etc which were important to developing a clear idea of what was being proposed but would not have been viewed by anyone inspecting the display outside the above hours.
4. Maps in the display did not show adjoining roads which meant that the proposed fire trails weren't shown in context with other fire trails.
5. Feedback forms were simplistic without any prompts towards environmental issues, merely asking for general positives and negatives.
6. There was no opportunity to talk to the cultural heritage consultants.

General comments on the four fire trails

1. Collection of on-ground flora and fauna information was restricted to a single walk-through in autumn, four years after severe fire and in the middle of the worst drought on record. In these circumstances we expect the flora and fauna survey to fall well short of what can be found in these areas in average to good seasons or when fire recovery is more sustained.
2. Data base research for flora and fauna records reveals a paucity of research and information about the four sites. Main sources to date seem to be records held by individuals or voluntary organisations.
3. There seems to be too much emphasis on finding endangered species to estimate the ecological value of the four areas. We are only just beginning to understand the inter-connectedness of habitat and the need for availability of a wide area for survival of different species stressed by climate changes and drought.
4. We believe the visual impact of fire trails on the bushwalking experience has been overlooked in consideration of the impact of fire trails. Most walkers prefer to have very limited reminders of human presence; they want to experience the beauty of the bush with as few human made intrusions as possible. Some prefer none at all. The likely visual impact of the fire trail appeared to have been checked from the "road and camp spots" only.
 - i. The recent Senate Report on Protected Areas identified the mental health values of bush experiences which are emerging as important to our modern society. People are reporting that they go to the bush for spiritual refreshment, to get away from it all and to refuel their energies.
5. There was no reference in any of the material to the likely erosion and weed control problems, thus giving the strong impression there were not any.
6. NPA ACT members have been noticing in recent months that new fire trails eg Burnt Hill fire trail, have a drainage lines already being eroded to the point that the trail surface was gullied. In attempting to rectify the situation, the plant operator, had simply graded the gullies using soil that had slumped from the up-slope side. The ultimate conclusion is that the trail will, over time, be cut deeper into the landscape unless some more substantial soil recovery is conducted on the down-slope side. This Burnt Hill area is quite modest terrain compared with Stockyard and Orroral, so the issues will only be worse there.
7. There is no reference to the precautionary principle as having any role in the decision to proceed or not proceed.
8. An informal orchid group in Canberra has provided an initial recording of 20 orchid varieties in the Orroral Ridge precinct. As stated above, the timing of the botanical assessment was not carried out at a time which would allow ready identification of orchids and other flowering species. Furthermore there are likely to be other orchid varieties on each of the other proposed fire trails.

Orroral ridge or tors

1. The first, strongest and most immediate response from NPA members to this proposal was that this is an area which has a special place in their lives. They have brought their children and grandchildren to this ridge to experience its beauty and richness. Every person who has commented to us has made remarks about the special qualities of this area, experienced as soon as the parking area is left behind; that it has a sense of remoteness, of direct engagement with nature as they walk along the small footpad. Not one person has seen a fire trail as an improvement.
2. The vegetation maps for Orroral Ridge are inadequate, for example they contain little or no reference to stands of mountain ash which are scattered along the proposed route and which are currently re-seeding. These areas should not be subjected to burning for at least 30 years.
3. The proposed budget would not cover the extensive earth works and blasting which would be required where the route would be forced across rock slopes which are extensive on the western end or through rocky tors which are a constant presence throughout the proposed route.
4. Some of the tors on top of Orroral Ridge would have to be demolished and this would be very expensive, create potential erosion problems and destroy native habitat.
5. Consideration appears not to have been given to the surrounding fire trails in managing fire in the park. In particular the fire trail along Bushfold Flat is not marked, nor seemed to be part of the fire management planning process.
6. One stated purpose of this trail was to conduct prescribed burning every 2-3 years from the trail down to the valley floor below. This area is steep, scree covered at various points and very susceptible to erosion. Prescribed burning of this area appears to ignore research showing the importance of fine litter in maintaining soil stability (R. Good and others).
7. The marked route for this fire trail weaves through rocky tors and across the headwaters of creeks. Especially on the western side, it is difficult to know what specifics to comment on as walking the trail as marked reveals that its route appears completely haphazard.
8. Information about Aboriginal use of the area has not been thoroughly researched or assessed to date. For example, a member has come forward with photographs of what appears to be an Aboriginal rock formation in good condition and these have been forwarded to the cultural heritage consultant who is undertaking the cultural heritage assessment of the Ridge. The consultants' initial response is that they are deserving of further investigation and recognition. Evidence of a previous rock arrangements (now removed) has also been provided.
9. A fire trail would open the area up to illegal vehicle access, weed invasion arson and damage to cultural artefacts. The Smokers Trail end has been subjected to sustained break-ins in recent years, involving smashing the gate down, cutting it off with angle grinders and using arc welders to cut the gates. Although illegal vehicles free-wheel down the Smokers Fire Trail they do not currently cross into Orroral Ridge because it is

impassable. This fire trail would give them direct access to sensitive area such as those mentioned above.

10. The proposed fire trail will also be subject to calls for public access for sporting events such as bike races and rogaining. The draft Namadgi Plan will allow cycling on management trails.
11. Scientists who are members of NPA have pointed out that Orroral Ridge would make a perfect release area should the breeding program in Tidbinbilla for rock wallabies be successful. It has exactly the right sort of rocky tors, protected and diverse habitat and isolation from vehicles which would be required. This re-in forces our belief that making an assessment of the area's natural values at this point in time is over-simplistic.

Stockyard Spur

1. Stockyard Spur has unsecured shale slopes and is very steep. The area is not suitable for road building.
2. Erosion from this trail would go directly into the Cotter River between Corin and Bendora dams, a stream which is supposed to be pristine. This presents a very real long term threat to the viability of this area of our water catchment.
3. Stockyard Spur has gullies in good condition with good quality tree ferns, and creeklines have stands of ribbon gum (*Eucalyptus viminalis* and *Euc. Radiata* (Narrow-leaved Peppermint)) which were unaffected by fire. With more than 90% of Namadgi burnt in 2003 this area is crucial to the recovery of the park.
4. When it comes to the Stockyard Spur trail construction, there at least 11 occurrences where the trail was greater than 15 degrees which is the maximum gradient for a tanker.
5. The Stockyard Spur trail would in effect create a circuit road from Corin Rd up to Mt Franklin Road, open up a currently remote area, and indeed much of the wilderness area park, to greater illegal activities (eg trail bikes), arsonists, and weed invasion.
6. The engineering consultants should also be aware that, even prior to Sandy Hollway's report "Shaping Our Territory – Options and Opportunities for No-Urban ACT", there have been proposals to have this road built in order to create a tourist route from Corin dam to the Cotter through the remote area of northern Namadgi. Obviously, such a plan would require a higher level of public safety and comfort than a fire trail and, although it is impractical, should this road be built, caution must be exercised as to determining limits on possible future use.
7. The Mt Franklin road area to the west of this fire trail is already a popular cycling track and if constructed, this trail would also be the subject of intense pressure to use it as a cycle track and as a venue for sporting events such as (cycle) road racing and rogaining.

Spencer's Fire Trail

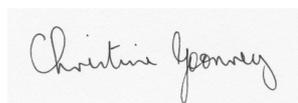
1. This fire trail will duplicate a fire trail on the NSW side of the border at great public cost to the ACT. Its construction makes a mockery of inter-jurisdictional co-operation.
2. An argument has been made that parks management prefer to have border trails under their own jurisdiction. This does not seem to apply to roads such as the Mt Franklin or Two Sticks roads which weave in and out of NSW and ACT. Nor does this argument sit well with the large areas of park border which have no roads. It appears to be a post-2003 justification.
3. Its close proximity to existing fire trails and facilities (Burnt Hill, Long Flat and Mount Clear camp ground) will encourage greater incursions into Namadgi National Park of illegal vehicles and unregulated horse riding. In turn, this will promote added weed infestation and rubbish accrual and associated management tasks.
4. The fire trail will elevate the risk to the heritage border marker trees that stand on the ACT side of the border fence. There are current three standing markers (one living) and at least one on the ground that lie along the proposed route of the fire trail. If the experience of the Burnt Hill fire trail is any guide, one cannot assume that the security of these trees will be a priority during the construction of the trail.

Bullen's Fire Trail

1. This fire trail is very close to the urban/rural interface and surrounded on three sides by private land. Although there is considerable risk of erosion directly into the Murrumbidgee River, we appreciate that there is a greater argument for its construction than for any of the other three fire trails.
2. The private leaseholder nature of surrounding land means there is considerably greater control over illegal vehicle access than within Namadgi National Park.
3. However, we reiterate that not much is known of the flora and fauna of this small area, nor of the likely impact of the fire trail on the Murrumbidgee River Corridor and extreme care should be exercised until proper surveys are conducted.
4. We would suggest that this trail be delayed until such studies can be carried out.

Thank you again for the opportunity to comment.

Yours Sincerely



Christine Goonrey

President

18 May 2007