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Nature Conservation Saves for Tomorrow

Submission re Capertee National Park Draft Plan of Management January 2023

Blue Mountains Conservation Society

The Blue Mountains Conservation Society (the Society) is a community-based organisation with over 850 members. This submission has been prepared by Society volunteers. We have read the Capertee National Park Draft Plan of Management (2022) and the Capertee National Park Draft Planning Considerations (28 October 2022).

The Society's mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area (GBMWH).

The highly significant natural values of Capertee National Park (NP) are acknowledged in the Draft Plan of Management and Draft Planning Considerations documents. Capertee NP supports a diverse and rich biodiversity including threatened flora, fauna and ecological communities. The threatened biota includes critically endangered communities and species such as 'Box-Gum woodland' and the Regent Honeyeater and Swift Parrot. Capertee NP is one of only a few areas with recent Regent Honeyeater breeding records or even occurrence records. Capertee NP is linked to the GBMWH via a corridor of reserved natural land which allows passage of flora and fauna. The maintenance of biodiversity in Capertee NP thus contributes to the maintenance of the internationally recognised outstanding biodiversity of the GBMWH. The Society's recent submission to the Australian Heritage Council's current assessment of lands which are potential additions to the GBMWH supported the addition of Capertee NP to the GBMWH.

Draft Plan of Management comments

The Society believes that it is important that the overriding aim of the Capertee National Park's Plan of Management, the first Plan of Management prepared for this park, should be to clearly emphasise and prioritise the conservation of the park's significant natural values and Aboriginal cultural values. It needs to take account of the Australian Heritage Council's current assessment of the national park as a potential addition to the GBMWH. The Society commends the efforts made in the Draft Plan of Management and Draft Planning Considerations to achieve this aim.

We make the following additional comments:

Baseline biodiversity data

The Capertee National Park Draft Planning Considerations (page 2) states that the biodiversity of the park has not yet been systematically surveyed. The Society recommends that a high priority outcome of the Management Plan should be to undertake and complete a comprehensive systematic survey of the park's biodiversity. This is required to provide appropriate baseline data for

the park against which future trends in biodiversity values may be measured. Without such baseline data, it is not possible to properly assess the effectiveness of management actions.

Monitoring of natural values

Table 2 of the Draft Plan of Management provides a list of desired Outcomes, Actions and Priorities for various categories of management. The Society supports the outcomes listed in the 'Protecting the Natural Environment' category. We recommend that an additional outcome be included that stipulates that the natural values (including threatened species and biodiversity in general) will be comprehensively monitored in the short and long term. In addition the outcome should include a requirement that results of monitoring be published regularly and be used to inform future management activities. Such monitoring should be designed to measure the impacts on natural values of factors likely to impact biodiversity in Capertee NP including (as noted in the Draft Planning Considerations) climate change, fire, visitor use, park infrastructure, surrounding lands, and easements within the park. Any other relevant factors likely to impact natural values now or in the future should also be considered.

Threatened Species listed in Capertee National Park Draft Planning Considerations

The Society notes that the Greater Glider (Endangered species at national and state level) is not listed in Appendix D *Threatened animal species* but records of this species in Capertee National Park are included in the Bionet Atlas wildlife database. The Gang-Gang Cockatoo is listed in Appendix D as a Vulnerable species in NSW but there is no mention that the species has now been listed at national level as an Endangered species.

The numbers of threatened species cited in the Draft Plan of Management should be checked. The Society asks whether targeted surveys for threatened Squirrel Gliders have been undertaken in the park.

Horse Riding

Table 3 of the Draft Plan of Management lists recreational activities allowed within Capertee NP. Horse riding is currently permitted on public roads and park roads (as shown in Figure 1) but not on walking tracks or management trails. The Society does not support horse riding in National Parks. The Draft Planning Considerations state that "Horse riding is a popular recreational activity that has cultural associations for many Australians". However, this does not mean that, in 2023 and into the future, horse riding is an appropriate activity in all settings. The Society is concerned about the likely adverse impacts of horse riding on both established and regenerating natural values in national parks, for example (as stated in the Capertee National Park Draft Planning Considerations page 11) 'erosion, vegetation trampling, weed introduction, damage to cultural sites, increased nutrient inputs into watercourses'. The Society is also concerned about safety issues that arise when walkers and horse riders share trails.

If horse riding is allowed to continue, the Society recommends that the Management Plan state that the impacts of horse riding must be monitored and that continuation of horse riding is subject to results of monitoring. The Society does not support the statement in Table 3 that "Additional areas may be designated for horse riding in the future, subject to the outcomes of environmental assessments". While current usage levels of the park by horse riders may be low there is no guarantee that such usage will not increase in the future and damage natural values.

Tourism

The Draft Plan of Management needs to clearly state that any upgrading of visitor facilities and provision of recreational opportunities would not be permitted if they adversely impact on the natural values and indigenous heritage of the National Park. The Plan of Management also needs to pre-emptively state that any existing or emerging impacts of tourism, for example incremental development of unplanned cycling trails, would be monitored and managed to maintain and improve the natural and indigenous cultural values of the park.

Regeneration and rehabilitation of cleared and disturbed natural areas within the park

The Plan of Management needs to clearly state the goals of planned regeneration and rehabilitation activities in the park. The Society recommends that such activities should be undertaken with the goal of restoring natural vegetation and habitats with floristics and structure as close as possible to that which occurs in comparable undisturbed vegetation communities. Appropriate restoration of previously cleared alluvial flats in the park would provide valuable habitat for threatened species and other biota. Such habitats are particularly rare in the GBMWA.

Conclusion

The Federal Government has recently made a pledge of 'no more species extinctions'. The Society believes that 'no more species extinctions' should be no more extinctions in the wild. The Society would also like to see 'no more threatened species'. The Society commends the efforts of NSW National Parks and Wildlife Service to prioritise biodiversity in the Capertee National Park Draft Plan of Management and, in doing so, to contribute to the maintenance of the outstanding natural values on the GBMWA.

Well directed management of Capertee National Park has the potential to play a role in conserving the critically endangered Regent Honeyeater in the wild, not just as a captive population in a zoo. Capertee National Park has the potential to also play an important role in conserving the diminishing 'threatened woodland birds' as well as other species either currently listed as threatened or approaching threatened status.



Tara Cameron
Vice President
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