



Mr Mick Gentleman
Chair, Standing Committee on Planning and Environment Committee
ACT Legislative Assembly
Canberra ACT 2601

Dear Mr Gentleman

Thank you for the opportunity to comment a second time on the draft Namadgi Plan of Management, now that we have seen the 2007 version of the draft plan.

This version of the Plan of Management goes some way towards reassuring our members on some items of concern. For example, we note that in fact the plan does not permit campfires in the wilderness area and the Australian Alps Fire Management Principles have been inserted into the text.

However we remain deeply concerned about several key issues and ask that, in your report, you make the following recommendations:

- That the extension of horse riding areas in the southern part of the park be delayed until there is a formal Memorandum of Understanding with ACT and NSW horse riding bodies that they will promote compliance with the restrictions on access and that they will educate members on why they should be observed.
- That Schedule 3 be restored to the plan of management in order to address an inappropriate emphasis on large scale sporting activities in the national park.
- That the proposed use of Gudgenby Homestead for commercial accommodation be removed from the plan.
- That the plan specifies the proposed pack based campgrounds **not** be serviced by management roads, be supplied with water, fire places and toilet facilities and that the designated areas **not** be cleared of overhanging trees.
- That the plan not be published until it has acceptable and measurable objectives and reporting timelines.

Extension of horse riding to Grassy Creek

We have already spoken at length about this topic, outlining concerns that this will lead to increased weed infestation, damage to waterways and bogs and illegal horse riding across the lower end of the park. We draw your attention to statements made at the time of your hearings into the plan by a spokeswoman for ACT Equestrian Association. She stated very clearly that they wanted to ride horses in all areas of Namadgi and could not see why

they shouldn't (ABC News 1 May 2008). Their submission questions the evidence that horses spread weeds and maintains there is no obligation to use clean feed while in the park. In short there is no intention or commitment to abide by the rules set out in the management plan.

We are at a loss to understand how there can be any expectation of horse riders following the rules with such encouragement from their formal representatives. In order to prevent illegal horse riding we urge the government to withhold any concessions on access to Grassy Creek fire trails until there is a formal Memorandum of Understanding with ACT and NSW horse riding bodies that they will promote compliance with the restrictions on access and that they will educate members on why they should be observed.

The emphasis on large scale sporting activities in the park

In order to fulfil its primary responsibilities for conservation and water harvesting, the management plan has to address the very clear expectation of large scale sporting events in Namadgi to "showcase both the sport and a high standard of environmental management" (p 139). Large scale sporting events in a national park cannot demonstrate a high standard of environmental management; they can only demonstrate the clean up and remediation after the event.

In order to address this issue we are asking the Committee very specifically to recommend that Schedule 3 in the first draft of the management plan be restored. This schedule states explicitly what group sizes and activities are permitted in the different zones. Its removal leaves park management open to persistent demands for inappropriate activities and events throughout the park, especially in remote and wilderness area. Pressure to increase the number and extent of large scale events appears to be driven by a wish for novelty. Namadgi appeals as a site not because its remote areas hold any special challenge but simply because they haven't been run, cycled or rogained before and competitors say they are bored with sites they have used before. This is not an adequate reason to put conservation and water values of the park at risk.

Removing Schedule 3 undermines the zoning system introduced by this plan for the first time. There is no point having zones if they are not used to classify the size of permitted activities. The absence of clear rules about what is permitted in different areas will inevitably lead to organisations and individuals tying up park and departmental resources re-litigating any refusals of access or large group activities. For example it appears the intent of Schedule 3 has been replaced by Action 39.68 "In consultation with other government agencies and sporting organisations develop a schedule of events, suitable sizes and arrangements for the conduct of the events. The number of events permitted in any year **may** be limited." This is impractical, resource-intensive and politically sensitive but most importantly it creates a long draw out process which places the burden of refusing access on park managers. Restoring Schedule 3 would reverse the burden of proof: organisations seeking to use remote and wilderness areas for sporting events would have to

make a very specific and sound case to gain the privilege of conducting a large sporting event in the national park.

Use of Gudgenby Homestead for commercial accommodation

We urge the Committee to recommend that the reference to use of Gudgenby Homestead for commercial accommodation (P 123) along the lines of Currango in KNP be deleted because it is a foolish and misguided idea. To begin with there is no similarity between Currango and Gudgenby precincts except that both are in national parks. Currango can cater for dozens of visitors at any one time with six separate accommodation facilities and horse yards which are managed by a caretaker contracted to NSW NPWS. The homestead is not available for hire but used as the private residence by the caretaker and his family.

Gudgenby precinct has two houses, one used by a park ranger as permanent accommodation and one used by community groups for a wide range of activities including art camps, as a base for bush regeneration and for fauna and flora surveys. Any commercial venture in this precinct would have to be limited to 5-8 guests at any one time; any attempt to move to private leasing would end up being subsidised by the government, ie public payment for private profit. In fact the management plan itself notes on p124 that “Given the existing and potential commercial and non-commercial opportunities available in the ACT and alpine resorts in Kosciuszko, it is unlikely that there is a large enough market to sustain any new facilities in Namadgi during the life of this plan (over the next 10 years.)”

Aside from its distinct lack of commercial viability, the buildings on the site are already fully utilised. It is essential to have a ranger living at Gudgenby because of its remote location and easy road access for vandals. The nearest ranger in the southern end of the park is at the Visitor’s Centre near Tharwa. Illegal four wheel driving, shooting and vandalism resulting from a loss of the ranger’s presence at Gudgenby would cost far more than any rent from a commercial agreement. The issue is broader than mere cost however; the safety of animals and people in this remote location would also be put at risk. Prosecution of a Canberra resident for extreme animal cruelty was only possible because the ranger in residence was able to keep a persistent watch for the offender who was shooting and maiming kangaroos in the area.

The alternative is to move the ranger into the Ready Cut Cottage to free up the homestead for this commercial enterprise. However the Readycut Cottage has been restored by KHA over many hundred of hours and its surrounding landscape is being restored and maintained by NPA ACT. The cottage is already being used for community activities and this is expected to increase as the restoration work is completed. Its allocation to commercial usage – or the transfer of the ranger to the Ready Cut to enable commercial operation of the homestead – would deprive community groups of an important resource which they have spent many hours repairing and maintaining.

The potential for the proposed pack based campgrounds to be used for large scale and damaging group expeditions

We are concerned about Policy 38.19 "Pack-based camp grounds (primitive bush campgrounds) may be established where dispersed camping is causing unacceptable impacts." We are aware that Outward Bound is seeking the establishment of permanent bush campgrounds for its exclusive use to enable it to cater for the large school parties which it brings into the park.

Outward Bound are asking that these campgrounds be serviced by management roads, be supplied with water, fire places and toilet facilities and that the designated areas be cleared of overhanging trees. This sort of marked change to the landscape would be contrary to the camping policies elsewhere in the POM yet appears to be flagged here as a future option to enable large groups sizes in Outward Bound parties and for fee-paying campers to be granted special privileges in non-designated camp sites.

We maintain that a simple solution to Outward Bound's concerns is to reduce their group sizes by splitting up the large school groups they escort into the bush, employ more staff to accompany the students and spread the groups over different areas. We are seeking some measures in the management plan which would preclude this over-development of any bush camps which may be established.

A continuing lack of measurable objectives and reporting timelines

We are disappointed to see that the promised *Management Actions and Priorities* at Appendix 8 does not in fact set up an effective action plan with measurable outcomes and specific timeframes against which the government and management can be held accountable. It does nothing more than place vague priorities on the Actions outlined in the plan. There is no reference to resourcing nor any specific objectives to be achieved in any specific timeframe. This lack of specificity completely undermines the POM and turns it from a useful document into a mere statement of good intentions.

We suggest that this is an opportunity for the ACT government to spell out a level of funding and explicit outcomes over the next 5 years against which this plan could be measured. Namadgi is one of the ACT's most valuable natural assets and it deserves the same level of certainty and accountability as our business assets.

We hope you find these comments useful. We can assure members of the committee that our members will continue to take the highest interest in the conservation and good management of Namadgi National Park.

Yours faithfully
Christine Goonrey
President
6 June 2008