

A Fire trail, a serious need to assist fire management or just an excuse to knock over more trees?

North Coast Water's Review of Environmental Factors Southern Fire Trail and Access Way.

20th February 2010

North Coast Water, a business arm of the Clarence Valley Council, has recently presented a Review of Environmental Factors (REF), asking Council's approval to construct a fire trail south west of the Shannon Creek dam. The proposal has been on the drawing board for at least 18 months since the 'walk through' environmental assessment was made in August 2008.

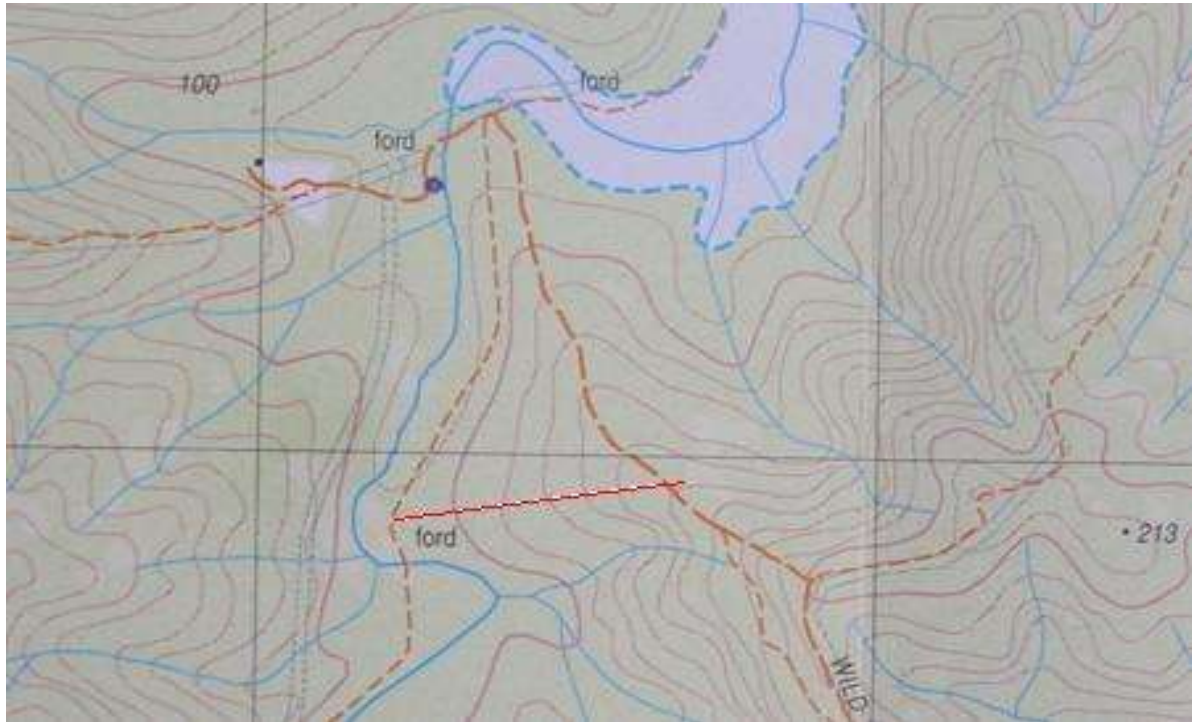
The Clarence Environment Centre received copies of Council Papers describing the proposal just one day before the matter was put to Council's sub-committee, so because of the lack of time allowed we were unable to take advantage of the offer to make a deputation on the subject. Perhaps this was the reason why the information was circulated at this late date

Now that we have assessed the REF we find that, like many former ecological assessments presented to the public in relation to the Regional Water Supply Scheme, not all is exactly as it is presented. The following graphic, Figure 2, on page 12, shows the proposed fire trail (red line), and the author has used a black line to show the supposed position of existing tracks which the proposed trail is to connect.

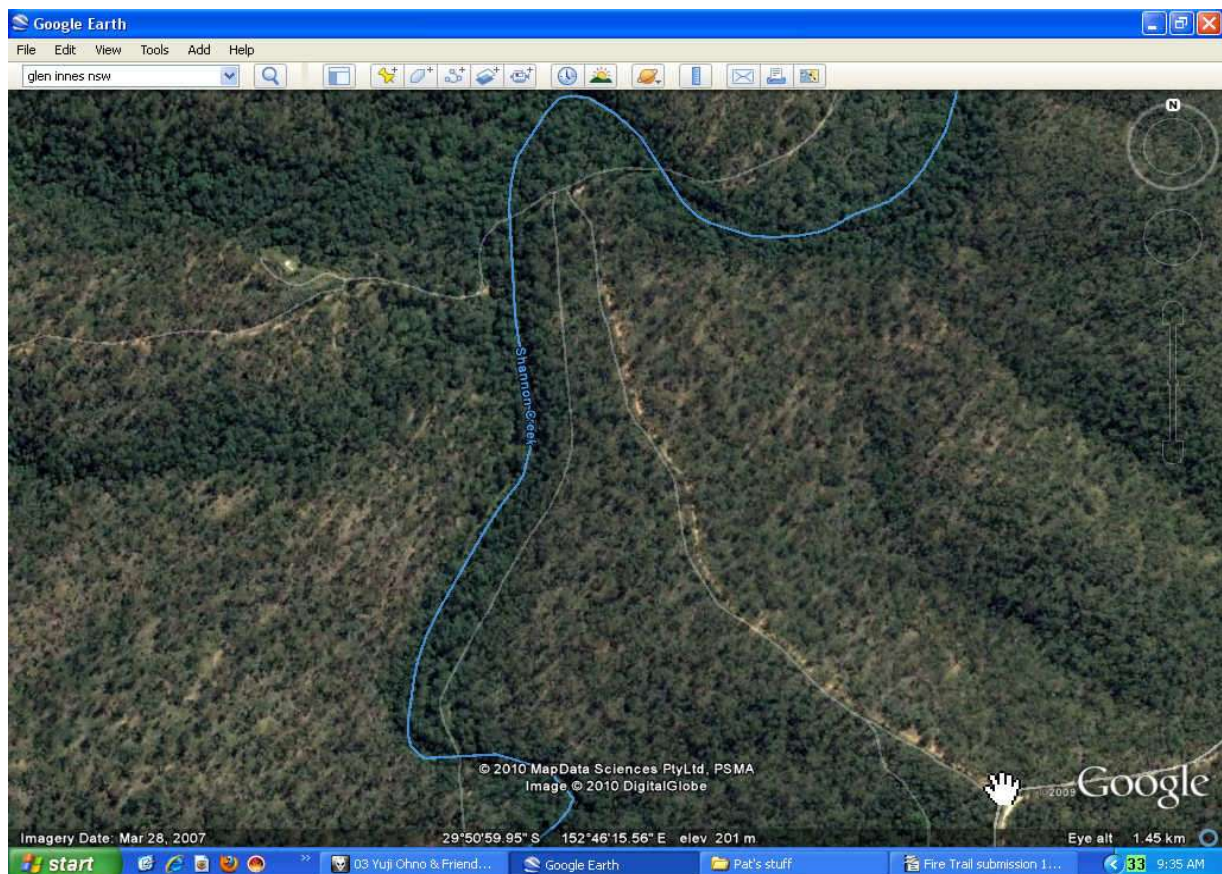


Note that the aerial photograph has clearly picked up the light shaded line of the existing track from which the proposed trail is attached at its eastern end (right hand end), then note the lack of any similar shading along the black line depicting the supposed existing road at the western end of the trail.

Now compare the previous image with the latest 2003 topographical map.



The above map clearly shows the trail at the western end of the proposed track (in red) does not cross the creek, as depicted in the REF image by way of a drawn black line, but follows the eastern side of the creek to the junction next to the dam. This map is supported by the 2007 Google Earth image below.



These images suggest that, not only is there no track crossing Shannon Creek at the western end of the proposed trail, but that the track at the eastern end actually joins a T junction at its northern end (at top) **which is above the dam's high water**, and will adequately provide the required fire access.

If these images are right, considerable impact on riparian habitat will occur to construct a crossing over Shannon Creek, habitat which appears on the Google Earth image to be healthy and intact. Also, before finally joining the T junction at the northern end (top), another creek line will have to be crossed. None of this impact is mentioned in the REF.

The question has to be asked therefore: Why is the fire trail being proposed, and why is the public again been misled.

Naturally the Environment Centre would have been keen to read the Ecology Report which, according to Section 3.9 of the REF: “... ***is attached in the Appendix.***”

Unfortunately it was not attached. However, extracts are provided which indicate the Report was undertaken by the ecologists that have been involved with the Regional Water supply project for over a decade.

However, past failures by the proponent to find any threatened flora occurring within the project footprint, does not engender confidence in the assurance that the: “***Walk through of the proposal with the Project’s ecologist indicated that it could be constructed with minimal ecological impact***”.

It should be noted that, of the 13 threatened plant species currently known to occur at and adjacent to the dam site, one was first identified during the NRAC surveys in 2005, another was discovered by a sub-contracted ecologist, and the remaining 11, 3 of which were subsequently listed as threatened, were identified by independent botanists, unaligned with the project. We also remind that in the case of endangered *Melichrus hirsutus*, the species first identified there by the NRAC botanists in 1995, the numbers to be destroyed by the project was understated in the original EIS by some 500% to 1000%.

As a result it is gratifying to note that at least one species, the Square-fruited Ironbark has been sighted in this instance. The other species listed as potentially occurring, *Tephrosia filipes*, would hardly be expected to be found in August when the 'walk-through' survey was undertaken, as it is a summer growing annual. We don't suppose any follow-up surveys were undertaken to catch up with those summer herbs, Ground Orchids etc?



Square-fruited Ironbark

The reasons why this trail is needed are stated as follows:

“The fire trail is required for land management practices. It is to meet multiple objectives including,

- *Operations & Maintenance. The track will allow for access to parts of the dam for maintenance and scheme operational purposes.”* **Comment:** Not true, as shown on the second image above, both roads connected by the proposed trail currently join together above the dam's high water, and already service all areas of the dam.
- *“Water quality protection. Wildfire events can interfere with water quality in the Shannon Creek Dam as a result of carbon deposition from ash. The primary purpose of the Buffer zone is to protect water quality. Fire management is an important component of this.”* **Comment:** While the comments about fire and water quality are true, it would be hard to see how this additional 500m trail would make any difference.
- *“Asset protection & human safety. CVC requires the strategic fire break to enable it to protect its infrastructure. The provision of the break will enable opportunity to manage fires on CVC lands.”* **Comment:** All CVC infrastructure is kilometres away to the north east, and the proposed trail link would provide no added protection to those assets, or increase human safety, or add to the ability to manage fires in any way.
- *“Fire management. The trial will allow mosaic fuel reduction burns to be conducted.”* **Comment:** As explained the proposed trail will add nothing to ability to manage fire. At the same time it should be emphasised that Shannon Creek's riparian zone will provide a more effective firebreak than the trail.
- *“Ecological Protection. A wildfire event may impact on the ecological values of the Shannon Ck Compensatory habitat lands.”* A 5 metre wide track offers little safety to firefighters, and it is doubtful if a responsible Brigade Captain would venture anywhere near such steep, treacherous trails during a wildfire event. In relation to the claim that fire would impact the ecological values of compensatory habitat land, it should be noted that that land, at its nearest point, is almost 3km from the proposed trail, and Wild Drake Road and Wild Drake Creek itself lie between the trail and the compensatory habitat land, providing good access.
- *“Implement the principles of the Fire Management Plan”.* **Comment:** In this document it is claimed that: *“The works are being in accordance with the Clarence Valley & Coffs Harbour Regional Water Supply (CV&CHRWS) Fire Management Plan (2002)”.* We do not recall there being any mention of this particular trail in the 2002 plan, which it is understood was long ago declared redundant owing to the fact that almost every component of the original scheme was changed after 2002. Even last year, Ian Preston, Executive Manager of NCW, recommended Council oppose the acquisition of a no longer needed crown road reserve because, he claimed, NCW might want it for fire management. However, he explained that the need had yet to be confirmed because **the Fire Management Plan was not yet completed**. What is the truth of the matter?

Other questions raised:

1. Given the Report's admission that: *“The project site receives extreme weather conditions with heavy rainfall and intense events. (And) The proposed track extends through steep terrain areas. As a result consideration needs to be given to ErSed in the construction of the track”*, and the fact that serious erosion has occurred along those roads in the past, with suggestions they should be closed, can construction of this new track down a 1 in 10 slope be justified?
2. We note the REF document provided to the Environment Centre was signed by Damien Grace, Project Officer (Environment), but nobody has seen fit to add their signature as having Reviewed the document. Was this done before Council gave its approval, or was a review seen as not needed?
3. We have concerns about reports of further destruction of Square-fruited Ironbarks, particularly the mention of very large specimens. This species is about to suffer enormous losses elsewhere in the district with the RTA predicting the destruction of well over 6,000 specimens in the Pacific Highway upgrade at Glenugie. Council failed to lobby the RTA to minimise that destruction, despite grand statements in its Sustainability Initiative about protecting biodiversity. Can we really justify more destruction to build a clearly unneeded fire trail?
4. In the document provided to us, only “in principal” support was received from the Rural Fire Service, which was subject to adopting a number of recommendations. Has the RFS given a final tick of approval, and all recommendations followed to their satisfaction?

Compiled by John Edwards