

Wednesday 2nd April, 2008

Ms Nicola Derigo
Committee Secretary
Standing Committee on Planning and Environment
Legislative Assembly of the ACT
GPO Box 1020
CANBERRA ACT 2601

Dear Ms Derigo,

Inquiry into the Namadgi National Park Draft Plan of Management

Issue of Interest to the Standing Committee Number One

The effectiveness of the management plan's consultative mechanism and co-operative management arrangements, including the role, management and operation of the Interim Namadgi Advisory Board.

The Colong Foundation for Wilderness believes that the consultative process on plan is very thorough, open and transparent. The Foundation provided detailed comments on the initial Recreation Strategy Issues and Options Paper in 2003. We made representations that the Namadgi Wilderness should be retained and expanded to the north, and that a Booth Wilderness to the east over the Booth Range be created.

The Colong Foundation was concerned that the options paper seemed to be raising expectations about what should be acceptable visitor use within a national park, particularly regarding off road vehicle use and what we see as a misapplication of the recreation opportunity spectrum analysis to allow an intensification of recreation use beyond what is appropriate for a national park.

The Colong Foundation believes that only the wilderness and natural setting categories of the recreational opportunity spectrum are appropriate for a national park. Commercial or semi-natural settings in parks (ie major development) should never be proposed. Other developments (mainly park roads, picnic areas, campgrounds etc) should be kept compact, small in extend and located toward park boundaries. The recreation opportunity

spectrum analysis process could change that ethic and push toward further development unless the above principles are applied.

The Colong Foundation prepared detailed proposals for wilderness protection within the national park which were submitted. While these suggestions were not taken up, the Foundation believes that our representations were considered by the interim Namadgi Advisory Board. The boundaries of the wild semi remote zone were perhaps influenced by our representations.

The Colong Foundation for Wilderness believes that the national park Advisory Boards or Advisory Committees should represent all Australians, and not just one element. The members should be required to support the national park management principles of the IUCN, and the provisions of the Land (Planning and Environment) Act 1991 and the Nature Conservation Act 1980.

Advisory Committees unfortunately tend to have persons on them who are not at all interested in nature conservation, and these members can harm open and transparent consultative processes by pushing for management hostile to the protection of the national park. Members who are narrowly interested only in sectional issues (like motorised trail bike riders) are a liability and tend to distort park management processes.

The Colong Foundation supports open and transparent processes regarding the preparation of park management plans. The 2001 agreement between Native Title Claim Groups and the ACT Government should be available for public scrutiny and review where it influences park management. Where an agreement involves the management of public lands, its content should be available to members of the public for comment and review. For example, where an agreement allows for hunting and gathering in a national park, or allows for vehicular access to a wilderness area, then these matters should be open for the public to comment upon.

The Colong Foundation was recently denied access by the Githabul National Aboriginal Corporation to a copy of the Githabul Indigenous Land Use Agreement (letter, 28 March 2008). This agreement covers ten rainforest national parks and three wilderness areas. The Colong Foundation has an active interest in these parks of many years standing. Gaining an understanding of the management implications of this Agreement has been denied to us.

Secret contractual agreements create suspicion and mistrust. Such agreements are contrary to the spirit of reconciliation and sharing. Secret agreements are a poor basis for joint management and are opposed by the Colong Foundation.

Issue of Interest to the Standing Committee Number Two

Namadgi National Park's value as a biodiversity conservation area and as part of the greater regional conservation corridor; including catchment protection and fire management issues.

The Bimberi Wilderness (zone 1a) and catchment protection (zone 1b) are two complementary zoning elements in the park management plan. These elements are in reality overlapping as the Bimberi Wilderness provides substantial protection to the Upper Cotter Catchment and prevents high impact use in the water supply catchment. The decision to prevent feral horse access to the Namadgi National park strengthens this protection.

The Colong Foundation believes that the wilderness should be extended over the catchment protection zone, and directs the Select Committee's attention towards the wilderness declaration of the inner catchment of the Warragamba Catchment Special Area as an example where this approach has been successfully applied in NSW.

The plan of management should also embrace the Tidbinbilla Nature Reserve as it is a logical part of the same regional conservation corridor in the ACT. A separate planning process for that reserve is unreasonable when the reserve directly adjoins and connects with the national park. A separate section in the plan of management, reporting on the nature reserve would be a cost saving to everyone involved in this process.

The Colong Foundation has raised the issue of cross border management with the NSW Minister for the Environment. Common planning and management strategies are laid down by the Memorandum of Understanding for Australian Alps National Parks. We note the consultation regarding fire management following the 2003 fire has been subject to feasibility studies, environmental assessments and community consultation.

The Colong Foundation believes that these fire planning processes should be part of the plan of management process, not imposed upon park management by a second process for fire management. The latter approach means that fire road access and fire management can subordinate the purposes of the park plan and push sub-alpine ecosystems protected in the park out of their ecological 'comfort zones' by over-burning.

Any well qualified and experienced fire manager can explain to the Select Committee that it was the fine fuels around the houses within Canberra that were the direct cause of houses burning down. It is irrelevant how much fuel there is in Namdagi National Park, if residents of Canberra retain their bush gardens right up next to their homes. Houses without asset protection zones will burn when next the fire one summers day moved into the Canberra. In very extreme fire hazard circumstances, houses can burn down from a tiny grass fire or ember attack regardless of the hazard reduction taken in the park. The destruction of plant and animal diversity in Namadgi National Park

by over burning is to no avail at all. This lesson will, it seems, need to be learnt many times until the fuel is removed from around peoples homes.

In this context, the Colong Foundation is concerned that the wild semi-remote zones (Booth and Blue Gum) could be subjected to fire road construction during a fire emergency.

The Select Committee should consider one consequence of a passive stance to vehicle access issues in the wild semi-remote natural areas is road construction. The position in the Government Response to submissions implies that were new fire roads constructed in wild semi-remote areas then public vehicle access would be allowed use of them.

Also, the proposal for low-loader access to remote park areas during fire emergencies is a mistake. It will lead to irrational bulldozing of park areas during these emergencies and perhaps place lives at risk. It was a back burn that got away and burnt into Canberra; bulldozing control lines and back burning from them will always be a high risk strategy. It is definitely an environmentally damaging strategy.

Vehicle access is available to almost everywhere on the planet and roadless areas are becoming very scarce. The Select Committee should consider a direction that new fire roads be prohibited within the wild semi-remote zones and any 'control lines' established during fire emergencies be rehabilitated immediately after the fire event.

Further, the stance that the Booth wild semi-remote zone has been proposed because there is little known about this area, may be in accordance with the precautionary principle, but is a very passive Government position. It is as if wilderness quality and roadless nature of these lands have little or no value in themselves. This is wrong and ignores the many benefits of wilderness management, for example the unhindered movement of animals in response to climate change and fire.

In regard to allowing off road vehicle clubs access to management trails for management purposes, the Colong Foundation believes that this proposal is the thin edge of the wedge and will lead to more vehicle access. Off road vehicles are damaging to fire roads and once access is allowed these roads will become degraded. Having seen, many times, the damage caused by off road vehicles and the degree to which their owners will go to get access to remote park areas, I urge the Select Committee to disallow public access for management purposes. Off road vehicle recreation is often a motor sport that degrades the bush and ruins fire roads.

The proposal for mosaic burning of Namadgi National Park is not supported because it will not ensure property protection or prevent wildfire, but it will degrade the natural environment unless ecologically based. It is almost certain that politics will ensure that the minimum interval between fires will not be met and that the park will be over burnt for no property protection purpose.

A superior method for fire suppression are the deployment of Remote Area Fire Teams. In fire suppression operations, rapid initial attack using Remote Area Fire Teams (RAFT) have proven to be essential in getting fires out before they are a problem. As you would appreciate, the past tactical use of RAFT teams has prevented a large number of lightening strikes in each fire season from becoming wildfires.

A key management plan work priority should be building the capacity of these RAFT operations. Yet, the draft plan does not mention RAFT capabilities or requirements. This omission is unwise given their past and future importance in limiting the frequency of wildfire outbreaks.

Increasing RAFT capability would be the single most effective suppression activity to curb the increase in wildfire outbreak arising from climate change. A Canberra-based and Canberra-funded RAFT capability for south-east Australia would be a common sense initiative. A national RAFT capability would repay any Government who funded it with many wildfires suppressed.

Further, there is no reason why an effective media officer cannot make RAFT wildfire suppression regular good news and feature stories with local media. Such reporting would help encourage a crop of young volunteers to become an elite RAFT team member.

Issue of Interest to the Standing Committee Number Three

Any other matters

The Colong Foundation is strongly opposed to access by off road vehicles, bicycles and horse riders to the wild semi-remote zone, and the wilderness and catchment zones. The Foundation believes that a national park should focus on low impact recreation, primarily bushwalking, which is consistent with the primary nature conservation purpose of the park.

The Colong Foundation opposes the access of commercial operations within wilderness areas. Wilderness is for self reliant recreation and there is something contradictory in having to pay someone and to rely upon their services on a wilderness bushwalk. A camping outfitter or commercial operator in Canberra should be able to drive a park visitor to a track head or starting point and provide you with a map, compass, as GPS or EPERB if required. The outfitter could hire camping gear and food. The operator could arrange to pick the walking party up at a specified place and time and ensure you log in and out of a walk. As soon as commercial operators, however, carry a walkers gear, provides camping arrangements, holds your hand while you cross a stream and helps you get up in the morning, the entire idea of self reliant wilderness recreation disappears. There may be a place for such commercial bushwalking operations, but it is not in a wilderness.

The Colong Foundation opposes 'special events' in wilderness areas where there are large numbers of participants (more than 8). Repetitive mass

events can have adverse environmental and social impacts, including soil erosion of unformed tracks, displacement of visitors and conflict with park visitors who are seeking a quiet natural environment. Given the large numbers, waste management for participants is also an important management issue.

Mass repetitive tourism events in national parks should be restricted to approved roads and approved formed walking tracks of a standard which can cope with large numbers of participants without erosion or damage to native vegetation. Footpads or unformed walking tracks should not be used. For this reason, rogaining is not an appropriate use for a national park because of the repetitive off track trampling caused to access the control points.

The routes should avoid areas of plant disease, recently burnt areas, and areas of high visitation where there could be serious conflict with other park visitors, for example at lookout points and narrow formed tracks, especially where near the commencement of the route.

Signs and checkpoint markers must not be nailed to trees. Portable toilets are required where existing facilities are considered inadequate by the national park staff.

Commencement and completion points for mass tourism events should be located on roads within a site hardened area, such as a car park.

Camping activities associated with the event should be restricted to designated facilities approved by a national park plan of management.

Administration facilities should be located on site hardened areas. Public announcement systems and generators are only to be used at the start and finish points during daylight hours. All rubbish should be removed from the route used.

In regard to bicycling, the Colong Foundation supports the proposals in the draft plan regarding wilderness. The Foundation believes that a prohibition on bicycle access should be applied to the Middle Cotter catchment and wild semi-remote zones. Bicycling should be limited to approved public roads, otherwise large areas of the park will be accessible by bicycle in a day. The proximity of Canberra and the possibility to ride through the park in a day could mean that large and unregulated numbers of mountain bike cyclists could pass through the park to the detriment of other park users.

The Colong Foundation is opposed to horse riding in national parks due to the damage it causes (eg weed invasion). Proposals for increased horseriding access, camping ground and other benefits that flow onto the Yaouk establishment are opposed due to the increase in environmental damages.

Peter Cochrane of Yaouk, the primary mover of improved facilities and horse riding access to Yaouk, is primarily concerned with economics, not conservation. "I unquestionably and undeniably have a commercial interest, and I have the interests of my employees at heart, I have the interests of my

community at heart, and as the Mayor of Cooma I'm concerned for the economy of the entire area, and I certainly won't be dictated to by the National Parks and Wildlife Service or any other government group who thinks that they can in any way inhibit the growth of our society so far as recreation is concerned" (ABC transcript, 29/4/01).

Thank you for the opportunity to make representations to the Select Committee regarding the Government Position on the Namadgi National Park plan of management.

Yours sincerely,

Keith Muir
Director