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Tidbinbilla Draft Plan of Management May 2010

The Canberra Ornithologists Group (COG) welcomes the opportunity to comment on this Draft Plan of Management.

COG is a volunteer-based community group with around 350 members whose mission includes the conservation of native birds and their habitats. COG plays an active role in advocating for the protection of native vegetation/bird habitats and for the mitigation of threats to and impacts on native birds. COG has a particular interest in the Tidbinbilla Nature Reserve and has been monitoring the recovery of the lyrebird population there since the 2003 bushfires.

While the Draft Plan appears to be reasonably well written overall and COG supports many of the principles in the Draft Plan, in COGs view, there are still issues of concern to us, principally:

1. The Draft Plan, due to the order of the chapters, does not emphasize enough right up front, the natural and cultural values and the balance that needs to be achieved between these and recreational etc use of the reserve.

COG recommends that the Chapters on the natural and cultural values need to be described earlier in the Draft Plan and must be before the current Chapter 4 on Community and Corporate Involvement.

COG also recommends that the Plan should include in Chapter 3 on Management Framework, in addition to the key desired outcomes for the Management Plan (p 33, 3.6), a comprehensive set of principles which would guide any further development, investigations and decision making regarding the possible use of the reserve. In our view, those fundamental principles must include the realistic recognition of Tidbinbilla for what it is (not 'pie in the sky' expectations), its bushfire proneness, its limitations and remoteness from urban Canberra, its important value for families and children as a soft and safe place to be introduced to the Australian bush, getting the balance right in terms of recreational activities and impacts on the natural values etc, and also recognise the real costs in allowing some of the more controversial activities in the reserve such as large-scale events.

2. The Draft Plan does not sufficiently or clearly define what Tidbinbilla is or should actually be, and its limitations, instead it seems to be trying to be all things to all people in terms of its

possible use for a wide range of activities and expectations, especially in relation to tourism and visitation. The Draft Plan is far too open-ended in terms of possible future development or the range of activities to be allowed in the reserve. There is a lack of clear and consistent principles consolidated in one place, which would serve to guide any future investigations and decisions on those matters.

There are significant use issues on which the community and stakeholder groups have strong views and in some instances differing views, eg overnight accommodation, eco-tourism, commercial activities, higher impact activities, large-scale events etc. It is rather disappointing that even after a Discussion Paper released in early 2009 which canvassed these matters and sought the community's views, these issues are still largely unresolved and up for further consideration.

In COGs view, this is not an appropriate way for a Management Plan to deal with so many of the more difficult management issues which could have serious impacts on the reserve's values, essentially it is a piecemeal approach. It leaves it open for too much discretion for bureaucrats to approve inappropriate events/activities, including those pressed at the political level by well connected interest groups, or the establishment of inappropriate infrastructure outside the broad framework of the Draft Plan and where the community may not have any say or input.

See the recommendation under 1 regarding the inclusion of over-riding management principles to guide any future development and decision making.

3. The Draft Plan refers prominently to Conservation Volunteers Australia (CVA) involvement in the reserve. However, it incorrectly describes this organisation as a 'community based' organisation. The Management Plan must accurately acknowledge what CVA is, a business which is paid for its services in the reserve. CVA is not 'community based' and does not have connections to other local community-based volunteer groups who are stakeholders in the reserve, such as COG, National Parks Association, Friends of Tidbinbilla. This distinction between CVA as a fee-for service business, and the community based volunteer groups involved in the reserve must be made clear in the Draft Plan.

Chapter 3, Management Framework

P 33 3.6 - Key desired outcomes for the Management Plan, under Research and Monitoring

This Framework should include something along the lines of : 'A comprehensive, long term biodiversity monitoring plan and survey programs of flora and fauna established and undertaken, which can provide opportunities for the greater involvement of community based volunteer groups'. This should also be reflected in Chapter 10 and in the Appendix summary.

COG would like to see an overall biodiversity monitoring program/plan and coordinated long-term surveys of flora and fauna as a greater focus of management activity, and that this is properly funded and reports available to the general public. Information on the success or otherwise of other management objectives, such as pest/invasive flora and fauna control should also be made available. In our view, monitoring and reporting are of fundamental importance to a conservation area and particularly in an environment of changing climatic conditions. As far as we are aware, there is little or no systematic, ongoing monitoring of flora and fauna undertaken by parks staff and no overall plan for long-term conservation/biodiversity monitoring. There are great opportunities to involve community volunteer groups including COG who have expertise in particular areas, with greater

support from parks staff than currently occurs. This issue was also raised in COGs response to the 2009 Discussion Paper.

Chapter 8 Recreation and Tourism

In relation to impacts by visitors generally, COG is pleased to see and agrees with the statement on page 89 that ‘recreational activities ... should complement the natural setting of the area and avoid or minimise detrimental impacts on natural and cultural heritage values’. However, this seems to be a throw away line after the Draft Plan discusses and identifies first as a ‘significant issue’ the provision of facilities for overnight stays in the precinct additional to those at Birrigai and the ‘potential for overnight stays is to be investigated’. Potential visitor impacts should be dealt with in a more prominent way, earlier in the chapter. COG agrees that programs to monitor visitor impacts need to be established, however, they also need to be properly resourced.

P 88, 8.3 about overnight stays: this is too open-ended with the reference to further investigations. The establishment of accommodation within the reserve itself, particularly commercial based accommodation has not been supported by COG and some other environmental community groups in the past. COGs position has not changed. We want the Draft Plan modified to put a clear limit on what might occur regarding overnight stays and only allow low-key camping for individuals and community groups engaged in management activities, surveys, monitoring of flora and fauna etc. COG reiterates its opposition to commercial type accommodation or commercial based-overnight stays in the reserve itself for a number of reasons, including the bushfire proneness of the reserve and the need to protect those assets (clearing native vegetation etc), and that this will divert resources away from conservation activities into managing the commercial interests. COG considers that if more overnight accommodation is desired by the community, this should be encouraged off-reserve, eg local rural lessees possibly with partnerships with business interests, or utilise Birrigai more when not used by schools.

P 91, 8.6 about marketing and promotion. COG believes there is a need to be realistic about the potential of Tidbinbilla, and the likely visitation it will attract. Marketing and promotion need to take this into account, and there should be an acknowledgement of the level of Government investment in this area including media and promotional salaries dedicated to Tidbinbilla, indeed on what basis would there be the visitor numbers to recoup the investment or future investment.

P93, 8.7 about commercial recreation and tourism, COG is concerned that this is being given a seemingly high priority without justification as to the appropriateness of Tidbinbilla, the appropriateness of various commercial activities, and the real cost for reserve management of managing such activities. There is no mention of the possible full cost recovery of managing these kinds of activities.

P 94, 8.8 about walking activities: COG certainly supports the expansion of walking tracks and recommends that bird trails could be established with interpretative material. There is a great opportunity to base interpretation around birdlife, eg the Lyrebirds, species which are potentially impacted by climate change, which to date has been missed or ignored by reserve managers. COG would be happy to provide advice regarding this.

P 95, 8.8 (b) about cycling: COG agrees with policy statements that cycling is only permitted on vehicle management trails, not walking tracks, and also that specialised bike tracks will not be built. COG would support cycling routes for families being established provided they are not located where they would interfere with bushwalkers and bushwalking trails. Some care needs to be taken in relation to the cycling policy in the reserve; there is a growing demand for mountain biking and off-

road cycling venues and for more challenging courses, which has already resulted in much damage to several Canberra Nature Parks through informal and illegal bike trails being made by cyclists.

P 96, 8.8 (g) about nature-based activities: This indicates that opportunities for further development of specialised wildlife tours is to be investigated. It is unclear what this means, as it is broad and open-ended, eg does this mean commercial operators. This needs to be more defined. COG does support the provision of more information and interpretive material in relation to wildlife and birds particularly.

P 97,8.8 (k) about orienteering, rogaining, mountain running: This is too open-ended and the guidelines are fuzzy and not sufficiently detailed. COG would like to see more defined limits, eg the number of events in a year will be limited, (not 'may' be limited) and more detailed guidelines for these events, especially caps on numbers. We are concerned about the reference to allowing occasional national/international events which would inevitably involve high numbers of people impacting on the reserve, and believe there are less sensitive and more appropriate areas within the parks and recreational system which could be used. COG agrees that if events are approved, monitoring and reporting must occur, however, this has to be done independently, not by the organisation itself. Also the real/actual \$ costs of such events occurring in the reserve needs to be recognised and fully cost recovered from the organisation running the event, with substantial bonds required in the event of damage occurring.

P 98, 8.8 (m) about special events: This is also fuzzy and open-ended. COG would like to see a clear statement that Tidbinbilla is not the place for special events like weddings, concerts, large group gatherings (not couched in loose terms like ...generally is not suitable, desirable to do more detailed planning). COG's view is that the reserve is not the place for these kinds of events and believes there are more than sufficient opportunities for these kinds of events in other, more appropriate venues in Canberra itself. COG does not support more detailed planning on this, we do not think these events are compatible with the values of the reserve, large numbers of people concentrated in an area will have damaging impacts to the environment and it will divert reserve resources amongst other negatives.

Yours sincerely

Jenny Bounds
Conservation Officer
19 July 2010