



*Wahlenbergia  
gloriosa*

# **Australian Native Plants Society Canberra Region Inc**

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## **SUBMISSION**

### ***MOLONGLO RIVER RESERVE DRAFT MANAGEMENT PLAN***

#### **1) The Australian Native Plants Society – Canberra Region (ANPS)**

The ANPS was established in 1962. ANPS is a non-profit, voluntary community organisation dedicated to the growing, conservation, preservation, promotion and appreciation of Australian native plants. ANPS has 300 members, including many working in a professional capacity in many spheres related to native plants (e.g. ecology, botany, horticulture and entomology) as well as closely related scientific disciplines.

ANPS members regularly undertake field and camping trips to floristically rich areas, and our members regularly use the various areas of Canberra Nature. Our members have contributed to the knowledge of these areas (including such areas in other states which we visit) by making publicly available lists of flora (and sometimes fauna) species that were observed during these trips. Our members have located new species and new records for plant species in some areas.

The ANPS constitution prominently advocates activity in conservation through the promotion of the conservation of Australian plants and their habitats and observing and support for laws related to the preservation of Australian native plants.

#### **2) Document reviewed**

ANPS reviewed the Molonglo River Reserve Draft Management Plan 2018, the Molonglo MNES Plan 2011 and the Strategic Bushfire Management Plan for the ACT - Supporting Information: Part Two (2009).

#### **3) General Comments**

ANPS appreciates the amount of effort that has gone into the draft plan. It is very comprehensive, and the reference list reveals how much scientific work has contributed to the draft plan. However, we have some concern that the plan was not completed prior to the urban development proceeding. The items of concern to ANPS in the draft plan follow:

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#### 4) Items of Concern

##### 4.1) Kama Nature Reserve (KNR) (clauses 3.1.3; 3.2; 3.2.1; Table 3.1; Fig 6.2)

Community environmental groups (including our combined voice through our peak environmental organisation the Conservation Council) have expressed their concerns regularly over the last few years about the location and width of the buffer zone between KNR and the urban development of Molonglo Stage 3. The plan still does not address this issue appropriately. KNR is important for its ecological community, the habitat it provides and as a linkage corridor. The location and width of this buffer should be clearly stated in the plan. ANPS's favoured buffer would extend from the eastern boundary of KNR down to Deep Creek, but if this is not accepted, the buffer must be wide enough to eliminate the need for regular biomass reduction within KNR. The whole of KNR is currently designated as a strategic firefighting advantage zone (SFAZ) and this is in contradiction with the Molonglo MNES Plan 2011 (page 31), which states that "*fire management is undertaken outside of the Kama Nature Reserve and will provide protection against urban edge effects*". The description of what a SFAZ can be used for in The Strategic Bushfire Management Plan for the ACT - Supporting Information: Part Two (2009) gives little confidence of how the KNR may be treated under this designation.

##### 4.2) Pink-Worm-tailed Lizard (PTWL) and its habitat (Fig 6.2)

ANPS notes that areas of moderate quality PTWL habitat is also designated as SFAZ's. As stated in 4.1 above, a SFAZ and how it is used may be a disadvantage to the PTWL.

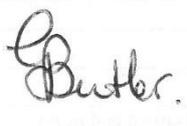
##### 4.3) Domestic Dog Management within Nature Reserves (Tables 9.1 & 9.2)

The draft Plan indicates that dogs on leashes will be permitted on designated walking tracks in the reserve, except for KNR. ANPS supports the exclusion of dogs in the KNR. We have great concern about domestic dogs being permitted within the corridor reserve. In discussions with other environmental groups and in many of our members own observations, as soon as dogs are permitted on-leash in such areas, a moderate number of dog owners allow their dogs off-leash within the reserves. There is no need to recite here the issues with dogs roaming free in reserve areas – they are well-known. ANPS has little confidence that any compliance will be undertaken, and there is no justification for additional reserve areas being available for supposedly leashed dogs. It is not as though there are not off-leash areas available to dog owners in the new urban development(s).

#### 5) Conclusion

ANPS believes the above issues of concern need genuine consideration and resolution.

Yours sincerely



For Lucinda Royston  
President  
23 March 2018