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Botanic Gardens and Parks Authority

Kings Park WA 6005

DRAFT BOLD PARK MANAGEMENT PLAN 2022 – 2027

The Urban Bushland Council WA Inc. (UBC) makes the following submission on the Draft Bold Park Management Plan 2022-2027. Representatives of the Urban Bushland Council WA Inc. are available and willing to discuss these matters further with the Botanic Gardens and Parks Authority.

The UBC appreciates the opportunity to comment on this Draft.

Governance on page 9.

This section well describes the governance framework for Bold Park. Notably however, in order to deliver and meet the important conservation functions (b) and (c) under the *BGPA Act*, there is a need for greatly increased Government funding for this essential conservation management.

As you are all too aware, in recent years staff numbers have been reduced, but the on-ground management work to be done has increased. Currently there are no BGPA staff and ground crews based at the Ecology Centre at Bold Park. This is totally inadequate and unacceptable and requires change. Given the large 361.7 ha size of Bold Park (much bigger than Kings Park) and its outstanding significance as a Bush Forever Area in the CAR reserve system, it requires a major BGPA team of scientists, rangers and on-ground management teams to control threats such as weeds, feral animals, fire risk, diseases and anti-social behaviour.

A significant omission in the draft is that the status of Bold Park as Bush Forever Area 312 is not even mentioned. On page 11, the Bush Forever policy and plan should be included as the main policy and plan applied in the management of Bold Park.

BGPA strategic priorities on pages 12-13.

The 'Theme' of Science and Conservation needs revision with much more focus and details with **Actions** to control threatening processes. There should be a whole section with details of weeds and control measures to be taken. Similarly with feral animals and other threats such as fire risk.

Under **Management effectiveness** on page 13, the first dot point should start by inserting the words 'greatly increasing and' maintaining a diverse, knowledgeable, professional and engaged workforce...'

Looking forward: issues and trends shaping this management plan on pages 16-17.

Again Bold Park's Bush Forever status should be included. The wording is vague and again lacks focus and specification of the on-ground management actions needed to control threatening processes of weed invasion, feral animals, fire, diseases and so on.

PLANNED ACTIVITIES 2022-2027 on pages 19-27

1. Community engagement and participation on pages 20-21

The proposed engagement with Aboriginal people is commended and supported.

We agree with the key management initiatives with the following qualifications:

In initiative **1.4**, the word '**passive**' should be inserted before 'recreation'. Only passive recreation is consistent with the governance requirement for conservation of the Bold Park bushland in the CAR reserve system. Various forms of active recreation are inconsistent with nature conservation and passive recreation uses. For example, bike riders can put walkers as well as wildlife at risk.

Initiative **1.5** sounds good but it needs to include much increased BGPA staff engagement work.

Similarly we agree that Initiative **1.7** is good but it must not be used to replace BGPA conservation actions and responsibilities which must be increased.

Also initiative **1.9** will require additional BGPA staff to deliver this.

2. Visitor experiences on pages 22-23

Again the word 'passive' should be included before the word recreation. Active recreation is a risk to visitors who are walking along tracks in Bold Park bushland as well as to fauna crossing or moving along the paths.

There is a lack of BGPA capacity and staff to deliver on-site, nature-based experiences, such as guided walks. The important voluntary contribution of the Friends of Bold Park to deliver some guided walks should be greatly added to by BGPA staff to provide daily, visitor guided walks. This delivery is a BGPA responsibility and it requires significantly increased BGPA staff.

Under **Key Management initiatives** on page 23, in **2.3** and **2.5**

The words 'and provide' should be added: Explore and provide opportunities for innovative experiences that attract visitors,... . To attract visitors, a café with bookshop in the Ecology Centre - Perry House precinct would be a significant improvement which is much needed. This could also include a public toilet facility and drinking water for visitors.

Under **2.5**, provision of bushland conservation information for visitors should be added.

We strongly disagree with **initiative 2.7**. There should not be any new or extended cycling access to designated paths in Bold Park. This form of active recreation is incompatible with and in conflict with passive recreation in this bushland conservation area. Cycling is a threat to human safety for walkers, and also is a threat to safety of wildlife which may be on paths.

In **initiative 2.10** insert the word 'passive' before the word 'recreation'. Thus it reads passive recreation.

3. Science and environmental conservation on pages 24-25

This Activity section should be number 1 rather than number 3 as it is the most important role in management of Bold Park. It should include much more biodiversity information and comprehensive management actions for the large 361.7 ha area of Bold Park. Its size and outstanding significance within the CAR reserve system for the biodiverse Perth region needs description. **It is recommended that this section be reworded with much more specific detail and management actions** (rather than on page 24 the vague wording 'Management initiatives are significantly influenced by').

Also the heading on page 25 should be changed to '**Key management actions**'. This activity section lacks basic information and targets on weed and feral animal control and other threats. There is a need for greatly increased capacity of BGPA to provide the necessary on-ground management of this large area of significant bushland. Greatly increased numbers of staff including scientists are needed.

Under **3.3** on page 25 the 'initiative' to '*Prepare a long term Bushland Conservation Plan....*' should be removed. Instead, this Bold Park Management Plan **should indeed be** the detailed Bushland Conservation Plan!

On page 24, the first dot point should be that Bold Park and Adjacent Bushland, City Beach is **Bush Forever Site 312** on the landforms of Spearwood Dunes, Quindalup Dunes, and Wetlands within these dunes. Management

actions within each of these landforms and each of their respective vegetation complexes and floristic community types need to be specified and included. This should include survey and mapping of each floristic community type as well as the wetlands.

Weed management: All the threatening processes (as in the third dot point) need to be described in detail. For example a comprehensive list of the weeds present, and mapping of the most invasive and threatening weeds such as grassy weeds of Veldt Grass and Wild Oats; Pelargonium; Geraldton Carnation Weed; Black Flag and more. Those to be removed/reduced should be listed.

Feral animals: Similarly feral animals need to be listed together with their threats to native fauna and habitat. Details of control actions and monitoring for cats, foxes, rabbits are essential. Similarly also for pest bird species such as Corellas and Rainbow Lorikeets and their threats to iconic species such as Carnaby's Cockatoo. Thus the **management initiative 3.7** on page 25 should be rewritten with detailed **management actions**.

Under **3.10** on page 25, the wording should be changed to a **management action** to re-introduce Quenda, Kangaroos and/or Black-gloved Wallabies to at least some parts of Bold Park bushland. This has the potential to greatly reduce grassy weeds and fire risk and to improve ecosystem functioning.

4. Amenity and infrastructure on pages 26-27

Planning context on page 26: The first paragraph clearly states the context for the role of BGPA. The next paragraph lists the key infrastructure facilities.

Community feedback of the need for additional infrastructure is strongly supported. The emphasis is on passive recreation needs. A café with book shop, and toilet facilities is certainly needed and would facilitate much more community engagement in Bold Park. See our comments under **4.3** below.

Our intended focus on page 26

While the focus is good, the management efforts are general and vague and there is a lack of commitment and capacity to deliver ecosystem conservation. The fact that the Ecology Centre is now closed with no DBCA staff based there to deliver on the need '*to maintain the natural values of our lands*' is a major shortfall that must be addressed. For such an important public conservation asset, as is Bold Park, to be unmanaged on-site by teams of BGPA staff is totally unacceptable. This must be addressed. BGPA and the wider community cannot and should not rely on community volunteers to fill this role.

Key management initiatives on page 27

Under **4.2**: We agree with this, but it also needs teams of BGPA staff guides on site to deliver visitor services in person. Rangers and guides need to be available at key locations in this large area of Bold Park.

Under **4.3**: New facilities that will be provided in the Ecology Centre precinct should be specified. This must include an indoor/outdoor café – bookshop and public toilet facilities which are currently remarkably lacking. A modern bookshop facility could be developed in conjunction with the Wildflower Society of WA and Birdlife WA.

Under **4.4**: The Reabold Hill precinct is a good facility. There is a need to stop access by bikers as they are a risk to pedestrians and wildlife.

Under **4.5: Bike trails in Bold Park**

We strongly disagree with a new or extended bike trail and biking facilities being located at the Drive-in site. Allowing bikers into this site would increase their incursions to the adjacent bushland. We have strongly objected at a workshop to such a proposal and stated:

'Cyclists are likely to want to expand their trails beyond the confines of the old drive-in site, which is actually quite small, unattractive and not interesting compared with the high quality bushland on steep limestone ridges that surrounds it.'

Please see the ATTACHMENT below being the text of the presentation given in October 2021 by the UBC at the '*Bold Park mountain bike activity and infrastructure workshop: community conservation perspective*'

Alternatively, we recommend that the former Skyline Drive-in site be used to provide building of a new native plant propagation facility, as well as an adjacent seed orchard. This site should be used to propagate only native species with propagules taken from Bold Park. It should be managed by BGPA staff and community volunteers could assist.

It is recommended that existing Bike trails in the bushland areas of Bold Park be removed, and that no new or extended trails be constructed through the bushland. They are an inconsistent use with the primary purpose of nature conservation.

Bike trails should be confined to cleared areas and be separated from pedestrian walk tracks.

Under **4.8:** We disagree with the continued **horse riding** opportunities. While the Bridle Trail has been reduced, it is now time for it to be ended. It is a form of active recreation and can bring in plant diseases and weeds via horse hoofs, urine and faecal droppings. Thus it is a threat to biodiversity health and condition.

Under **4.10:** This is supported with the addition of the phrase at its end: ...'and its nature conservation values.'

ATTACHMENT: Presentation given in October 2021 by the UBC (by Mary Gray) at the ***Bold Park mountain bike activity and infrastructure workshop:***

Bold Park mountain bike activity and infrastructure workshop: community conservation perspective

Since its inception - ie for more than 25 years - I have been involved with the UBC and have been President for many years. We are an association of ~75 community groups with a common interest in bushland protection and conservation. See brochure.

Our network of Friends groups are familiar with pressures that urban bushland is under, including pressure to open up bushland areas to active recreation such as mountain bikes. As the city's population is growing, remaining areas of bushland are growing in conservation importance, and at the same time, more people are looking for places to be engaged in sports. This is understandable BUT valuable bushland is not the right place for activities that cause loss and damage to bushland.

The Friends of Bold Park Bushland is a UBC member and I know they are very concerned about proposals for bike facilities to be located anywhere in Bold Park. We have also made submissions objecting to bike trail proposals in 2019 in the City of Albany's Mt Claremont and Mt Clarence reserves, and in 2020 in Manning Park (Bush Forever site) in the City of Cockburn. Local groups have also objected.

The Perth region is a biodiversity sub- hotspot within the globally recognised biodiversity hotspot of the South West region of WA. Global biodiversity hotspots are areas that are of global significance for their species richness and are *for conservation priority because they are under threat.*

Bold Park is a very high conservation value site as recognised in **Bush Forever**. It is reserved for the primary purpose of conservation of species, vegetation communities, and its inherent complex ecosystem processes. This means its suitable human use is for passive recreation only.

Bold Park and other bushland sites are vulnerable to disturbance and fragmentation:

- Active recreation uses such as cycling and mountain biking and associated construction of bike trails in urban bushland sites are inappropriate uses as they are in conflict with bushland conservation goals.

- Cyclists are likely to want to expand their trails beyond the confines of the old drive-in site, which is actually quite small, unattractive and not interesting compared with the high quality bushland on steep limestone ridges that surrounds it.
- Construction of new separate trail networks would need to be created to segregate pedestrians and cyclists. But this would increase bushland loss and degradation, fragmentation and risks to fauna.
- Degradation would include loss of native understorey, shrubs and trees from clearing for new trails. Also there would be edge effects and potential for plant diseases and weeds to be spread along trail edges and into the bushland.
- Small native fauna would be at risk of being killed or injured when on paths or crossing. For example, lizards like to sun themselves on open trails. Bold Park is important for its high number of reptiles and its diversity of reptile species.
- Increased fragmentation of remnant vegetation occurs if these facilities are located in the bushland, even if the site is degraded. Fauna such as small birds and pollinators move through bushland regularly and seasonally but need the connected low shrub cover.
- Bikers do not engage with nature, they just race through it. They don't need to be in bushland areas.

Suitable locations for mountain bike facilities

Suitable locations are on areas that are not in bushland, and are in large open grassed parklands on designated bike paths.

Alternative use of the former drive-in movie site

Goal: Revegetate most of the site with species native to Bold Park bushland.

- Build a plant nursery facility to propagate species native to Bold Park, taking propagules only from Bold Park.
- Grow a 'seed orchard' specialising in Bold Park plants such as Tuarts, Marri, and the Banksias which provide food for endangered species such as Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo, as well as providing seeds for propagation.
- With plants supplied from the nursery, revegetate the remainder of the site with a mixture of the native plants that occur in Bold Park suited to the landform and soils at the site.
- Educate and involve nearby school kids and the local community in plant propagation, planting and weeding.