



Department of
Environment and Conservation (NSW)

Your reference : NA96 R 12
Our reference : MEPRD/mhb/03/00403
Contact : Martin Bremner 9585 6826

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RECEIVED

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L.D. NOWRA

Attention: Karen Fowler

--Dear Sir or Madam--

Killalea State Park Plan of Management Addendum

I refer to your invitation to comment on the Killalea State Park Plan of Management Addendum and provide the following comments on behalf of the Department of Environment and Conservation (DEC).

The DEC does not object to the Killalea State Park Trust increasing the level of usage and visitation to Killalea State Park provided that it is done in a manner that protects the park's biodiversity and cultural values. However, the level of information that has been provided in support of this proposal makes it difficult to determine the extent of its likely impact. For example, the location and condition of threatened species, including endangered ecological communities (EECs), and their habitats within the park is not documented in either the plan of management (POM) or its addendum. While it is prudent to withhold threatened flora locations from a public document, the provision of such details in a confidential appendix would have been appropriate.

The addendum also fails to mention that a number of the vegetation communities that occur in the park have been listed as EECs under the *Threatened Species Conservation Act 1995* (TSC Act) since the preparation of the original POM. These include:

- *Melaleuca armillaris* Tall Shrubland in the Sydney Basin Bioregion;
- Illawarra Subtropical Rainforest in the Sydney Basin Bioregion;
- *Themeda* Grassland on Seacliffs and Coastal Headlands in the NSW North Coast, Sydney Basin and South East Corner Bioregions;
- Bangalay Sand Forest of the Sydney Basin and South East Corner Bioregions; and
- Littoral Rainforest in the NSW North Coast, Sydney Basin and South East Corner Bioregions.

The following EECs may also be present within the park:

- Freshwater Wetlands on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner Bioregions; and
- Swamp Oak Floodplain Forest of the NSW North Coast, Sydney Basin and South East Corner Bioregions.

While the POM contains 'conservation value' and 'sensitivity' maps, the extent to which threatened species values are considered in these maps is not clear. The justification for the modifications that are made to these maps in the addendum is also unclear given that additional technical and field studies were not undertaken, and recent threatened species listings were not reviewed, during its preparation.

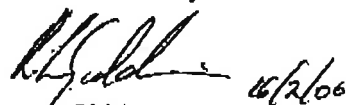
In order to minimise the potential for the proposal to impact detrimentally upon the biodiversity values of the park, it is strongly recommended that the proposed development footprint (including all associated infrastructure and asset protection zones) be located entirely within the existing cleared sections of the park. As part of the design of the development footprint, consideration should also be given to the need to establish vegetated buffer zones and corridors to protect and link areas of remnant vegetation, and the locations where these would be most effectively established.

Any funds that are generated from a future change in the use of the park should also be partly directed towards the restoration and management of threatened species habitats within the park, including the establishment of buffer zones and corridors. In the view of the DEC, this should be explicitly stated in the POM. The addendum states only that the proposed changes will provide a source of capital funding for additional park facilities and services.

The addendum should not focus on enabling a major change in the park's use without addressing the potential direct and indirect impacts. It is understood that, should the Minister for Lands approve the proposed amendments, a more detailed investigation of the proposal will be undertaken at the rezoning and development application stages. However, given the nature of the proposed changes and the significant biodiversity values involved, it would be more appropriate to undertake these studies up-front. The information generated could then be used to inform both the design of the proposal and the preparation of a new POM that addresses the issues associated with the proposed changes, including the impacts of increased patronage on the EECs and other threatened species habitats that occur within the park.

All inquiries regarding this issue should be directed to Martin Bremner, Threatened Species Officer on (02) 9585 6826 or martin.bremner@environment.nsw.gov.au.

Yours sincerely



Ray Giddins

A/Manager

**Biodiversity Conservation Section, Metropolitan
Environmental Protection and Regulation Division**