



260 Franklin Street,
Adelaide SA 5000

Phone: (08) 7127 4630

Fax: (08) 8231 9773

Email: ncssa@ncssa.asn.au

Website: www.ncssa.asn.au

ABN: 40 538 422 811
GST registered

Mr Barry Hayden,
Team Leader,
Protected Area Management
Department of Environment, Water and Natural Resources
GPO Box 1047, Adelaide SA 5001

August 27, 2014

Re: Deep Creek and Talisker Conservation Parks Management Plan Draft Amendment 2014

Dear Mr Hayden,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to provide comment on the Deep Creek and Talisker Conservation Parks Management Plan Draft Amendment 2014. 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.

Please refer to the following pages for our comments on specific sections of the proposed amendment. We hope these comments are useful in finalising the amendment to the management plan. 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 Comments on Deep Creek and Talisker Conservation Parks Management Plan Draft Amendment 2014

NCSSA recognises the significance of both Deep Creek and Talisker Conservation Parks to biodiversity conservation in South Australia, containing the largest areas of intact native vegetation communities remaining in the southern Mount Lofty Ranges (DENR 1997). Both Reserves provide critical habitat for a significant number of species and ecological communities listed under the EPBC and NPW Acts in addition to regionally rare species. The NCSSA consider these areas to be extremely important for long term biodiversity conservation along with other landholdings in the region that are managed by private landholders for conservation purposes.

As a general comment, the NCSSA supports the proposed amendments to the management plan however we strongly recommend that the following issues are further considered and addressed in finalising the amendment:

Managing Total Grazing Pressure

NCSSA acknowledges the impact that over-abundant kangaroo species and introduced herbivores can have on native vegetation communities and the need for control programs to ensure the biodiversity values of these Reserves are maintained. The existing text in management plan states that “A base line study and on-going monitoring will be conducted to determine whether population levels are too high for the native vegetation to sustain.” We strongly recommend that the proposed amendment provide further evidence from the baseline study and ongoing monitoring of the current condition of native vegetation in areas where kangaroo culling or feral animal control is proposed. We also strongly recommend that the amendment refer to DEWNR’s Policy for Management of Overabundant Kangaroos so that it is clear to the broader community that culling programs will be conducted within a structured management framework with strict adherence to animal welfare guidelines.

NCSSA considers the second paragraph of the proposed amendment to this section is unclear about what methods are used for the annual assessment of total grazing pressure and decision-making process in terms of when control of overabundant species is required. We strongly recommend that the amendment state whether the assessment of total grazing pressure will be made using indicators based on vegetation condition or density of overabundant fauna species or a combination of both, if appropriate. We also recommend that target densities for overabundant species are clearly stated in the amendment – acknowledging that these targets may change over time as further monitoring data is collected.

NCSSA strongly supports the need for integrated management of introduced herbivores in conjunction with strategic culling of overabundant kangaroos to restore and maintain habitat values of these important remnants of native vegetation. We strongly recommend that rigorous and long-term monitoring programs to evaluate the effectiveness of proposed management programs are both adequately resourced and implemented.

Providing Opportunities for Bush Camping

NCSSA acknowledge the increase in visitation and demand for bush-camping since the management plan was adopted in 1997 and the need to provide additional camping facilities to cater for this increase. We consider the proposed amendment is acceptable however, in order to specifically address the need for further development of camping facilities rather than other types of visitor infrastructure, we strongly recommend that the wording of the proposed amendment is changed from “visitor facilities” to “camping facilities”. We also strongly recommend that any developments outside of existing development zones are carefully planned and, if considered to be the only practicable solution, they are undertaken to ensure the impact on plant and animal species and ecological communities with conservation significance is

minimised. We consider this issue to be of particular importance for species and ecological communities listed under the EPBC Act but also for species listed under the NPW Act and regionally rare species.

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 planning for current and future recreation and tourism activities in these Reserves:

- > 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
- > Ongoing vigilance and management to address the further spread of *Phytophthora cinnamomi*