

Marcus Beach Bushcare Association Submission to The Draft Noosa Bushland Reserves Strategic Plan 2021-2026

Introduction

The MBBA understands the importance of targeted, prioritised allocation of resources across the 178 Council Bushland Reserves which cover a total area of 3,469 hectares, and include some Regional Ecosystems of high conservation value ("Endangered" or "Of Concern" under the Vegetation Management Act 1999). It does however feel that the intent of this strategic plan could have been more clearly enunciated.

In order to comment specifically on various aspects of the Draft Noosa Bushland Reserves Strategic Plan, our submission includes excerpts from the draft plan in chronological order in green with headings and page references for ease of reference, and the attendant comments below. While some of the comments are general ones, the MBBA comprises of a collection of Bushcare groups that work primarily on the eastern beaches coastal reserves which means that more specific observations/comments will pertain to those areas. For the purpose of this submission "Coastal Reserves" will refer to the eastern beaches coastal reserves only.

1.3 Purpose of the Plan

The Noosa Bushland Reserves Strategic Plan 2021 – 2026 (The Plan) outlines the values and management issues within Council's bushland reserve network.

The Plan provides recommendations as to how Council should manage its bushland reserve network over the next five years to achieve the bushland reserve network's objectives as presented in section 3*. In addition to refining and defining the management planning framework for the Natural Areas Program, three reserve management program categories ('Protect', 'Enhance', and 'Monitor') have been allocated to the prioritised reserves with associated planning documentation required identified.

It is intended that the Noosa Bushland Reserves Strategic Plan will provide an over-arching plan for all Council owned and managed Bushland Reserves, and establish clear and consistent management objectives for all issues that relate to or impact upon Noosa's bushland reserve values for the next five years.

Sometimes putting things in point form makes things clearer.

Perhaps the purpose of the plan is to:

- provide an over-arching plan for all Council owned and managed Bushland Reserves,
- establish clear and consistent management objectives for all issues that relate to or impact upon Noosa's bushland reserve values for the next five years.

*Section 2 not 3



Section 2.1 Council's Vision for Noosa Bushland Reserves Network p. 6

The following vision statement provides an overarching framework for driving the management of Noosa Council's bushland reserves network:

"Council's Bushland Reserve Network is protected, enhanced and valued by the Noosa community for its natural, cultural and social values."

This vision statement is ambiguous as it could be misinterpreted as the protection and enhancement being the responsibility of the **Noosa community** not the Noosa Council. Needs to be rewritten so that it's clear that the **Council is the one responsible for protecting and enhancing**

Part 3. Statutory & Strategic Obligations P.8

The Plan will have particularly strong links and implementation relevance to the following strategic documents:

- Conservation Land Guideline
- Climate Change Adaptation Plan (Climate Hazards Adaptation Plan) (currently in draft)
- Noosa River Plan (currently in draft)
- Coastal Management Plan (not yet developed)
- Biosecurity Plan
- Bushland Reserve Fire Management Plan
- Koala Conservation Plan

MBBA assumes 'implementation relevance' means that the Bushland Reserves Plan will need to plan for and potentially provide resources (i.e. money and staff) for measures required in the Reserves as a result of the implementation the above plans.

For the Coastal areas in which the MBBA operates, the three most relevant plans are the Climate Hazards Adaptation Plan (in draft), the Coastal Management Plan (to be developed) and The Reserve Bushland Fire Management Plan (in draft). The latter is covered by its own Bushland Reserve Management plan.

The Coastal Hazards Management Plan is not yet written but it will require a larger resource allocation for Coastal Reserves than the reserves currently receive. The allocation of a management plan for all the Coastal Reserves, including the tier 4-5 is a step in the right direction, but it does not go far enough. How much additional labour time and budget has been allocated to the Coastal Reserve over the five-year period of the plan?

Section 4.2.4 Climate Change Amelioration p.11

Being a coastal shire, Noosa is particularly exposed to the predicted impacts of climate change. These impacts are summarised as:

• Increased coastal erosion, coastal hazards, and extensive inundation from sea level rise;



- More frequent mass die-off of vegetation and vulnerable flora and fauna;
- Loss of rainforest and expansion of eucalypt forests resulting in greater intensity, spread and frequency of bushfires;
- Loss of saltmarshes and swamps from sea level rise;
- Reduction or loss of native folivores from increased CO2 levels in foliage;
- Increased frequency and intensity of flood events;
- More disturbance to native ecosystems leading to an increase in weed incursions.

Bushland reserves will play an important role in buffering the effects of climate change both physically (temperature regulation, stability for 'at-risk' landscapes) and through carbon storage and capture.

Noosa's bushland reserves can provide refugia during adverse climatic events (such as riparian areas during a prolonged drought), and as potential dispersal corridors for fauna (and flora propagules) as species retreat or retract to less impacted areas.

Apropos of the preceding point, this is section of the Draft should also make to reference the Coastal Management Plan and an anticipated increase in demand on budget and staff and contractor allocation. (Even if the money comes from a different 'bucket' it will have resource implications for Natural Areas as they will be the operational area that will oversee or do some of the work.)

Section 6.3.2 Community Involvement

Provided efforts are strategic and well consulted, the work undertaken by community groups, volunteers and employment teams can achieve great results and can complement and greatly value-add the Council's efforts to manage a variety of reserve issues.

The acknowledgement in this report of role Bushcare Groups play in Noosa's Bushland Reserves is appreciated. MBBA also agrees that best results can be achieved when efforts are strategic and done in consultation with the Council. This has always been the policy of the MBBA, however we note that Bushcare Groups, being volunteer based and with a local focus, are not always easy to mobilise in an operationally strategic way that provides an exact fit with the priorities outlined in this Draft. Therefore, the Council cannot rely on or expect Bushcare groups to do core maintenance work which is the responsibility of the Council.

Part 7. Noosa Reserve Management Framework 2021-2026 p.25

General comment: This section, which is supposed to be providing a framework for the management of Noosa Reserves, gives a great deal on information on how the framework was devised, but less is clear what it will achieve. There needs to be more detail on how it



will inform operational plans for Reserves. Furthermore, it is not clear how Strategic Plan's Objectives (pp.7 & 49) and Action Plan (p.45) fit within this management framework.

Council will follow best practice management principles throughout its Natural Areas Program.

Best practice bushland management principles are detailed in the SE Qld Ecological Restoration Framework Guideline and Manual (Chenoweth 2012) and are focused on developing ecosystem resilience. This is defined as the ability of an ecosystem to recover its structure and function following a disturbance event.

The five key principles are:

 Restored ecosystems incorporate assemblages of species reflecting those in reference

ecosystems and have the potential to recruit further species by natural means;

- Restored ecosystems support the same structure and function as reference ecosystems;
- Restored ecosystems consist of indigenous species of local provenance to the greatest extent practicable;
- Restored ecosystems are self-sustaining to the same degree as a reference ecosystem, such that they are resilient to normal periodic stress; and,
- Restored ecosystems interact with the surrounding landscape and contribute to ecosystem services.

While the concept of following best practice management principles as per above is laudable, the MBBA questions whether this is realistic, achievable or even desirable in the Coastal Reserves. The weed burden is so great that these reserves will not be restored to their natural state in the short-term or even the long-term.

The total eradication the weeds defined as target weeds in this report is an unrealistic goal, meaning these reserves will never have exactly the same structure and function as their reference ecosystems. Nor are they likely to be completely self-sustaining, as weed load and climate change induced alterations to the vegetation mix, will require active and ongoing management.

Given this situation, the Draft will need to redefine its management principles in relation to the Coastal Reserves, particularly in the light of the yet to be written Coastal Hazards Management Plan. For example, the priority in the Coastal Hazards Management Plan could see dune stabilisation taking precedence over complete ecological restoration. If this were the case, the best practice principles outlined in this Draft, would not be the guiding principle, or indeed an objective as stated in *Part 10. Monitoring & Evaluation Strategy p.49*, *Objective #1*



Section 7.1 Formal Management Framework p. 27

The intent of each Management Program category is as follows:

Protect Program

Aims to preserve the current vegetation condition of a reserve through the undertaking of minor restoration works (<5 years in duration) where necessary as a result of annual inspections and / or in accordance with a Bushland Reserve Management Plan if one is necessary for the site due to conflicting management issues.

Enhance Program

Aims to intensify, increase, or further improve the condition, value, and/or extent of vegetation within a reserve. Works undertaken in accordance with a current Bushland Reserve Management Plan (where one is necessary for the site due to conflicting management issues), and subordinate Ecological Restoration Plan and/or BOA.

Monitor Program

Aims to observe and check the trajectory and quality of vegetation condition of a reserve over a period of time. Annual Reserve Inspections occur, in accordance with a Bushland Reserve Management Plan if one is necessary for the site due to conflicting management issues.

This description of Project Management Categories is plans is confusing. What does 'conflicting management issues' mean? Of the 178 Bushland Reserves that the Council is responsible for, 114 are in the Monitor program category which appears to mean they will just be observed and checked once a year with no maintenance or labour allocation. MBBA contends that this is a 'do nothing' category and completely at odds with the assertion that:

Council will follow best practice management principles throughout its Natural Areas Program.

The Council cannot assert that it is following best practice principles when this is clearly **not** the case for 114 of their reserves. Rather the Council needs to be transparent, and **state exactly how, when, and in which reserves, it does follow best practice principles.**

Section 7.1 Formal Management Framework p.28 Reserve Management Plans

Reserve Management Plans documents the values within the reserve, statement of management intent, threats (mapped condition assessment via a BOA), recovery potential, community uses, built assets construction and maintenance, and prescribes a broad five year schedule of on-ground works to address management issues. Further, the plans incorporate a Fire Management Plan

Of the areas in which MBBA operates, Castaways Beach and Marcus Beach are the categorised as 'Monitor' with a management plan. This presumably means that these reserves do have a labour allocation to target priority weeds that are having significant impact. Given that the Coastal Reserves have at least four species of transformer weeds that are seriously threatening the health and biodiversity of the dune system, there will need to



be significant resources available to combat these. The other area where MBBA operates is Peregian Creek Reserve which is categorised as 'Enhance' which presumably gives it a higher resource allocation.

The MBBA notes and supports the intention to include BOAs for the Coastal Reserves. There are already BOAs in place that can be used as base data to inform the Coastal Management Plan. Ongoing BOAs will help to ascertain the effectiveness of work done by coastal Bushcare groups, as well as being a monitoring and assessment mechanism for on ground work, Council funded grant work and the overall condition of a Reserve.

Data from BOAs will help to inform management strategies in the Coastal Management Plan, and being repeated every five years, they will yield data on whether or not the Plan is achieving its objectives. However, MBBA notes that a BOA is insufficient to ensure that there is any ongoing improvement to the dune system. Resources are required.

The MBBA also supports the inclusion of a Fire Management Plan for these reserves, given community concern about fire, and the potential threat to property abutting Council Coastal Reserves.

Section 7.2 Reserve Prioritisation Method

Table (unnamed) p.29

Reserve Values	Weight	Total Score
Biodiversity Value	47%	100
Waterway Value	24%	
Carbon Sink Value	7%	
Social Value	12 %	
Cultural Value	10 %	
Potential for Successful Outcome	Weight	Total Score
Ecological potential for	50 %	100
recovery	30 / 0	100

The MBBA considers the weightings to the Reserve Values, that are presumably those outlined in Moore *et al* (2007), to be a sound basis for prioritising the ecological value of a Reserve, because they put environmental value first and foremost, whilst also including the social and cultural value of the Reserve.

Without going through the methodology in detail and having a thorough understanding of the weightings applied, the MBBA is left wondering whether the Potential for Successful Outcome scoring could actually skew the results Reserve Values scoring in some cases.



If the process is to combined the scores of the Reserve Values component and the Potential for Successful Outcome component to obtain an overall score, could this result in a reserve with higher Reserve Values, but lots of weeds and maintenance required, obtaining an overall lower score than a site that has a score lower on the Reserve Value score but has with few weeds and a low maintenance requirement? This could potentially be the case in a large reserve which is very overgrown and requires masses amounts of labour, but also has a very small patch of ecologically significant vegetation.

The Prioritisation Matrix and Decision Support Tool yields the following results for the Coastal Reserves.

Table 1

Eastern Beaches Reserve: Tier, Management Categories and Planning Mechanisms				
Reserve ¹	Prioritisation	Management	Planning	
	Tier	Program Category	Mechanism Required	
Castaways Creek Foreshore Reserve	4	Monitor	Management plan	
Marcus Beach Foreshore Reserve	4	Monitor	Management plan	
Peregian Beach Foreshore Reserve North	3	Enhance	Management plan	
Peregian Beach Foreshore Reserve South	4	Monitor	Management plan	
Peregian Creek Reserve	1	Enhance	Management plan	
Sunrise Beach Foreshore Reserve	5	Monitor	Management plan	
Sunshine Beach Foreshore Reserve	4	Monitor	Management plan	

MBBA would like to have more details of how these scores were ascertained as this would help us to better understand both the prioritising process, and what the Council considers to be important in their strategic planning.

The MBBA strongly favours the adoption of a whole of coast approach to the Coastal Management Plan, that would encompass all of the Coastal Reserves. An interesting exercise would be to apply the Prioritisation Matrix and Decision Support Tool to the total

¹ Marcus Creek Bushland Reserve has not been included because MBBA assumes that this refers to the Council owned land on the western side of David Low Way. The name implies it is a Bushland not Coastal Reserve. MBBA has included Peregian Creek Reserve as a foreshore Reserve assuming this is the Peregian Creek the that MBBA works at.



area the Coastal Reserves and see if it yields a similar result to the above, where the reserves are considered as separate entities.

Does the size of a reserve affect the amount of detail that the tool is able to capture and use in the prioritising process? For example, would the tier 1 rating for Peregian Creek Reserve be lost when it is part of an aggregated whole of coast 'Reserve'?

7.4.3 Bushland Operational Assessments

In this section there is a table pp34-38 showing the Prioritisation Tier, The Management Program Category and the Planning Mechanism Required for each reserve. Why it is in the section relating to BOAs? MBBA has been unable to reproduce this table, which is crux of the report, due to its formatting. We note that the table being so long makes it difficult to quickly get an overall picture of the how many reserves receive what level service in the five years of Plan. Below is an aggregation that provides the reader with a clearer picture of this. We suggest that this table replace the longer more detailed table that would then become an Appendix item that is referred to in the body of the report.

Service Level of Management Program Category for 177 Reserves					
	Prioritisation Tier	Planning Mechanism			
		M/mt Plan	ERP	BOA	Nil
Enhance	1	2	1	18	
Enhance	2		2	18	
Enhance	3	3	2	11	
Protect	1	1			14
Protect	2				17
Protect	3				17
Monitor	3				1
Monitor	4				31
Monitor	5				34
Total		11	5	47	114

Comment on the tabulation of data above



As one would expect from the methodology employed, the higher categories receive the most in terms of management. Exactly how the allocations are made is not clear. What does become apparent in this way of presenting the data, as opposed to the way it is currently present in the Draft is that few reserves will have a management plan and 114 of the 177 reserves listed in the table will have a 'Monitor' which from the data presented in Section 7.6 p.38 appears to have no labour allocation and only an annual inspection.

Nor is it clear that the 47 reserves listed as having a BOA will have a labour allocation. What this tell us is that is possible that 161 of the 178 reserve will have little or no work done on them in the next five years.

It would be useful if the Draft could provide more detail that hopefully refutes this, as if this is the case, the future for Noosa Bushland Reserves will be compromised. In fifteen to twenty years, many reserves will be weed patches and the Council will be under pressure to sell them off to developers.

Section 7.6 Service Levels p.38

A level of service is the amount of resourcing Council will put towards managing a reserve to address its legal obligations, community expectations, level of threat, and the potential for biodiversity values to be maintained or improved. Levels of service capture both proactive and reactive actions.

Each service item within the Level of Service table has an estimated costing identified including plans, staff time, expenses and contracting costs.

Management Programs	Monitoring •	Invasive species management
Protect	Annual inspection	As guided by management Plan and Annual inspection. Target all invasive species in reserve with <6 Labour days per annum
Enhance	Where ERP's or Boa's exist or are required – reviewed every 5 years. Annual inspection	Target priority biodiversity pest species only. Guided by ERP or BOA with <36 Labour days per annum.
Monitor	Annual inspection.	Target priority biodiversity pest species only

In this table, the management categories, 'Protect' and 'Enhance' have indicative labour allocations whereas 'Monitor' has no labour allocation. The table does not make clear how labour days are applied to individual reserves or if all Reserves in these two categories will receive labour allocations - presumably this is contained in operational plans?



The MBBA is curious as to how the level of services as outlined in this table will achieve Objective #1 of the Strategic Plans stated objectives. The table does not link the labour allocations to Objective #1, give any indication of whether or not the labour allocations will meet the any of the stated objectives, or demonstrate that the resources allocated are sufficient to carry out the invasive species management operations that are listed in the table.

For example, it is unclear how it will be possible to carry out **any** invasive species management i.e. weeding, without a labour allocation. Once again, this table suggests that 'Monitor' means 'do nothing', so stating that the management strategy is to "Target priority biodiversity pest species" is misleading at best and disingenuous at worst.

The MBBA is not familiar with most of the Reserves and unfortunately the Draft does not contain a map to enable the reader to see the location of the Reserves. From their names MBBA does recognise some parcels of land in the 4-5 tier as suburban Reserves that are small, isolated patches with vegetation that is abundant, i.e. not categorized as a "threatened" or "of concern" ecosystem.

For these Reserves, a strategic decision to 'do nothing' in terms of maintenance other than address any issues of potential fire hazard and safety could be justified on common sense resource allocation grounds alone that does not require a complicated matrix process.

Part 8. Operational Management Review

Section 8.1.1 Reserve Naming Convention Introduced p.39

The MBBA welcomes the rationalisation of Reserve Categories from 16 to 7 as it should make the system of documentation and maintaining records more efficient.

Section 8.1.2 Reserve Signage p.39

Council will conduct a signage audit (via the annual reserve inspection) to identify the current status of reserve signage to inform replacement of signage that reflect the reserve naming protocols and Noosa Council's signage style and policy. In high priority reserves (tier 1) with high individual Social Values scores, Council will consider reserve naming and interpretive signage.

The placing of interpretive signage at a site should not be confined to tier 1 Reserves. Rather it needs be guided by public accessibility and use. There is no point in putting interpretive signage in a remote tier 1 site that nobody visits, but justification for putting signage in high use areas. For example, Marcus Beach Foreshore is a tier 4 site, but has a heavily used beach access. The MBBA installed interpretive signage along BA. 47 at this Reserve. The fact that we have to replenish the brochure box every weekend shows the active engagement of people who the track. MBBA also installed interpretive signage along BA 49 (Peregian Creek tier 1 site) which is a less frequently use track and there is far less requirement to replenish brochures.



Section 8.2.1 External Investment Opportunities p.39

Opportunities exist for Council to source external funding under State and Commonwealth programs to assist with managing reserves for threatened species recovery, and managing certain invasive species.

Within Noosa, many community groups have successfully obtained external funds to undertake on- ground activities within Council's bushland reserve network. Council will continue to work in partnership with the community to apply for external funding, with the understanding that when the funding for a particular project finishes, Council then has responsibility for managing that area into the future.

MBBA notes and agrees that the Council has responsibility for managing an area when funding of a particular project finishes. In the past, too many areas have not been sufficiently maintained after initial funded works are undertaken. This should also apply to Council funded grants such as the Coastal Connect Grant that is currently funding regeneration and maintenance work at Marcus Creek, Castaways Creek and on the dune tree line along Peregian and Marcus Beach.

In addition, Council needs to apply for external funding for specific projects in the Reserves that come under state or federal jurisdiction (e.g. bushfire recovery, climate change) **as a matter of urgency.** Currently the Council relies too heavily on volunteer groups to attract funding. These groups do not necessarily not have the same priorities and target areas within the reserve network as the Council.

Section 8.3.2 Bushland Care Program

The Bushland Care groups have a long history of successfully obtaining external funding and committing to follow-up maintenance to a number of sites. Council will continue to support the community groups preferably guided by, but sitting independently of, the prioritisation and management recommendations within this Plan.

Resources will be allocated to improving the capacity of the Bushland Care Groups to undertake works to best practice standards in consultation with the local community and to aid in the attraction of external funding. This may include training workshops, grant writing support and assistance, and on- ground materials such as signage and flyers to local residents.

The above states that Bushcare groups who obtain external funding commit to follow-up maintenance. This statement seems at odds with Section 8.2.1 External Investment Opportunities p.39 on the previous page.

There is at least one Bushcare group that considers follow up work to be the Council's responsibility. It is therefore apparent that this is not a mutually agreed arrangement between all Bushcare Groups and Council.

The MBBA's position on this is that in applying for funding we will consult with and be guided by the Council. Whether or not we can commit to any follow up maintenance will depend on the nature of the site, and the level of volunteer support available at the time.



The Council needs to be mindful that the capacities of volunteer groups wax and wane, so expecting Bushcare groups to make open-ended commitments to maintenance of projects is unrealistic. Ultimately the Council is responsible for the care and preservation of its reserve.

Having said this, volunteer groups are generally keen to contribute where they can. If the Council wishes to draw on volunteers to maintain their Reserves, it needs to actively recruit more volunteers, and promote the Bushcare program or other activities that use volunteers to assist. Currently the Council does not have the resources within the Bushcare program to do this.

Section 8.4.2 Invasive species management p.41

For reserves allocated the 'Protect' and 'Enhance' Management Category, the desired medium- term objective is to eradicate all invasive weed species from the reserves.

Weed control activities should be undertaken at the most effective times based on the target weed species life cycle with the intent to reduce weed seed production and exhaust the reserves of weed seeds in the soil.

Weed such as lantana that have some habitat values for native animals should be removed gradually (for example lantana thickets can provide suitable habitat for Black-breasted Buttonquail (Turnix melanogaster). The aim is to remove weeds at the rate of recovery of native species to avoid disruption to faunal habitat. Areas of exotic grasses such as setaria (Setaria sphacelata) may provide habitat for granivorous bird species such as finches so should not necessarily be slashed to "tidy up" the site.

For reserves within the 'Monitor' category, the intent is to monitor priority invasive species identified by the Noosa Biosecurity Plan or the 'transformer' weeds list and target if significant impacts are occurring.

Is the eradication of invasive weed species just a 'desired' outcome for 'Protect' and 'Enhance' or a 'real' formally committed to outcome with attendant KPI's?

The relevant KPI and performance measures are found in the table on p.49 of the Draft. See MBBA's comments on p.13 of this submission.

The MBBA notes that in the last paragraph of Section 8.4.2 states that in 'Monitor' category Reserves, the intent is to **target 'transformer' weeds only if significant impacts are occurring.** The interim results of the soon to be completed three-year Asparagus Fern Eradication Trial undertaken by the MBBA demonstrates Asparagus Fern, which is classified as a transformer weed in the Draft report, is having a significant impact on the recruitment of native species on the Coastal Reserves. We therefore would like to know what resources will be allocated to address this issue.

Part 9. Action Plan

Pp.45 The Action Plan is categorised as follows:



- Management Planning Activities The Bushland Reserve Management Framework is Strategic and Efficient.
- Education & Engagement Activities Management threats and impacts to reserve values are reduced through effective engagement with the local community through education and awareness.
- **Operational Activities** Bushland reserve values are protected, maintained or improved through best practice management.
- Building Reserve Knowledge Activities Enhancing knowledge and data of bushland reserves and improving data collection and maintenance.

It is concerning to the MBBA that operational activities only comprise one of the four areas of activities above. Given that Natural Areas is primarily an operational unit within Council and has only six staff, it needs to prioritise its activities carefully. There is be too much weight given to planning and knowledge building and education, and not enough to doing the job of maintaining the reserves.

MBBA assumes that the 'action plan' is the table (which is not labelled) on pp.46-7.Once again, it is clear is most of the plan actions are **planning and monitoring activities** and how few of the plan actions are operational ones that have demonstrable on the ground outcomes i.e. actual improvements to the Bushland Reserves

Part 10. Monitoring & Evaluation Strategy

Table: Noosa Bushland Reserves Strategic Plan objectives, KPI's and measures p.49 (not reproduced in full as it a landscape page)

The MBBA contends that Objective #1 is not specific enough and the KPI does not address the objective.

#1 Objective:

Protect and improve biodiversity values within the bushland reserve network using best practice management.

Key Performance indicator:

Ecological Condition of reserves and EVNT monitoring (species) shows no net decline Measure:

Condition change within BOA's and Expert Panel Scores

Editorial Note: EVNT *monitoring* is not the KPI, the monitoring is the **method** for measuring whether or not the KPI has been achieved.

How is it possible to have an objective to improve biodiversity values within the bushland reserve network and set a KPI which is "that the condition of the reserves shows no net decline"? The KPI for Objective #1 is disappointingly low, and in the MBBA's opinion unacceptable.



The KPI, if applied to Monitor only site will not be achieved, unless those sites are virtually weed free now. Given that 65 of the 114 Monitor sites are level 4-5, they most likely scored high on weediness and cost to regenerate. So obviously the 'no net decline' lets the Council off the hook for improving many of the lower tiered Reserves, as there is likely to be some improvement in the Reserves targeted for work which will equate to no net decline. It would be far more transparent and more accurate, and create greater accountability to set specific targets for the Reserves related to their tier level.

It has already been pointed out in this submission that the Council will not be employing best practice management as defined in the Draft Plan across all reserves, specifically in tier 4-5 Reserves. Therefore, **Objective #1 relates only to tier 1-3 Reserves where "Enhance" or "Protect" is the Program Management Category.** The KPI for *these reserves only* then becomes:

Ecological Condition of tier 1-3 reserves with a Protect or Enhance Management Category improves and EVNT species shows no net decline.

Conclusion:

The Draft Noosa Bushland Reserves Strategic Plan 2021 – 2026 makes it abundantly clear that the Shire is unable to properly maintain its 178 Bushland reserves. Rather than concede that it is impossible to do the job with an operational staff of six people and an inadequate budget, the Plan has created a complicated rating system that masks the fundamental problem – a lack of resources to carry out ongoing maintenance. This must be addressed within the strategic plan itself as a matter of urgency otherwise strategic plan will result in more recording and planning, less action and a continuing deterioration of the Bushland Reserves.

The actions arising from the plan are mainly Management Planning Activities rather on operational activities. Assessment, documentation and monitoring are of little value if they do not result in tangible outcomes – i.e. a reduction in weed load, an increase in biodiversity, an increase in the recruitment of native plants, no loss in EVNT species and healthier ecosystems.

Draft Report Recommendations:

- 1. Provide more clarity for the reader by including a map, glossary of terms and numbered tables and diagrams that are consistently labelled.
- 2. Create a clear, concise summery page that would enable the lay reader, a new employee coming into Natural Areas or an employee from another operational area to have a grasp of the vision, aims and objectives of the Strategic Plan, the methodology employed and the expected outcomes.
- 3. Provide a clear framework that links the prioritisation tool outcomes to operational plans and work on the ground. Below is a suggested framework that would require some reworking of the Strategic Plan, but does give a clear pathway to the



operational level.

Level 1 Works

Objective #1best practice as defined in the Draft is to be applied to the following priority areas and work plans are set accordingly:

413 hectares of "Endangered" Regional Ecosystem 1,345 hectares of "Of Concern" Regional Ecosystem

Objective defined as per current Draft. Define what resource allocation that will be required and expected outcomes for these priority areas in the next five years.

Level 2 Works

Concede that Objective #1 is not a realistic objective for the five-year period and indeed never achievable in some reserves (Apply to tier1-3 with 'Enhance' and 'Protect' with management plans, where the regional ecosystems not endangered or of concern) Modify the Objective for these reserves so that it more honestly reflects the dire resourcing situation, and has achievable outcomes. Re-define what the Objective is, state what resource allocation will be required and expected outcomes for these Level 2 areas in the next five years.

Level 3 Works

Clearly state which Reserves will have no/minimal resource allocation and why. No objective, resource allocation or expected outcomes. (These reserves will stay the same or deteriorate over the five years of the Plan.) NB Some of these reserves may have an Objective of attending to infrastructure and vegetation that are hazardous, and putting in place fire mitigation measures.

- 4. Clearly show the resources (budget and staff) required to make the 'best practice' strategic plan operational. If the resources will not be sufficient to make the plan operational then state this.
- 5. Write a 'realistic' alternative that shows how little can be achieved with the current resources.
- 6. Include as a high priority management objective, the securing of more funds and staff to enable Noosa Council to properly maintain its Reserves. Strategies could include actions such as:
 - Increase the environmental levy with the money to be used for Reserve maintenance.
 - Use funds from the environmental levy for maintenance of Reserves.
 - Seeking funds from Federal or State government.
 - More stringent requirements for development offsets (suggested in the Draft).
 - Devolution of marginal or unconnected parcels of land with money going to maintain high ecological value Reserves.
 - Community stewardship of smaller urban reserves.