



**Title of Referral: Territory and Municipal Services, ACT
Government/Tourism and recreation/Canberra
/ACT/Canberra Centenary Trail Project
Date Received: 26 Nov 2012 Reference Number: 2012/6645**

Thank you for the opportunity to comment on the above referral. The Red Hill Regenerators is a Parkcare group of around 90 members that has been active on Red Hill for over 20 years. Red Hill forms the wooded southern backdrop to the Parliamentary triangle and is a large and diverse remnant of critically endangered White Box - Yellow Box - Blakley's Red Gum Woodland. It is also a habitat of many threatened and regionally rare plant species. There are several kilometers of the proposed centenary trail within Red Hill nature reserve. The works now appear to be confined to existing fire trails and walking tracks but there are a few matters that are unclear in the referral documents, which could have a significant impact on matters of National Environmental Significance and which if planned should be subject to thorough impact assessment.

1. There is no relevant detailed map within the referral documentation but the overall route map on page 62 of the Ecological Assessment suggests that a new trail will be construction from Flinders way across about 100 m of critically endangered woodland to the start of a walking track on Red Hill. There is already an over abundance of vehicle and walking tracks connecting to this point and recent works have been taken to close and rationalise tracks in this area. It would be non-sensical for a new track to be constructed. It should be clarified that only existing trails or tracks will be utilised in this area. A new track would be a significant new impact on a matter that has already caused major degradation.

2. The Red Hill Regenerators were led to believe that the trail at Red Hill would branch into cycle and walking options. The major cycle option would follow the base of the Hill along an existing fire track, while the walking track would visit the summit and utilise an existing foot track from water tanks on the ridgeline down to Melbourne Avenue. To quote from the TAMS final consultation report, "In order to avoid the need for new trail within Red Hill Nature Reserve, walkers will use existing trails to reach the top of Red Hill, whereas bike riders will be directed along the existing fire trails on the eastern side.". However the referral document makes no mention of branching track options and only mentions one standard method of upgrade. This is a major concern. If the "walking tack" is now going to be subject to an upgrade suitable for bicycles this will involve clearance in woodland of high quality that occurs on steep highly erodible soils. There are a few plants of the nationally endangered button winklewort (*Rutidosia leptorhyncoides*) immediately adjacent to the existing track, while there are also several other woodland plants in the immediate vicinity of the track that are considered rare in the ACT, these include *Dianella longifolia*, *Lotus australis*, *Swainsona sericea* and *Calotis lappulacea*. The upgrade (as described in the referral) is likely to directly destroy endangered and rare plants. If the track was upgraded to a bicycle standard then it is also likely that it would be used by bicycles. The current walking track has limited line of sight and even if widened, the steep and bushy nature of the woodland and the windy nature of the track, means that it is likely



to be a hazard to both bike riders and walkers. It seems likely that extensive clearance would be required to allow a line of sight. The referral does not contain detailed track design. If the upgrade works were to proceed on Red Hill the track would require drainage and erosion control measures not described in the referral. These ancillary works would further impact on critically endangered woodland. It should be clarified what level of upgrade is envisaged for the Red Hill "walking track". Given that there are several available options for bikes to visit the summit and continue through the reserve, upgrade of the walking track to a bicycle standard should not be countenanced.

Red Hill Regenerators have limited our comments to matters concerning Red Hill, but we notice that several of the proposed new tracks in other areas are in high quality native vegetation on steep land and erodible soils.

Yours sincerely

Ross Kingsland
President
Red Hill Regeneration Group

10 December 2012

