



Jessica Wilson  
Policy and Planning Officer  
Department of Environment, Water and Natural Resources  
GPO Box 1047, Adelaide SA 5001

April 17, 2013

Dear Jessica,

**Re: Comments on Discussion Papers for South Para Parks Management Plan**

As South Australia's primary nature conservation advocacy organisation, the Nature Conservation Society of SA (NCSSA) has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

Since 1962, NCSSA has played a key role in establishing and expanding the reserve system in South Australia by promoting the protection of key biodiversity assets through the dedication of reserves and by undertaking ecological research to inform their management. Our current and past activities also address the significant need for ongoing management within parks and ongoing engagement with and education of the wider community.

The NCSSA welcomes the opportunity to contribute to the development of the management plan for the South Para Parks an area where we have previously assisted the South Para Biodiversity Project to evaluate their on-ground works through establishment of monitoring sites and programs. We also like to commend the Department for adopting a more consultative approach to development of management plans for Reserves.

Please refer to the following pages for our comments on key points raised in the in the Discussion Papers. We hope these comments are useful in developing the draft management plan and look forward to further involvement as the plan is finalised. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [nicki.depreu@ncssa.asn.au](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,

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## NCSSA comments: Conserving Biodiversity – South Para Parks Management Plan

We offer the following views in terms of the Discussion Points in this Paper:

Discussion Point #1: *In your opinion, which areas in the parks have high landscape appeal and intrinsic natural values? What is special about the parks?*

The NCSSA strongly support the statement in the Introduction to this Discussion Paper that the South Para Parks play a vital role in conserving remnant vegetation in the Mount Lofty Ranges and Barossa Valley. The links between DEWNR Reserves and land managed by Forestry SA, SA Water and private landholders form an extensive area of native vegetation that is critical for the long-term conservation of biodiversity in these areas. It is currently estimated that these areas contain 75% of the remaining plant associations in the Mount Lofty Ranges. The NCSSA consider all of the South Para Parks area to be important in terms of remnant vegetation but the occurrence of the nationally threatened Peppermint Box Grassy Woodland and numerous species of plants and animals with national and/or state conservation ratings is of particular importance.

Discussion Point #2: *In your opinion, what do you consider to be the major issues that affect the parks?*

The NCSSA consider the major threats to Reserves and other key landholdings in the South Para Parks area to be pest plants and animals, overabundant kangaroos, further spread of Phytophthora, inappropriate fire regimes and the effect of adjacent land management activities and human impact on biodiversity values. The NCSSA also believe that the effect of climate change on this extremely important area of remnant vegetation, threatened ecological communities and species of national and state conservation significance is an emerging threat that needs to be carefully considered in developing the management plan for the South Para Parks.

Discussion Point #3: *What are the priorities for managing threatened flora and fauna species?*

In terms of managing threatened flora and fauna species, the NCSSA believe that management of key threatening processes is critical to their long term survival however, where these are not fully known or understood, further research is essential to improve knowledge and enable management practices to be adapted over time. The NCSSA strongly recommend that future management of threats should endeavour to minimise off-target effects to species of conservation significance that occur within the South Para Parks area. The NCSSA also recommend that rigorous and long-term monitoring programs for threatened species be included in the management plan in order to determine population changes and enable the effects of management to be evaluated.

Discussion Point #4: *What are the priorities for collaborating across park boundaries?*

The NCSSA believe that a landscape scale approach to management is critical to long-term biodiversity conservation and this is particularly important in areas such as the South Para Parks where relatively small areas of intact native vegetation remain. The area forms an important part of the Borda to Barossa NatureLink and therefore collaboration across park boundaries should be considered wherever possible to achieve biodiversity outcomes. The NCSSA consider there are considerable benefits in terms of both costs and overall effectiveness from managing threats across the broader landscape. Pest plant and animal control would be a high priority for collaborating across park boundaries but the management of fire to prevent impacts of widespread habitat loss through bush fire would also be a priority.

Discussion Point #5: *What are the key threats to the parks?*

The NCSSA consider all of the threats listed in the discussion paper to be important in terms of managing the area for long-term biodiversity conservation. Pest plants and animals would have to be one of the highest priorities however other threats such as the further spread of Phytophthora, inappropriate fire regimes and the effect of adjacent land management activities and human impact must be duly considered also.

Discussion Point #6: *Which threats are not well understood and require additional research?*

The NCSSA believe there are a number of key threats to landholdings in the South Para Parks area that are not well understood and require additional research including the following points:

- The impact of vegetation condition on declining bird species and how this changes in response to management of grazing pressure.
- The effect of inappropriate fire regimes on threatened ecological communities and species of conservation significance.
- The effects of climate change on native species, particularly those with national or state conservation significance.
- The impact of *Phytophthora cinnamomi* on native vegetation within the area and ways of preventing further spread to areas where it has not yet been detected.

Discussion Point #7: *What are the key indicators of ecological condition within each park?*

The NCSSA recommend the Bush Condition Monitoring (BCM) method in combination with site based bird surveys are an appropriate technique for monitoring key indicators of ecological condition within the South Para Parks area. We have previously assisted the South Para Biodiversity Project to establish and re-monitor BCM sites on a number of key landholdings including DEWNR Reserves, Forestry SA, SA Water and private landholdings in this area to evaluate the effectiveness of on-ground works. The BCM assessments provide a tool to monitor and evaluate the performance of activities intended to maintain or restore biodiversity that are a high priority for the South Para Parks area. We would strongly recommend that ongoing monitoring of these sites is included as a priority in the management plan along with adequate resourcing for such programs.

Discussion Point #8: *Are any of the objectives and actions in the current Para Wirra Recreation Park Management Plan (1993) still relevant?*

The NCSSA considers that a number of objectives and actions in the current Para Wirra Recreation Park Management Plan (1993) are still relevant in developing the South Para Parks Management Plan in particular Objectives 2, 3, 4, 8 & 10. The NCSSA strongly recommend that the impact of prescribed burning programs on threatened ecological communities and species of national and state conservation significance be duly considered in developing the management plan.

As an additional point, the NCSSA believes that it is important to recognise how the South Para Parks Management Plan will contribute to the conservation goals of the Adelaide and Mount Lofty Ranges Natural Resources Management Board, Regional Natural Resources Management Plan (2008). The NCSSA would strongly recommend that relevant resource condition and management action targets are included in the management plan and demonstrate how management activities in the South Para Parks will align with and address these targets.

## **NCSSA comments: Visitor use, appreciation & enjoyment – South Para Parks Management Plan**

As a general comment, the NCSSA strongly believe that, in accordance with Section 28 of the South Australian National Parks and Wildlife Act, that conservation objectives must be given primacy in all reserve planning and that a full and rigorous impact assessment of recreational activities must be undertaken to enable effective integration of conservation and recreation objectives.

We offer the following views in terms of the Discussion Points in this Paper:

Discussion Point #1: *What is special about each park? What should the visitor experience be in 10 years time (what is your vision for the parks)?*

The NCSSA believe that the whole of the South Para Parks Area forms an extensive area of native vegetation in the Mount Lofty Ranges and Barossa Valley that is critical for the long-term conservation of biodiversity. The NCSSA strongly recommend the vision for the area should be to maintain or improve the condition of native vegetation in the future with particular emphasis on threatened ecological communities and species of national and state conservation significance.

Discussion Point #3: *Are there areas in the parks that should enable activities such as cycling that are not currently allowed?*

The NCSSA strongly recommends that any assessment of recreation and tourism activities in the South Para Parks includes due consideration of environmental factors as well as social, cultural and economic ones. The Society believes that the following critical issues for biodiversity need to systematically and comprehensively consideration in relation to current and future recreation and tourism activities conducted in the South Para Parks:

- > The location of significant flora and fauna populations and habitat and threatened ecological communities
- > The potential adverse impacts of an increase in vehicle traffic on biodiversity
- > The potential adverse impacts of trail construction, realignment and maintenance on biodiversity
- > The potential adverse impacts of increased soil erosion due to increased vehicle traffic
- > Management of *Phytophthora cinnamomi*

The NCSSA strongly recommends that due to current known occurrence in the South Para Parks area, the potential spread of *Phytophthora* should be carefully considered before enabling recreational activities such as cycling where they are not currently allowed.