

The Project Officer
Aquatic Species & Riparian Zone Conservation Strategy
Environment ACT
PO Box 144
LYNEHAM ACT 2602

**COMMENTS FROM MARK BUTZ ON
*RIBBONS OF LIFE: DRAFT AQUATIC SPECIES AND RIPARIAN ZONE
CONSERVATION STRATEGY***

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**OVERALL COMMENTS**

The development of this Action Plan is welcomed, as is its approach to connecting species to communities and habitats.

It has been useful to consider it in connection with the draft *ACT Wetlands Policy*.

Most of the comments below arise from the restricted scope of the document, and in turn from its restricted definition of the riparian zone.

Although it is recognised that there are limits to what one document can achieve, it represents a missed opportunity to take a more comprehensive view non-riverine streams and their riparian zones. It perpetuates the lack of attention paid to the values of, and threats to, of some geographic areas and some habitat types, in particular streams, wetland systems and riparian zones which lie outside the reserve system, including those within the former ACT Forests plantation estate.

The document could have paid these areas at least cursory and summary attention based on whatever is already known about them, but they have been excluded. There is no indication of when or how due attention might be paid to these areas.

It is curious that a draft for public comment should contain no invitation to comment and no indication of where to send comments or to whom or by what date. Reliance on access to the Environment ACT Web site to find out this kind of information seems unfortunate.

**SPECIFIC COMMENTS**

**1. Introduction**

**1.2 Scope of the Strategy and 1.3 Definition of the Riparian Zone**

The restriction of the document to river corridors specifically excludes lesser (but significant) streams, and other aquatic systems such as wetlands with limited or episodic surface water [despite section 1.3 on definition which offers alternatives e.g. a) and b)]. The document defers (p.4; col.1) to the draft *Wetlands Policy*, which falls a long way short of a conservation strategy or Action Plan, and is notably incomplete in its coverage.

In view of the confinement of the document to river corridors, it would have been more precise and informative to have called this the 'riverine aquatic species and riparian zone' strategy.

On the face of it this narrowing of focus may be defensible because we obviously cannot do everything in one Plan, and riverine systems tend to come under intense pressure. However, a riverine focus perpetuates the neglect of areas and systems in the ACT which have historically 'fallen through the cracks' in survey and conservation planning. The values of some of these

areas are poorly understood, and in turn they become vulnerable to ill-informed development or management decisions.

For example, despite the existence of the draft *Wetlands Policy*, there is no comprehensive list (or results of a meaningful survey) of wetland areas in the ACT, nor apparently is there a conservation strategy in the pipeline for non-riverine wetland communities, despite the presence of, or potential for, multiple threatened or uncommon species in those communities. The currently available documents do not address many of these communities in any purposeful way.

The document focuses on 'the rivers and larger tributary creeks and their riparian zones in the ACT, that support threatened flora and fauna species' (p.2; col.2). Past practice has led to values in some non-riverine riparian areas being overlooked (particularly those within the former ACT Forests plantation estate), and by definition this Action Plan will perpetuate that lack of recognition.

For example, the Blundells Flat-Shannons Flat area is excluded from this document because it is not riverine (although located on Condor Creek, a significant and perennial tributary of the Cotter). More is said about this area below, as its exclusion illustrates a lack of comprehensiveness in conservation planning.

### **1.5 Relevant Legislation**

The section on the *Heritage Act 2004* (p.8; col.1) could also mention relevant devices such as Heritage Directions, Heritage Agreements, and Conservation Management Plans.

And having said that most of the rivers and riparian zones are on public land (p.10; col.1), it would be relevant to point to the requirements placed by Part 16 of the Heritage Act on public authorities responsible for heritage places. The relative paucity of natural heritage listings in the current Register is not a reason to omit reference to the potential application of the Act in a section such as this.

For completeness, the section on the EPBC Act (p.9; col.2) would advisedly go beyond matters of NES to include reference to triggers involved in actions on Commonwealth areas and actions taken by the Commonwealth. These could be of particular interest in relation to ACT rivers.

## **2. ACT Rivers and riparian vegetation**

### **2.2 Vegetation**

This section begins by acknowledging some of its limitations. However, a further limitation arises from the restriction of attention to riverine areas which is mentioned above. This appears to distort the characterisation of riparian vegetation in pp.19-26.

Although this section gives the impression of applying to the whole of the ACT (within the limits of knowledge), it is blind to the kinds of communities in the Blundells-Shannons area, which have been documented to some extent since the 2003 wildfires. For example, the document describes Tableland grasslands as occurring below 625m asl and Montane types as occurring above 1000m. Between these elevations, most of the ACT is slopes and ridges, but there are relatively unusual occurrences of 'lowland' type vegetation in a montane setting, such as Blundells-Shannons at around 700-750m. Their grasslands and wetland-riparian communities fall through this rather wide crack, yet these unusual and/or uncommon occurrences should be receiving attention.

At least two of the tussock grassland communities described are on the face of it very similar to those found in meadow areas at Blundells, and these are among those associations defined for endangered temperate grassland in the ACT. Yet these have not been recognised in any of the Action Plans to date (or in any other plan or survey). This is calling out for assessment.

Similarly, the characterising of ACT riparian vegetation describes the *E.viminalis* type but due to the riverine definition confines this to parts of the Murrumbidgee River. This is blind to the conspicuous and relatively unusual stand of *E.viminalis* which dominates the riparian zone on low relief areas at Blundells on Condor Creek, where it is fringed by *E.stellulata* at the low (cold drainage) end of meadow areas.

## **2.4 Flora**

Because of the geographic restriction of the document noted above, *E.camphora* does not rate a mention, although (now released from pines) it is certainly the dominant in the riparian zone at Shannons Flat and on the Wombat Creek-Condor Creek junction, and this is the only ACT location for the species. There was an opportunity in this plan to highlight the importance and needs of this occurrence on a larger tributary which supports an uncommon (if not threatened) species of flora in its riparian zone, but it falls through two cracks of scope definition, being non-riverine and being found at the wrong elevation. It is unclear where and how this is to gain due recognition.

The difficulty with this is that sections like 2.4.2 give the impression of being comprehensive e.g. (p.42; col.2) 'Known locations in the ACT of uncommon plant species are shown in Fig.2.5', and similar references throughout. This is rather misleading and could be more qualified.

It is pleasing to note identification of an additional threat to uncommon plant species being 'lack of botanical and ecological knowledge' (p.45; col.1). However, the selective application of available knowledge may be quite as great a threat (with less justification).

## **3. Riparian Fauna**

The same limitations noted above for plants apply to fauna. For example, no mention is made of Corroboree Frog, formerly recorded at Blundells, because that location is not riverine and at the wrong elevation (although the lowest elevation and perhaps therefore an important refuge for this species).

## **4. Fish, crayfish and macroinvertebrates**

It is pleasing to see these groups receiving the level of attention they do in the document. However, the restricted coverage allows some of these to 'fall through the cracks'.

For example, *Engaeus cymus* (formerly recorded in the Blundells area) gains a one-line mention on p.62; col.2. Because it is a land burrowing crayfish and does not spend time in watercourses (i.e. is not considered to be an aquatic species) it is not given any attention, although by definition it is dependent on the riparian zone (including that around wetland soaks) where it burrows down to the water table.

There has been limited interest in assessing whether or not *E.cymus* persists in the Blundells-Coree area, although it is notably uncommon and unusual in the ACT, and despite the fact that many *Engaeus* species across Australia, once they are examined, have ended up on threatened species lists because of its habitat location. This is another case calling for assessment and recognition.

## **5 Planning and Management for Conservation and 6 Conservation Strategy**

Throughout these sections, it is unclear what roles if any might be played by any of the advisory and decision-making mechanisms which guide the work of Environment ACT e.g. ACT Natural Resource Management Board or Flora & Fauna Committee.

In 5.1 and 5.2 the restricted scope of the document once again implies that it is more comprehensive than it is in reality by presuming that 'more environmentally sensitive' are protected in reserves of some form or another. This is not an accurate reflection of the situation with non-riverine riparian areas. The document is rather dismissive of the likely need for additional reservation, albeit with a rider about what emerges from survey and inventory, and this may be somewhat overstated in view of the lack of inventory and data to date.

In 5.7 more could be made of opportunities for community engagement in the Management Actions, and closer links could be drawn to investments identified in the ACT NRM Plan.

The Management Actions reassure the reader that threatened or uncommon animals of rivers and riparian zones will receive assessment and their habitat will receive attention, and that management plans will be prepared for 'rivers and riparian areas, and conservation management of aquatic ecological resources'. However, this offers no comfort in areas which lie outside the definition scope of the document and are not evidently to be the subject of any other similar level of planning. Some of these areas are potentially subject to pressures from development and/or ill-informed management.

The opportunity to comment on Action Plan 29 offers an opportunity to point out the effective exclusion of such areas from the Action Plan series (and any other known mechanism) and in turn an opportunity to bring some of their values to the attention of decision-makers.

The recent Government decision to not reinstate pine plantations in the lower Cotter raises the question of what will happen to large areas in varying states of treatment since the 2003 fires, including significant riparian and aquatic systems. The number one priority in the lower Cotter may be water (quality and yield) but close behind must come the ecosystem services provided by riparian and aquatic systems.

This document could take the opportunity to make clear recommendations about the systems in the lower Cotter, to guide decision-making, survey and management, and associated community engagement. It is unclear how, when and by whom this would otherwise be done.

The document alludes to its being used as input into such decision-making, but it could go further to address this area specifically. This would be particularly valuable for the Condor Creek catchment which covers most of the area and provides important native vegetation corridor linkages between the bulk of Namadgi and those parts which adjoin Brindabella National Park to the north in NSW.



Mark Butz

Mobile: +61-(0)418-417-635 Phone: +61-(0)2-6251-2923 Fax: +61-(0)2-6251-2173  
Email: mark.butz@bigpond.com Web: www.markbutz.com  
PO Box 128 JAMISON CENTRE ACT 2614