



1 July 2011

Ros Ransome
Land Policy
Environment and Sustainable Development
ACT Government
GPO Box 1908 Canberra ACT 2601

Dear Ros,

Friends of the Pinnacle attended the public information session regarding The Molonglo River Park Concept Plan, Phase 2 Opportunities and Constraints on June 2 2011. Our group has experience in park management, in dealing with conflicting objectives associated with park management, and substantial expertise in biodiversity conservation. We are therefore in a good position to provide advice on park management issues that appear set to arise under the Molonglo River Park Concept Plan.

The Concept Plan lists three design principles that inform the design: (1) protect and enhance habitat values; (2) provide for effective fire protection; and (3) provide recreational opportunities.

The Friends of the Pinnacle are seriously concerned about the lack of integration of these objectives, amounting to a fundamental flaw that requires substantial revision.

The three objectives have given rise to three plans that are poorly integrated. While the Concept Plan identifies areas of potential conflict, it does not present a strategy that clearly resolves the conflict. Plans addressing the three different objectives are overlaid, with the consequence that principle (1) protect and enhance habitat values, will be enormously compromised. Examples of clashes are:

- 3m wide bicycle path through the largest continuous patch of *Aprasia parapulchella* (pink tailed worm lizard) habitat in the narrowest section of the gorge
- picnic facilities and carparks at Misery Point, overlaying *Aprasia* habitat and increasing recreational impact on adjacent *Aprasia* habitat and critically endangered woodland
- high quality woodland opposite Misery Point identified as an 'intermediate recreation node'
- water quality control dam in NW will flood *Aprasia* habitat, and the surrounding high use parkland will degrade or eliminate habitat
- fire management principally aimed at asset protection and likely to reduce habitat values for a broad range of species including *Aprasia*.

This last point about potential fire impacts on *Aprasia* is a very important one. Information presented by Hassel at the public information night indicated explicitly that frequent burning was a good thing for *Aprasia*. This appears to be incorrect. There appears to be nothing in the scientific literature addressing fire effects on *Aprasia*. In the grey literature, use of fire in *Aprasia* habitat is not recommended. For



example, TAMS fire guidelines for this species¹ indicates "Vegetation around rocky outcrops not to be burnt", and recommends no more than 30% of surrounding land be burnt at low intensity. It is very doubtful that fire management in the outer asset-protection zone is compatible with maintenance of *Aprasia* habitat, despite Hassel's assurances.

Generally, the vision presented by Hassel in the public consultation night was one of open parkland with green lawns that would not provide habitat for the majority of woodland species. Habitat values cannot be protected or enhanced for woodland species under the current recreational use plan.

Solution and Recommendation

A modified River Park Concept Plan is needed that gives primacy to habitat conservation. The modified plan should include features designed to avoid clashes between recreation and the high biodiversity values within the gorge. Such modifications would include:

- no vehicular access to Misery Point
- strategic fencing to reduce access to *Aprasia* habitat
- a series of displays and interpretation points to inform users of habitat values and conservation strategies
- strategic location of paths to direct heavy recreational use away from areas of high conservation value
- wide paths should never pass through *Aprasia* habitat.
- outer asset protection zones within the development area, not in the river park.

The Friends of the Pinnacle ask that a revised concept plan be drawn up to include these recommendations and that a new round of public consultation be entered into. This will help to ensure that the objective of protecting and enhancing habitat values can be met alongside the recreation and fire protection objectives.

Yours sincerely

Dr Don Driscoll
Committee member. Friends of the Pinnacle.

¹ http://www.tams.act.gov.au/__data/assets/pdf_file/0007/176128/Pink-tailed_Worm_Lizard_Apraisia_parapulchella.pdf