

## COMMENTS ON LOWER COTTER CATCHMENT DRAFT MANAGEMENT PLAN 2017

Manager, Conservation Planning, Environment, Planning and Sustainable Development Directorate  
PO Box 158, Canberra ACT 2601  
Email: [environment@act.gov.au](mailto:environment@act.gov.au)

### **Overall comments:**

It is pleasing to see attention finally being paid to the values and management needs of the Lower Cotter Catchment (LCC) after a long period of neglect.

While the draft plan recognises the existence of a conservation management plan (CMP) for the Blundells Flat/Shannons Flat area (p.79), the content of the CMP is largely ignored.

There is reference to its advice on cultural heritage, while ignoring its advice about landscapes, habitats and elements of biodiversity.

The draft plan does not indicate any adherence to the advice or recommendations of the CMP, despite the CMP being accepted by the ACT Heritage Council.

The draft plan does draw on background information from a preliminary study of the Blundells Flat/Shannons Flat area undertaken in 2004, but does not make use of much more detailed and more management-focused information in the CMP of 2009. The 2004 study pointed to matters requiring greater attention, which was undertaken for, and included in, the 2009 CMP.

As a result, the draft plan represents a lost opportunity to highlight some of the distinctive values of the LCC. Instead, it seems to treat the area as a set of riverine habitats among forest and woodland i.e. not particularly different from much of the ACT and reserve system. Other notable habitats receive scant attention.

The same is suggested by the plan's treatment of landscapes, with very limited attention paid to functionality, or aesthetics, or cultural associations. For example, there is no mention of Mount Coree and environs, whether as a distinctive landscape feature or as a component of geodiversity or of notable Aboriginal use or biodiversity features associated with it. While Coree itself is within Namadgi NP, the landscape connections and associations warrant mention.

The impression is one of uniformity in vegetation and values across the LCC ('more of the same'). This may blind us to important functional elements which are less obvious in the landscapes of the area.

Ultimately, the draft plan offers little encouragement that the community will be assisted to understand and appreciate the significant natural and cultural values of the area, beyond rivers and fish, or encouraged to participate in management and presentation of the area in the future.

Whatever the ultimate designation of the LCC (in Namadgi NP or as a separate reserve), future management would benefit from acknowledging that it has distinctive features and values (not just 'more of the same'), and it has different historical associations with the Canberra community.

### **Specific comments:**

2.3 The return to native vegetation and habitat is almost exclusively focused on forest and woodland structures with scant attention to open grasslands, meadows, fens, etc. as landscape and habitat elements and as important contributors to landscape functionality and resilience.

5.3 The presence of bog/fen systems at Blundells Flat and Shannons Flat is acknowledged, however most references subsequently omit Shannons Flat from consideration.

Additionally, Blundells Flat is not acknowledged as a peatland. Resource managers generally pay close attention to the management needs of peatlands, but recognition is a vital first step. Given the emphasis elsewhere in the plan on water quality and responses to climate change, ecosystem services are inherently important, and peatlands play key roles in association with bog/fen communities and as significant reservoirs of CO<sub>2</sub>. Desiccation of peatland will affect water quality and allow release of sequestered CO<sub>2</sub>.

In the same vein, Action 9 to protect wetlands and riparian vegetation needs to recognise the different wetland types which are present and the different management approaches which may need to be applied.

6.5 Native vegetation is primarily forest and woodland, with little attention paid to other structural communities, unless considered rare or threatened. There is no overt objective for the desired trajectory of landscape or ecology beyond the broadest 'native' aspiration and an implied bias towards forests and woodlands. This lack of nuance can lead to skewed approaches to native regeneration.

For example, the objective: 'Native plant species and communities are maintained and/or rehabilitated, with an increase in both extent and condition' may be seen to be satisfied by regeneration of native trees. At both Blundells Flat and Shannons Flat, hydrated valley floor flats and meadows have been overtaken by wheatfield eucalypt regeneration following the 2003 fires. This would be seen as a good outcome, as long as we ignore non-forest native communities. To be justifiable, this kind of objective requires attention to the range of native communities which are present, what is valued about them, and what management treatment is required to sustain those values.

Arguably these flats are being pumped dry by eucalypt regeneration, which compromises their landscape and ecological function and the ecosystem services they provide, which are elsewhere (3.3) considered to be the 'primary consideration for all decisions and activities'. We could have done much better than this, as outlined in the 2009 CMP, by early attention to rehydration of the flats through minimal hard engineering works and additional soft engineering (which could have been undertaken by community volunteers). The draft plan does not offer any sense that we can do better in the future. The action is to monitor effectiveness of restoration/regeneration effort, without a commensurate effort to understand non-forest/woodland values.

6.5.1 refers to 'Alpine Sphagnum bogs and associated fens' as listed under the EPBC Act. It is pleasing to see recognition of the risks to this ecological community and to see that a recovery plan and conservation advice have been prepared in the ACT. The draft plan notes that new management guidelines for the ACT Sphagnum bogs and fens will be applied to the bog/fen complex at Blundells Flat. It is unfortunate that no mention is made of Shannons Flat.

The plan does not seem to recognise that all types of wetlands play important ecological roles i.e. not just those with Sphagnum. For this reason the Ramsar Convention places obligations on a signatory nation beyond those wetlands on the 'Ramsar list', extending to all wetlands within a jurisdiction.

Within the scope of the draft plan, there is no recognition of the potential importance of other wetland types when considering climate change projections (6.7.1). If we consider only alpine bog/fen communities, we may consider their loss inevitable and thus miss opportunities for montane bog/fen communities to play roles as refugia in the face of impacts on alpine areas and transition to new structural community types. These potential refugia (and considerable biological diversity) may be lost if our revegetation efforts champion tree regeneration where previously there were hydrated flats and diverse wetland communities. This may conflict with Action 31.

6.6.2 The draft plan content on rare or unusual invertebrates relating to the Blundells Flat area draws on the 2004 initial study rather than the more comprehensive 2009 CMP. This allows some unfortunate conclusions to be presented in the draft plan.

For example, the value of land burrowing crayfish *Engaeus cymus* is minimised because it is seen as widespread (at the scale of 'eastern Australia'). Reference to the CMP would have pointed to this species as:

- uncommon, if not rare, in the ACT, and at the limit of its geographic range
- one of the few *Engaeus* found above 1000m asl (habitat at risk from climate change)
- member of a genus of some vulnerability, noting that (as of 2009) 17 other Australian *Engaeus* were listed as species of conservation significance, some as threatened species, because of limited distribution and sensitivity to disturbances; these include impacts on seepage, wetland and stream bank habitat quality, and the nature of streamside water tables (wheatfield regeneration of eucalypts on valley bottom flats poses a direct threat to these water tables)

- disregarded by most ACT studies to date as a terrestrial, rather than aquatic, species i.e. failure to recognise its dual habitat dependence excludes it from a place among our freshwater animals (so unlikely to be monitored as per 11.8), and it is further discriminated against as an invertebrate.

6.6.3 A similar rather dismissive approach characterises content about the Corroboree frog, 'considered extinct'. This assumption may ignore the potential for a montane site like Blundells Flat (formerly habitat for this species) to play a role in research into recovery, partly because of reduced impact of UV-B radiation at the lower elevation (however, if the flat continues to become a forest then that potential is greatly reduced).

7.3 The draft plan content on Aboriginal heritage is curious, given what is available (including in the CMP). The plan seems to repeat generic content without reference to the landscape and ecological contexts of the area. For example, it mentions bogong moth harvests and Urayarra, but not the application of this history to Coree, Coree Flats and the walk along Condor Creek.

Additionally, the draft plan does not acknowledge the historical Aboriginal reference to practically the whole of the LCC as 'Goondawarra'. This name is documented as applying to Condor Creek, the Cotter River and Mount Blundell. The CMP documented this and recommended consideration be given to applying the name to the area outside Namadgi to at least the Condor Creek crossing. Subject to consultation with Traditional Custodians, it would be a fitting name for the LCC reserve all the way to the dam (later perhaps as a discrete geographic subset of Namadgi NP), and would acknowledge and draw attention to the notable Aboriginal cultural heritage of the area and its many stories, which are somewhat glossed over by the draft plan. This warrants inclusion in Actions for Ch.7.

7.6 Similarly, references to early settlers are very selective, although the need for brevity is accepted. More concerning is reference to the TSR of the 1880s, acknowledging this as a traditional route but only in a European context. The CMP emphasised that this was a long-established Aboriginal pathway, whereas the draft plan asserts that it was 'probably first used by Terence Murray in 1838'.

Within European cultural heritage, the draft plan mentions conifer arboreta but provides no indication of how they will be viewed or managed. There is no mention of parts of the Blundells Flat conifer arboretum which survived the fires, nor of the Blundells Flat poplar arboretum, nor the threatened eucalypt seed orchard at that site. Management approaches for these heritage elements were explored at length in the CMP.

9.5 The draft plan proposes to exclude fire from the Blundells Flat bog/fen community (but not the Shannons Flat community). While on the face of it this is largely positive, it does not address the potential application of low intensity fires to control tree regeneration and inhibit it taking over and dehydrating associated wetlands on the valley-bottom flats. It is likely that this area had a pattern of cultural burning for much the same reason, to keep the landscape open and enhance diverse in the resulting ecotones (note cultural burning is addressed in 7.4 and 9.4).

Ch.10 The approach to community engagement could extend beyond compliance and labour to participation in caring for particular areas (custodianship) and playing roles in interpretation and education.

The successful approaches of the Woodlands & Wetlands Trust offer a useful model for the LCC (even if not applied to more distant, parts of Namadgi NP), and should be explored.

Appendix 3 lists ACT strategies and plans relevant to the LCC, but contains no cultural heritage materials. Specifically, there is no mention of the CMP.

Appendix 4 lists only 'interesting, rare and threatened species', with no mention of ecological communities.

**Concluding comments:**

In conclusion, the draft plan misses an opportunity to emphasise the value of Blundells Flat in planning recreation (8.2). Ch.8 is dominated by consideration of control of recreation and its impacts. Perhaps this is a reaction to the past neglect of the area and misuse for inappropriate activities. While that is an appropriate inclusion, it tends to miss opportunities for encouragement of interpretation and education associated with low-key facilities and passive recreation.

The CMP offered a vision for the Blundells Flat area as 'a significant hub for presentation and interpretation of natural and cultural heritage, including passive enjoyment of the environment and nature-based and cultural tourism'.

It continued:

'The primary conservation philosophy for management and use of Blundells Flat is to ensure that all of the natural and cultural heritage values of the area are recognised, appropriately valued and protected in decision-making.

Conservation management and presentation of the area should be based on:

- recognition of the distinctive qualities of the area in terms of diversity and layers of natural and cultural heritage values available for interpretation and education, within easy reach of Canberra, and currently outside the formal reserve system
- recognising that the values of the area have been obscured due to past land use and management, and ensuring that maximum advantage is gained from the opportunities afforded by changed policy and management for the Lower Cotter catchment since the January 2003 wildfires
- a coordinated approach to ensure that management for water quality, management for biodiversity, and management for cultural heritage values are properly integrated and mutually supportive
- understanding of functional interactions between the place and its surroundings, including both Namadgi National Park and Brindabella National Park (in the context of the Australian Alps national parks), and the Condor Creek corridor and associated historic routes to Uriarra and the Canberra Plain
- building resilience into the landscape, including rehydrating wetland systems, enhancing their capacity for slow release of water, and restoring and enhancing ecological connectivity in riparian zones and upslope to timbered hills and ridges
- reconnecting people to the place in its new form, building a constituency of support and advocacy for protection of its values, and maximising engagement of individuals and groups in protection and restoration works, monitoring and research, and interpretation and education activities.

The draft plan appears to offer none of this. Rather, its approach to the value of this area (8.2) is reduced to: 'Blundells Flat presents an opportunity to provide information to visitors about past uses at a location that is a sufficient distance from Cotter Reservoir to minimise water quality impacts. Consideration may be given to installing low key facilities for visitors, including information on catchment values.'

Thank you for the opportunity to comment on the draft plan.

**Mark Butz**

PO Box 128 Jamison Centre ACT 2614

Phone: +61-2-6251-2923

Mobile +61-418-417-635

Email: [mark.butz@bigpond.com](mailto:mark.butz@bigpond.com)