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Submission: Molonglo River Reserve Draft Reserve Management Plan 2018

Thank you for the opportunity to make a submission on the draft *Molonglo River Reserve Draft Reserve Management Plan 2018* (the Plan). 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 through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

The NPA ACT has a particular interest in the new Molonglo River Reserve (the Reserve), given the significance of its river landscapes and nationally threatened species and communities, as well as its connections to two key river systems in the ACT and its links to other important nature reserves in the north of Canberra. The Plan is an opportunity to create an important precedent for the future inter-relationships of park management and urban development planning in areas in close proximity to sites of high conservation value within the Territory.

Summary

The NPA ACT welcomes the general thrust of the Plan, which focuses on the protection and, in some cases, rehabilitation of the river landscapes and nationally/regionally threatened species and communities while seeking practical solutions to the challenges posed by human communities living in close proximity to ecologically sensitive sites. However, the NPA ACT has noted a number of issues with the usefulness of the Plan for land managers.

The Plan is designed to be used by the Reserve manager (the Custodian of the Reserve in the *Planning and Development Act 2007*) to guide decision making about activities in the Reserve, and by all others to provide information about its values and objectives and guidance on the reasoning for decisions about uses of the Reserve. While the Plan adequately provides other users with a discursive document on values, objectives and management philosophy as a document that is useful for land managers it is inadequate. Not everything that requires an action has been identified in the Plan and the Plan regularly refers users to other documents without identifying the parts within those documents that are specifically relevant to the Reserve. There is no discussion on whether the other documents adequately

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan

cover the all specific risks facing the Reserve and priorities for actions identified in the other documents are not included in the Plan. Sections like the permitted and not permitted recreational activities will be useful to land managers but such clear guidance is not available throughout the Plan.

Due to the long time between when the Plan was first proposed and when it was released for comment, it is disappointing that it has not been updated with relevant information available in recently undertaken studies and strategies (eg, new knowledge about the range of the Little Eagle and the recently released grassland strategy).

A key pressure on achieving the required conservation outcomes is the significant population surrounding the Reserve. The impact of this population pressure is exacerbated by the extensive urban interface with the Reserve and the narrowness of the Reserve.

The Plan downplays the potential impact of increased recreational usage by the residents of adjoining suburbs but does not present a convincing argument as to why this should not be a more serious concern. This is a serious matter, as the successful retention of the Reserve's environmental values appears to be highly dependent on the success of future community cooperation.

The critical subject of budgetary needs and resources to implement the Plan also needs to be addressed in the content of the Plan.

Detailed comments have been included as Attachment A to this submission.

To assist with future editing some typographical errors identified in the Plan have been included as Attachment B to this Submission.

Should you require any further information please do not hesitate to contact the NPA ACT office, to the attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee or by mobile on 0410 875 731.

Yours sincerely



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NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

General - Discussions in the Plan’s Management Consideration sections do not lead to clear identification of actions.

An example of this is “In particular, the river banks where rainbow bee-eaters breed must be protected from damage and their burrow entrances not concealed with vegetation.” (Page 79 6.6.3). This is a specific issue for the area covered by the Plan but land managers have to refer to various sections of the Ecological Management Guidelines (EMGs) to identify mitigating actions. The text in the Plan provides no direct linkages to the various relevant sections in the EMGs.

Page 11 Objective 1, Policy 1.1 and Action 1.1.1 The current objective states that “Reserve boundaries, management zones and buffers adequately protect its threatened species and communities.” This reflects the focus of the Plan on the 5 identified threatened species and communities as required under the NES Plan. However, the Plan should reflect all the values of the area covered by it and this includes significant vulnerable species as well as species that are endemic to the area. The NPA ACT recommends that the objective has the following words inserted at the end “...and helps maintain the existing natural diversity.” In addition, the words “and the existing natural diversity” should be included after the words “threatened species and communities” in Policy 1.1 and Action 1.1.1. This will make Objective 1 consistent with Objective 5.

Page 11 Action 1.1.2 While monitoring of Kama for edge effects is important there should be a preliminary action for the Custodian to work with the relevant land developer and lobby for the establishment of an adequate buffer as required under the NES Plan and as set out in the principles described in section 3.2 of the Plan (pages 31 et al).

Page 11 Action 3.1.2 This states “Apply the design and construction approach used in new sections of the Centenary Trail (CBRE 2014) to new trails in the Nature Reserve, where appropriate”. But there are areas in the Centenary Trail where the NPA still has concerns about the safety of users due to the interaction of high speed bicyclists with pedestrians in areas where there are limited options for avoidance due to the narrowness of the trail and the steepness of the landscape.

Page 12 Action 5.1.1 Develop a set of scientifically-based ecological management guidelines that incorporate the NES agreements – This implies that it hasn’t been done already. Surely this is a key tool for managing responsibilities under the NES agreements. How do you know that the requirements of the NES are being met? (refer to comments on Appendix 5) What has been the objective of the operational plan that ended in 2017?

Page 12 Action 5.1.4 This states “Implement the adaptive management strategy for the NES areas (ACT Government 2013d) to track progress and adjust management as learning grows;

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

and review other objectives in Years 5 and 10.” Shouldn’t this be being implemented already? This would change the action to “Continue implementing...”.

Page 14 Action 11.1.3 It is unclear to whom this action is referring to.

P 22 Table 1.1 Significant attributes of the Reserve - A trail network that aims eventually to straddle the river on both sides, with several crossing points between them. The NPA ACT strongly disagrees with this proposal. The rural section contains some significant areas of conservation significance including the raptor breeding area in the gorge. Consistent with the 2001 Lower Molonglo River Corridor Plan of Management trails in this area must be avoided.

In the Rural part of the reserve there should be one multipurpose Management road/track (the Pipeline Road) for use also by walkers and cyclists. West of the most westerly above ground section of the pipe line no formed all weather management road exists. A link for management purposes does appear to exist between the most westerly above ground section of the pipe line north to Stockdale Drive and an informal vehicle track also follows the boundary fence which is suitable for walkers only.

If a formed road was built from this point (most westerly above ground section of the pipe line) following the northern reserve boundary it could dissect and fragment PTWL habitat.

No management road/multipurpose track should be built on the south side of the river in the rural section. Access to south side of river corridor for reserve managers can be arranged with bordering land holders as has occurred in the past. A management road/multipurpose track has the potential to fragment PTWL habitat and generate surface runoff and erosion problems.

Page 30 There should be an indication that the two objectives under Nature Reserve are not equal priorities and that legislatively recreation and other activities should not compromise the nature conservation objective. OK covered in subsequent paragraphs

Page 30 This page contains the statement “Any changes must be in accordance with the objectives of the Management Plan and the NES Plan which identifies 488 ha as the River Park offset area and 155 ha as the Kama Nature Reserve offset area (ACT Planning and Land Authority 2011)”. What is this referring to? – The Plan needs to provide the context to this and its implications.

Will the proposed Kama buffer (pp 31-32, the width of which is to be determined during Stage 3 Molonglo planning, be sufficient to protect this important place? Looking at the map, this is likely to become a major corridor of cycling (and possibly horse?) and other movements by recreational users. The reserve will be 2 kms wide where it encompasses

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

Kama, but this is still close for seed movements, etc. Figure 9.1 (pp 104-105) shows an equestrian trail along its boundary, and there is a network of trails that will also be considered for a fire access plan (p 110). Does the proposed boundary fencing (p 103, 9.4.6) extend to the equestrian/management trail?

Page 31 3.1.2 Shouldn't the proposal that the corridor of public land along the river below Scrivener Dam be changed from Urban Open Space to Nature Reserve in the Territory Plan be identified as an action, the progress of which can then be monitored.

Page 31 3.2.1 This section states "The buffer will be managed as an Asset Protection Zone, consistent with the commitment in the NES Plan. It is proposed that Kama be managed as a Strategic Firefighting Advantage Zone (SFA) and appropriate management actions are dealt with in Sections 6.7.2, 6.7.3 and 6.7.5." However, in the context of the restoration work underway in Kama it is especially critical that fuel reduction is carried out in a manner that considers restoration outcomes. Otherwise the conservation objectives of Kama are undermined? The buffer should therefore be of significant width to allow protection to property.

Page 31 3.2.2 This section includes the statement "The nature and significance of the impact on conservation outcomes depends on the context and a number of different mechanisms have been identified (Issue Box 3.1)". However, while the Issue Box referred to does describe likely edge effects it contains no descriptions of mechanisms to control these effects. These are described in Table 3.1 but the mechanisms described are not reflected in the actions of the Plan.

Page 33 1.2.1 This section states "Monitor Kama annually for edge effect impacts (Table 3.1), as part of the Adaptive Management Strategy (ACT Government 2013d)". But if infrastructure and building has already occurred then there would be limited effective actions available to reduce the effects identified. Sufficient measures need to be in place before construction.

Page 35 The Coombs neck/tip significantly impinges on the southern bank of the Reserve. Preferably this should be included in the Reserve which would also lessen the length of the reserve boundary. As a minimum this area should not be used for dwellings or other buildings but used in a way that provides a buffer effect for this area of the Reserve eg for potential community use.

Page 35 Much of the northern part of the reserve on this page is very narrow and therefore will be subject to increased edge effect which will undermine the conservation objectives for the reserve.

Page 35 How will the connectivity between Kama and the extension of the Pinnacle Nature Reserve be managed given they are separated by William Hovell Drive?

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

Page 40 4.2.2 The distinction between the urban and rural sections will become more clouded in the future when pressure builds to release land for development in the land bank areas held by the development agency next to the rural section and with the expansion of the West Belconnen development. This is a relevant place to make the first references to these impacts.

Page 51 For completeness the Plan should also mention the high level Tuggeranong Parkway bridge as its foundations are within the Reserve.

Page 58 5.3.2 The NPA ACT agrees with the statement “Therefore, as a matter of policy, as little as possible soil disturbance should occur in the Reserve. Where it is deemed necessary in order to fulfil other objectives for the Reserve or the ACT, the slope, soil type, type of disturbance, area, and capacity for remediation need to be considered”.

Page 59 Guidance Box 5.1 The guidance included in this box should be incorporated into an action, which will facilitate monitoring of the adherence with these guidelines, as action 4.1.1 lacks sufficient detail.

Pages 62 and 63 Table 6.1 This table provides a list of “threatened communities and species that live in the Reserve, depend on it seasonally, or, in the case of fish, have been present in the past and could potentially be returned”. The Plan however does not address the actions to be conducted for each of the listed species. Some, like the *Pomaderris pallida* are at least mentioned again but without any consideration of the conservation requirements for this species. Others like the White-winged Triller have no further mention in the Plan.

Some species like the Regent Honeyeater are deemed to be covered by an Action Plan but there is no discussion about the relevance of the specific values in the Reserve for these species and how this would determine the priority of implementation of actions in the Action Plan for the Reserve. Nor does it identify whether the threats facing the species in the area covered by the Plan would require actions not identified in the Action Plans.

Lichens – GN Stevens in *A Conservation Overview of Australian Non-marine Lichens, Bryophytes, Algae and Fungi* (Endangered Species Program, Environment Australia Canberra 1997 pp. 15-22) identifies the lower Molonglo region as containing the only known locations for two species of lichen, *Xanthoparmelia hyposalazinica* and *Xanthoparmelia sublumina*. In addition area covered by the Plan includes another species of lichen *Xanthoparmelia xanthofinosa* which is rare in the ACT. However the Plan makes no mention of these lichens and therefore there are no proposed actions to address the threats facing them.

Page 72 Box-Gum restoration knowledge This refers to “Establish and manage an off-site restoration project, as an indirect offset, for Box-Gum Woodland”. The Plan identifies that a project on Barrer Hill encompasses this requirement under the NES Plan. Will this be sufficient to offset BGW losses across the Molonglo development? As a requirement under

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

the NES plan it would be expected that the Plan would provide a description of the actions taken to address the requirement and that an action be incorporated in the Plan.

Page 74 So to find out the actions adopted you need to go to the Ecological Management Guidelines!

Page 75 6.5.1 Are the objectives listed here for the Riparian Strategy still consistent with the new draft of this strategy?

Page 79 6.6.1 Flows The proposals to increase environmental flows and reduce thermal pollution are good in principle. However, both of these issues have been around for a long time. For increased water flow it would not be difficult to calculate the cost of water and water transfer on an annual basis and to reduce thermal pollution caused by Scrivener Dam calculate the cost of modifying the outlet system. There does not appear to be anything in the Plan to indicate these problems are any closer to being resolved.

Page 79 6.6.2 This section states “Two new road bridges, a high level sewer and pedestrian crossing, and at least one recreational crossing are planned to cross the river. Their siting and design, including the approaches and bank vegetation, must be selected to minimise barriers to fish passage and disturbance of significant river habitat”. There is not a specific action addressing this issue. Action 16.11 is a general action but as this is a specific issue then a specific action should be raised.

The constant reference to action plans limits the functionality of this document both for land managers and to the general public both of which need to locate the referred to documents. There is limited discussion on how the relevance of the actions in the actions plans for the Molonglo Reserve

Page 81 Strongly support the trial rehabilitation of Section K

Page 81 Kama is proposed to be SFAZ which has the potential to undermine the conservation values there. Is it not possible introduce a greater fuel management regime to the north west of Kama to, in turn, reduce the threat to both Kama and the future settlements to the east of Kama.

Page 83 It is amazing that pests, weeds and climate change rate only 5 paragraphs within this section as they represent some of the biggest threats to the viability of the conservation values of the Reserve. There are no specific actions identified within the Plan to address these issues instead there is a reference to ACT wide Action Plans or Strategies. The Plan provides no assistance to land managers on the priority issues facing the Reserve in respect to weeds, pests and climate change. There will be specific pest and weed risks, including existing and emerging risks, for the Reserve that should be addressed in the Plan. While specific actions

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

may be dealt with more fulsomely in operational plans the Plan should be identifying and prioritising these risks.

The *A New Climate Change Strategy and Action Plan for the Australian Capital Territory* has limited discussion on the impact of climate change on the natural environment and will not provide land managers with the specific impacts of climate change on the Reserve. While it is appreciated that climate change is a broad management issue, responses to this threat can be identified in other actions in the Plan (including reduced clearing in the Reserve) and should be discussed in this section.

Page 85 6.2 This section provides no useful assistance to land managers. It simply refers them to other documents without setting out the strategic objectives and priorities for Reserve.

Page 87 et al 7 Aboriginal connections it is commendable that “Aboriginal people will be involved in the management and interpretation of the Reserve” (p 90). At the same time, the specific actions do not contain a clear or strong statement about their role in decision-making, only with regards to consultation and involvement. Will Aboriginal people have an active or a passive role in contributing to key decisions about the Reserve?

Page 99 Group walking The Canberra Bushwalking Club and the Brindabella Bushwalking Club are potential users of the Reserve and should be acknowledged in the Plan. They should be added to any list for future community consultation and engagement.

Pages 102 and 103 Given the narrow nature of the reserve it would be impractical to establish a wide network of paths. Also given the conservation and heritage sensitivities it is not appropriate to have Reserve length trails on both sides of the river.

Page 103 9.4.4 The NPA ACT supports the positioning of the trunk path outside of the Reserve.

Page 103 9.4.5 The Plan states that the main concern of walkers is “having to avoid horse and dog droppings” and that horse riders are not concerned about sharing trails with bushwalkers. Bushwalkers, however, are concerned about safety risks when sharing trails with horse and bicycle riders.

Page 103 9.4.7 Agree with the proposal for access. The rural area will be subject to increasing pressures for access with the growth of the Molonglo suburbs and consideration should be given to how the more valuable conservation areas in the rural section are to be protected from over use. Planning of the new suburbs should not rely entirely on the Reserve to provide recreational opportunities and the sensitive design of new suburbs that provide complementary recreational opportunities should be sought during the planning stage of these new suburbs.

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

Pages 104 and 105 Table 9.1 These maps would indicate a significant reduction in current informal trails in the reserve, particularly in the rural section. How does the Plan intend to manage community expectation of continued use of these areas?

Page 106 9.4.11 Dogs There is a mention here of a dog park but no context is provided for this. Does it mean the one being constructed in Duffy or refer to future dog parks within the new suburbs? How this can these help with alleviating pressure on the Reserve should be discussed in the Plan?

Currently, dogs are not allowed in the nature reserve areas of the rural section, not just Kama. Also the following Nature Reserves have no dog access. Black Mt., Callum Brae, Crace Grasslands, Dunlop Grasslands, Mulligans Flat, Goorooyaroo, Jerrabomberra Wetlands, Gungahlin Hill, Mc Quoids Hill, Mulanggari Grasslands, Tidbinbilla, Rob Roy, and also Namadgi NP, Bullen Range, Gibraltar Forest and Googong Foreshores.

This plan contains no justification for its expansion of dog access. If previously it was deemed to have a high conservation impact what has changed so it is now deemed to be a low impact activity. Issue box 9.1 states that if certain conditions are met dog visitation is “not considered to add substantially to the impact of people or threaten the ecological objectives of this Reserve” but it provides no evidence that these conditions will be met.

The NPA ACT would contend that access by dogs in the rural section, some of which will be invariably off leash, will restrict the use of the most effective methods (poison) of controlling rabbits and the most significant predator of wild life in the reserve – foxes. Cat trapping will also become more difficult. Dog access equals restricted pest management.

Page 106 Dog swimming The Plan seems to be unaware that the special purpose reserve on the southern downstream of Coppins Crossing has, for decades, been a site for dog swimming and does not address how the assumed continued demand for this will be addressed other than an implied future review based on ecological impact. The NPA ACT would argue this issue should already have been considered and that the Plan would provide clear policy on this issue.

Because of intermittent river flow, any pools along the river will be feeding sites and refuges for fish and semi aquatic animals such as the Water Rat, Gippsland Water Dragon and Long Necked Turtle, none of these are endangered species but their presence in sustainable populations is important for environmental health which may be affected by dog swimming.

Page 106 9.4.1 The NPA ACT agrees that social norms will be a key factor in managing dog owner behaviour and supports action 12.1.2.

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

Page 107 Commercial Activities The NPA ACT agrees with the ban on commercial activities in the nature reserve section of the Reserve and the conditions on the commercial activities in the special purpose reserve sections.

Page 108 Objective 13: The Reserve adds value to the ACT as a distinct recreation destination, a long-distance recreation link, and an attractive contribution to the Canberra Open Space System. This was not discussed in the text and no justification as to why this is a desirable objective is provided. This objective is subject to it not subverting the conservation values of the nature reserve section of the Reserve.

Page 109 et al 10. Fire protection, infrastructure and operations The amount of infrastructure already approved, or required to facilitate the Molonglo development, is substantial – including a lot of waterworks. The construction stages alone are a cause for concern, some of which may cause disturbance to wildlife over long periods (p 111). The plan states:” Construction and management activity outside the Reserve may also impact on the Reserve ...Suitable mitigation actions are required as a condition of construction approval, *but experience in the development of the Molonglo to date indicates that they have not always been satisfactorily implemented.* In particular, sediment from construction activities prior to establishment of stormwater ponds has been difficult to maintain (p 111). The John Gorton Drive bridge is identified as having a potential impact on the reserve in the Coppins Crossing area, etc (p 110).

The identified actions are: to monitor and report non-compliance with legislative activities and negotiate mitigation (p 112). In light of the recent tree removal incident in Coombs by developers in contradiction to the Conservator’s guidance, is this sufficient action? In order to ensure compliance by contractors, one usually has to hit them at the “bottom line,” ie introduce contractual penalties for failure to comply. Do the proposed water quality measures provide adequate protection of the river system (p 78)?

Page 112 Action 16.1.1 Provide advice to proponents of constructed works and facilities about how impact can be mitigated. But wouldn’t some construction be undertaken under the auspices of TCCS and which case the contract should clearly stipulate the required mitigation measures as opposed to providing advice.

Page 113 et al Neighbours and Communities The sentiments of this section are supported.

Page 119 Examples Another example of popular and successful community awareness has been the development of the “treasures” series of books published by the Conservation Council ACT Region. The Gungahlin Treasures publication was provided to new residents in Forde and Bonner as part of a welcome package and was warmly received. The publication of a Molonglo Treasures book would be a useful tool for engaging the local community.

Page 120 Action 19.1.2 Develop a MoU with the Molonglo Catchment Group for carrying out collaborative community engagement activities in the Molonglo Valley and the Reserve.

NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan Attachment A – Detailed Comments

While the need to coordinate community activities is acknowledged, given that funding for the Molonglo Catchment Group coordinator runs out on 1 July 2018 and this may restrict the capacity of that organisation would this action be better couched in the terms of “Develop an MOU with a community organisation or organisations for.....”.

Page 125 Action 20.1.1 Appoint a community consultative committee and hold regular meetings to exchange feedback and develop joint, proactive responses to emerging issues.

The Plan has already stated that a community consultative committee exists and therefore if this action is to be kept it should say “Continue supporting the existing community consultative.....”.

Appendix 5 NES Plan

One of the functions of the Plan is address obligations imposed on the ACT by the Commonwealth under the NES Plan. The requirements of the NES Plan are identified in Appendix 5 but these are not cross referenced to the relevant sections of the Plan that address them. Actions in the NES Plan that do not appear to be adequately address in the Plan include:

- The independent monitoring of CEMPs in actions 4 and 31;
- A comprehensive analysis of the risks and issues relating to the maintenance and enhancement of the ecological condition of Box-Gum Woodland in Kama (Action 5) and the Molonglo River Park (sic) (Action 9), as well as the improving and applying the knowledge about the management of Box-Gum Woodland requirements in Action 10;
- A comprehensive analysis of the risks and issues relating to the maintenance and enhancement of the ecological condition of Natural Temperate Grassland within Kama (Action 25);
- Amendment of the East Molonglo river corridor boundary in stages 2 and 3 respectively with a view to reducing impacts to high and moderate quality PTWL habitat to ensure that connectivity within the river corridor is maintained (Action 29);
- Where are the two offset sites referred to in the NES Plan conservation outcome PTWL (b) (Actions 30 to 34);
- A comprehensive analysis of the risks and issues relating to the maintenance and enhancement of the ecological condition of high and moderate quality PTWL habitat within the Molonglo River Park (sic) (Action 36).

**NPA ACT Submission on the Molonglo River Reserve Draft Reserve Management Plan
Attachment B – Matters for Future Editing**

Page 31 3.1.4 “achieve” is misspelt.

Page 38 4.1 “Scrivener” is misspelt.

Page 45 Should Opik Park, Barrer Hill and Ryans Hill Park be identified as existing or potential place names on the map? Currently they are not identified as either.

Page 71 “Threatened” is misspelt.

Page 73 Issue Box 6.1 is partially obstructed by the page design.

Page 74 6.3.2 Reference to Table 5.3 should be Table 6.3.

Page 74 6.4 This section makes reference to Bold Hill but this is not on the place name map at page 45.

Page 104 Figure 9.1 The legend in does not define the use of the black squares on the map (page 105). Are these proposed or existing walking trails?

Page 108 Snake Bite There are no poisonous snakes in Australia only venomous ones.

Page 110 “achieve” in objective 7 is misspelt.

Page 110 10.2 Fire Protection and Management Everything in this section starting from table 10.1 relates to infrastructure and construction not fire protection.