



National Parks Association of the ACT Inc.
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50 years of conservation, nature protection and education

Ms Maxine Cooper
ACT Commissioner for Sustainability and the Environment
PO Box 356
Dickson ACT 2602

Dear Ms Cooper

Comments re “Should Gorooyarroo, Mulligans Flat, Mount Majura and Mount Ainslie become a National Park.....”

The National Parks Association of the ACT (NPA ACT) would like to compliment the Office of the ACT Commissioner for Sustainability and the Environment (OCSE) for commissioning the report entitled *Should Gorooyarroo, Mulligans Flat, Mount Majura and Mount Ainslie become a National park or remain as discrete Nature Reserves as part of Canberra Nature Park?* (the Report). As outlined in our submission to the Investigation into Canberra Nature Park, Molonglo River Corridor and Googong Foreshores (the Investigation), we believe there are benefits arising from the creation of a new national park in the ACT. In reviewing the Report we believe that it implicitly recognises this benefit.

At the time of the investigation the NPA ACT was still developing its proposal for a new national park for the ACT and in responding to the Report it is important to articulate the NPA ACT's current proposal. The key points of the proposal now incorporate that:

- the new national park should be used to address the requirements of the ACT's Lowland Woodland Strategy (ACT Action Plan No 27).
- the new national park also should incorporate key woodland reserves south of Lake Burley Griffin, eg the Red Hill, Mt Mugga Mugga, Callum Brae units of Canberra Nature park as a minimum.
- The new national park should drive connectivity measures. In particular it is a key component in ensuring that other high value lowland woodland areas in the ACT are conserved through reservation or other conservation land tenures. For example, the proposed reserve at Kinleyside would appear to be an obvious addition to a new national park. This would then highlight the need for connectivity between Kinleyside and Mulligan's Flat.

A summary of our impressions of the Report would be:

- Although it fails to give an opinion on whether a new national park should be created, the Report identifies 18 advantages to only 8 disadvantages. Weighing up the advantages against the disadvantages the NPA ACT believes there is a strong case that the creation of a new national park would have a positive outcome for the environment.
- The Report only covers Mulligans Flat, Gorooyarroo, and Mounts Ainslie and Majura. Our current proposal for a new national park is now based on the need to protect the ACT's lowland grassy woodlands with a particular emphasis on the Yellow Box Red Gum ecosystem. We believe that our current proposal further strengthens the positive outcomes for the environment.

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- The Report does not address the ACT's Lowland Woodland Strategy (Action Plan No 27). This seems to be a key omission as it provides significant rationale for the creation of a new national park,
- The Report clearly states that the creation of a national park would be allowable under IUCN principles.
- The Report doesn't draw out the relevance of the term "National Park to the general community ie the creation of a new national park would raise the issue of the importance of the ACT's lowland woodlands in the public's eye.

A detailed response to the Report is attached.

The NPA ACT believes its proposal for a new national park in the ACT will improve the conservation of the ACT's lowland woodlands and, in particular, the yellow box red gum grassy woodland ecosystem. The NPA ACT thanks the OCSE for its role in investigating the feasibility of a new national park and would welcome an opportunity to further discuss the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths
President

4 June 2011

ATTACHMENT A

National Parks Association of the ACT's Detailed Response

Part 1 – the Introduction identifies that OCSE has sought advice on whether the identified reserves should become a national park, however no recommendation either way is provided.

Parts 2.1 to 2.4 – No comments.

Part 2.5.1 Conservation values and significance – Noted.

Part 2.5.2 Management Purpose – The ACT's yellow box red gum grassy woodlands are recognised by the ACT's Parks Service as one of the jewels in the ACT's reserve system. It is identified as national threatened and the ACT is of national importance in the maintenance of this ecosystem.

Part 2.5.3 Design, size and boundaries –The NPA ACT's research also found that national parks in Australia range widely in size and that the enlarged scope of the NPA ACT's proposal would be significant for a national park so close to the urban environment.

Part 2.5.4 uses and condition – Noted – separately the NPA ACT has been lobbying for the establishment of an outdoor recreation plan for the ACT to ensure sustainable usage of the ACT's reserves.

Part 2.5.6 Threats – Noted.

Part 2.5.7 Connectivity – Connectivity is a vital part of the NPA ACT's proposal. While the establishment of a national park based on key reserves would be an important starting point for the conservation of lowland woodlands, ultimately the viability of these ecosystems will rely on connectivity. This can be achieved in many ways including expansion of the national park or the adoption of conservation actions in respect to other land tenures.

Part 3.1 Advantages

1 – Agreed.

2 – Agreed – A new national park does have the potential to significantly increase public awareness of the plight of the Act and Australia's woodlands.

3 – Agreed.

4 - A key factor arising from the creation of a new national park would be its ability to facilitate the addressing of the issues identified in the ACT's Lowland Woodland Strategy. This will be achieved through the use of conservation actions on public and private lands, with the new national park providing the core preserves for the ACT's lowland woodlands.

5 – It would be envisaged that new national park would provide significant impetus and expansion of the important work being conducted at Mulligans Flat Sanctuary.

6 – Agreed.

7 – There is the potential for this but the clarification of the ACT's naming conventions for its reserves and the associated management objectives is out side the scope of the NPA ACT's proposal. It would be a worthwhile project in its own right.

8 – As per 5.

9 – Agreed.

10 – The creation of a new national park should be seen as the first stage in the full implementation of measures outlined in the ACT's Lowland Woodland Strategy. A key addition would be the incorporation of Kinleyside. However, the Lowland Woodland Strategy identifies a range of areas of high conservation value currently lacking adequate protection.

11 – Agreed that the initial creation of a new national park need not be expensive. However, it is uncertain whether there would be increased costs from community expectations not offset through improvements in administration and the potential to attract new funding.

12 – Agreed and this could arise from the reconfiguration of existing management boards.

13 – Agreed.

14 – Agreed – again this is one of the benefits of the proposal.

15 – In fact, it is felt that this could enhance the sanctuary project by extending its scope and facilitating additional funding.

16 – Funding could also arise from other sources. The creation of a new national park would provide an important marketing tool for the ACT and its reserve system.

17 – As per 12.

18 -An important point.

Part 3.2 Disadvantages

1 – The ACT already has significant statutory protection available to its conservation reserves. The new national park proposal builds on other factors associated with the national park concept to improve conservation outcomes for the ACT's lowland woods

2 – Disagreed, the ACT already has a national park and this has not created a two tier system. Yes resources are scarce but the amalgamation of the ACT's lowland woodland reserves would introduce management efficiencies for affected reserves and would have the potential to improve funding and economic opportunities for the ACT which would benefit the whole reserve system.

3 – Disagreed – refer to the benefits identified under advantages No 2 and recommendation No 2.

4 – Such a process would require a variation to the Territory and would be open to public scrutiny. Such an approach would expose the Government to significant political pressure and would certainly be unlikely to be achieved in the current political climate.

5 – Disagreed – While there is no ironclad guarantee, the current ACT Government has created new boards for Mulligans Flat, the Jerrabomberra Wetland and Tidbinbilla Nature Reserve which would indicate that they are aware of the benefits of having such boards

6 – The NPA ACT would see that there is potential for the current Board at Mulligan's Flat to be a basis for the advisory board for the new national park. This would open up new opportunities for the expansion of the work done at the Sanctuary.

7 – The NPA ACT believes that the ACT’s lowland woodlands are a significant national asset and should be managed in accordance with the Lowland Woodland Strategy. Scientific research is an important component of that strategy and the work at the Sanctuary is seen as being highly relevant to woodland conservation. There is no reason for this to change under a new national park. The threats of inappropriate recreation and other activities are a threat to the ACT’s woodlands including the Sanctuary and need to be also managed to ensure the viability of the ecosystem as a whole.

8 – The Report’s wording already concludes that size does not necessarily matter in determining whether a national park should be created.

Part 4 Conclusions

1 – Agreed - There is no legal requirement for

2 – Agreed – but the benefits of the proposal do not lie in additional statutory protection for the existing reserves. The benefits lie in the ability to increase public awareness of lowland woodlands in the ACT, in the recognition of the national importance of the Yellow Box Red Gum components of the ACT’s lowland woodlands, through efficiencies in the management of the amalgamated units and through the potential for improved marketing for funding additional to that already available for the ACT’s reserve system.

3 – Agreed – However, the NPA ACT’s current proposal for a significantly larger new national park has an even better fit with the IUCN category II National Park.

4 – Agreed – The NPA ACT’s proposal is completely consistent with the need for conservation of lowland woodlands to be placed in a landscape wide perspective. Our proposal advocates for the use of a range of land conservation tenures to protect lowland woods and to provide connectivity. However, it does believe that ultimately the best protection is in publicly own conservation reserves that are adequately resourced.

5 – Agreed – The NPA ACT’s proposal should not be used to decrease funding to other conservation reserves. However, it would be hoped that the new national park would introduce management efficiencies as a result of the amalgamation of reserve units. It would also be logical for the Board of the Sanctuary to be responsible for this larger woodland reserve and be used to attract additional external funding for the national park’s management.

6 – Noted – the re-badging of existing conservation units probably does not require legislative intervention. However as the park is expanded through new acquisitions then the points discussed at 6 would become relevant.

Part 5 Recommendations

1 – There is no difference is a lack of definition between the naming of the ACT’s reserves and their management purposes. It is agreed that the proposal will not change the statutory status of existing reserves but the benefits of the proposal are not reliant on increasing the statutory protection of existing reserves. The benefits lie in the ability to increase public awareness of lowland woodlands in the ACT, in the recognition of the national importance of the Yellow Box Red Gum components of the ACT’s lowland woodlands, through efficiencies in the management of the amalgamated units and through the potential for improved marketing for funding additional to that already available for the ACT’s reserve system.

2 – Agreed.

3 – As per recommendation 1 this is not the point of the proposal. To increase the legal protection of the national park would require significant changes to ACT legislation. The proposal will however improve the conservation prospects of the ACT’s lowland woodlands by

assisting in addressing the actions of the Lowland Woodland Strategy and by increasing public awareness of the ACT's woodlands.

4 – The proposal should not be used to reduce funding for other key strategic conservation management issues in the ACT. However, a world class new reserve would have the potential to increase visitor numbers to the ACT, to open up opportunities for funding from other sources including public and private grants and sponsorship and would be justified in attracting additional funding from the ACT Government.

5 - The proposal does have the potential to be a “centre-piece to visitors..... and to showcase world classbest practice woodland recovery and management”. These are additional benefits for the NPA ACT's proposal. The ability to attract additional funding should be enhanced by the creation of a world class woodlands national park.

6 – This is addressed as part of 4.

7 – Agreed - A key aim of the new national park proposal is to encourage the implementation of a strategic approach to lowland woodland management in the ACT. Connectivity will be a key factor in the viability of the ACT's woodland and a range of options should be used to achieve conservation objectives. The new national park would be the catalyst for such actions. The increased scope of the NPA ACT's proposal will also assist in the strategic management of the ACT's lowland woodlands.

8 – This recommendation is worthwhile in its own right but not part of the NPA ACT's proposal.