

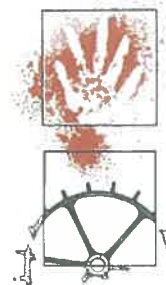


Bombala Sawmill Expansion Bombala, NSW



Aboriginal Cultural Heritage Management Plan

September 2011



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Report Register

The following register documents the development and issue of this document.

Issue No.	Notes/Description	Issue Date
v1	Draft for proponent comment	June 2011
v3	Draft following comments	June 2011
v4	Final draft	July 2011
v5	Final	August 2011
v6	Amended Final	September 2011

EXECUTIVE SUMMARY

Dongwha Timbers Pty Ltd (Tasco) proposes to expand the Bombala Sawmill which is located on Sandy Lane, approximately 2 km southwest of the town of Bombala. This expansion will approximately double the footprint size of the mill, and introduce new processing technology.

Proposed actions associated with this project include: construction of additional facilities including a dry mill, treatment plant, green mill, and office building; paving of the new site with a combination of compacted hardstand gravel, concrete and bitumen/asphalt pavement; and development of a water management and reuse system.

This report documents the results of an Aboriginal cultural heritage assessment of the Bombala Sawmill expansion study area, and the ensuing management plan. This assessment and management plan includes literature review, database searches, Aboriginal consultation and field inspection.

The report has been prepared as an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill expansion

The proposed Bombala Sawmill expansion will be assessed under:

- Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The study found that:

- No previously recorded Aboriginal sites are registered in the AHIMS within the Bombala Sawmill expansion study area;
- One previously recorded site, an open artefact scatter, was located within the study area by the Eden Local Aboriginal Land Council in August 2009.

This site could not be relocated during the NOHC survey in May 2011.

- No Aboriginal sites were identified during the course of the present study.
- Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

It is recommended that:

- Any unanticipated discoveries of Aboriginal cultural material (such as items or features which fall outside of the scope of the current significance assessment), should be managed according to the unanticipated discovery protocols recommended in Section 7.3 of this report.
- No further cultural heritage assessment is required for the Bombala Sawmill expansion project.
- Dongwha Timbers may wish to consider the ELALC's request for monitoring during the earthworks stage of development.

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1. INTRODUCTION

1.1 Project Description

Dongwha Timbers Pty Ltd (Tasco) proposes to expand the Bombala Sawmill located on Sandy Lane, approximately 2 km southwest of the town of Bombala. This expansion will approximately double the footprint size of the mill, and introduce new processing technology.

Proposed actions associated with this project include:

- Construction of additional facilities including a dry mill, treatment plant, green mill, and office building;
- Paving of the new site with a combination of compacted hardstand gravel, concrete and bitumen/asphalt pavement; and
- Development of wetlands.

This report documents the results of an Aboriginal cultural heritage assessment of the proposed Bombala Sawmill expansion site. The report has been prepared as an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill expansion.

1.2 Project Framework

The proposed sawmill expansion will be assessed under:

- Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A ACT).

1.3 This Report

1.3.1 Outline

This report:

- Describes the proposed development (Section 1);
- Describes the methodology employed in the study (Section 2);
- Describes the environmental setting of the study area (Section 3);
- Provides information relevant to the Aboriginal cultural context of the study area (Section 4);
- Provides a heritage context for the study area (Section 5);
- Describes the results of the data review, field survey and Aboriginal consultation program conducted in the context of the assessment (Section 6); and
- Provides management recommendations based on the results of the investigation (Section 7).



1.3.2 Copyright

Copyright to this report rests with Fifth Estate except for the following:

- The NOHC logo and business name (copyright to this rests with Navin Officer Heritage Consultants Pty Ltd);
- Generic content and formatting which is not specific to this project or its results (copyright to this material rests with Navin Officer Heritage Consultants Pty Ltd);
- Descriptive text and data relating to Aboriginal objects which must, by law, be provided to OEH for its purposes and use;
- Information which, under Australian law, can be identified as belonging to Indigenous intellectual property;
- Content which was sourced from and remains part of the public domain.

1.3.3 Restricted Information

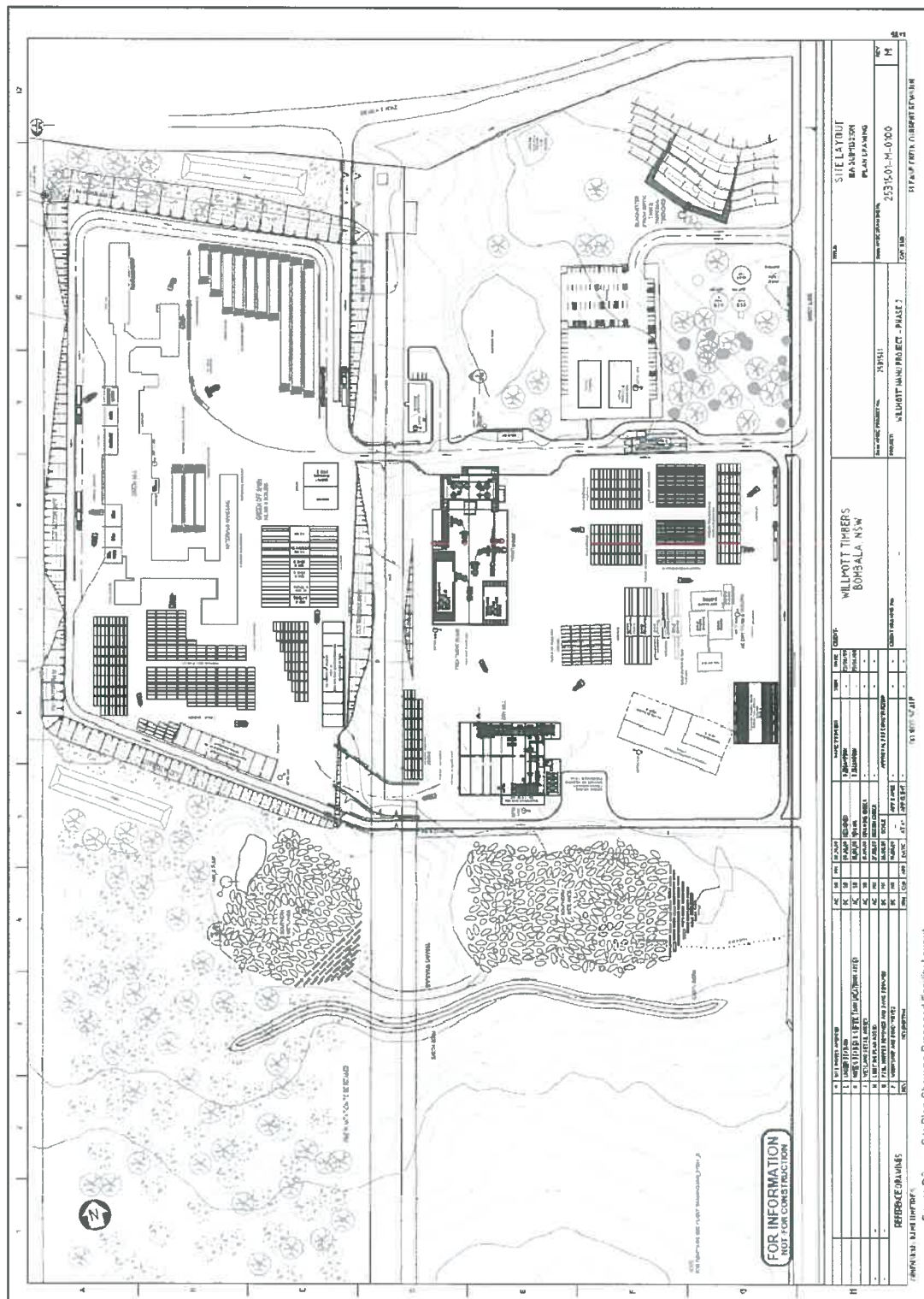
Information in this report relating to the exact location of Aboriginal sites should not be published or promoted in the public domain.

1.3.4 Confidentiality

No information in this report has been classified as confidential.



Figure 1.1 Location of Bombala Sawmill expansion site
(figure supplied by Fifth Estate)





2. STUDY METHODOLOGY

2.1 Contributors

An archaeological survey of the Bombala Sawmill expansion site was undertaken by archaeologist Sam Harper and Aboriginal Cultural Co-ordinator Glenda Hyde on May 26th, 2011. Sam has a Bachelor of Arts with Honours in Archaeology from the Australian National University and Glenda has a Certificate IV in Conservation and Land Management and Community Facilitation.

This report was prepared by Sam Harper and edited by Kerry Navin.

2.2 Literature and Database Review

A range of archaeological data was reviewed for the Bombala Sawmill expansion study area and its surrounds. This literature and data review was used to determine if known Aboriginal sites were located within the area under investigation, to facilitate site prediction on the basis of known regional and local site patterns, and to place the area within an archaeological and heritage management context.

Literature sources included the Aboriginal Heritage Information Management System (AHIMS) maintained by the NSW Office of Environment and Heritage (OEH, formerly DECCW) and associated files and catalogue of archaeological reports; and theses held in the library of the School of Archaeology and Anthropology, the Australian National University.

Searches were undertaken of the following statutory and non-statutory heritage registers and schedules:

- Statutory Listings:
 - : Aboriginal Heritage Information Management System (AHIMS) (NSW OEH);
 - : World Heritage List;
 - : The National Heritage List (Australian Heritage Council);
 - : The Commonwealth Heritage List (Australian Heritage Council);
 - : The Register of the National Estate (Australian Heritage Council);

2.3 Field Methodology

The field survey was undertaken on the 26th of May, 2011 on foot by two individuals walking approximately 5-10 m transects covering the area of the proposed expansion site, taking advantage of available ground exposure.

Information was recorded using a handheld Trimble Juno GPS, digital camera, and notebook.

2.4 Sampling Strategy

A full coverage survey was conducted of the Bombala Sawmill, dependent on visibility.

2.5 Consultation with Office of Environment and Heritage

Initial consultation with the OEH was conducted by phone in early April 2011 when advice was provided regarding background to the project, the required scope of the Aboriginal heritage assessment, and the application of the DECCW 2005 consultation guidelines (phone conversation between Ms Kerry Navin NOHC and Ms Jackie Taylor, OEH, Environment Protection and Regulation Group (EPRG), Southern Branch, early April 2011).



As part of the first phase of the Aboriginal stakeholder consultation program, a postal letter was sent to the OEH, providing formal notification of the proposal, the associated heritage assessment, and seeking advice regarding OEH requirements and potential Aboriginal stakeholders which should be contacted (letter dated 20 April 2011). A letter of reply was received from Mr Dimitri Young (Acting Manager Landscape and Aboriginal Heritage Protection South, EPRG) dated 4 May 2011 (OEH reference DOC11/19764). In the letter the OEH noted that, following NOHC clarification by telephone, the OEH could advise that the Office did not have any known Aboriginal parties listed for the Bombala local government area. The Letter went on to advise that this response was not necessarily exhaustive for all interested Aboriginal parties. It was noted that there remained a requirement to advertise in local print media and to contact other parties seeking interested Aboriginal parties.

At the direction of the proponent, a copy of a draft of this report was provided to the OEH on the 7 July 2011, with an invitation to provide comment by 18 July 2011. No comment was received.



3. LANDSCAPE CONTEXT

3.1 Location

The proposed Bombala Sawmill expansion site is located approximately two kilometres southwest of Bombala, in south-eastern New South Wales. The study area falls within the South Eastern Highlands Biogeographic region, which encompasses the ranges and plateau of the Great Dividing Range and Monaro Tablelands. The study area is located in the upper Bombala River catchment in the Monaro Tablelands within the Snowy River Basin. The site is located approximately 700 m to the west of Saucy Creek, and approximately 1.4 km south of Bombala River. A minor tributary crosses the study area, flowing from a third order stream, which is a tributary Saucy Creek.

3.2 Landscape history, erosion and soils

The 1:250 000 Bega-Mallacoota geology map indicates that the rock profile within the study area is made up of Quaternary age alluvial and colluvial deposits. Surrounding the study area is a Kelvin Suite, comprised of Bombala tonalities (Jenkins 1993).

A gentle knoll in the centre of the study area has been heavily eroded and degraded (Figure 3.1). To the south of the knoll the study area slopes to a small gully with a third order tributary running east-west. This slope is also heavily eroded and degrading (Figure 3.2). The main forms of erosion within the study area are slope wash/sheet erosion and wind erosion in the more exposed areas such as saddles and crests.

The soil profile across the study area is dominated by silty sands with large gravels and alluvial cobbles. The northern end of the study area includes darker silty loam. The site vegetation is made up of mixed introduced grass species.



Figure 3.1 Eroded land surface on the knoll in the middle of the study area



Figure 3.2 Slope wash/sheet erosion and rabbit burrow - facing south

3.3 Landforms

The proposed Bombala Sawmill expansion site is marked by a gentle knoll, surrounded by low to moderate gradient basal slopes to the north and south. Landforms to the south include a small gully. The study area is located approximately 1.4 km south of Bombala River, and approximately 700 km west of Saucy Creek, a tributary of Bombala River. A third order stream enters the study area from the west, with minor tributaries branching off this within a gully landform.



A pine plantation is located at the southern end of the study area.

The region surrounding the study area comprises rolling hills and open plains. Extensive colluvial and fan slope deposits typify this landscape.

3.4 Natural resources and features

The Monaro Tableland lies in a rain shadow zone, with Bombala falling within the driest areas in the region (Keith and Bedward 1999). Most of the Monaro tablelands have an annual average precipitation of 535-635 mm, with an elongated area between Bombala and Queanbeyan being particularly arid (Flood 1980:15).

Temperature in these areas is closely related to altitude, with extreme monthly and daily temperature ranges not uncommon. At lower altitudes on the Monaro the diurnal range is less in summer and greater in winter. Temperatures in Bombala (elevation 705 m above sea level) vary between a mean monthly maximum of 5°C in winter to 17.8°C in summer. However temperature extremes of 40.3°C to -10°C have been recorded in Bombala (Flood 1980:15). Strong winds and frosts occur frequently on the Monaro and these factors, together with cold air drainage, would have had an effect on Aboriginal exploitation and occupation of the area.

There has been considerable debate as to whether the so-called 'treeless plains' of the Monaro were a result of Aboriginal 'fire-stick' farming practices. Flood (1980:20) postulates that the absence of trees in these areas may be explained by climatic factors such as the combination of low temperature with low rainfall, the phenomenon of cold air drainage (which causes severe winter frosts), and the underlying basalt geology of the Monaro. Thus in prehistory, the vegetation of the Monaro was broadly similar to the vegetation which exists today, with scattered trees and grasslands. However, much of the original native grasslands have been replaced with introduced pasture grasses. The majority of the study area is vegetated with native and exotic grasses.

The study area lies within the Bombala River catchment. Saucy Creek to the west of the study area is a semi-permanent fourth order stream, flowing into the Bombala River approximately 1.4 kilometres north of the study area. Locally elevated and low gradient landforms adjacent to Saucy Creek are likely to have been targeted by Aboriginal people for activities such as camping.

3.5 Land-use history

Prior impacts in and around the study area can generally be classified as moderate to high. The land has been subject to vegetation clearance, *Pinus radiata* plantations, logging, fencing and grazing. Development of a softwood sawlog industry based on pine plantations was established in the Bombala region over marginal grazing lands and native forest in the region during the 1970's and 1980's (Keith and Bedward 1999: 7). Additionally, a 40 metre wide gas pipeline easement runs along the fence line on the eastern side of the block on which the study area is located.

The study area has been recently used for agistment of sheep and cattle. The presence of rabbits in and around the study area is evidenced by large rabbit warrens (Figure 3.2).

No original land surfaces are extant within this study area.



4. ABORIGINAL CULTURAL CONTEXT

4.1 Tribal Boundaries

The Bombala Sawmill expansion site is located within the area which according to Tindale (1974) was occupied by the Ngarigo people. However its proximity to the inferred boundary between the Ngarigo and the Ngunnawal people may indicate that the area was utilised by both tribal groups. Additionally, the Bidawal people, a coastal group whose homeland extended inland to the south of Bombala, may have also utilised the area (HO and DUAP 1996).

The Aborigines of the Monaro spoke the Ngarigo language (Tindale 1974, Eades 1976). Their territory extended over most of the Monaro Tablelands covering over 15,000 square kilometres. In the early 19th century, at the time of first European contact, the numbers of Ngarigo were estimated at around 500 to 600 (Helms 1895:388, Hancock 1972:67).

The Aboriginal population of the Monaro district quickly declined with the increase in the white population, and the disastrous effects of European diseases and alienation from tribal lands. An 1856 census indicated that 319 'most probably Bidawal' Aborigines were living in the Bombala area (NPWS 2003: 206). The last 'full blood' Aborigine is reported to have died in Cooma around 1916 (Cooma- Monaro Historic Society 1959:2 in Djekic 1982), although an Aboriginal population survives in the area today.

North of the Ngarigo territory was the land occupied by the Ngunnawal people, which included an area from the highlands west of Nerriga to just south of Queanbeyan. Early reliable direct observations of the Aborigines in this area are scarce. It is probable that a 'lack of sympathetic interest by the early settlers resulted in an irremediable paucity of information about the Aborigines' (Lea-Scarlett 1968:20). William Davis Wright (1895, 1923) collected much of the early information about the Ngunnawal Aborigines.

According to Wright, there were between 400 and 500 people in the 'tribe' still leading a nomadic life in 1850. Wright's 'tribe' was, however, probably a regional network grouping. Early commentators often confused bands or regional networks, which were more relevant to everyday life, with broad tribal groupings. Combined with other ethno-historic evidence, this lack of early sightings of Aborigines led Flood (1980) to suggest population density in the Canberra region and Southern Uplands was generally quite low (Kuskie 1989:11).

Similarly to the Ngarigo, the Ngunnawal population quickly declined with the increase in the white population. Nelly Hamilton, commonly known as 'Queen Nelly', the last of the people living a traditional lifestyle in the Canberra/Queanbeyan region, died on January 1st, 1897.

4.2 Aboriginal Consultation

The Bombala Sawmill expansion area was surveyed and assessed by the Eden Local Aboriginal Council (ELALC) on the 21st of August 2009. The ELALC recorded one Aboriginal site, an artefact scatter, during this survey. A copy of their report has been attached in Appendix 2.

The Aboriginal heritage assessment conducted by the Eden LALC did not fulfil the OEH requirements. Subsequently an indigenous cultural heritage assessment, as defined in the Part 3A project approval for the Bombala Sawmill expansion, was required for the Bombala Sawmill expansion. (This current report documents that assessment).

The NSW OEH *Interim Guidelines for Community Consultation for Proponents 2005* (NSW DEC 2005) were implemented for this project.



Letters were sent (20 April 2011) to the following organisations, providing notification of the assessment, and seeking registrations of interest, and the names of other persons or organisations who may have an interest in the project:

- Edén Local Aboriginal Land Council (ELALC);
- Office of the Registrar Aboriginal Land Rights Act 1983;
- Native Title Services (NSW);
- Bombala Shire Council; and
- Office of Environment and Heritage (NSW).

The closing date for expressions of interest in response to the 20 April 2011 letters was 5 May, 2011.

No responses to the letters or registrations of interest were received by close of registration.

In a letter from OEH, dated 4 May 2011, and received 6 May 2011, the OEH advised that their Office did not have any known Aboriginal parties listed for the Bombala local government area. As a consequence of there being no additional identifications of potential interested Aboriginal persons or groups from the first round of letter correspondence, no additional letters were sent.

A media notice seeking expressions of interest in the Aboriginal consultation program for the assessment was placed in the Bombala Times on the 4 May 2011 (refer Appendix 3). The closing date for expressions of interest was the 19 May 2011.

No responses to the media notice were received.

As part of a phone conversation with Mr Bobby Marr of the Edén Local Aboriginal Land Council (ELALC) on the 9 June 2011, the ELALC formally registered their interest in the project and requested that a copy of the report be provided to them with an opportunity to provide comment (phone conversation between Mr Kelvin Officer NOHC and Mr Bobby Marr ELALC).

A draft copy of this report, accompanied by an invitation to provide comments, was provided via email to the Edén LALC, no response was received.

Aboriginal Field Participation

The Bombala Sawmill expansion site falls within the boundaries of the Edén Local Aboriginal Land Council.

No responses were received as a result of the consultation process outlined above prior to the field survey of the study area.

No Aboriginal representatives participated in the field survey, however, ELALC representatives have previously surveyed the development site and presented a report of their findings (ELALC 2009) (refer Appendix 2).

4.3 Cultural Knowledge and Values

During their inspection of the development area on the 21 August 2009, the ELALC identified one artefact scatter at 696633E 5910472N. The ELALC found the proposed development area, being close to a permanent water source, to have very high potential for other Aboriginal sites, such as burials and artefact scatters.

They identified the presence of other registered Aboriginal sites within a one kilometre radius of the proposed development as further evidence of the high potential of the site (ELALC 2009).



5. ARCHAEOLOGICAL CONTEXT

5.1 Previous Archaeological Research

A number of archaeological surveys have been conducted in the region around the Bombala Sawmill expansion study area. These surveys provide a regional context for the study area.

Research into the prehistory of the wider region around the Bombala Sawmill study area has been carried out over a number of years. Studies have been conducted within an academic research framework (theses by Flood 1980, Stone 1985, Walkington 1986, Comber 1989, Kuskie 1989 and Grinbergs 1992), in a landscape management context (NOHC 1999) and in a commercial cultural management context. The latter includes surveys and investigations for the Eastern Gas Pipeline, the Welcome Reef Dam, various State Forests, telecommunication cables, electricity transmission line easements, sand, gravel and peat extraction areas and sewerage augmentation programs.

Flood's pioneering work of 1973, later published in 1980, presented an overview of the state of knowledge concerning the highland Aboriginal culture at that time. Flood (1980) listed a number of factors which may be responsible for the location of Aboriginal campsites and argued for a settlement pattern which focused on riverine corridors. Flood (1980:158-168) concluded that sites were generally located on well-drained and elevated ground within one hundred metres of a water source, but rarely at the water's edge.

Flood noted that there were 'few sites on the treeless parts of the tablelands' and that only a few of the numerous small Monaro Lakes exhibited evidence of Aboriginal occupation (1980:181). Flood (1980:181) concluded that the treeless plains were in fact 'an unfavourable environment for Aborigines' due to the harsh climatic conditions, restricted availability of water and relative paucity of food resources.

North of Cooma, Paton (1985) located fourteen surface scatters of artefacts, one stone quarry and six isolated artefacts during a survey of the No. 2 Cooma to Royalla 132 kV transmission line route. Seven of the artefact scatters were located on high spurs overlooking the Numeralla River. Paton (1985) concluded that river valleys generally, though not necessarily including the actual river bed and banks, have a high archaeological potential. Paton (1985) also suggested that micro-regional variations in the archaeology of the southern tablelands are responsible for sites being located on low ground and immediately adjacent to creeks.

Studies conducted by Australian National University students in the Numeralla River valley north of Bombala have suggested that high site densities and dense artefact concentrations can be expected to occur in close proximity to the major fluvial corridors of the Monaro (Ian Farrington pers.comm.).

Comber (1989) investigated a number of stone quarries on the Southern Tablelands between Bredbo and Rock Flat, Chakola and Springs Downs. Ordovician chert was quarried at the sites and the material was transported away in blocks (blade blanks), which were then fashioned into tools (J. Comber pers. comm.). Comber's (1989) research identified differing intensities of quarry exploitation and a local distribution of transported material.

In August, 1991, an Aboriginal burial comprising two individuals and significant grave goods was found in an alluvial terrace north-east of Bunyan. This burial is the first of its kind to be archaeologically recorded within a terrace context in the northern Monaro (Feary and Pardoe 1992). Skeletal material was dated to around 6000 years BP (Before Present) and was located within a terrace of fine black sediments, estimated to date to a period between 10,000-2,000 years ago. Grave goods included 327 pierced teeth from Eastern Grey, Red Neck and Swamp Wallabies and 450 grams of red ochre. Stone artefacts such as hammerstones, and bone implements were also associated with the site (Cohen 1993).

The 1995 survey for the Eastern Gas Pipeline travelled through the Monaro Tablelands, traversing the watershed between the Snowy and Murrumbidgee Rivers, crossing the Bombala River to the west of the Bombala township. The survey between the New South Wales Border and Hoskinstown recorded one hundred and one archaeological sites. The survey recorded four artefact scatters



(Bombala River 1 and 2; Parsonage Creek 1 and Saucy Creek Bombala), and two isolated finds (Bombala River 3 and 4) (Kuskie, Navin & Officer 1995) in close proximity to the Bombala Sawmill expansion site.

5.2 AHIMS Search Results

No previously recorded Aboriginal sites are listed on the OEH AHIMS within the proposed Bombala Sawmill expansion study area (Figure 5.1).

Twelve Aboriginal recordings are listed on the OEH AHIMS for the area around the Bombala Sawmill study area within the following (MGA/GDA) map grid references: 692881.5906628 – 700473.5913857 (Figure 5.2).

All twelve sites recorded on the AHIMS register are open artefact sites, found in close proximity to creeks or rivers.

Table 5.1 Inventory of Recorded Aboriginal Sites

SITE NO.	SITE NAME	RECORDING TYPE	AMG REFERENCE
62-5-0028	EGP 2-96; Bombala River 2	artefact	697160.591198
62-5-0131	Parsonage Creek 1	artefact r	698480.5907400
62-5-0220	Biddamurra SU1/L1 2	artefact	700342.5911790
62-5-0029	EGP 2-97; Bombala River 3	artefact	698570.5914750
62-5-0144	Gerrahween Site 2	artefact	698097.5908031
62-5-0219	Biddamurra SU1/L1	artefact	700342.5911790
62-5-0143	Gerrahween Site 2	artefact	697952.5908041
62-5-0027	EGP 2 -95; Bombala River 1	artefact	696900.5911500
62-5-0130	Parsonage Creek 2	artefact	697920.5908750
62-5-0013	EGP2 12; Saucy Creek	artefact	696100.5906100
62-5-0026	EGP 2-94; Parsonage Creek 1	artefact	696900.5910670
62-5-0001	Bombala	artefact	699000.5912600

A copy of the AHIMS search is provided in Appendix 1.

5.3 Predictive Model

The most common Aboriginal site type present in the Monaro and Southern Tablelands landscape is the open artefact scatter, which may occur almost anywhere that Aborigines have travelled and may be associated with hunting or gathering activities, domestic camps, or the manufacture and maintenance of stone tools. The density of artefacts represented in these scatters can vary dramatically. Previous survey results suggest that artefact scatters are most likely to be located on well-drained and locally elevated ground adjacent to permanent water sources. High site densities and relatively dense artefact concentrations can be expected in close proximity to the major fluvial corridors and lake basins of the Monaro. Elevated sand bodies within valley floor contexts are a landscape element with high potential.



Isolated finds, generally defined as a single stone artefact which occurs without any associated evidence of Aboriginal occupation within a radius of 60 metres, are also a common site type in the Monaro. Isolated finds may be indicative of: random loss or deliberate discard of a single artefact, the remnant of a now dispersed and disturbed artefact scatter, or an otherwise obscured or subsurface artefact scatter. Except in the case of the latter, isolated finds are considered to be constituent components of the *background scatter* of Aboriginal artefacts present within any particular landform.

Lithic quarry and procurement sites, together with associated flaking floors, may occur wherever rock types, suitable for stone tool manufacture, are exposed. Typically these sites involve the extraction of siliceous rock types for the manufacture of artefacts. Several quarry sites have been recorded in the Monaro and adjacent regions.

The location of the proposed Bombala Sawmill expansion site in the gentle undulating hills of the Monaro Plain within close proximity to semi-permanent and permanent water sources may have provided both effective travel routes between the adjacent river corridors - the Murrumbidgee to the northeast and the Snowy River to the west - and corridors to exploit the resources of coastal south-eastern New South Wales. Previous archaeological surveys across the Bombala region suggest the following archaeological attributes and site location parameters for the study area:

- Artefact scatters are the most common site type and generally contain low numbers of artefacts and are found in low densities.
- The most important site location determinants appear to be the following (both singly and in combination): level or near level ground, well drained and locally elevated ground, proximity to permanent water, and location on a major watershed.
- Crest topographies on major watersheds which offer an effective through-access route across rugged and incised terrain do appear to have a higher site incidence than lesser order crest-line topographies.
- Site location trends toward mid-valley slope contexts may be indicative of avoidance of cold air drainage.
- Wetland margins are a focus for Aboriginal occupation.

As discussed in Section 4, the study area was most likely used for sporadic activities such as moving through country, hunting and gathering. These activities are most likely to result in low to moderate densities of stone artefacts. Other site types such as scarred trees have low potential to be identified due to the deforestation and treeless quality of the Monaro tablelands.



Figure 5.1 AHIMS search result for immediate area around and including the Bombala Sawmill expansion site (outlined in red); location of ELALC site shown;
(Base image provided by Google Earth Pro)

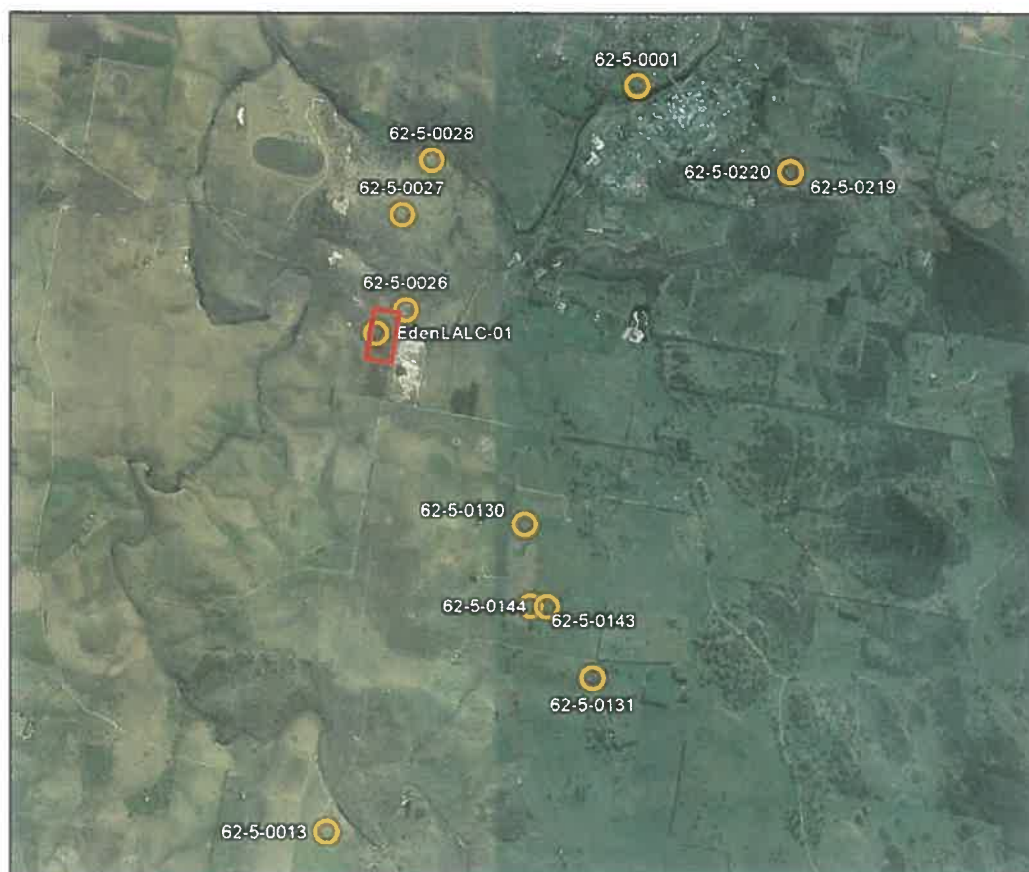


Figure 5.2 AHIMS search result (5 kilometre radius of the proposed Bombala Sawmill expansion site - outlined in red) (Base image provided by Google Earth Pro)



6. RESULTS

6.1 Summary

- No previously recorded Aboriginal sites are registered in the AHIMS within the Bombala Sawmill expansion study area;
- One previously recorded site, an open artefact scatter, was located within the study area by the Eden Local Aboriginal Land Council on the 21st August 2009 (ELALC 2009, refer Appendix 2). The recorded site location was 696633E 5910472N. The visibility of the proposed development area was noted to be around 45%.

Despite extensive inspection of the reported location, the ELALC recorded site could not be relocated during the NOHC survey in May 2011. The reported located was not assessed as having archaeological potential.

- No Aboriginal sites were identified during the course of the present study.
- Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

6.2 Survey Coverage and Visibility Variables

The effectiveness of archaeological field survey is to a large degree related to the obtrusiveness of the sites being looked for and the incidence and quality of ground surface visibility. Visibility variables were estimated for all areas of comprehensive survey within the study area. These estimates provide a measure with which to gauge the effectiveness of the survey and level of sampling conducted. They can also be used to gauge the number and type of sites that may not have been detected by the survey.

Ground surface visibility is a measure of the bare ground visible to the archaeologist during the survey. There are two main variables used to assess ground surface visibility, the frequency of exposure encountered by the surveyor and the quality of visibility within those exposures. The predominant factors affecting the quality of ground surface visibility within an exposure are the extent of vegetation and ground litter, the depth and origin of exposure, the extent of recent sedimentary deposition, and the level of visual interference from surface gravels. Two variables of ground surface visibility were estimated during the survey:

- A percentage estimate of the total area of ground inspected which contained useable exposures of bare ground; and
- A percentage estimate of the average levels of ground surface visibility within those exposures. This is a net estimate and accounts for all impacting visual and physical variables including the archaeological potential of the sediment or rock exposed.

The obtrusiveness of different site types is also an important factor in assessing the impact of visibility levels.

6.3 Survey coverage analysis

The Bombala Sawmill expansion study area was divided into two survey units comprising two types of landform; knoll crest and simple slope. Exposure incidence was relatively uniform across the study area, averaging between 30% and 40% across all survey units (Table 7.1). Ground visibility within these exposures varied between 50% and 70%. High levels of visibility occurred within the knoll crest survey unit, and the southern portion within the simple slope. Lowest levels of visibility were encountered within the northern portion of the simple slope.



Taking into account survey coverage, archaeologically useable exposures, and visibility variables, the effective survey coverage (ESC) averaged 21.5%, varying from 15% to 28% between landforms.

Overall, due to the low effective survey coverage there has been a reliance on the predictive model (section 5.3) to identify likely site locations. The Bombala Sawmill expansion study area was most likely used for sporadic activities such as moving through country, hunting and gathering and not for longer term occupation.

Table 6.1 Survey Coverage Data

Survey Unit	Landform	Survey Unit Area (sq m)	Exposure %	Visibility %	Effective Coverage Area (sq m)	Effective Coverage %
SU1	Knoll crest	15,000	40	70	4,200	28.0
SU2	Simple slope	94,250	30	50	14,137.5	15.0
Totals		109,250			18337.5	21.5

Table 6.2 Landform summary

Landform	Landform Area (sq m)	Area Effectively Surveyed (sq m)	% Of Landform Effectively Surveyed	Number of Sites	Number Of Artefacts Or Features
Knoll crest	15,000	4,200	28.0	0	0
Simple slope	109,250	14,137.5	15.0	0	0
Totals	76,150	18,337.5	21.5	0	0



7. MANAGEMENT CONSIDERATIONS

7.1 Management Considerations

No Aboriginal archaeological sites have been identified within the Bombala Sawmill expansion site during the course of this study. The potential for undetected archaeological material is low due to the high levels of disturbance that have already occurred within the study area.

The Eden Local Aboriginal Land Council previously identified one site within the study area. This site has not been registered with AHIMS, and could not be re-found during the course of this study.

Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

ELALC have recommended that either monitoring or salvage of the site be undertaken during any earthworks at the site (ELALC 2009). There is no archaeological basis for either salvage or monitoring at this site, however, it is recommended that the proponent consider ELALC's request.

Further, protocols have been established to manage any unanticipated discoveries.

7.2 Recommendations

It is recommended that:

1. No further cultural heritage assessment is required for the Bombala Sawmill expansion project.
2. Any unanticipated discoveries of Aboriginal cultural material (such as items or features which fall outside of the scope of the current significance assessment), should be managed according to the unanticipated discovery protocols presented in Section 7.3 of this report.
3. Fifth Estate may consider the ELALC's request for monitoring during the earthworks stage of development.
4. A copy of this report should be provided to the ELALC for their comment.

7.3 Unanticipated Discovery Protocols

7.3.1 Protocol to be followed in the event that previously unrecorded or unanticipated Aboriginal or non Aboriginal archaeological material (objects, artefacts, deposits or relics) are encountered

1. All ground surface disturbance in the area of the finds should cease immediately the finds are uncovered.
 - a. The discoverer of the find(s) will notify machinery operators in the immediate vicinity of the find(s) so that work can be halted; and
 - b. The site supervisor and the development proponent will be informed of the find(s).
2. If there is substantial doubt regarding a human or Aboriginal or historical European origin for the finds, then consider if it is possible to gain a qualified opinion (such as from the project archaeologist) within a short period of time. If feasible, gain a qualified opinion (this can circumvent proceeding further along the protocol for remains which turn out not to be archaeological). If a quick opinion cannot be gained, or the identification is positive, then proceed to the next step.
3. Immediately notify the following authorities or personnel of the discovery:



- a. The Heritage Branch of the Department of Planning ;
 - b. An archaeologist or Aboriginal Heritage Officer from the Office of the Environment and Heritage (OEH), Environment Protection and Regulation Group, Southern Branch (02 62297177, or call the OEH Environment Line: 131555 (excluding mobiles), or 02 99955555);
 - c. Representative(s) from the registered Aboriginal stakeholders (as appropriate); and
 - d. The project archaeologist (if not already present).
4. Facilitate, in co-operation with the appropriate authorities and stakeholders:
- a. The recording and assessment of the finds. This will include determining if the find(s) are from a new or previously recorded site, and lodgement of an OEH site card for all new recordings;
 - b. Fulfilling any legal constraints arising from the find(s). This will include complying with OEH directions, and HMP requirements in the case of a previously recorded site; and
 - c. The development and conduct of appropriate management strategies. Strategies will depend on stakeholder requirements and the assessed significance of the find(s).
5. Where the management of find(s) involves the salvage excavation or collection of artefacts, this material will be curated according to the provisions of any relevant CMP, or as directed by OEH.
6. Where the find(s) are determined to have cultural heritage value according to the criteria specified in the *Heritage Act 2004*, any re-commencement of construction related ground surface disturbance may only resume in the area of the find(s) following compliance with any consequential legal requirements and gaining written approval from OEH.

7.3.2 Protocol to be followed in the event of that suspected human remains are encountered

1. All ground surface disturbance in the area of the finds should cease immediately the finds are uncovered.
 - a. The discoverer of the find(s) will notify machinery operators in the immediate vicinity of the find(s) so that work can be temporarily halted; and
 - b. The site supervisor and Tasco will be informed of the find(s).
2. If there is substantial doubt regarding a human origin for the remains, then consider if it is possible to gain a qualified opinion within a short period of time. If feasible, gain a qualified opinion (this can circumvent proceeding further along the protocol for remains which turn out to be non-human). If conducted, this opinion must be gained without further disturbance to any remaining skeletal material and its context (Be aware that the site may be considered a crime scene containing forensic). If a quick opinion cannot be gained, or the identification is positive, then proceed to the next step.
3. Immediately notify the following people of the discovery:
 - a) The local Police (this is required by law);
 - b) Department of Planning



- c) An archaeologist or Aboriginal Heritage Officer from the Office of the Environment and Heritage (OEH), Environment Protection and Regulation Group, Southern Branch (02 62297177, or call the OEH Environment Line: 131555 (excluding mobiles), or 02 99955555);
 - d) An archaeologist or appropriate staff member from the Heritage Branch, Office of the Environment and Heritage (OEH) (02 98738500);
 - e) Representative(s) from the registered Aboriginal stakeholders (as appropriate); and
 - f) The project archaeologist (if not already present).
4. Facilitate the evaluation of the find(s) by the statutory authorities and comply with any stated requirements. Depending on the evaluation of the find(s), the management of the find(s) and their location may become a matter for the Police and/or Coroner.
 5. Construction related works in the area of the find(s) may not resume until the proponent receives written approval from the relevant statutory authority: from the Police or Coroner in the event of an investigation, or from OEH in the case of Aboriginal or Non-Aboriginal remains outside of the jurisdiction of the Police or Coroner.

In the event that the proponent continues an active role in the evaluation and/or management of the find(s), via a direction or advice from the Police, Coroner and/or Heritage Council, then all or some of the following steps *may* be conducted:

6. Facilitate, in co-operation with the appropriate authorities, the definitive identification of the skeletal material by a specialist (if not already completed). This must be done with as little further disturbance to any remaining skeletal material and its context as possible.
7. If the specialist identifies the remains as non-human then, where appropriate, the protocol for the discovery of Non-Aboriginal or Aboriginal artefacts should be followed.
8. If the specialist determines that the remains are human, then the proceeding course of action may be of three types:
 - a. The remains are of an Aboriginal or non-Aboriginal person who died less than 100 years ago. All further decisions and responsibilities regarding the remains and find location rest with the Police and/or the State Coroner.
 - b. The remains are of a non-Aboriginal person who died more than 100 years ago. In this case, and where the Police have indicated that they have no interest in the find(s), the following steps may be followed:
 - i. Ascertain the requirements of the Heritage Branch (OEH), the proponent, the project archaeologist, and the views of any relevant community stakeholders;
 - ii. Based on the above, determine and conduct an appropriate course of action. Possible strategies could include one or more of the following:
 1. Avoiding further disturbance to the find and conserving the remains in situ (this option may require relocating the development and this may not be possible in some contexts);
 2. Conducting (or continuing) archaeological salvage of the finds following receipt of any required statutory approvals;
 3. Scientific description (including excavation where necessary), and possibly also analysis of the remains prior to reburial;
 4. Recovering samples for dating and other analyses; and/or
 5. Subsequent reburial at another place and in an appropriate manner determined by the Heritage Council and in consultation with other relevant stakeholders.



- c. The remains are of an Aboriginal person who died more than 100 years ago. In this case the following steps may be followed:
 - i. Ascertain the requirements of the relevant Aboriginal stakeholders, the OEH, the proponent, and the project archaeologist;
 - ii. Based on the above, determine and conduct an appropriate course of action. Possible strategies could include one or more of the following:
 - 1. Avoiding further disturbance to the find and conserving the remains in situ, (this option may require relocating the development and this may not be possible in some contexts);
 - 2. Conducting (or continuing) archaeological salvage of the finds following receipt of any required statutory approvals;
 - 3. Scientific description (including excavation where necessary), and possibly also analysis of the remains prior to reburial;
 - 4. Recovering samples for dating and other analyses; and/or
 - 5. Subsequent reburial at another place and in an appropriate manner determined by the Aboriginal stakeholders and the OEH.



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APPENDIX 1

AHIMS HERITAGE REGISTER SEARCH RESULTS



SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site features	SiteType	Remarks
62-5-0026	EGP 2.96 Bombala River 2, Eastern Gas Pipeline	A CD	55	697160	5911980	Open site	Artefact	Open Camp Site	
62-5-0131	<u>Contact</u> Parrington Creek 1	Recorder	55	698480	5907400	Open site	Artefact	<u>Permit</u>	
62-5-0120	<u>Contact</u> Bombala SUE 1 2	CD A	55	700342	5911790	Open site	Artefact	<u>Permit</u>	
62-5-0029	<u>Contact</u> EGP 2.97 Bombala River 3, Eastern Gas Pipeline	Recorder	55	698560	5914750	Open site	Artefact	<u>Permit</u> Open Camp Site	
62-5-0144	<u>Contact</u> Cerralween Site 2	Recorder	55	698997	5908031	Open site	Artefact	<u>Permit</u>	99419
62-5-0219	<u>Contact</u> Bombala SUE 1	CD A	55	700342	5911790	Open site	Artefact	<u>Permit</u>	
62-5-0143	<u>Contact</u> Cerralween Site 1	Recorder	55	697952	5908041	Open site	Artefact	<u>Permit</u>	99419
62-5-0027	<u>Contact</u> EGP 2.95 Bombala River 1, Eastern Gas Pipeline	Recorder	55	699000	5911500	Open site	Artefact	<u>Permit</u> Open Camp Site	
62-5-0130	<u>Contact</u> Parrington Creek 2	Recorder	55	697920	5908730	Open site	Artefact	<u>Permit</u>	
62-5-0013	<u>Contact</u> EGP 2.12 Saucy Creek Bombala, Eastern Gas Pipeline	Recorder	55	696100	5906100	Open site	Artefact	<u>Permit</u> Open Camp Site	
62-5-0026	<u>Contact</u> EGP 2.94 Parrington Creek 1, Eastern Gas Pipeline	Recorder	55	696900	5910670	Open site	Artefact	<u>Permit</u> Open Camp Site	
62-5-0001	<u>Contact</u> Bombala	Recorder	55	699000	5912600	Open site	Artefact	<u>Permit</u> Open Camp Site	

Report generated by AHIMS Web Service on 23/05/2011 for Rebecca Parker for LAL Long Form : -36,9667, 149,1667 - Lat, Long To : -36,9, 149,25 with a Buffer of 1000 meters. Additional Info : In a part 3A project approval assessment. Number of Aboriginal sites and Aboriginal objects found is 12

This information is not guaranteed to be free from error or omission. The Department of Environment, Climate Change & Water (NSW) and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.





APPENDIX 2

EDEN LALC ABORIGINAL ASSESSMENT



Eden Local Aboriginal

M.B.G. Keeping Place
Jigamy Farm

Ph: 02 - 6495 7177
Fax: 02 - 6495 7433

PO Box 199
Eden NSW 2551

25 August 2009

Julia Beck
Project coordinator
Assist Estate
GPO BOX 5494
Sydney NSW 2001

Dear Julia

RE: Willmotts NAMU Project-Phase 2

Eden Local Aboriginal Land Council have been consulted with and have carried out an Aboriginal heritage assessment on 21/08/09. Field work was carried out by Ben Cruse and myself Laurence Bamblett.

The proposed development was walked from the southern to the northern boundary and back and so on. The results of the survey were that there was one artefact scatter located at 696633E 5910472N. The visibility of the proposed development area was around 45%.

Eden LALC find the proposed development area, being close to a permanent water source, to have very high potential for other Aboriginal sites such as burials and artefact scatters. There are already a number of registered Aboriginal sites within a 1 kilometre radius of the proposed development.

Recommendations

Due to the above findings and the landscape in which the proposed development lies, Eden LALC recommends:

- That if the development is proposed to go ahead, a Section 90 application will need to be applied for through the Department of Environment and Climate Change (NPWS) Heritage Division.

**Option 1:**

- Due to the size and permanency of the proposed development, Eden LALC would need to monitor and salvage any potential artefacts which may be exposed during any earthworks.

Option 2:

- If monitoring and salvage cannot take place for any particular reason, further studies will be required and an Archaeologist will need to be engaged, and a Section 87 permit will need to be applied for to eliminate the potential of any Aboriginal sub-surface sites being destroyed.

If you require any further information in relation to the above, please don't hesitate to contact this office on the above numbers.

Yours sincerely

Laurence Bamblett
Sites Officer



APPENDIX 3

PUBLIC NOTICE & LETTERS



ABORIGINAL HERITAGE ASSESSMENT

Navin Officer Heritage Consultants Pty Ltd has been commissioned by Fifth Element to prepare an *Aboriginal Cultural Heritage Management Plan* in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill Expansion

We are implementing the NSW Office of Environment and Heritage 2005 *Interim Community Consultation Requirements for Applicants* for this project.

We invite Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of objects and places in the Bombala area, to register an interest in a process of community consultation.

Please forward expressions of interest to:

The Secretary
Navin Officer Heritage Consultants Pty Ltd
4/71 Leichhardt Street
Kingston ACT 2604

or

navinofficer@nohc.com.au

The closing date for this registration of interest is 19 May 2011

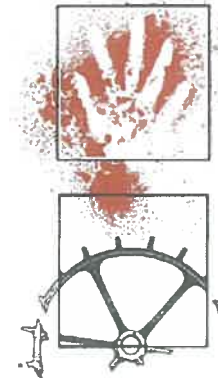


Example of 20 April 2011 consultation correspondence:

20 April 2011

The Secretary
Eden Local Aboriginal Land Council
PO Box 199
EDEN NSW 2551

Our Reference: BSM2011



**Navin
Officer**

*heritage
consultants
pty ltd*

abn. 28 092 901 605

Dear Sir/Madam,

Re: Willmott Timbers – Sawmill Expansion – Bombala, NSW

Navin Officer Heritage Consultants Pty Ltd has been commissioned by Fifth Element to prepare an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill Expansion (please see attached map).

As this is a Part 3A project we are required to implement the Office of Environment and Heritage's (formerly the Department of Environment, Climate Change and Water) *Interim Community Consultation Requirements for Applicants* for this project. I am therefore writing to inform you of this development and invite registration as an interested group.

The closing date for this registration of interest is Thursday May 5, 2011.

Please respond in writing to:

The Secretary
Navin Officer Heritage Consultants Pty Ltd
4/71 Leichhardt Street
KINGSTON ACT 2604

or by fax to, (02) 6282 9415

We look forward to working with the Land Council on this project.

Yours faithfully,

Kerry Navin

(Ms) Kerry Navin

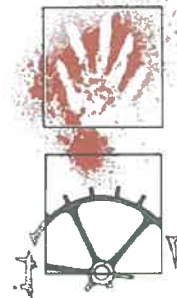
Number 4 Kingston Warehouse
71 Leichhardt St Kingston ACT 2604
ph 02 6282 9415 fax 02 6282 9416 m 0419 296 868
navinofficer@navinofficer.com.au



Bombala Sawmill Expansion Bombala, NSW

Aboriginal Cultural Heritage Management Plan

August 2011



**Navin
Officer**

*heritage
consultants Pty Ltd*

acn: 092 901 605

Authors

*Sam Harper
Kerry Navin*

*Number 4
Kingston Warehouse
71 Leichhardt St.
Kingston ACT 2604*

LGA: *Bombala Council*

Client: *Fifth Estate*

Proponent *The Australian Sawmilling Company (Tasco)*

*ph 02 6282 9415
fx 02 6282 9416*

Report Register

The following register documents the development and issue of this document.

Issue No.	Notes/Description	Issue Date
v1	Draft for proponent comment	June 2011
v3	Draft following comments	June 2011
v4	Final draft	July 2011
V5	Final	August 2011

EXECUTIVE SUMMARY

Willmott Timbers Pty Ltd (Tasco) proposes to expand the Bombala Sawmill which is located on Sandy Lane, approximately 2 km southwest of the town of Bombala. This expansion will approximately double the footprint size of the mill, and introduce new processing technology.

Proposed actions associated with this project include: construction of additional facilities including a dry mill, treatment plant, green mill, and office building; paving of the new site with a combination of compacted hardstand gravel, concrete and bitumen/asphalt pavement; and development of wetlands.

This report documents the results of an Aboriginal cultural heritage assessment of the Bombala Sawmill expansion study area. The assessment included literature review, database searches, Aboriginal consultation and field inspection.

The report has been prepared as an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill expansion

The proposed Bombala Sawmill expansion will be assessed under:

- Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The study found that:

- No previously recorded Aboriginal sites are registered in the AHIMS within the Bombala Sawmill expansion study area;
- One previously recorded site, an open artefact scatter, was located within the study area by the Eden Local Aboriginal Land Council in August 2009.

This site could not be relocated during the NOHC survey in May 2011.

- No Aboriginal sites were identified during the course of the present study.
- Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

It is recommended that:

- No further cultural heritage assessment is required for the Bombala Sawmill expansion project.
- Fifth Estate may wish to consider the ELALC's request for monitoring during the earthworks stage of development.
- A draft copy of this report should be provided to the ELALC for their comment.

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1. INTRODUCTION

1.1 Project Description

Willmatt Timbers Pty Ltd (Tasco) proposes to expand the Bombala Sawmill located on Sandy Lane, approximately 2 km southwest of the town of Bombala. This expansion will approximately double the footprint size of the mill, and introduce new processing technology.

Proposed actions associated with this project include:

- Construction of additional facilities including a dry mill, treatment plant, green mill, and office building;
- Paving of the new site with a combination of compacted hardstand gravel, concrete and bitumen/asphalt pavement; and
- Development of wetlands.

This report documents the results of an Aboriginal cultural heritage assessment of the proposed Bombala Sawmill expansion site. The report has been prepared as an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill expansion.

The report was commissioned by Fifth Estate Pty Ltd.

1.2 Project Framework

The proposed sawmill expansion will be assessed under:

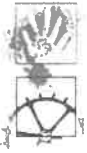
- Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A ACT).

1.3 This Report

1.3.1 Outline

This report:

- Describes the proposed development (Section 1);
- Describes the methodology employed in the study (Section 2);
- Describes the environmental setting of the study area (Section 3);
- Provides information relevant to the Aboriginal cultural context of the study area (Section 4);
- Provides a heritage context for the study area (Section 5);
- Describes the results of the data review, field survey and Aboriginal consultation program conducted in the context of the assessment (Section 6); and
- Provides management recommendations based on the results of the investigation (Section 7).



1.3.2 Copyright

Copyright to this report rests with Fifth Estate except for the following:

- The NOHC logo and business name (copyright to this rests with Navin Officer Heritage Consultants Pty Ltd);
- Generic content and formatting which is not specific to this project or its results (copyright to this material rests with Navin Officer Heritage Consultants Pty Ltd);
- Descriptive text and data relating to Aboriginal objects which must, by law, be provided to OEH for its purposes and use;
- Information which, under Australian law, can be identified as belonging to Indigenous intellectual property;
- Content which was sourced from and remains part of the public domain.

1.3.3 Restricted Information

Information in this report relating to the exact location of Aboriginal sites should not be published or promoted in the public domain.

1.3.4 Confidentiality

No information in this report has been classified as confidential.



Figure 1.1 Location of Bombala Sawmill expansion site
(figure supplied by Fifth Estate)

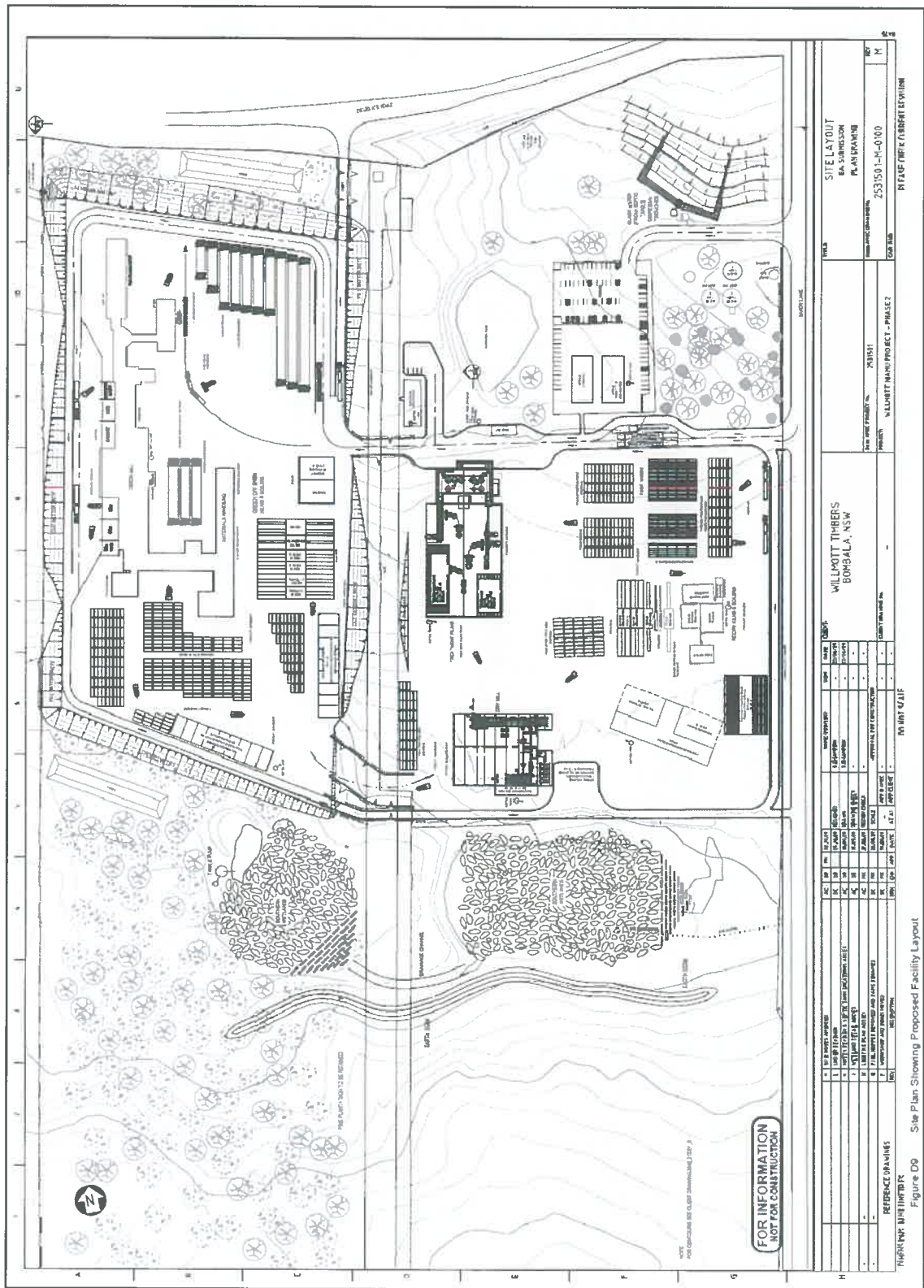
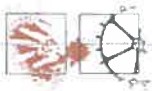


Figure 1.2 Proposed site layout of Bombala Sawmill expansion
(figure supplied by Fifth Estate)



2. STUDY METHODOLOGY

2.1 Contributors

An archaeological survey of the Bombala Sawmill expansion site was undertaken by archaeologist Sam Harper and Aboriginal Cultural Co-ordinator Glenda Hyde on May 26th, 2011. Sam has a Bachelor of Arts with Honours in Archaeology from the Australian National University and Glenda has a Certificate IV in Conservation and Land Management and Community Facilitation.

This report was prepared by Sam Harper and edited by Kerry Navin.

2.2 Literature and Database Review

A range of archaeological data was reviewed for the Bombala Sawmill expansion study area and its surrounds. This literature and data review was used to determine if known Aboriginal sites were located within the area under investigation, to facilitate site prediction on the basis of known regional and local site patterns, and to place the area within an archaeological and heritage management context.

Literature sources included the Aboriginal Heritage Information Management System (AHIMS) maintained by the NSW Office of Environment and Heritage (OEH, formerly DECCW) and associated files and catalogue of archaeological reports; and theses held in the library of the School of Archaeology and Anthropology, the Australian National University.

Searches were undertaken of the following statutory and non-statutory heritage registers and schedules:

- Statutory Listings:
 - : Aboriginal Heritage Information Management System (AHIMS) (NSW OEH);
 - : World Heritage List;
 - : The National Heritage List (Australian Heritage Council);
 - : The Commonwealth Heritage List (Australian Heritage Council);
 - : The Register of the National Estate (Australian Heritage Council);

2.3 Field Methodology

The field survey was undertaken on the 26th of May, 2011 on foot by two individuals walking approximately 5-10 m transects covering the area of the proposed expansion site, taking advantage of available ground exposure.

Information was recorded using a handheld Trimble Juno GPS, digital camera, and notebook.

2.4 Sampling Strategy

A full coverage survey was conducted of the Bombala Sawmill, dependent on visibility.

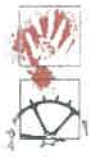
2.5 Consultation with Office of Environment and Heritage

Initial consultation with the OEH was conducted by phone in early April 2011 when advice was provided regarding background to the project, the required scope of the Aboriginal heritage assessment, and the application of the DEC 2005 consultation guidelines (phone conversation between Ms Kerry Navin NOHC and Ms Jackie Taylor, OEH, Environment Protection and Regulation Group (EPRG), Southern Branch, early April 2011).



As part of the first phase of the Aboriginal stakeholder consultation program, a postal letter was sent to the OEH, providing formal notification of the proposal, the associated heritage assessment, and seeking advice regarding OEH requirements and potential Aboriginal stakeholders which should be contacted (letter dated 20 April 2011). A letter of reply was received from Mr Dimitri Young (Acting Manager Landscape and Aboriginal Heritage Protection South, EPRG) dated 4 May 2011 (OEH reference DOC11/19764). In the letter the OEH noted that, following NOHC clarification by telephone, the OEH could advise that the Office did not have any known Aboriginal parties listed for the Bombala local government area. The Letter went on to advise that this response was not necessarily exhaustive for all interested Aboriginal parties. It was noted that there remained a requirement to advertise in local print media and to contact other parties seeking interested Aboriginal parties.

At the direction of the proponent, a copy of a draft of this report was provided to the OEH on the 7 July 2011, with an invitation to provide comment by 18 July 2011.



3. LANDSCAPE CONTEXT

3.1 Location

The proposed Bombala Sawmill expansion site is located approximately two kilometres southwest of Bombala, in south-eastern New South Wales. The study area falls within the South Eastern Highlands Biogeographic region, which encompasses the ranges and plateau of the Great Dividing Range and Monaro Tablelands. The study area is located in the upper Bombala River catchment in the Monaro Tablelands within the Snowy River Basin. The site is located approximately 700 m to the west of Saucy Creek, and approximately 1.4 km south of Bombala River. A minor tributary crosses the study area, flowing from a third order stream, which is a tributary Saucy Creek.

3.2 Landscape history, erosion and soils

The 1:250 000 Bega-Mallacoota geology map indicates that the rock profile within the study area is made up of Quaternary age alluvial and colluvial deposits. Surrounding the study area is a Kelvin Suite, comprised of Bombala tonalities (Jenkins 1993).

A gentle knoll in the centre of the study area has been heavily eroded and degraded (Figure 3.1). To the south of the knoll the study area slopes to a small gully with a third order tributary running east-west. This slope is also heavily eroded and degrading (Figure 3.2). The main forms of erosion within the study area are slope wash/sheet erosion and wind erosion in the more exposed areas such as saddles and crests.

The soil profile across the study area is dominated by silty sands with large gravels and alluvial cobbles. The northern end of the study area includes darker silty loam. The site vegetation is made up of mixed introduced grass species.



Figure 3.1 Eroded land surface on the knoll in the middle of the study area



Figure 3.2 Slope wash/sheet erosion and rabbit burrow - facing south

3.3 Landforms

The proposed Bombala Sawmill expansion site is marked by a gentle knoll, surrounded by low to moderate gradient basal slopes to the north and south. Landforms to the south include a small gully. The study area is located approximately 1.4 km south of Bombala River, and approximately 700 km west of Saucy Creek, a tributary of Bombala River. A third order stream enters the study area from the west, with minor tributaries branching off this within a gully landform.



A pine plantation is located at the southern end of the study area.

The region surrounding the study area comprises rolling hills and open plains. Extensive colluvial and fan slope deposits typify this landscape.

3.4 Natural resources and features

The Monaro Tableland lies in a rain shadow zone, with Bombala falling within the driest areas in the region (Keith and Bedward 1999). Most of the Monaro tablelands have an annual average precipitation of 535-635 mm, with an elongated area between Bombala and Queanbeyan being particularly arid (Flood 1980:15).

Temperature in these areas is closely related to altitude, with extreme monthly and daily temperature ranges not uncommon. At lower altitudes on the Monaro the diurnal range is less in summer and greater in winter. Temperatures in Bombala (elevation 705 m above sea level) vary between a mean monthly maximum of 5°C in winter to 17.8°C in summer. However temperature extremes of 40.3°C to -10°C have been recorded in Bombala (Flood 1980:15). Strong winds and frosts occur frequently on the Monaro and these factors, together with cold air drainage, would have had an effect on Aboriginal exploitation and occupation of the area.

There has been considerable debate as to whether the so-called 'treeless plains' of the Monaro were a result of Aboriginal 'fire-stick' farming practices. Flood (1980:20) postulates that the absence of trees in these areas may be explained by climatic factors such as the combination of low temperature with low rainfall, the phenomenon of cold air drainage (which causes severe winter frosts), and the underlying basalt geology of the Monaro. Thus in prehistory, the vegetation of the Monaro was broadly similar to the vegetation which exists today, with scattered trees and grasslands. However, much of the original native grasslands have been replaced with introduced pasture grasses. The majority of the study area is vegetated with native and exotic grasses.

The study area lies within the Bombala River catchment. Saucy Creek to the west of the study area is a semi-permanent fourth order stream, flowing into the Bombala River approximately 1.4 kilometres north of the study area. Locally elevated and low gradient landforms adjacent to Saucy Creek are likely to have been targeted by Aboriginal people for activities such as camping.

3.5 Land-use history

Prior impacts in and around the study area can generally be classified as moderate to high. The land has been subject to vegetation clearance, *Pinus radiata* plantations, logging, fencing and grazing. Development of a softwood sawlog industry based on pine plantations was established in the Bombala region over marginal grazing lands and native forest in the region during the 1970's and 1980's (Keith and Bedward 1999: 7). Additionally, a 40 metre wide gas pipeline easement runs along the fence line on the eastern side of the block on which the study area is located.

The study area has been recently used for agistment of sheep and cattle. The presence of rabbits in and around the study area is evidenced by large rabbit warrens (Figure 3.2).

No original land surfaces are extant within this study area.



4. ABORIGINAL CULTURAL CONTEXT

4.1 Tribal Boundaries

The Bombala Sawmill expansion site is located within the area which according to Tindale (1974) was occupied by the Ngarigo people. However its proximity to the inferred boundary between the Ngarigo and the Ngunnawal people may indicate that the area was utilised by both tribal groups. Additionally, the Bidawal people, a coastal group whose homeland extended inland to the south of Bombala, may have also utilised the area (HO and DUAP 1996).

The Aborigines of the Monaro spoke the Ngarigo language (Tindale 1974, Eades 1976). Their territory extended over most of the Monaro Tablelands covering over 15,000 square kilometres. In the early 19th century, at the time of first European contact, the numbers of Ngarigo were estimated at around 500 to 600 (Helms 1895:388, Hancock 1972:67).

The Aboriginal population of the Monaro district quickly declined with the increase in the white population, and the disastrous effects of European diseases and alienation from tribal lands. An 1856 census indicated that 319 'most probably Bidawal' Aborigines were living in the Bombala area (NPWS 2003: 206). The last 'full blood' Aborigine is reported to have died in Cooma around 1916 (Cooma- Monaro Historic Society 1959:2 in Djekic 1982), although an Aboriginal population survives in the area today.

North of the Ngarigo territory was the land occupied by the Ngunnawal people, which included an area from the highlands west of Nerriga to just south of Queanbeyan. Early reliable direct observations of the Aborigines in this area are scarce. It is probable that a 'lack of sympathetic interest by the early settlers resulted in an irremediable paucity of information about the Aborigines' (Lea-Scarlett 1968:20). William Davis Wright (1895, 1923) collected much of the early information about the Ngunnawal Aborigines.

According to Wright, there were between 400 and 500 people in the 'tribe' still leading a nomadic life in 1850. Wright's 'tribe' was, however, probably a regional network grouping. Early commentators often confused bands or regional networks, which were more relevant to everyday life, with broad tribal groupings. Combined with other ethno-historic evidence, this lack of early sightings of Aborigines led Flood (1980) to suggest population density in the Canberra region and Southern Uplands was generally quite low (Kuskie 1989:11).

Similarly to the Ngarigo, the Ngunnawal population quickly declined with the increase in the white population. Nelly Hamilton, commonly known as 'Queen Nelly', the last of the people living a traditional lifestyle in the Canberra/Queanbeyan region, died on January 1st, 1897.

4.2 Aboriginal Consultation

The Bombala Sawmill expansion area was surveyed and assessed by the Eden Local Aboriginal Council (ELALC) on the 21st of August 2009. The ELALC recorded one Aboriginal site, an artefact scatter, during this survey. A copy of their report has been attached in Appendix 2.

The Aboriginal heritage assessment conducted by the Eden LALC did not fulfil the OEH requirements. Subsequently an indigenous cultural heritage assessment, as defined in the Part 3A project approval for the Bombala Sawmill expansion, was required for the Bombala Sawmill expansion. (This current report documents that assessment).

The NSW OEH *Interim Guidelines for Community Consultation for Proponents 2005* (NSW DEC 2005) were implemented for this project.



Letters were sent (20 April 2011) to the following organisations, providing notification of the assessment, and seeking registrations of interest, and the names of other persons or organisations who may have an interest in the project:

- Eden Local Aboriginal Land Council (ELALC);
- Office of the Registrar Aboriginal Land Rights Act 1983;
- Native Title Services (NSW);
- Bombala Shire Council; and
- Office of Environment and Heritage (NSW).

The closing date for expressions of interest in response to the 20 April 2011 letters was 5 May, 2011.

No responses to the letters or registrations of interest were received by close of registration.

In a letter from OEH, dated 4 May 2011, and received 6 May 2011, the OEH advised that their Office did not have any known Aboriginal parties listed for the Bombala local government area. As a consequence of there being no additional identifications of potential interested Aboriginal persons or groups from the first round of letter correspondence, no additional letters were sent.

A media notice seeking expressions of interest in the Aboriginal consultation program for the assessment was placed in the Bombala Times on the 4 May 2011 (refer Appendix 3). The closing date for expressions of interest was the 19 May 2011.

No responses to the media notice were received.

As part of a phone conversation with Mr Bobby Marr of the Eden Local Aboriginal Land Council (ELALC) on the 9 June 2011, the ELALC formally registered their interest in the project and requested that a copy of the report be provided to them with an opportunity to provide comment (phone conversation between Mr Kelvin Officer NOHC and Mr Bobby Marr ELALC).

A draft copy of this report, accompanied by an invitation to provide comments, was provided via email to the Eden LALC, no response was received.

Aboriginal Field Participation

The Bombala Sawmill expansion site falls within the boundaries of the Eden Local Aboriginal Land Council.

No responses were received as a result of the consultation process outlined above prior to the field survey of the study area.

No Aboriginal representatives participated in the field survey, however, ELALC representatives have previously surveyed the development site and presented a report of their findings (ELALC 2009) (refer Appendix 2).

4.3 Cultural Knowledge and Values

During their inspection of the development area on the 21 August 2009, the ELALC identified one artefact scatter at 696633E 5910472N. The ELALC found the proposed development area, being close to a permanent water source, to have very high potential for other Aboriginal sites, such as burials and artefact scatters.

They identified the presence of other registered Aboriginal sites within a one kilometre radius of the proposed development as further evidence of the high potential of the site (ELALC 2009).



5. ARCHAEOLOGICAL CONTEXT

5.1 Previous Archaeological Research

A number of archaeological surveys have been conducted in the region around the Bombala Sawmill expansion study area. These surveys provide a regional context for the study area.

Research into the prehistory of the wider region around the Bombala Sawmill study area has been carried out over a number of years. Studies have been conducted within an academic research framework (theses by Flood 1980, Stone 1985, Walkington 1986, Comber 1989, Kuskie 1989 and Grinbergs 1992), in a landscape management context (NOHC 1999) and in a commercial cultural management context. The latter includes surveys and investigations for the Eastern Gas Pipeline, the Welcome Reef Dam, various State Forests, telecommunication cables, electricity transmission line easements, sand, gravel and peat extraction areas and sewerage augmentation programs.

Flood's pioneering work of 1973, later published in 1980, presented an overview of the state of knowledge concerning the highland Aboriginal culture at that time. Flood (1980) listed a number of factors which may be responsible for the location of Aboriginal campsites and argued for a settlement pattern which focused on riverine corridors. Flood (1980:158-168) concluded that sites were generally located on well-drained and elevated ground within one hundred metres of a water source, but rarely at the water's edge.

Flood noted that there were 'few sites on the treeless parts of the tablelands' and that only a few of the numerous small Monaro Lakes exhibited evidence of Aboriginal occupation (1980:181). Flood (1980:181) concluded that the treeless plains were in fact 'an unfavourable environment for Aborigines' due to the harsh climatic conditions, restricted availability of water and relative paucity of food resources.

North of Cooma, Paton (1985) located fourteen surface scatters of artefacts, one stone quarry and six isolated artefacts during a survey of the No. 2 Cooma to Royalla 132 kV transmission line route. Seven of the artefact scatters were located on high spurs overlooking the Numeralla River. Paton (1985) concluded that river valleys generally, though not necessarily including the actual river bed and banks, have a high archaeological potential. Paton (1985) also suggested that micro-regional variations in the archaeology of the southern tablelands are responsible for sites being located on low ground and immediately adjacent to creeks.

Studies conducted by Australian National University students in the Numeralla River valley north of Bombala have suggested that high site densities and dense artefact concentrations can be expected to occur in close proximity to the major fluvial corridors of the Monaro (Ian Farrington pers.comm).

Comber (1989) investigated a number of stone quarries on the Southern Tablelands between Bredbo and Rock Flat, Chakola and Springs Downs. Ordovician chert was quarried at the sites and the material was transported away in blocks (blade blanks), which were then fashioned into tools (J. Comber pers. comm.). Comber's (1989) research identified differing intensities of quarry exploitation and a local distribution of transported material.

In August, 1991, an Aboriginal burial comprising two individuals and significant grave goods was found in an alluvial terrace north-east of Bunyan. This burial is the first of its kind to be archaeologically recorded within a terrace context in the northern Monaro (Feary and Pardoe 1992). Skeletal material was dated to around 6000 years BP (Before Present) and was located within a terrace of fine black sediments, estimated to date to a period between 10,000-2,000 years ago. Grave goods included 327 pierced teeth from Eastern Grey, Red Neck and Swamp Wallabies and 450 grams of red ochre. Stone artefacts such as hammerstones, and bone implements were also associated with the site (Cohen 1993).

The 1995 survey for the Eastern Gas Pipeline travelled through the Monaro Tablelands, traversing the watershed between the Snowy and Murrumbidgee Rivers, crossing the Bombala River to the west of the Bombala township. The survey between the New South Wales Border and Hoskinstown recorded one hundred and one archaeological sites. The survey recorded four artefact scatters



(Bombala River 1 and 2; Parsonage Creek 1 and Saucy Creek Bombala), and two isolated finds (Bombala River 3 and 4) (Kuskie, Navin & Officer 1995) in close proximity to the Bombala Sawmill expansion site.

5.2 AHIMS Search Results

No previously recorded Aboriginal sites are listed on the OEH AHIMS within the proposed Bombala Sawmill expansion study area (Figure 5.1).

Twelve Aboriginal recordings are listed on the OEH AHIMS for the area around the Bombala Sawmill study area within the following (MGA/GDA) map grid references: 692881.5906628 – 700473.5913857 (Figure 5.2).

All twelve sites recorded on the AHIMS register are open artefact sites, found in close proximity to creeks or rivers.

Table 5.1 Inventory of Recorded Aboriginal Sites

SITE NO.	SITE NAME	RECORDING TYPE	AMG REFERENCE
62-5-0028	EGP 2-96; Bombala River 2	artefact	697160.591198
62-5-0131	Parsonage Creek 1	artefact r	698480.5907400
62-5-0220	Biddamurra SU1/L1 2	artefact	700342.5911790
62-5-0029	EGP 2-97; Bombala River 3	artefact	698570.5914750
62-5-0144	Gerrahween Site 2	artefact	698097.5908031
62-5-0219	Biddamurra SU1/L1	artefact	700342.5911790
62-5-0143	Gerrahween Site 2	artefact	697952.5908041
62-5-0027	EGP 2 -95; Bombala River 1	artefact	696900.5911500
62-5-0130	Parsonage Creek 2	artefact	697920.5908750
62-5-0013	EGP2 12; Saucy Creek	artefact	696100.5906100
62-5-0026	EGP 2-94; Parsonage Creek 1	artefact	696900.5910670
62-5-0001	Bombala	artefact	699000.5912600

A copy of the AHIMS search is provided in Appendix 1.

5.3 Predictive Model

The most common Aboriginal site type present in the Monaro and Southern Tablelands landscape is the open artefact scatter, which may occur almost anywhere that Aborigines have travelled and may be associated with hunting or gathering activities, domestic camps, or the manufacture and maintenance of stone tools. The density of artefacts represented in these scatters can vary dramatically. Previous survey results suggest that artefact scatters are most likely to be located on well-drained and locally elevated ground adjacent to permanent water sources. High site densities and relatively dense artefact concentrations can be expected in close proximity to the major fluvial corridors and lake basins of the Monaro. Elevated sand bodies within valley floor contexts are a landscape element with high potential.



Isolated finds, generally defined as a single stone artefact which occurs without any associated evidence of Aboriginal occupation within a radius of 60 metres, are also a common site type in the Monaro. Isolated finds may be indicative of: random loss or deliberate discard of a single artefact, the remnant of a now dispersed and disturbed artefact scatter, or an otherwise obscured or subsurface artefact scatter. Except in the case of the latter, isolated finds are considered to be constituent components of the *background scatter* of Aboriginal artefacts present within any particular landform.

Lithic quarry and procurement sites, together with associated flaking floors, may occur wherever rock types, suitable for stone tool manufacture, are exposed. Typically these sites involve the extraction of siliceous rock types for the manufacture of artefacts. Several quarry sites have been recorded in the Monaro and adjacent regions.

The location of the proposed Bombala Sawmill expansion site in the gentle undulating hills of the Monaro Plain within close proximity to semi-permanent and permanent water sources may have provided both effective travel routes between the adjacent river corridors - the Murrumbidgee to the northeast and the Snowy River to the west - and corridors to exploit the resources of coastal south-eastern New South Wales. Previous archaeological surveys across the Bombala region suggest the following archaeological attributes and site location parameters for the study area:

- Artefact scatters are the most common site type and generally contain low numbers of artefacts and are found in low densities.
- The most important site location determinants appear to be the following (both singly and in combination): level or near level ground, well drained and locally elevated ground, proximity to permanent water, and location on a major watershed.
- Crest topographies on major watersheds which offer an effective through-access route across rugged and incised terrain do appear to have a higher site incidence than lesser order crest-line topographies.
- Site location trends toward mid-valley slope contexts may be indicative of avoidance of cold air drainage.
- Wetland margins are a focus for Aboriginal occupation.

As discussed in Section 4, the study area was most likely used for sporadic activities such as moving through country, hunting and gathering. These activities are most likely to result in low to moderate densities of stone artefacts. Other site types such as scarred trees have low potential to be identified due to the deforestation and treeless quality of the Monaro tablelands.



Figure 5.1 AHIMS search result for immediate area around and including the Bombala Sawmill expansion site (outlined in red); location of ELALC site shown;
(Base image provided by Google Earth Pro)

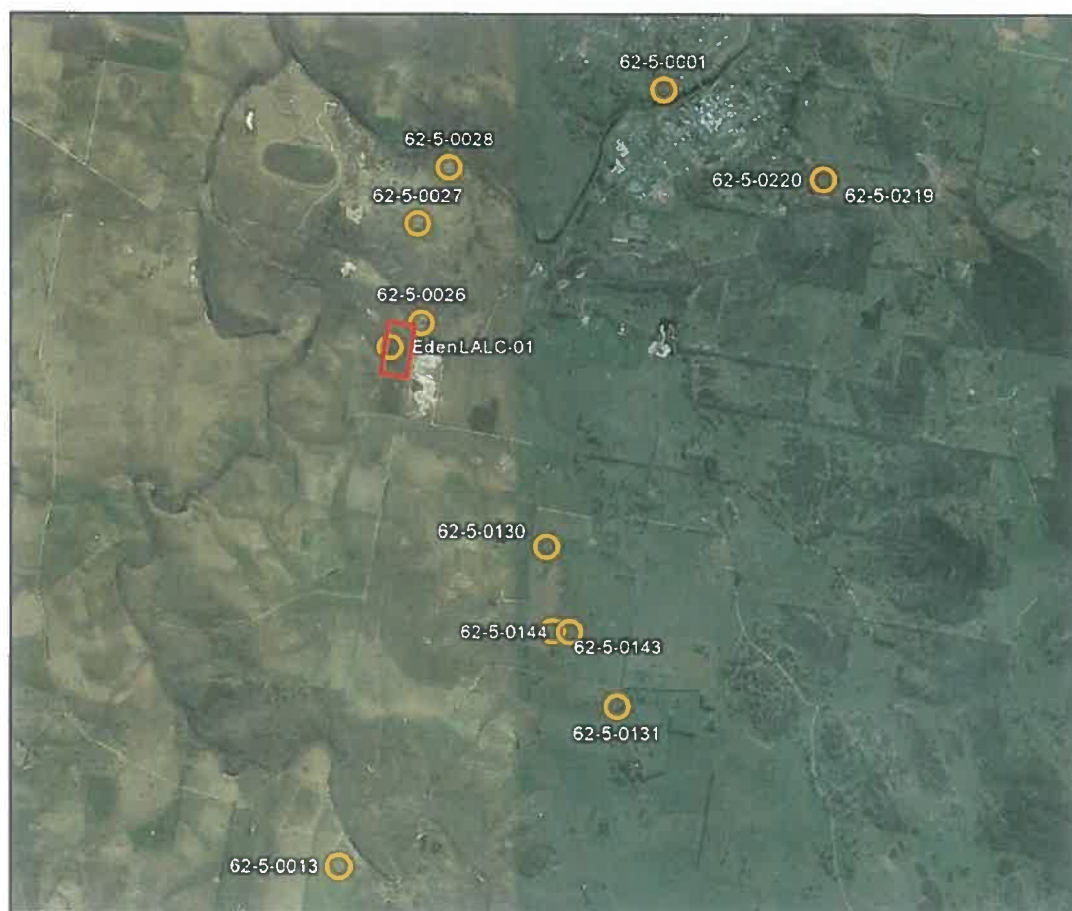
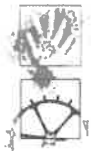


Figure 5.2 AHIMS search result (5 kilometre radius of the proposed Bombala Sawmill expansion site - outlined in red) (Base image provided by Google Earth Pro)



6. RESULTS

6.1 Summary

- No previously recorded Aboriginal sites are registered in the AHIMS within the Bombala Sawmill expansion study area;
- One previously recorded site, an open artefact scatter, was located within the study area by the Eden Local Aboriginal Land Council on the 21st August 2009 (ELALC 2009, refer Appendix 2). The recorded site location was 696633E 5910472N. The visibility of the proposed development area was noted to be around 45%.

Despite extensive inspection of the reported location, the ELALC recorded site could not be relocated during the NOHC survey in May 2011. The reported located was not assessed as having archaeological potential.

- No Aboriginal sites were identified during the course of the present study.
- Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

6.2 Survey Coverage and Visibility Variables

The effectiveness of archaeological field survey is to a large degree related to the obtrusiveness of the sites being looked for and the incidence and quality of ground surface visibility. Visibility variables were estimated for all areas of comprehensive survey within the study area. These estimates provide a measure with which to gauge the effectiveness of the survey and level of sampling conducted. They can also be used to gauge the number and type of sites that may not have been detected by the survey.

Ground surface visibility is a measure of the bare ground visible to the archaeologist during the survey. There are two main variables used to assess ground surface visibility, the frequency of exposure encountered by the surveyor and the quality of visibility within those exposures. The predominant factors affecting the quality of ground surface visibility within an exposure are the extent of vegetation and ground litter, the depth and origin of exposure, the extent of recent sedimentary deposition, and the level of visual interference from surface gravels. Two variables of ground surface visibility were estimated during the survey:

- A percentage estimate of the total area of ground inspected which contained useable exposures of bare ground; and
- A percentage estimate of the average levels of ground surface visibility within those exposures. This is a net estimate and accounts for all impacting visual and physical variables including the archaeological potential of the sediment or rock exposed.

The obtrusiveness of different site types is also an important factor in assessing the impact of visibility levels.

6.3 Survey coverage analysis

The Bombala Sawmill expansion study area was divided into two survey units comprising two types of landform; knoll crest and simple slope. Exposure incidence was relatively uniform across the study area, averaging between 30% and 40% across all survey units (Table 7.1), Ground visibility within these exposures varied between 50% and 70%. High levels of visibility occurred within the knoll crest survey unit, and the southern portion within the simple slope. Lowest levels of visibility were encountered within the northern portion of the simple slope.



Taking into account survey coverage, archaeologically useable exposures, and visibility variables, the effective survey coverage (ESC) averaged 21.5%, varying from 15% to 28% between landforms.

Overall, due to the low effective survey coverage there has been a reliance on the predictive model (section 5.3) to identify likely site locations. The Bombala Sawmill expansion study area was most likely used for sporadic activities such as moving through country, hunting and gathering and not for longer term occupation.

Table 6.1 Survey Coverage Data

Survey Unit	Landform	Survey Unit Area (sq m)	Exposure %	Visibility %	Effective Coverage Area (sq m)	Effective Coverage %
SU1	Knoll crest	15,000	40	70	4,200	28.0
SU2	Simple slope	94,250	30	50	14,137.5	15.0
Totals		109,250			18337.5	21.5

Table 6.2 Landform summary

Landform	Landform Area (sq m)	Area Effectively Surveyed (sq m)	% Of Landform Effectively Surveyed	Number of Sites	Number Of Artefacts Or Features
Knoll crest	15,000	4,200	28.0	0	0
Simple slope	109,250	14,137.5	15.0	0	0
Totals	76,150	18,337.5	21.5	0	0



7. CONCLUSIONS AND RECOMMENDATIONS

7.1 Impact Assessment

No Aboriginal archaeological sites have been identified within the Bombala Sawmill expansion site during the course of this study. The potential for undetected archaeological material is low due to the high levels of disturbance that have already occurred within the study area.

The Eden Local Aboriginal Land Council previously identified one site within the study area. This site has not been registered with AHIMS, and could not be re-found during the course of this study.

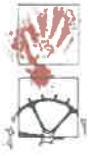
Based on predictive site location modelling for the region, and levels of ground surface disturbance within the study area, it is unlikely that significant and/or undisturbed Aboriginal sites remain within the area.

ELALC have recommended that either monitoring or salvage of the site be undertaken during any earthworks at the site (ELALC 2009). There is no archaeological basis for either salvage or monitoring at this site, however, it is recommended that the proponent consider ELALC's request.

7.2 Recommendations

It is recommended that:

1. No further cultural heritage assessment is required for the Bombala Sawmill expansion project.
2. Fifth Estate may consider the ELALC's request for monitoring during the earthworks stage of development.
3. A draft copy of this report should be provided to the ELALC for their comment.



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APPENDIX 1

AHIMS HERITAGE REGISTER SEARCH RESULTS

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	SiteFeatures	SiteType	Remarks
62-5-0028	EGP 2-96; Bombala River 2; Eastern Gas Pipeline; <u>Contact</u>	ACD	55	697160	5911980	Open site	Artefact	Open Camp Site	
62-5-0131	Parsonage Creek 1 <u>Contact</u>	Recorders	55	698480	5907400	Open site	Artefact	Permits	
62-5-0220	Biddamunna SU 1 L 1 2 <u>Contact</u>	CDNA	55	700342	5911790	Open site	Artefact	Permits	
62-5-0029	EGP 2-97; Bombala River 3; Eastern Gas Pipeline; <u>Contact</u>	Recorders	55	698360	5914750	Open site	Artefact	Open Camp Site	
62-5-0144	Gierahween Site 2 <u>Contact</u>	Recorders	55	698097	5908031	Open site	Artefact	Permits	99619
62-5-0219	Biddamunna SU 1/L 1 <u>Contact</u>	CDNA	55	700342	5911790	Open site	Artefact	Permits	3253
62-5-0143	Gierahween Site 1 <u>Contact</u>	Recorders	55	697952	5906041	Open site	Artefact	Permits	99619
62-5-0027	EGP 2-95; Bombala River 1; Eastern Gas Pipeline; <u>Contact</u>	Recorders	55	696900	5911500	Open site	Artefact	Open Camp Site	
62-5-0130	Parsonage Creek 2 <u>Contact</u>	Recorders	55	697920	5908750	Open site	Artefact	Permits	
62-5-0013	EGP 2-12; Saucy Creek Bombala; Eastern Gas Pipeline; <u>Contact</u>	Recorders	55	696100	5906100	Open site	Artefact	Open Camp Site	
62-5-0026	EGP 2-94; Parsonage Creek 1; Eastern Gas Pipeline; <u>Contact</u>	Recorders	55	696900	5910670	Open site	Artefact	Open Camp Site	
62-5-0001	Bombala; <u>Contact</u>	Recorders	55	699000	5912600	Open site	Artefact	Open Camp Site	

Report generated by AHIMS Web Service on 23/05/2011 for Rebecca Parker for Lat, Long From : -36.9667, 149.1667 - Lat, Long To : -36.9, 149.23 with a Buffer of 1000 meters. Additional Info : In a part 3A project approval assessment. Number of Aboriginal sites and Aboriginal objects found is 12

This information is not guaranteed to be free from error or omission. The Department of Environment, Climate Change & Water (NSW) and its employees disclaim liability for any act, omission or commission made on the information and consequences of such acts or omission.



APPENDIX 2

EDEN LALC ABORIGINAL ASSESSMENT



Eden Local Aboriginal

M.B.G. Keeping Place
Jigamy Farm

Ph: 02 - 6495 7177

Fax: 02 - 6495 7433

PO Box 199
Eden NSW 2551

25 August 2009

Julia Beck
Project coordinator
Assist Estate
GPO BOX 5494
Sydney NSW 2001

Dear Julia

RE: Willmotts NAMU Project-Phase 2

Eden Local Aboriginal Land Council have been consulted with and have carried out an Aboriginal heritage assessment on 21/08/09. Field work was carried out by Ben Cruse and myself Laurence Bamblett.

The proposed development was walked from the southern to the northern boundary and back and so on. The results of the survey were that there was one artefact scatter located at 696633E 5910472N. The visibility of the proposed development area was around 45%.

Eden LALC find the proposed development area, being close to a permanent water source, to have very high potential for other Aboriginal sites such as burials and artefact scatters. There are already a number of registered Aboriginal sites within a 1 kilometre radius of the proposed development.

Recommendations

Due to the above findings and the landscape in which the proposed development lies, Eden LALC recommends:

- That if the development is proposed to go ahead, a Section 90 application will need to be applied for through the Department of Environment and Climate Change (NPWS) Heritage Division.

**Option 1:**

- Due to the size and permanency of the proposed development, Eden LALC would need to monitor and salvage any potential artefacts which may be exposed during any earthworks.

Option 2:

- If monitoring and salvage cannot take place for any particular reason, further studies will be required and an Archaeologist will need to be engaged, and a Section 87 permit will need to be applied for to eliminate the potential of any Aboriginal sub-surface sites being destroyed.

If you require any further information in relation to the above, please don't hesitate to contact this office on the above numbers.

Yours sincerely

Laurence Bamblett
Sites Officer



APPENDIX 3

PUBLIC NOTICE & LETTERS



ABORIGINAL HERITAGE ASSESSMENT

Navin Officer Heritage Consultants Pty Ltd has been commissioned by Fifth Element to prepare an *Aboriginal Cultural Heritage Management Plan* in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill Expansion.

We are implementing the NSW Office of Environment and Heritage 2005 *Interim Community Consultation Requirements for Applicants* for this project.

We invite Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of objects and places in the Bombala area, to register an interest in a process of community consultation.

Please forward expressions of interest to:

The Secretary
Navin Officer Heritage Consultants Pty Ltd
4/71 Leichhardt Street
Kingston ACT 2604

or

navinofficer@nohc.com.au

The closing date for this registration of interest is 19 May 2011

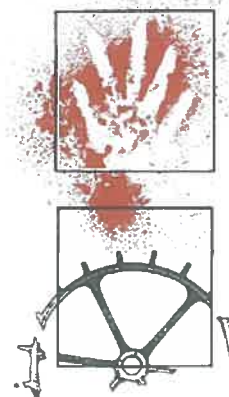


Example of 20 April 2011 consultation correspondence:

20 April 2011

The Secretary
Eden Local Aboriginal Land Council
PO Box 199
EDEN NSW 2551

Our Reference: BSM2011



**Navin
Officer**

heritage
consultants
pty ltd

abn 28 092 901 605

Dear Sir/Madam,

Re: Willmott Timbers – Sawmill Expansion – Bombala, NSW

Navin Officer Heritage Consultants Pty Ltd has been commissioned by Fifth Element to prepare an *Aboriginal Cultural Heritage Management Plan* (ACHMP) in order to fulfil the indigenous cultural heritage requirements as defined in the Part 3A project approval for the Bombala Sawmill Expansion (please see attached map).

As this is a Part 3A project we are required to implement the Office of Environment and Heritage's (formerly the Department of Environment, Climate Change and Water) *Interim Community Consultation Requirements for Applicants* for this project. I am therefore writing to inform you of this development and invite registration as an interested group.

The closing date for this registration of interest is Thursday May 5, 2011.

Please respond in writing to:

The Secretary
Navin Officer Heritage Consultants Pty Ltd
4/71 Leichhardt Street
KINGSTON ACT 2604

or by fax to: (02) 6282 9415

We look forward to working with the Land Council on this project.

Yours faithfully,

(Ms) Kerry Navin

Number 4, Kingston Warehouse
71 Leichhardt St, Kingston ACT 2604
ph 02 6282 9415 fax 02 6282 9416 m 0419 296 868
navinofficer@navinofficer.com.au

