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Mr Brett Simes
Senior Policy and Project Officer
Protected Area Management
Department of Environment, Water and Natural resources
GPO Box 1047, ADELAIDE SA 5001

November 19, 2015

Re: Draft amendment to the Management Plan for Flinders Chase National Park, Kelly Hill Conservation Park, Ravine des Casoars and Cape Bouguer Wilderness Protection Areas.

Dear Brett,

The Nature Conservation Society of SA (NCSSA) welcomes the opportunity to provide comment on the draft amendment to Management Plans for the above parks and Wilderness Protection Areas. 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 and education of the wider community regarding the importance of protected areas for nature conservation.

We generally support the proposed amendments to the management plan however, we have concerns about the ecological impact the increased trail network and infrastructure developments will have on the natural assets within these parks. In order to demonstrate sustainable management and long-term protection of the conservation values, we strongly recommend the Department needs to provide adequate funding and resources to establish long-term and rigorous monitoring programs to evaluate the ecological impacts of the development.

The NCSSA provides the following comments for consideration in finalising the draft 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

NCSSA comments on draft amendment to the Management Plan for Flinders Chase National Park, Kelly Hill Conservation Park, Ravine des Casoars and Cape Bouguer Wilderness Protection Areas

Section 10.1 Zoning

In principle, we support the proposed amendment to the plan to allow for overnight ecosensitive accommodation options associated with the Kangaroo Island Wilderness Trail (KIWT) within Minor Development Zones in these reserves. We have concerns about the ecological impact the increased trail network and infrastructure developments will have on the conservation and wilderness values of the reserves and would appreciate further information and advice about how DEWNR will address this issue. For example how has the trail alignment and sites for accommodation and associated infrastructure been planned to minimise impacts on the surrounding area? What types of ecological information have been considered in planning this development? DEWNR need to be able to demonstrate how the impact of the KIWT and associated infrastructure will be managed to protect areas of high conservation value and prevent adverse impacts on the natural assets within these parks. In order to demonstrate sustainable management the Department needs to ensure that, as part of this initiative, adequate resources are provided to establish long-term and rigorous monitoring programs to evaluate the ecological impacts of the KIWT and associated infrastructure. We would be happy to meet with DEWNR to discuss this issue further.

Section 10.3 Visitor Facilities and Infrastructure Development

We support the proposed text addressing the development of the KIWT however, strongly recommend that the importance of the area as habitat for a number of nationally and state listed species of conservation significance is acknowledged in the text. We also recommend an additional action is included in the table: Monitor the impact of the trail and associated infrastructure on locations that provide habitat for nationally and state listed species of conservation significance. This action should also be a high priority and duration ongoing. We also recommend that results of such monitoring be made publically available as completed annually.

Section 10.3 Visitor Facilities and Infrastructure Development

We support the proposed additional text for a minimal impact crossing to be developed over the South West River in consistence with the objectives of the Wilderness Code of Management.

Section 10.3.1 Walking Trails, Cape Bouguer Wilderness Protection Area

We support the proposed additional text for develop of a short trail to connect the KIWT to the Hanson Bay Hike and in particular the proposal to minimise clearance of vegetation in constructing this connection. We strongly recommend comprehensive vegetation surveys are conducted by suitably qualified professionals as part of the risk assessment for this development in order to site the trail in an area where there are no adverse impacts on plant or animal populations with conservation significance.