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Ms Prue Adamson,
Policy and Planning Officer,
Protected Area Policy and Planning
Department of Environment, Water and Natural Resources
GPO Box 1047, Adelaide SA 5001

June 25, 2014

Re: Feedback on Discussion Paper for the Gawler Ranges National Park

Dear Ms Adamson,

I am writing to you on behalf of the Nature Conservation Society of South Australia (NCSSA) to provide feedback on the Discussion Paper that has been released for public consultation to assist in the development of an updated Management Plan for the Gawler Ranges National Park.

As South Australia's primary nature conservation advocacy organisation, 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.

NCSSA welcomes the opportunity to assist the Gawler Ranges National Park Advisory Committee to develop the new management plan for the Park. We also commend the Department for adopting a more consultative approach to development of management plans for Reserves.

Please refer to the following pages for our feedback on various sections of the Discussion Paper. We hope these comments are useful in developing the draft management plan and 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

Yours sincerely,

Nicki de Preu
Conservation Ecologist
Nature Conservation Society of South Australia

NCSSA Feedback on 'A new plan for the Gawler Ranges National Park'

NCSSA recognises the Gawler Ranges as a particularly important area for biodiversity conservation in South Australia due to the high diversity of native plants and animals the area supports and its location within a transition zone for species along an east-west and north-south gradient. The Society considers the Gawler Ranges National Park (GRNP) as a critical part of the biodiversity conservation values of this area along with other landholdings that are managed for conservation of biodiversity by private landholders.

As a general comment, the NCSSA supports the issues raised in this Discussion Paper and believe they provide a reasonable overview of key management issues and due recognition of historic and current threats posed to biodiversity in the area. We offer the following feedback in terms of the structured questions and specific sections of the Discussion Paper:

1. Protecting Natural Values

How can the effectiveness of biodiversity conservation programs be improved in the park and across the Gawler Ranges landscape?

We strongly support the importance of the GRNP and the nearby reserves of Pinkawillinie, Corrabinnie Hill and Gawler Ranges Conservation Parks as core elements of the East meets West NatureLink. We acknowledge the importance of these extensive and largely intact areas to biodiversity conservation and importance of ongoing management efforts to maintain and enhance protection of these areas. We strongly recommend that management activities need to be co-ordinated across the landscape in order to maintain long-term biodiversity values. Management of feral goats is one example where considerable resources and effort have been allocated to management on GRNP however the benefits will short-lived if reinvasion occurs from adjacent landholdings.

Are there other important plants, animals or environmental assets that have not been mentioned in this paper?

We recommend the addition of the Greater Long-eared Bat (*Nyctophilus timoriensis*), listed as Vulnerable under the EPBC Act, to the list of species of conservation significance for the Park. Suitable habitat also exists for the eastern subspecies of the Thick-billed Grasswren (*Amytornis textilis modestus*) and, although there are at present no confirmed records of this species, the Park lies within the known distribution and further surveys may result in its detection. The Gawler Ranges was also historically an extremely important refuge for the Night Parrot (*Pezoporus occidentalis*) with many specimens collected by Mr F. W. Andrews, a naturalist collecting for the South Australian Museum in the late 1800's. It is quite possible that this species still persists in suitable habitat that includes *Triodia* Hummock Grasslands and Samphire assemblages.

Are there other threatening processes that haven't been mentioned in this paper?

The Discussion Paper refers to the importance of the GRNP as a refuge for many species under pressure from a changing climate and the need to build resilience to climate-driven disturbances for long-term protection of natural values. We strongly recommend that the Management Plan address the threat that climate change poses to natural values of the Reserve, particularly given its location spanning the agricultural and pastoral regions of northern Eyre Peninsula. We recommend that long-term monitoring programs are established for the Gawler Ranges Short-tailed Grasswren, groundwater dependent ecosystems and other species likely to be affected by climate change. We strongly recommend the Management Plan builds on the information from the 2006 Management Plan and include an assessment of the current condition of key biodiversity conservation values. We also recommend that the new Plan acknowledge the importance of adequate resourcing for rigorous and long-term monitoring to assess the effectiveness of threat management programs.

Specific comments on this section of the Discussion Paper

Page 3, Paragraph 3

We strongly support the inclusion of information pertaining to species of national and state conservation significance in the Management Plan (further outlined in Appendix 1, page 7). We also recommend that the new Plan acknowledge that the former Hiltaba Station was acquired by the Nature Foundation in 2012 for addition to the National Reserve System, and is now managed for biodiversity conservation.

Page 4, Paragraph 1

We strongly recommend that the Management Plan refer to Volume 4 of the South Australian Arid Lands Biodiversity Strategy that describes the natural attributes, land uses and the major threats to biodiversity for the Gawler Bioregion and sets out priority actions for biodiversity conservation.

Page 4, Paragraph 3

We support the inclusion of listed threats posed by feral animals and introduced plant species to biodiversity conservation and believe it is extremely important to address future management of these threats in the new Management Plan.

Page 4, Paragraph 5

We recommend that the Management Plan should acknowledge the significant achievements that have been made in reducing the threats posed by feral goats, foxes and rabbits through the Bounceback program since the Park was proclaimed in 2002. An additional aim of the Bounceback program is to restore native vegetation communities in areas that were historically impacted by grazing of domestic stock. On GRNP these areas include the open plains and valleys in particular the piospheres surrounding artificial waterpoints and natural springs. We strongly recommend these areas be a continued focus for recovery efforts and future management. We also recommend that the new Management Plan incorporate information from previous Land Condition Assessments and vegetation monitoring to determine the condition of vegetation communities across the Park as a framework for prioritising future management efforts.

Page 4, Paragraph 7

We support the statement that “Fire is a natural component of the South Australian environment and plays a critical role in sustaining species lifecycles and maintaining natural habitat structures.” We strongly recommend that the threat posed by inappropriate fire regimes is also acknowledged in the Management Plan and provide further detail of the fire history of the Reserve. Fire management is a particularly important issue for GRNP as there have been a number of large uncontrolled bushfires along with some smaller ones across the Reserve since it was first proclaimed. The significant impact that these fires have had on the biodiversity conservation values of the reserve should also be acknowledged in the Management Plan.

Page 4, Paragraph 7

We acknowledge that the proclamation under Section 43 of the National Parks & Wildlife Act, allows for petroleum, geothermal and mineral exploration (as well as mining) within GRNP, Gawler Ranges Conservation Park and Pinkawillinie Conservation Park. We strongly recommend the Management Plan addresses the impact of such activities on areas where threatened species or ecological communities are known to occur. We also recommend the plan outline strategies for long-term monitoring and evaluation of rehabilitation activities associated with mining exploration or mining activity to ensure that these are completed effectively.

2. Enhancing Visitor Experiences

What types of visitor experiences or recreation activities should people be able to enjoy in the future?

We strongly recommend that any assessment of recreation and tourism activities in the park includes due consideration of their impact on the biodiversity conservation values as well as social, cultural and economic factors. NCSSA believes that the following critical issues for biodiversity need systematic and comprehensive consideration in relation to current and future recreation and tourism activities conducted in the Park:

- > 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*

We consider both camping and bush-walking to be the most appropriate recreational activities for people to continue to experience the Park in the future. Further development of low impact, nature-based tourism opportunities such as guided bird-watching or wildflower tours may also be of interest. In terms of visitor experiences, in addition to the traditional use of signage and information brochures there may be opportunities to utilise emerging technology such

as smart phones to convey stories about the history and biodiversity conservation values of GRNP and surrounding areas.

We also strongly support the requirement to prevent collection of fire wood from within the park in the future in order to prevent habitat loss and degradation of native vegetation.

Do the roads, walking trails and visitor facilities provided in the park adequately cater for the needs of visitors?

We consider the current network of roads, walking trails and visitor facilities to be adequate for the current number of visitors. Ongoing resourcing to maintain the existing track network is vital to ensure that soil erosion issues are not exacerbated through creation of 'side diversions' around existing tracks that encroach on native vegetation communities. As per our comments for the previous question, we strongly recommend that due consideration be given to the potential impacts of any trail realignment on biodiversity values of the Park in particular species of conservation significance.

Appendix 1: Species of Conservation Significance

We recommend that it would be useful to clarify how these lists have been generated i.e. are they from confirmed records for the Park? If so the Management Plan should acknowledge that further surveys may record other species of conservation significance.

As a final editorial comment, the Fauna list in Appendix 1 contains two entries for Gilbert's Whistler and the heading for the Flora list is incorrect.