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

Dear Doctor Cooper

OCSE Investigation into Canberra Nature Park, Molonglo River Corridor and Googong Foreshores

The National Parks Association of the ACT (NPAACT) is pleased to submit its submission in respect to the above investigation.

Our comments focus on the Canberra Nature Park (CNP) but many of these comments are applicable to the Molonglo River Corridor and Googong Foreshores.

Some of the key points raised in our submission include:

- Concerns about recreational usage and unsocial behaviour impacting on reserves;
- A concept for a new national park;
- The setting of reserves as part of a bigger picture of conservation management;
- The relationship of reserves and neighbouring land managers;
- The shortcomings resulting from Parks Conservation and Lands' budget situation – which has led to a need for more rangers and a greater on-the-ground presence; and
- The concept of reserves and connectivity.

Should require any further information please do not hesitate to contact me on 6231 8395 or Rod Griffiths on 0410 875 731.

Yours sincerely

Christine Goonrey
President

28 February 2010



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Attachment A Comments in Respect to the Terms of Reference

1 .Assessment of the condition of the forests, woodlands and grassy woodlands in these areas, including the effects of grazing by stock and/or kangaroos, vertebrate pests and weeds

Canberra Nature Park (CNP) – The CNP is a series of remnant bush areas spread throughout and around the suburbs of Canberra. The CNP's proximity to the majority of the ACT's population contributes strongly to the sense of Canberra being a bush capital. The reserves making up the CNP cover a range of ecosystems, including areas of threatened yellow box-red gum grassy woodlands.

The ecological condition of the individual reserves do vary, with some reserves being significantly more degraded than others. Naturally, much of this variability is a result of past usage, however, there are still ongoing threats to all of the components of the CNP.

The very location of the components of the CNP throughout and near to Canberra's suburbs means that many of the units are subject to high visitation numbers. The components of the CNP provide opportunities for a wide range of recreational activities, not all of which are appropriate or sustainable. There is an increasing disregard among nature park users for the environment and biodiversity values of the nature parks. At the same time, the ACT government is increasing its promotion of the nature parks as areas for exercise and recreation, unfortunately without an accompanying increase in funding to cope with the added use, nor with an equal emphasis on users respecting the conservation values of the areas.

This imbalance in promotion and protection has resulted in quite severe degradation of areas of nature parks across the ACT. Attachment B to this submission is a portfolio of photographs showing the impact of recreational usage on various reserves within the CNP. The NPAACT supports the use of the ACT's conservation reserves for low impact recreation but qualifies this by stating all recreation must be sustainable and appropriate for the area in which it is being undertaken. The NPAACT acknowledges that damage arises simply from the general wear and tear of large numbers of visitors. Parks, Conservation and Land (PCL) has hardened and in some cases, rerouted many of the CNP's more popular walking tracks in an effort to reduce erosion. However, visitor pressures have led to a proliferation of informal tracks which have undermined erosion protection mechanisms.

The NPAACT's members have also noted, as per the photos in Attachment C, inappropriate usage of the CNP including mountain bikes on single tracks, horses off equestrian trails and off-lead dog walking. While the NPAACT accepts that there will always be rogue elements of the population who flaunt rules and regulations it has been increasingly concerned that these and other anti-social incidents appear to be more prevalent, directly impacting on the condition of the CNP.

The photos in Attachment C also provide evidence of the strong presence of weeds throughout many areas of the CNP. These are an ongoing problem for all the ACT's



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reserves. Weed management needs to embrace a holistic approach with management of weeds in the reserves and in neighbouring properties being managed co-operatively. Weed management in the ACT will, for the foreseeable future, require significant inputs of resources to avoid serious environmental impacts. However, part of the resources should be devoted to ensuring all land managers are working together to reduce weed threats.

The NPAACT recognises that in certain circumstances the ACT's eastern grey kangaroo population can place significant grazing pressure on the ACT's reserves. However, while the NPAACT has supported recent cullings of eastern grey kangaroos in highly overgrazed areas of threatened ecosystems it believes that cullings, in general, should only be conducted where there is clear scientific justification for such action.

A key issue for CNP is the impact of bushfire prevention measures on the conservation values of the components of the CNP. Fuel reduction can occur in a number of ways including burning, slashing and grazing. All methods used to reduce fuel loads should be ecologically sensitive in respect to the extent and timing of the measures. However, the Asset Protection Zone which extends up to 300 metres in nature parks in various areas around Canberra, prescribes reduction of grasses, separation of tree canopies, removal of rocks to enable grass slashing and other measures which effectively destroy the ecological values of an area. Aranda Bushland, Farrer Ridge, Mulligan's Flat Sanctuary and Coleman Ridge are all subjected to this treatment under the requirements of the Strategic Bushfire Management Plan 2009.

The problem is exacerbated by new developments on the urban fringe such as the current development proposal at Watson North. This new development will push the Asset Protection Zone 300 metres into Mt Majura Nature Park, which is an example of urban developments placing direct pressure on the conservation values of the CNP. The extent of that proposed development would force asset protection measures to be concentrated within the Mt Majura component of CNP instead of being catered for within the development site itself. New developments adjoining reserves should respect the conservation priority of the existing reserve and incorporate asset protection zones within the boundaries of the development, not the reserve.

Molonglo River Corridor – Large portions of the lower section of the Molonglo River Corridor are currently relatively unvisited. However, this will be radically different with the development of the Molonglo residential suburbs. This urban development will introduce direct pressure on the environment of the lower Molonglo. It would be expected that increased recreational pressures will be evident and it will take strong actions to ensure the ecological balance of the lower Molonglo is not disturbed. Planning for the urban developments must be sensitive to the requirements of the lower Molonglo as the area is home to key raptor species and the threatened pink-tailed worm lizard (*Aprasia parapulchella*).

2 Identify actions to protect and enhance these areas, including land use or boundary changes while taking into account their purpose, values and location



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and the status of indigenous species and communities protected in the nature reserve system

General Comments – The NPAACT believes that any actions to protect and enhance these areas need to be taken in a manner which considers a broad conservation perspective. Decisions should not be taken in isolation but need to consider issues such as

- The role of reserves as part of a bigger picture of conservation management
- Connectivity with other natural areas and the provision of ecological corridors
- Interaction with the actions of the managers of land adjoining the reserves

Create an integrated biodiversity/spatial planning system

The Conservation Council of the ACT Region is putting a proposal to the ACT government which would establish an integrated, workable ecosystem/ spatial planning and decision making framework across the ACT so that long term planning and environmental protection activities are conducted within a framework of certainty which achieves environmentally sustainable development. This would enable proper planning of land use and identify any potential boundary changes within a detailed and comprehensive planning process which would stand the test of time. Such a framework would pull together environmental and planning data such as the detailed biodiversity map of the ACT derived from the TAMS fire and environmental mapping exercise; complete the connectivity mapping of the ACT being done by the ANU and publicly identify the matrix of key networks and corridors for species protection and movement throughout the region to increase adaptation and survival as the climate changes; collate detailed mapping of ACT's urban heritage sites with these maps; work with local Parkcare groups and community groups and with specialist information to develop local species lists for individual urban reserves and local areas; identify and develop interconnected ecosystems across multiple management regimes including urban development which enable adequate representation of regional ecological systems and protection of listed species; and co-ordinate inter-departmental co-operation and data merging to produce the final integrated ecosystem/spatial planning and decision-making framework and integrate it into the existing systems.

Without pulling together all this existing information into an integrated framework, any attempt to alter boundaries or change land use provisions would make school closures look like a walk in the park. It would be potentially devastating for ACT biodiversity; would be subject to intense public outcry; and any subsequent planning or development actions would experience long term delays and objections,

Reserve Nomenclature – The NPAACT believes that this review also provides an opportunity to review the naming of CNP. Almost all other conservation reserves in the ACT are called nature reserves or in the case of Namadgi, national park. The terms national park and nature reserve correspond with legislative management categories and this is an opportunity to recommend the alignment of legislative and common names. It is also an opportunity to recommend the clear definition of what should be a national park and what should be a nature reserve.



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A New National Park – The CNP plays a significant role in protecting areas of Yellow Box - Red Gum grassy woodland, a nationally threatened ecosystem. In the north the key reserves for this role are Mulligans Flat, Goorooyaroo, Mt Majura and Mt Ainslie and, in the south Red Hill Mt Mugga Mugga and Cullum Brae. The national importance of this ecosystem would suggest that a higher level of environmental recognition should be provided.

The NPA ACT therefore proposes that a **national park** be created from the aforementioned reserves. Their amalgamation would create potentially the largest single reserve of this important ecosystem and be of national significance.

The creation of a single national park would emphasise the concern that the ACT has for this endangered ecosystem. The single reserve would be one of Australia's most urban national parks and would help build on the extensive environmental community engagement that is already occurring in Canberra and, in particular, the newer northern suburbs.

The NPA ACT believes that the words "national park" describe for many members of the public the epitome of a conservation reserve. The creation of a new national park will therefore raise its ecological standing in the eyes of the community. In the north, considerable work has been done in the Gungahlin region, by organisations such as the Conservation Council ACT Region, to engage the communities there with the natural wonders on their doorstep. The creation of a national park would build on this community engagement and emphasise the importance of the protected ecosystem.

Discussion about whether it is appropriate for these CNP reserves to be amalgamated into a national park is discussed at Attachment B.

A key feature of all the nominated reserves is their woodland environments. Mulligans Flat and Goorooyaroo have been described by TAMS as holding "treasures of national significance including Yellow Box — Red Gum Grassy Woodland, an endangered ecological community". Similar descriptions are applicable to Mt Majura and Mt Ainslie and Cullum Brae and all protect common and threatened plant and animal species as well as many indigenous and European cultural sites. Amalgamated, the new national park would be a new jewel in the ACT's reserve system.

The creation of national park would emphasise the importance of woodland environments and, in particular, would highlight the critically endangered predicament of the Yellow Box - Red Gum grassy woodland

The creation of a national park would also further promote the sanctuary project located at Mulligans Flat. This leading edge ecological study is a key research project for the preservation and rehabilitation of grassy woodlands and further highlights the importance of the potential national park.

The northern component of the new national park would form an almost continuous arc through the north of the ACT, however there would be potential for expansion through additions of land in Kenny and Majura and along the northern border of the ACT.



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Similarly, in the south, the nominated reserves form an almost continuous band. Therefore while a new national park can be created immediately at relatively little cost. Such an action should be seen as a starting point for the reservation of other relevant areas and as a tool working in conjunction with other conservation land management strategies.

3. Review existing land management programs and practices for these areas and areas that adjoin them. This is to include, but not be limited to, agistment, leasing, culling arrangements, Land Management Agreements or plans of management which may apply

The CNP is treated as a single entity for the production of a plan of management as required for all areas of public land. The CNP is made up of more than 30 reserves, covering numerous ecosystems with varying management requirements. The current plan of management provides broad guidance for the management of the CNP. Future editions should address the actions and policies required to address specific issues peculiar to individual or like groups of CNP reserves. Such an approach would improve the usefulness of the plan of management for users by providing reserve specific actions that are relevant to the key environmental issues of the individual reserves.

The NPAACT notes that this term of reference identifies a number of potential models for the management of the CNP and other reserves. The NPAACT believes that conservation reserves are created with conservation of the natural environment as their primary land management objective. The incorporation of private usage of conservation reserves would appear to introduce other management objectives that have the potential to undermine the primacy of the conservation objective. There may be situations where significant private usage will enhance conservation but the NPAACT would only support such developments where there is clear scientific evidence of a positive environmental outcome.

4. Identify any urgent actions and longer-term changes that are needed to improve the management of these areas. This is to include identifying successful management measures that should be retained

A concern of the NPAACT is the lack of funding for conservation in the ACT. Funding pressures on PCL limits its ability to employ more rangers who would be able to increase the on-ground presence of PCL throughout the reserve system. There is an increased reliance on parkcare groups to address field issues, such as weeds, in the reserves. However, funding for many of the parkcare groups are limited.

The NPAACT would recommend a real increase in the level of funding for conservation purposes by the ACT government with an emphasis on increasing ranger numbers, supporting park and landcare groups and the expansion of weed and pest programs.
((Guys, any thoughts how this could be funded???)

The Government insists that it cannot increase funding for the TAMS budget and that previous shortfalls must be made up through even harsher savings measures over the next triennium. NPA ACT argues that the conservation budget in TAMS has been



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significantly underfunded over the past three years, not over-expended. This is a political decision, made not on sound business or management evidence but on a guesstimate of what the electorate won't notice or worry about too much.

Late in 2009 the Government invited community organisations to a series of meetings to identify possible service cuts to the TAMS budget. Feral pest and weed controls were mentioned as possible cuts. The overwhelming advice from community groups at these meetings was that to cut maintenance programs for environmental services in Canberra's nature parks, reserves and national park would create significantly larger costs very shortly thereafter. It is our opinion that Treasury is being hypocritical demanding savings be identified regardless of outcomes in the environment portfolio while allowing speculative bids for ad hoc funding in the Sport and Recreation portfolios, eg to fund sporting superstars.

We do not believe it is appropriate for community organisations to try to second guess government savings measures or to invent new revenue streams. On its own business plans, its Threatened Species Plans, its management plans, these are sensible, moderate conservation management measures which need to be carried out in the normal routine of business and funding should be appropriately applied to these activities,

5. Identify knowledge gaps, research or survey needs, and compliance and monitoring requirements that may be necessary to support improved management programs and practices while taking into account the context of the areas and effects of climate variability

We have several suggestions for research and surveys:

1. Further work needs to be done on the response of various vegetation types to the fire regimes specific in the Strategic Bushfire Management Plan. This is a longterm requirement and should be undertaken regularly in order to inform the five year reviews of these fire management plans.
2. There is a need to research and monitor the impact of recreation on the ecological values of the nature parks, particularly in high use areas, and to develop appropriate management regimes
3. Monitoring of the government's various management plans for the nature reserves is an essential tool but is not carried out regularly nor with adequate research. A routine, regular maintenance and data collection program should be built into core costs for the program.

6. Identify ways for ensuring effective communication and involvement of stakeholders, including Aboriginal people, whose actions potentially, indirectly or directly, affect these areas

The NPAACT notes with interest that the PCL website does not provide a listing of all the reserves making up the CNP. This would appear to be an obvious omission in the information available to the general public on the CNP.



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The NPAACT recommends to this enquiry the actions taken, by the Conservation Council ACT region and others to engage residents in the newer Gungahlin suburbs with their neighbouring reserves.

The NPAACT also would recommend the continuation of programs to increase the numbers of, and assist the development of, aboriginal rangers. We also consider that the failure to re-convene the Interim Namadji Advisory Board has hampered efforts to get the Aboriginal community engaged in the nature park system because this act of bad faith has impacted on their belief that their interests are respected.

We would also suggest that, should the INAB be re-convened, consideration should be given to including in its brief a role for the nature parks.

7. Identify potential biodiversity offset management actions or sites

The NPAACT recognises that there are areas of high conservation value outside of the current conservation reserve system. However, it believes that where offsets are being proposed it is up to the ACT bureaucracy to identify these areas, communicate clearly with the ACT public the benefits that would accrue from the use of an offset and provide the ACT community with an opportunity to comment on the offset proposal and the perceived benefits.

In general, the NPAACT would not support offset proposals unless clear and significant environmental benefits were to arise.

8. Identify the evidence justifying the need for managing grazing pressure in the context of sound reserve management practices.

The management of reserves should always be based on the best scientific knowledge. Where significant uncertainty exists on whether net environmental benefits would arise from an action, a principle of conservatism should be applied. Therefore the NPAACT would welcome such research as is required to clearly identify the best practices for the management of grazing pressures. The draft kangaroo management report by Kevin Frawley and Don Fletcher is an important baseline for macropod management and similar documents are required for domestic grazing impacts. In many instances decisions on the management of reserves will need to be made on a site by site basis as varying ecosystems and sites will be affected differently by grazing practices.



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**Attachment B
Requirements for a National Park**

The International Union for the Conservation of Nature and Natural Resources (IUCN) is seen as a world expert on conservation reserves. In its 2008 publication *Guidelines for Applying Protected Area Management Categories.*, the IUCN sets out the following six management categories

- I Strict protection [Ia) Strict nature reserve and Ib) Wilderness area]
- II Ecosystem conservation and protection (i.e. National park)
- III Conservation of natural features (i.e. Natural monument)
- IV Conservation through active management (i.e. Habitat/species management area)
- V Landscape/seascape conservation and recreation (i.e. Protected landscape/seascape)
- VI Sustainable use of natural resources (i.e. Managed resource protected area)

The IUCN states that the names (strict nature reserve, etc) are meant to align, more or less, with the main management objective of each category. The exception to this is the name "national park". The IUCN recognises that national park is a term that has been in use for well over a century and has been applied to areas in all management categories. It therefore notes that "the fact that a government has called, or wants to call, an area a national park does not mean that it has to be managed according to the guidelines under category II. Instead the most suitable management system should be identified and applied; the name is a matter for governments and other stakeholders to decide."

The main management objectives for each IUCN category need to be compared to the legislated primary management objective for the land in the Canberra Nature Park, as per Schedule 3 of the *Planning and Development Act 2007*, which is "(t)o conserve the natural environment". While the Schedule 3 definition could be aligned with most of the IUCN's management categories it is probably most aligned with either Category II National Park or Category IV Habitat /species management area. However, there are differences between the IUCN's definitions which for the management category of National Park seemingly provides equal weighting to promoting education and research as well as conservation. For the areas of land in the proposed national park education and recreation are secondary legislative objectives which are to be pursued where not in conflict with the conservation of the natural environment.

The IUCN recognises that individual reserves can have objectives that are different to its objectives and that the actual name applied to the amalgamated units is a matter of choice for the ACT government and stakeholders i.e. the IUCN would have no objection to the amalgamated area being named a national park.

The amalgamation of the CNP reserves into a new national park will not change their legislative management objectives and this would not affect projects such as the Sanctuary in Mulligans Flat. Nor would the creation of a national park change the opportunity for the community to experience low impact recreational activities.



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Attachment C

Impacts on Reserves - Examples

(A number of photos will be included here showing user impacts and inappropriate behaviour)