

Comments on Preliminary Assessment of Burnt Hill and Grassy Creek Fire Trails
by
National Parks Association of the ACT
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General Comments

NPA ACT submits that the proposed works are a significant over-engineering of the access required for these areas. There are three major purposes for which access is required:

1. To carry out proscribed burning in the Grassy Flat and Mt Clear areas under Version 1 of the Strategic Bushfire Management Plan
2. To provide long term accessibility to remote areas of the park for wild fire suppression, particularly intense burns.
3. For routine management of the park.

We submit that eight metres wide roads are not necessary to carry out fire management and routine functions in this area of Namadgi National Park, in particular that a light vehicle management trail for the proposed re-alignment of the Grassy Creek Trail is more appropriate for the defined purposes.

As regards the proposed Burnt Hill Fire Trail, members of NPAACT understand its role in effective fire management in the park but we are concerned about its actual construction and effect on other management issues in the park.

Specific objections to road building undertaken on the grounds of the requirements of the existing Strategic Bushfire Management Plan.

The use of proscribed burning and fuel reduction and the type and location of fire trails is proscribed in the Strategic Bushfire Management Plan Version 1. In particular:

- SBMP requires fuel reduction burns when surface fine fuels in Native Forest and Shrubland category reach a height of 25-35 mm (page 87 SBMP). The plan defines minimum burn coverage at 80%.
- The SBMP prescribes tanker access to these areas of the park which necessitates a road structure up to 8 metres wide, punctuated with even wider turning areas every 250 metres (Map 9 SBMP).

NPAACT, among others, has made strong representations to different government agencies over the past three years that the fire management strategies proposed in the various maps and table in the current versions of the SBMP are not the best way to reduce the risk of wildfire in Namadgi National Park and that they will cause serious ecological damage if carried out in their present form. In particular:

- The proscribed level of 35mm of fine fuel has replaced the pre 2003 level of 75mm without the support of scientific evidence or justification in the SBMP.
- The Provisional Fuel Management Zones (Map 7) and Preliminary Map of Minimum Fire Intervals for Ecological Communities (Map 8) were widely acknowledged at the time to lack detail and to be ineffective for identification for actual fire management regimes. They have not been updated since Version 1 was published.
- There is sufficient scientific research to cause concern that the proscribed burning plan set out in Version 1 of the SBMP would significantly alter the type and structure of natural vegetation in areas such as Grassy Creek and Mt Clear.

- Work done in Kosciuszko National Park has indicated that it may even encourage wildfires by promoting shrubby growth over a sustained period of time rather than just in the few years immediately following a fire.
- The rationale given for these fire trails is that these areas have not been burned recently and are a source of biodiversity. The protection of biodiversity by controlled burns assumes that long term controlled burns do not select for fire-resistant species.
- Building fire trails to tanker standard throughout the park to service the proscribed burning standards would not only destroy the natural values of the park but would create erosion, feral weed and animal problems and human vandalism which would significantly degrade the overall purpose of the park.

Newly constructed
tanker standard fire trail
of the type proposed for
Grassy Creek



We have sought on several occasions to have the tables, maps and charts reviewed. Each time we were assured that the Strategic Bushfire Management Plan was still being refined (it is marked "Version 1") and we were asked to wait until the Coronial Enquiry has finished. Yet we are now facing environmentally damaging road construction necessitated by the SBMP and an unsustainable fire management regime.

Objection to the construction of a large tanker road in the Grassy Creek Area.

We understand that the proposal to build Grassy Creek Fire Trail to tanker standard through virgin bush along the border is to provide access for remote area fire fighting to the more remote areas of Scabby Range.

- This access is already there via the Old Boboyan South road and the proposed Grassy Creek Fire Trail would create significant environmental damage without providing any substantial benefit for fire management or fire crew safety.

Another purpose of this tanker standard trail is for fire management or fire suppression in the area around Grassy Creek itself

- Light vehicles are more appropriate in this area because of their flexibility and reduced impact on the landscape.

We support the move of the Grassy Creek Trail to the ridge in order to prevent further damage to the creek and bog areas but submit that this trail should be a management road only and constructed so as to minimise visual and environmental impact on the area.

- We note that there still remains the need for the existing management trail along the Grassy Creek valley floor in order to maintain heritage areas such as Waterhole Hut and adjacent yards.

Specific comments against the Preliminary Assessment Burnt Hill Area

We understand the need for a proactive fire management strategy in the Potters Hill area and that this requires a tanker standard fire trail because of the nature of the terrain and a requirement to prevent fires burning out of the park into NSW land. However, we are concerned that there are two very real threats to continuing the good management of Namadgi National Park which must be addressed before such construction can go ahead:

Firstly the construction itself represents a very real threat to the cultural artefacts in the area:

- Firstly, as they are themselves highly flammable, they would be threatened by any kind of fire without very specific and careful protection strategies, and
- This proposal does not cite M. Higgins work on survey history as a reference, so the accurate location and security of remnant survey markers cannot be assumed.



The Johnston survey reference tree W40 and the fire trail alignment flag in foreground – the image was taken from the border and the tree is 8m from the border fence.

Firstly, the PA neither acknowledges nor proposes the shared access of an existing track that runs along much of the border fence on the NSW side.

This shows the track immediately on the NSW side with the proposed fire trail marker on the ACT side with the border fence between. Attached image Nos 11, 14 and 15 show other views of this track.



Secondly, the road, once constructed, will allow incursions of feral pests and weeds and will enable significantly more human destruction and illegal use of the area than already occurs, particularly incursion from the NSW side of the border.

Thirdly, the area in Grassy Creek near the proposed junction of the Burnt Hill trail with the current trail to The Long Flat (position S35° 53' 17" E149° 00' 08.5" according to Attachment B) is classified by the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 as endangered. Attachment B recommends referral of the PA to the Commonwealth for assessment.

- This proposal seeks to negate referral by stating that only grass slashing will be undertaken to delineate the trail. However, Attachment A states that this area will require a ford to be constructed and estimates that 349m³ of cut and 22m³ of fill will be needed. At the end of the day, a 10t truck or a heavy tanker is going to leave a footprint and alter the appearance of the area and will likely have some affect on the habitat.



An example of the effect of a light vehicle track at the location where it crosses the proposed track near the ford.

- We submit that notification should be made to the Commonwealth of the proposed work.

Disadvantages and Advantages of both trails

Advantages cited in the proposal include:

- Enhancement of boundary security
 - yet this road would increase access to illegal activities such as pig hunting and motor bike riding in these remote areas of the park.
- Minimisation of ad hoc trails
 - yet there is little evidence of such trails already existing in the area. Based on our members' personal experience in the area, the most frequently encountered 'trails' are those made by kangaroos and wombats.



The alignment of the proposed Burnt Hill fire trail along the existing footpad

- Enhancement of the National Bicentennial Trail (NBT). The NBT follows the Boboyan Rd for only 4.5km and this is through rolling and relatively open country.
 - This road would re-direct the trail and its users through difficult terrain as well as increase opportunity for trail users such as cyclists and horse riders to extend their activities into remote areas, which is not permitted under the Management Plan.



Typical terrain below [north] of the border that has been chosen to avoid the rougher rocky terrain further up the slope

Disadvantages

Disadvantages of the proposals are dismissed quite summarily without proper regard to the actual purpose of Namadgi National Park nor to its fragile environment.

The first disadvantage is quoted as short term loss of some habitat and some minor fragmentation. Whether the habitat loss is short term depends on the nature of the habitat.

- Attachment B identifies numerous (in excess of 100) habitat trees in the area of both trail sections. It recommends that these be avoided during construction but there is no strategy to protect them or their inhabitants outlined in the proposal. However, their security will be threatened by the ultimate regime of controlled burns.
- Habitat fragmentation has been exacerbated since the 2003 fires by the widening of trails within the extant fire trail network. Further fragmentation caused by the proposal is supposed to be offset by the unspecified advantages of a regular fire regime. But the effect on diminutive grassland communities of an 8m wide barrier is not discussed.
- Further, the recommendations of Attachment B regarding re-routing of the trail in certain locations to avoid unnecessary habitat disturbance are not incorporated in or discussed on in the PA.

The second disadvantage is “short term loss of some visual amenity”. The National Capital Plan 1990 also addresses visual amenity.

- The proposed Burnt Hill trails will ascend the western side of Burnt Hill. This area is visible from the Boboyan Road. Further, the affect of seeing a major fire trail whilst walking in the bush is a major detraction from the values that bushwalkers seek when entering such areas. It is difficult to see how a 4m wide trail surrounded by 2m wide shoulders can leave anything but a permanent earth scar.



The current Mt Clear to Long Flat trail at the point where the Burnt Hill trail would join – note that the current trail is 4m wide but does not have the 2m shoulders.

The third disadvantage is some increase in vehicular traffic associated with management activities. The PA states that there is no anticipated increase in vehicular traffic caused by the proposed trails. Yet the summary and conclusions indicate that there may be some such increase. Clearly the latter will be the case, as the trails will be used and the current Grassy Creek trail will likely be retained for the maintenance of Waterhole Hut. This increase in use will be a source of weed infestation into areas that are currently seldom visited due to their rocky terrain, close vegetation and lack of the usual attractions for bushwalkers.

The final disadvantage recognised is facilitation of illegal access to these areas of the Park. This issue is only raised in the conclusions and there are no strategies identified to address it.

- We consider this to be one of the most important issues raised by this proposal and submit that it should not proceed without evidence of sufficient control measures to prevent such access. Our greatest concern is that this illegal access will lead to more frequent fires in the remote areas accessed by these roads and a considerable reduction in the natural values of the areas.

We submit that, to proceed, these proposals need to:

- Modify the Grassy Creek Trail to management trail standard only.
- Identify and cost in strategies to conserve and protect both the natural and cultural values of the areas, eg habitat trees and border markers during construction.
- Be supported by costed strategies to reduce feral pests and weeds over the life of these roads.
- Be supported by costed strategies to control illegal activities in these area over the life of these roads which have the greatest potential to start fires, create ad hoc trails and generally degrade pristine bush.
- Be preceded by an investigation of the opportunities to share the development and maintenance of the current fire trail that largely follows the Burnt Hill trail on the NSW side of the border.

Thank you for the opportunity to comment on this proposal

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Attachment 1: Views of ACT/NSW border and associated fire trails



NSW/ACT border

