



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Mr Ray Brown
Principle Officer, Belconnen, Gungahlin and Rural
Development Assessments Section
Development Services Branch
ACT Planning and Land Authority
GPO Box 1908, Canberra ACT 2601

RE: Final PA Report: the Long Flat Diversion Fire Trail at Namadgi National Park. District: MT Clear Block 40

Dear Mr Brown,

The PA proposes the development of a tanker standard (4m wide plus 2m shoulders) fire trail in two sections. Members of the National Parks Association of the ACT have studied the proposal carefully and walked the relevant areas several times to ascertain its impact. Our earlier comments, made in relation to associated fire trails, particularly Burnt Hill and that part of the fire trail now known as Spencer's fire trail, still apply even more strongly than before.

We consider these trails over-engineered for the actual purpose and as such we expect them to continue to damage the park environment for many years to come through erosion, weed introduction and continued grading of the surface. Evidence of such deterioration has been documented by members on tracks graded as recently as several months ago. We urge you to seek firm assurances that the works proposed in this PA actually are actually carried out in the manner intended.

Previous PAs have made only passing reference to the preservation of heritage-listed marker trees. This broad approach has been replicated in the current PA. Specific attention is drawn to the grading around a heritage marker tree identified in our earlier submission to the Burnt Hill PA, known as the Johnston survey marker tree W40. As predicted, the tree now protrudes directly onto the graded road as it was only 8 metres from the fence. Highly combustible material has been heaped at the base of the tree during road construction and the root area has been exposed less than a metre from the trunk. The tree is at significant danger of being further damaged by future maintenance and eventually killed. We are dismayed that our fears have been confirmed so early in the piece.

In general, however, we accept that this particular fire trail has some merit in that it is seeking to avoid putting an 8-10 metre fire trail along a creek bed. In that light we make the following comments.

Section 1

Section 1 is a realignment of the current Long Flat track away from the valley floor. With the increased level of use of this track by vehicles since 2003, its condition has deteriorated and its appearance detracts from an otherwise unblemished area of NNP. Its realignment to higher and dryer ground is welcomed. The PA also proposes that the current track will be closed to vehicular traffic and allowed to regenerate. This proposal is also strongly supported.

The PA identifies the starting point of Section 1 as S35° 54' 11" E149° 03' 33". These coordinates plot to a location at Top Flats on the Clear Range (approximately 3km to the east). This error has been copied into Attachment 1 – a disappointing lack of attention to detail that raises the issue of the extent to which other items have simply been transposed. The location graphically depicted in Figure 2 of the PA has a position closer to S35° 54' 11" E149° 02' 39".

Assuming this to be the commencement of Section 1, the track will cross a tributary of Naas Creek within metres of its start. This crossing should be facilitated by a culvert in order to prevent erosion of the creek bank. Paragraph 4.3.2.2 of the PA indicates a reluctance to use culverts, but their lack of use in the Burnt Hill fire trail has resulted in erosion in drainage lines during the wet conditions of February. The creek that drains the Long Flat flows more consistently than the drainage lines on Burnt Hill and specific management for wet condition should be incorporated into the PA. (The current track crosses the creek via a ford – an adequate arrangement given the level of use of the track for park management purposes but one that still has resulted in creek bank erosion.)

Section 1 ends at the border adjacent to a clearing and soak. The path through the clearing is unclear from the PA. As the clearing is the head-water of a small tributary of Naas Creek and contains a rare bolder field of unusual appearance, not unlike that at Rock Flats, it should be avoided by the trail.

Section 2

Section 2 links Section 1 to the existing fire trail at the border gate to the south of the Long Flat. It also forecasts the possible 4.5km westerly extension to connect with the new Burnt Hill fire trail (the Spencer border trail). Unfortunately, this proposed trail, again, parallels an existing tanker grade trail on the NSW side of the border. This pre-ordained lack of cooperation with the Park's neighbours is disappointing in the extreme. To simply sweep such cooperation aside by referring to an unspecified Parks, Conservation and Lands policy that purportedly expresses a preference for fire management trails to be on public land (paragraph 1.5.2) ignores the principles of cooperation that are encompassed in the ACT RFS/NSW RFS memorandum of understanding (MOU). It also displays a cavalier disregard for the principles of conservation within a national park and for containment of costs.

Given that prevailing fire weather is accompanied by north westerly winds, it is clear that the proposed Section 2 will be of greatest benefit to the property owners on the NSW side of the border. Accordingly, they should be prevailed upon to assist the ACT to assist them. Further, the MOU between the ACT and NSW RFS permits the transfer of resources and the identification of mutual risks. Given that the NSW RFS will have statutory access to the existing trail during a bushfire emergency, its access by ACT RFS staff should be similarly guaranteed by the MOU.

Any fire trail development on the ACT side of the border will potentially threaten the heritage-listed border marker trees. Given that their locations are recorded, specific reference and particular management plans could be developed. Like the Burnt Hill case, this has not occurred. And like the Burnt Hill case, the security of these marker trees is threatened by this PA. (Attachment B to the PA, the cultural heritage assessment, is silent on the matter of marker trees.)

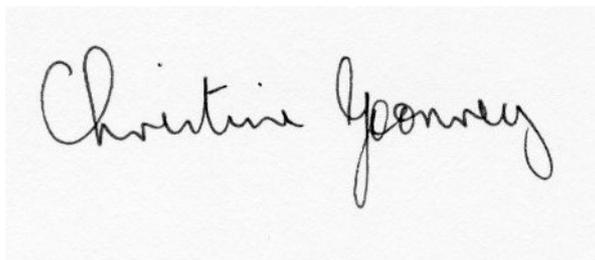
According to data on the ACT RFS web page, records kept since the 1920s indicate that this part of the ACT has not been burnt in the last 80 years (excepting the act of arson in October 2006). Given this tangible history, contentions that regular fuel reduction burns are necessary to prevent fires are dubious. Therefore, a fire trail network to facilitate fuel reduction burns is not well based.

The use of fuel reduction burns will also impose an additional management responsibility on those involved to prevent damage to the marker trees (most of which are dead) and the drop-log fences along the Long Flat.

As an interesting aside, according to an inspection of maps, the current fire trail network (including Burnt Hill) in the southern tip of Namadgi is more dense than any other region of Namadgi or Kosciuszko National Parks. On this basis, the addition of Section 2 (and the proposed Spencer border trail) will result in an oversupply of fire trail facilities compared with the greater Kosciuszko/Namadgi complex.

Thank you for the opportunity to comment on this proposal.

Yours sincerely

A handwritten signature in black ink that reads "Christine Goonrey". The signature is written in a cursive style with a large, looping 'G' at the end.

Christine Goonrey
President
NPA ACT
9 May 2007