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Nature Conservation Saves for Tomorrow

30 December 2015

The Planning Officer
Mugii Murum-ban SCA, NPWS
27-31 Inglis St
Mudgee
NSW 2850

Dear Sir/Madam,

**Submission on the Draft Plan of Management for
the Mugii Murum-ban State Conservation Area**

The Blue Mountains Conservation Society is a community organisation working to achieve the preservation and regeneration of the natural environment of the Greater Blue Mountains. The Society has around 900 members.

The Society was one of the proposers of the Gardens of Stone Stage 2 reserve proposal to protect the forest corridor between the Gardens of Stone National Park and the Capertee Valley to the north. This area was identified as early as 1934 as worthy of conservation as part of the Greater Blue Mountains National Park proposal. Mugii Murum-ban State Conservation Area (MMSCA) is part of this Gardens of Stone reservation area and has been protected as a reserve under the *National Parks and Wildlife Act (NSW) 1974* since 2011.

The Society supports the Draft Plan of Management for the Mugii Murum-ban State Conservation Area.

Size and values of MMSCA

The Plan of Management (PoM) sets out the values of MMSCA including its geological, landscape, catchment, biological, historic and aboriginal heritage values. The park contains more than 340 different plant species, including the federally listed and endangered Genowlan Point Dwarf Sheoak Heathland which is unique to this reserve and the only living examples of the critically endangered Pultenaea sp. Genowlan Point. Other notable features include the stone dwellings of New Hartley oil shale ruins, 20 metre Brown Barrel eucalypt trees and internationally significant pagoda rock formations, like the

'Citadel' and nearby the Grotto, just two of the hundreds of remarkable formations in this park.

Relationship to the Greater Blue Mountains World Heritage Area

Because of its superb geodiversity and biodiversity values, MMSAC is included in an area which is currently being assessed by the Australian Heritage Council for potential National Heritage values as a precursor to formal consideration for inclusion on the National Heritage List. It is understood that there is also a real possibility of subsequent re-nomination of this area to the World Heritage List as part of an expanded Greater Blue Mountains World Heritage Area. It is therefore important to ensure that the highly significant biodiversity and geodiversity values of MMSCA are protected.

In summary, MMSCA is a small park with exceptional features which need to be diligently protected. The proposed Plan of Management is commendable for recommending practical measures to protect these exceptional values.

Comment on proposed management measures to conserve MMSCA in accordance with NPWS Act

Threatened species

The Society particularly supports measures to protect the:

- *Pultanenaea* sp. Genowlan Point which is critically endangered under the *Threatened Species and Conservation Act (NSW) 1995* (TSC Act) and the *Environment Protection Biodiversity and Conservation Act (Cth) 1999* (EPBC Act).
- *Allocasuarina nana* Heathland Endangered Ecological Community
- *Prostanthera stricta* (Mount Vincent mint bush), which is listed as vulnerable under the TSC and EPBC Acts.
- Aboriginal and Historic Heritage.

The proposed management responses to protect these threatened species include the restriction of vehicular access to Genowlan Point by relocating the 'Existing Gate' to the position identified as the 'Proposed Gate' in Figure 1 (Management response 3.7.10). These responses are strongly supported. Relocating the gate would also reduce water availability for feral goats and protect an Aboriginal heritage site near Genowlan Point (Management response 3.5.4).

Vehicle, camping, cycling and horse riding

The Society commends and supports the proposed actions to contain and manage activities which would damage the park, in particular, by restricting vehicular access, camping, cycling and horse riding. These actions include:

- having a ban on new roads (3.7.12);
- relocating the locked gate further south (3.7.10);
- not permitting recreational horse riding in MMSCA. Research has demonstrated that horse riding degrades parks so it should not be expanded into MMSCA, especially as it is such a significant

- conservation area. There is no history of horse-riding in the park and this should be maintained. The POM notes there are existing opportunities in nearby parks;
- retaining walking tracks for walkers and only permitting cycling on existing park roads and management trails. This would ensure that the erosion and damage from cycling is contained to these areas only and the creation of new paths from cycling is avoided.

Restricted use of access roads

The proposed controlled access system for Genowlan Mountain should limit the number of 4WD vehicles to five at any one time, given the small size of 'Airly Turret' visitor facilities, the steep access road and the narrow and winding nature of the roads on the mesa. In relation to Mount Airly, the Society agrees with the draft plan in proposing that the access road to the top of the mesa is so steep that private use would be inappropriate.

Mining uses

The Society supports approved mining activities having to use of the existing trails and walking tracks. This would prevent the creation of new trails or tracks by 4WDs and therefore prevent permanent erosion, flora damage (including damage to threatened species) and the opening up of new areas to adverse use. (5.2.4)

Mining or mineral Exploration activities including monitoring must have environmental assessment and approvals as required by law.(5.2.3) NPWS (Office of the Environment) needs to be alert to and comment on mining development proposals which encompass future exploration activities.

Encouraging low impact enjoyment of MMSCA

The proposed arrangements for motor vehicle access are adequate for this small reserve. The society supports the closure of the Tramway Trail to motor vehicles, as this trail passes the stone ruins at the New Hartley settlement and passing vehicles will intrude on visitors' appreciation of the historic site. Closure will still provide a short and easy walk from the proposed camping area at Airly Gap. This trail will appeal to family visitors.

The road to Genowlan Point should provide a second easy walk in the reserve, offering dramatic views of the Capertee Valley in all directions over a diverse and nationally endangered heathland community. Closure of this road will ensure all can appropriately enjoy this dramatic landscape.

The Society appreciates the opportunity to comment on the draft Plan.

Yours sincerely



Madi Maclean
Management Committee

