



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Director, Parks Planning and Policy  
Environment, Planning and Sustainable Development Directorate  
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Via epsddcomms@act.gov.au

## **NPA ACT Submission on the Canberra Nature Park Draft Reserve Management Plan 2019**

Thank you for the opportunity to comment on the Canberra Nature Park (CNP) Draft Reserve Management Plan 2019 (the Draft Plan). As you may be aware, the National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with fifty-nine years of working to protect our natural environment. The NPA ACT was a key player in the creation of Namadgi National Park and as an advocate for the natural environment maintains a strong on-going interest in Canberra Nature Park.

### **Key Points**

This a major management plan and the Environment, Planning and Sustainable Development Directorate (EPSDD) should be acknowledged for the high standard of the Draft Plan's content. The Draft Plan is a big improvement of the preliminary draft circulated to NPA ACT in 2016 and there are many activities and principles in the Draft Plan that the NPA ACT strongly supports and the separation of subject areas in Chapters 1 – 10 from the unit specific information improves overall readability.

### **Vision**

It is puzzling that the initial emphasis of the vision is on the impact on the ACT community and then on the natural values of CNP. Given the legislative requirement underpinning primacy of the management objective "conserve the natural environment" and the support this is provided by the rest of the Draft Plan the emphasis of the vision is misplaced.

### **Funding**

The Draft Plan identifies many activities that are needed to satisfactorily protect CNP. The implementation of these will require adequate funding over the long-term. This situation is one of the key threats to the Draft Plan's implementation. Historic funding levels have contributed to issues like the significant delay in the review of the current CNP management plan. The NPA ACT appreciates the difficulties faced by EPSDD in increasing its share of the ACT's budget.

While it is beyond the specific scope of this Draft Plan it is imperative that new funding models are identified and implemented for the protection of the ACT's environment.

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### Urban interface

The CNP is made up of 37 units and as such has a significant urban interface. This is another key risk to the long-term sustainability of CNP.

The introduction of zoning within Chapter 6 is an important step in identifying areas of high conservation values within CNP and for identifying and regulating the permissible activities within each of the two zones. However, the sustainability of CNP's units is also impacted by activities and threats originating from outside of the CNP's units' boundaries.

### Connectivity

The NPA ACT is pleased to note that included in Draft Plan is a goal that the CNP units "are well-connected across the landscape". The relatively small size of each CNP unit increases the importance of this objective, particularly for our woodland and grassland ecosystems. Individual units face significant pressures from the urban interface and from climate change. Connectivity is a key factor in the ability of CNP units to cope with these pressures.

The Draft Plan (Chapter 2.4) identifies a number of breaks and bottlenecks in connectivity. To address these will require the introduction of a range of approaches including working in conjunction with the activities planned to increase the extent of the urban tree canopy.

### Recreation and Tourism Strategy

The NPA ACT is encouraged by the reference in the Draft Plan that a recreation and tourism strategy is being developed by EPSDD. This is an initiative that the NPA ACT has been lobbying for over a long period. Such a strategy must be driven by the primary management objective for the ACT's national park and nature reserves, being the conservation of nature. It should address recreation and nature based tourism opportunities across the whole of the ACT and not just within conservation reserves.

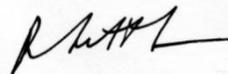
Further comments are included as part of Attachment 1 Other Detailed Commentary.

Should you require any further information regarding the NPA ACT's input, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

Yours sincerely



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President  
National Parks Association of the ACT



Rod Griffiths  
Convener  
Environment Sub-committee

16 December 2019

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## **Attachment A**

### **Other Detailed Commentary**

#### Chapter 2 Plants and Animals

This chapter may be seen as the most important for nature conservation, but in Section 2.6 there are management objectives and actions but there are no supporting policies which is disappointing.

Fig 2.2 is useful in identifying where restoration to improve connectivity is required.

The NPA ACT support the Draft Plan's emphasis focus on building resilience against the impacts of climate. It is important that a precautionary approach be taken in respect to maintaining and restoring diversity in ecological communities and maintaining large, well-connected and genetically diverse populations. Therefore, it is imperative that actions be taken to create climate resilient ecosystems in the CNP.

#### Chapter 3 Water

The NPA ACT recommends that action 35, being "Rehabilitate damaged creeks, drainage lines and dams and improve the condition of aquatic habitat" should be upgrade to a high priority.

Drainage lines becoming gullies can reduce infiltration of water into the landscape and cause irreparable changes in local plant communities. The dispersion and migration of terrestrial animals can also be affected.

#### Chapter 4 Indigenous Connection to Country

The NPA ACT strongly supports the policies, objectives and actions outlined in this chapter.

#### Chapter 7

The best practice boxes (boxes 1 to 5) in this chapter contain advice for people involved in recreation and would be better suited for distribution to CNP users through various communication styles such brochures, etc as opposed to inclusion in the Draft Plan.

#### Part 2 Reserve Profiles

Division of CNP into 7 reserve complexes, and display in a map form, page 117, is a useful way to understand management in 37 reserves. However, it is disappointing that an opportunity to group CNP units into ecosystems that match key strategies such as the Woodland or Grassland Strategies has been missed. An issue with previous CNP final and draft management plans was how they interacted with and implemented key environmental strategies and this could have been further addressed in the current Draft Plan.

All reserve maps would be improved by showing the major trails in the reserves.

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### **Goorooyarroo NR**

The map of the reserve would be improved by showing the location of the predator proof fence.

The last Key Action listed for this reserve “protect grassland fauna and woodland bird habitat, including Superb Parrot breeding trees” raises some questions. Are not all fauna and habitats protected in the reserve? If natural regeneration of woodland trees occurs in the Offset Area, and grassland areas are thus reduced, will this woodland regeneration be limited by management action to protect grassland fauna? This is a management quandary that should be addressed in the Draft Plan.

### **Mount Ainslie NR**

The first key action “Protect bird breeding habitat on the eastern side of Mount Ainslie during breeding seasons” seems vague. What on-ground actions will this include? Why only protect habitat in the breeding seasons, when the habitat needs protection all year round?

### **Mulligans Flat NR**

The map of the reserve would be improved by showing the location of the predator proof fence.

### **Central Grasslands**

All the grassland reserves (except Jarramlee / West Macgregor) have the following key action “trial the use of reinstated surface rock as habitat for grassland lizards and invertebrates”. This action is not justified in the grassland summary. It is an unusual action in what appears to be a natural environment. What evidence is there that rock has been removed from all these reserves, and needs to be reinstated? Will there be an environmental assessment before the trial begins? Will there be assessment of any negative effects to other fauna? If there are negative effects, will all the reinstated rock be removed again, and what impacts will this cause? Will the reinstated rock affect the preceding action of the site specific slashing to increase habitat quality for Striped legless lizard?

### **Aranda Bushland NR**

There is a block of bush adjoining the eastern side of the reserve that PCS staff refer to as an offset and manage as part of Aranda Bush NR. However, this area is not shown on the map, nor mentioned in the text. This situation should be clarified in the final plan.

### **Coleman Ridge NR**

One key action is to protect and improve Pink-tailed Worm-lizard habitat. There is no description of what these actions may entail. Will actions such as these be preceded by environmental assessment to consider whether there are negative effects to other species?

### **McQuoids Hill NR**

One key action is to maintain woodland condition and connectivity to other reserve areas. This suggests that actions will be taken off reserve, and previously would not have been included in a management plan. It is pleasing to see it here as such

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actions are required to improve the overall health of CNP. It is however puzzling that it is not referred to in other CNP profiles other than Farrer Ridge.

### **Farrer Ridge NR**

A key action is to “improve connectivity between woodland patches”. It is not clear if that means woodland patches within or between the reserve and other reserves. There are no details of this action, whether this will be implemented by encouraging natural regeneration or by other methods such as direct seeding or plantings.

Another key action is to “improve the habitat for Pink-tailed Worm-lizard”. Again, no details are provided of what methods will be used to achieve the desired result.

### **Jerrabomberra East Grasslands**

Why was this reserve not been included in the Draft Plan? Signage in this reserve unit refers to it as being part of CNP.

### **Appendix 1 Table of Actions**

It is useful to see the full list of actions from Chapters 2 -10 listed, with their priorities. However, none of the key actions in Part 2 CNP Reserve Complexes and Summary Profiles section of the Draft Plan have indications of their priority.