



Environment, Planning and Sustainable Development Directorate
Conservation Research
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All italics are direct quotes from the document.

Draft ACT Native Grassland Conservation Strategy and Action Plans.

The National Parks Association of the ACT (“NPA ACT”) welcomes the release of the 2017 draft ACT Native Grassland Conservation Strategy (“the Strategy”) and associated Action Plans and the opportunity to comment on their content.

The NPA ACT is a community-based conservation organisation with more than fifty-six 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.

General Comments (please note all italics are direct quotes from the Strategy or Action Plans).

The Strategy and associated Action Plans identify the continuing need for protection, management, monitoring and research. While many of the native grassland communities display resilience and the capacity to revive after high impact events, such as drought and over grazing, the impact of climate change will introduce additional pressures upon these important communities. Continued invasions of well adapted weeds will threaten the ACT’s grasslands into the foreseeable future.

The NPA ACT welcomes the Strategy’s utilisation of digital technology through the use of links to documents and maps to provide greater context to the Strategy and Action Plans.

Comments on the Strategy

Vision. There should be a sentence or two about engaging the community and expanding community involvement.

Although, in the Introduction 1.4 (p5) Scope, the Strategy says, unlike the previous strategy, this revised strategy covers all grasslands in the ACT, including rocky grasslands and grasslands that occur above 625 metres above sea level, there is no indication where references to where these additions may be found, other than on p79 referring to Figs.1 and 2 (Namadgi NP). We could not find any information on Rocky Grasslands, prime habitat for the threatened Pink Tailed Worm Lizard and as a newly recognised community worthy of a detailed description which could be placed under Section 8.9 (p93) Descriptions of Grassland Associations.

8 Background, 8.5 Grassland conservation activities in the ACT since 2005 (p82) has about 5 pages on management, research and monitoring and community engagement since 2005 that informed the development of this Strategy. The NPA ACT believes that a brief summary of these developments since last the strategy in the introduction would have assisted in providing context to the Strategy.

7 Strategy: Engage the community. There are many experts in NGOs or community conservation groups who would want to be part of the knowledge generating process as well as providing skilled hands for data collection and on ground planting and weeding. These citizen scientists must be kept in the picture with invitations to research presentations and considered access to research documents and reports produced within the Environment, Planning and Sustainable Development Directorate.

7.6 Support appropriate recreational and tourism use of natural areas. This section appears to be suffering from internal conflict. While recreation and tourism are important for engaging the community with the natural landscape, in the case of native grasslands visitation can result in negative impacts on fauna and flora through trampling and illegal collecting.

The NPA ACT believes that it is important that the precautionary principle is applied to ensure that general visitation to native grasslands and especially endangered Natural Temperate Grasslands does not lead to a degradation of these communities. The NPA ACT recommends that a thorough evaluation of the impact of current general visitation, including an emphasis of study on the impacts occurring during the peak flowering time from late spring to early summer, is conducted. Organised visitor programmes should be confined to a limited number of reserves while general visitation impacts are determined.

7.6.1 Enhance key partnerships across government, community and the private sector. This section seems to be out place under the banner. 7.6 Support appropriate recreational and tourism use of natural areas. Would it be better to renumber as 7.7 with its own Section Banner the same as the 7.6.1 banner?

Comments on the Action Plans

General Comment on all draft action plans for Natural Temperate Grassland (“NTG”) Endangered Ecological Community, Beureans Gentian, Button Wrinklewort, Ginninderra Peppergrass, Golden Sun Moth, Grassland Earless Dragon, Perunga Grasshopper and Stripped Legless Lizard.

It would be helpful to include in the preamble or a “background” section of each Action Plan a few paragraphs on any change of direction or emphasis since the acceptance/ approval of the previous iterations of the action plans or what recent significant research or monitoring is now informing the best practice management. This would put the sequence of action plans (in some cases now extending over 20 years) for individual threatened species or endangered communities into context with these draft Action Plans.

NPA ACT Comments on the Draft ACT Native Grassland Conservation Strategy and Action Plans.

Each Action Plan has an identical list of dot points under the implementation heading. The following dot points have a particular relevance for community conservation groups:

- The second dot point. Allocation of adequate resources to undertake the actions specified in the strategy and action plans; and
- The sixth (last) dot point. Engagement with the community, where conservation of a threatened species or relevant, to assist with monitoring and other on-ground actions, and to help raise community awareness of conservation issues.

Active community conservation groups that are engaged with the conservation and science of Grassland ecosystems and the plant and animal species that make up those systems are:

- the strongest advocates for a better understanding through research and of the need to reduce threats and promote resilience;
- a strong authorities voice in the community for the adequate resourcing of research, monitoring and management.

The NPA ACT recognises the benefits of including the action plans for threatened grassland species with the Strategy and the NTG action plan but questions the exclusion of the action plan for the Pink Tailed Worm Lizard *Aprasia parapulchella*.

Quoting from the Draft PTLW Action Plan 2016. Sites containing *A. parapulchella* tend to be well drained and contain numerous scattered surface rocks which are weathered and partially embedded in the soil and grass. The lizards are typically found beneath rocks that range from about 10 to 30 cm in diameter, and less frequently under rocks smaller or larger than this size range. Habitat for *A. parapulchella* usually has a cover of predominantly native tussock-forming grasses and native forbs that are indicative of low disturbance. Dominant grasses in *A. parapulchella* habitat include species from the genera *Themeda* (Kangaroo grass), *Austrodanthonia* (Wallaby grass), *Aristida* (Wire grass), *Bothriochloa* and *Poa*. Non-grass plants often present in suitable habitat include species from the genera *Sourghum*, *Dianella*, *Lomandra* and a range of disturbance-sensitive forbs.

In chapter 4 of the ACTNGC Strategy: Section 4.5.2. Guidelines for managing grass biomass structure (page 38) there are Guidelines for Pink-tailed Worm-lizard Habitat

These extracts would appear to emphasise the grassland aspects (particularly rocky grasslands) of this species. The NPA ACT would therefore suggest that it may be more appropriate to include the action plan for this species with the Strategy.

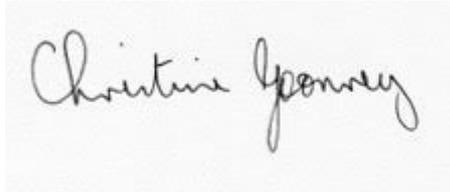
The information contained within these action plans provides a valuable resource for all those interested in the ACT's Native Grasslands, the endangered Natural Temperate Grassland and the associated threatened plant and animal species, particularly the comprehensive information on life cycles, ecology and best practice management.

NPA ACT Comments on the Draft ACT Native Grassland Conservation Strategy and Action Plans.

These Plans may even stimulate some young (or even old) person to take up a career in life science research to help some of Australia's unique threatened species to survive and thrive.

Should you require any further information please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convenor, NPA ACT Environment Subcommittee.

Yours sincerely

A handwritten signature in black ink that reads "Christine Goonrey". The signature is written in a cursive style with a large initial 'C' and 'G'.

Christine Goonrey
Vice President
National Parks Association of the ACT

11 May 2017