



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

The Manager
Conservation Planning Environment
Planning and Sustainable Development Directorate

Lower Cotter Catchment Draft Reserve Management Plan 2017

Thank you for the opportunity to comment on the Lower Cotter Catchment Draft Reserve Management Plan 2017 (the Plan). As you may be aware, the National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with more than fifty years of working to protect our natural environment. The NPA ACT was a key player in the creation of Namadgi National Park and maintains a strong on-going interest in the Lower Cotter Catchment (LCC) due to its proximity to Namadgi.

The plan appears to be a comprehensive document but the NPA ACT is uncertain as to the intended audience and this should be clearly identified in the Plan.

The NPA ACT notes that a proportion of the content is of a nature that is generic across all of the ACT's environmental management plans. In the past, the NPA ACT has recommended that standard content and policies for management plans be collated into a central document which can then be referred to in specific management plans.

The Plan does not provide any meaningful information about lessons learnt in the management of the LCC in prior years and how they have been applied in the Plan.

The Plan could be more detailed in describing its interactions with the Namadgi Plan of Management and the synergies and economies of scale that could be encouraged between the two plans of management.

The NPA ACT strongly supports the objective for Chapter 8 Recreation. It is important that recreational activities are consistent with maintaining water and the conservation objectives of the Plan.

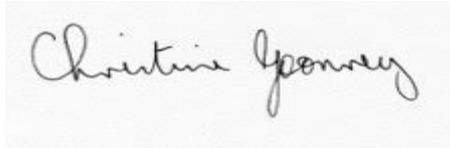
Our detailed comments are included in Attachment A to this submission.

NPA ACT Submission to the Lower Cotter Catchment Draft Reserve Management Plan 2017

The NPA ACT would be happy to discuss any of the issues raised within this letter and can be contacted, either by writing to our office address or through email (noting that the NPA ACT office is manned by volunteers and a daily presence is not able to be maintained).

Alternatively, Rod Griffiths can be contacted on 0410 875 731.

Yours sincerely



Christine Goonrey

Vice-President

25 March 2017



Rod Griffiths

Convenor Environment Sub-committee

Attachment A – Detailed Comments

Plan Audience and Generic Content

This plan is comprehensive, but one wonders who is the intended audience. Due to its size, it is not expected any executive would have the time to read the plan thoroughly. On-ground reserve managers would probably only refer to the actions section.

The plan has a lot of extraneous material that relates to reserve management in general, and which has no particular reference to the LCC. For example, Section 9.2 has only the last paragraph relating to the LCC, Section 9.6, Section 9.7 paragraphs 1, 2 and 5, Section 10.2 and much of Section 10.3, Section 11.3 and Section 11.7 contain general management principles that apply to all parks managed by PCS, but are not specific to the LCC.

Similar excessive material was also a feature of the draft management plan for Ginini wetlands. It is suggested that all general management principles are removed from this Plan and be used to create a new document that will be a reference for all management plans for conservation reserves across the whole of the ACT. Then the individual reserve management plans can concentrate of the issues and management actions specific to the reserve. If well written, the reserve management plans should then be no longer than 20 pages, and thus more accessible to staff and the public.

We would also query the purpose of the white lines in the top left corners of the chapter headings.

Maps

Fig 2 on page 30 is the only large scale map provided in the Plan that focusses specifically on the feature of the LCC. As such, it should show any location mentioned in the text, such as Bulls Head Range and Pipeline road. It should also show clearly all neighbouring tenures, so the section on Neighbours make more sense.

Chapter 2 Significant Challenges in the Lower Cotter Catchment

Section 2.1 refers to a new approach to managing the LCC but does not appear to clearly describe this. Nearly everything in this section has already been covered earlier, and if, it not, then it could be incorporated into Introduction Section 1.1 Management Plan purpose and scope.

Sections 2.2, 2.3, 2.5, 2.6, and 2.7 describe challenges, but they also describe in very general terms what actions will be taken. The text on actions should be removed, and left to the full explanations of actions in later chapters.

Section 2.8 Is “Engaging the Community” a significant challenge? No problems in the catchment are outlined here. This section could be removed and incorporated into Section 10.

If the whole of Chapter 2 was more tightly written, as suggested above, these challenges could be listed in significantly less space at the end of the introduction in chapter 1.

Chapter 4 Zoning and Access

Section 4.1 Table 4.1 describes a Road Corridor zone. There is no definition of the width of this / these road corridor(s). If the map at Fig. 2 is to scale, then these road corridors could be about 250 m wide. Apart from the road formation, what is different in the road corridor than what is found in the Core Catchment zone?

Table 4.1 Core Catchment zone. This is the total catchment minus the road corridors, so it is hardly a 'core' zone. It could be called a 'Catchment Zone'.

Chapter 5 Water Resources

Should Action 6 say "Work with Icon Water to continue releases of environmental flows....." as it would be expected that Icon Water is responsible for delivery of environmental flows?

Chapter 6 Landscape and Ecological Values

Section 6.4 Geodiversity. Two sites of geological significance are mentioned (page 50). It would be useful to have these sites indicated on the map of LCC, if no cultural sensitivities are associated with these sites.

Section 6.5 Vegetation Similarly, a site with specific vegetation, Bulls Head range, should be shown on the map of the LCC.

Section 6.6.1 Fish Given that the Macquarie Perch and the Coral Trout are identified as endangered in the ACT and nationally and the Two Spined Blackfish is listed as vulnerable in the ACT, it would be expected that the Plan would make clear reference to how the recovery actions in the 'ACT Aquatic Species and Riparian Zone Conservation Strategy' will applied in the LCC. Action in respect to these species is very limited in the Plan and given the importance of the species this is disappointing.

6.6.2 Invertebrates Similar to 6.6.1 there is a lack of linking the actions within the 'ACT Aquatic Species and Riparian Zone Conservation Strategy' to the protection of invertebrates in the LCC.

6.7.2 Pest Plants and Animals The NPA ACT's observations in respect to the status and controls listed in table 6.1 are:

- Hare control: shooting is an ineffective method of pest control.
- Goat trapping is suggested. Are there sites where this could occur, given the free availability of water in the catchment? If the problem is significant, then aerial shooting (combined with shooting feral pigs) is the most effective control method. However, the problem is listed as "occasional animals" and trapping and shooting are ineffective at low animal densities, and not likely to occur due to staff shortages. In these circumstances, what are the most effective and efficient available controls?
- Feral cats: trapping and baiting are listed as control methods. Trapping is difficult, and opportunistic shooting is ineffective, so neither method would appear to be useful for population control.

These proposed ineffective control methods for hares, goats and cats do not fit Action 13 "Undertake feral animal control using the most effective current approaches suitable for use in a water supply catchment."

Section 7.4 Contemporary Aboriginal Connection to Country. All this section is superfluous to the plan except the last two paragraphs.

Chapter 8 Recreation

The NPA ACT strongly supports the objective of this section that all recreational activities must be consistent with the water quality and natural heritages aims of the Plan. It is expected that there will be continuing pressure on land manager of the LCC to open up the area for increased recreation opportunities. It is therefore vital that this section of the Plan to be well thought through.

The draft plan describes the increasing urban and recreational pressures on the Lower Cotter Catchment and lists actions to address this but, this seems to mostly echo existing actions. Chapter 11, p 115 then discusses compliance and enforcement across a range of activities – legal and illegal. Is there expected to be available funds to manage these issues (or others mentioned, like weed control, etc.)?

There is no dedicated commentary on the use of motor bikes in the commentary and the reference to trail bikes in the “cycling” section is confusing. It is noted that trail bikes are referred to in Table 8.1.

The Plan should consider the benefits of the hardening of water crossings in the LCC in order to reduce water turbidity.

Chapter 9 Fire Management

Section 9.7 Planned burning. The last paragraph on page 101 suggests that vegetation is managed by fire primarily for fire advantage. This is a concern if fire advantage considerations occur across all of the LCC.

The first paragraph (last sentence) on page 102, suggests that some areas are to be burnt more frequently than indicated by fire thresholds of that vegetation community. The preceding sentences do not justify this approach. This is a major concern: no vegetation should be burnt more frequently than indicated by the fire threshold data, especially in a reserve where one of the major aims is regeneration of the native vegetation, and eventual incorporation into a national park as well as the potential for increased erosion.

The Cotter Reserve Fire Management Plan 2014-2019 proposes that 25% of the LCC be burnt in those 5 years. This is in addition to the approximately 5% burnt in 2009-2013 and the additional 5% to be treated by physical removal of fuels. This is despite the vegetation still affected by the 2003 fires. This is an excessive amount of burning where there are large areas of the catchment classed as having extreme or very high erodibility of soils (Fig 4, p 100). It is also an excessive amount of burning when vegetation is to be regenerated. It does not fit the second objective of Fire Management (Page 105, that “The recovery of native vegetation is promoted, erosion reduced and water quality improved”).

There is a spelling error in the title of Fig 4. ‘erodibility.’

While it is commendable to recommend measures to prevent the introduction of EHN virus by fire appliances and buoy walls, (page 102) there is no mention on restrictions on water sources for aircraft which are used increasingly in modern fire operations, and can move rapidly outside the fire area to source water.

Section 9.9 Blue Range The Blue Range is a potential conduit for fire into the LCC and this point and the potential for significant degradation arising from such an event is not highlighted in this section.

Action 3. “Manage the construction of roads” When so many roads are being closed, why should new roads be constructed?

Action 6. Why do actions for Icon Water have no priority rating?

Chapter 10 Community engagement

P 115 et al. Are there ways to encourage new and expanded volunteer participation? Are there any new possibilities to tap into citizen science and other approaches?

Resourcing

There is no discussion of resourcing the strategy, nor the increased resource needs implied in the plan. A management plan should have a chapter or section on resourcing scenarios and how they may influence implementation – for instance, has recognition of the LCC as an important water catchment area led to a boost in resources (human and financial? And not just for physical infrastructure like the Cotter Dam enlargement?). A more detailed workplan gets into the nuts and bolts, based on known available resources, but this MP should still discuss the subject, especially given the dismal budgets that are usually given to parks authorities.