



27th May 2008

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Dear Cheryl,

BUSHWALKING VICTORIA (BWV) SUBMISSION ON THE MARCH 2008 PAPERS "CARING FOR COUNTRY – THE OTWAYS AND YOU – DRAFT MANAGEMENT PLAN", "DRAFT RECREATION AND TOURISM ACCESS PLAN" AND "DRAFT HERITAGE PLAN"

I acknowledge receipt of the Parks Victoria letter of 19 March 2008 announcing the release of the three abovementioned draft plans and calling for comments by Monday 2 June 2008. Thank you for the letter, the copies of the draft plans which accompanied it, and for the realistic lead time, which has allowed BWV to develop a meaningful response prior to submitting.

Bushwalking Victoria is the peak bushwalking body in Victoria and represents the common interests of over 80 Victorian bushwalking clubs, with in excess of 10,000 members. It also proactively represents the interests of all other recreational walkers in Victoria as well as visiting walkers from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural (particularly pristine) landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery the walking areas have to offer and ensure their preservation for future generations. Founded in 1934, BWV has a long history of active interest in conservation, including being one of a group of like-minded organizations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

At the outset, let me congratulate Parks Victoria on the excellent quality of the draft plans, which are comprehensively informed and articulately presented. BWV is very supportive of many of the elements of the plans you outline, but, that having been said, there are a number of areas of the reports upon which BWV would like to constructively comment, and these are addressed in the submission which follows.

To assist your analysis of this submission I have divided it into four parts and inserted headings within each part. The submission deals with all three draft plans together rather than separating them by document because the issues addressed are not document specific but overlap.

As a matter of policy Bushwalking Victoria does not take a narrow sectional view of the way parks are managed. Therefore we have examined and commented on all matters that we believe are important to the integrity of these parks as a total system.

Part one deals with those matters that relate specifically to bushwalking and bushwalking amenity.

Part two addresses a range of environmental concerns.

Part three deals with a range of matters that are not bushwalking specific but they are subjects about which we have some knowledge and experience or expertise.

Part four lists for your convenience a number of document production errors.

We trust that you will give our above comments and suggestions your serious consideration, and genuinely take them into account when formulating the final versions of the Plans.

Yours sincerely,

David Reid
President
Bushwalking Victoria

Bushwalking Victoria: Promotes bushwalking, engages in activities that add value to the community and proactively represents the interests of all recreational bushwalkers

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BUSHWALKING VICTORIA SUBMISSION ON THE MARCH 2008 PAPERS
"CARING FOR COUNTRY – THE OTWAYS AND YOU – DRAFT MANAGEMENT PLAN", "DRAFT RECREATION
AND TOURISM ACCESS PLAN" AND "DRAFT HERITAGE PLAN"

PART ONE - BUSHWALKING-SPECIFIC MATTERS

Envisioned Track Improvements

We see that the Plans show that very little development of new tracks and facilities is envisaged.

Essentially, apart from a few proposals regarding mostly picnic area tracks (Tables 9 & 10, Access Plan p29), incremental improvements to the Great Ocean Walk (GOW) and the Surf Coast Walk are the only new proposals. We applaud the proposals to replace sections of the GOW with better-located tracks, but we are disappointed that our known "desire for experiences on rough tracks (AS2156.1 class 6) in remote locations with minimal infrastructure, and opportunities for multi-day walks in the hinterland" (1st column, Management Plan, p49), has produced little tangible response in the Plans; in fact, your response has been decidedly negative: "... creation of new routes must be carefully considered because of the potential for undesirable safety and environmental impacts such as sedimentation of streams, habitat loss and fragmentation, increased spread of weeds and soil-borne pathogens, and increased access by feral and pest animals" (2nd column, Management Plan, p49). We agree that such issues must be addressed but we do not accept your position in view of the fact that you already have walks like the Erskine Falls to Lorne one where all those things might (but probably won't) occur, and you encourage as many walkers as possible to use it! We would submit that you are more likely to experience those effects if a multitude of informal tracks develops because you haven't put in a dedicated formal one. You may be interested to know that many of these issues have been successfully addressed by your colleagues in Queensland on tracks in similar terrain such as the Sunshine Coast Hinterland Great Walk.

Great Ocean Walk Amenities

We are sceptical, to say the least, about the possibility you float regarding "the provision of a broader range of [GOW] services, including quality "in park" dining experiences such as "gourmet dining' ... which may include infrastructure to support enhanced services" (1st column, Access Plan p7). As virtually all the GOW is located in National Park, we imagine that the "in park" would most likely mean "in the National Park", and we don't think that haute cuisine, cordon bleu restaurants should be located within National Parks, although we are less concerned about them being positioned outside but near to National Parks provided they do not obtrude on park scenery. Besides, people who walk the GOW are not looking for fine dining in imposing restaurants. Rather they are seeking solitude, fresh air, native floral and faunal encounters, seascapes and landscapes, challenge and exercise.

Trans-Otway Waterfalls Walk

The notion of a Trans-Otway Waterfalls Walk (TOWW) is documented, inter alia, in the April 2008 Surfcoast Walk Feasibility Study (eg, pages 12 and 51) and a relevant paper prepared by the Otway Ranges Walking Track Association (ORWTA) is appropriately listed in the references on page 65 of the Access Plan. We are therefore surprised and very disappointed that a TOWW receives no mention in your Otways Plans, even as a possibility. Bushwalking Victoria and its member clubs, the Geelong Bushwalking Club and the Otway Ranges Walking Track Association along with other local stakeholders maintain the need for a multi-day walking track that showcases the forests and waterfalls of the Otways as distinct from the coastal scenery along the Surfcoast Walk and the GOW. We believe that the TOWW is an excellent and logical link between the GOW at Apollo Bay and the proposed extension of the Surfcoast Walk to Lorne and Cumberland River. Additionally, the TOWW proposed route passes through many areas suitable for day walks and short walks, eg Wild Dog, Brunswick, Allambee Beek and Sabine Falls. If the TOWW goes ahead, which we submit it should, there ought to be signage adequate to identify direction and distance to waterfalls or other features along or on branches off the track. Sufficient signage of this nature to assist walkers to locate particular waterfalls/features or the trailheads of the tracks leading to them has not always been evident in the past. We would like to see recognition in your Plans of the value of such a link, including the complementary shorter walks and to see you include in the Plans the action of undertaking a detailed feasibility study in consultation with the abovementioned stakeholders.

Future Tracks and Camping

We note there is some recognition of the possibility that the walking track network may need to be further developed in the future; 3.5 page 25 of the access plan.

However we believe that you should not impose prohibitive controls (eg the economic rationalistic requirements for “A sound business case” [1st column, Management Plan p50], or “a cost-benefit analysis” [2nd column, Management Plan p50]) on the creation or modification of walking tracks as an evident need arises. Any analysis of the viability of such tracks should take into consideration the non-tangible but important community benefits, eg community health and wellbeing, which align with your own “Healthy Parks: Healthy People” philosophy. Furthermore, there is a restorative and spiritual side to bushwalking which your business case and cost-benefit analysis approach does not come even close to identifying or appreciating.

Please recall that the VEAC Angahook-Otway Investigation report at page 38 under “National Parks, Activities and Uses, Recreational Opportunities” mentioned that “Opportunities for short walks and to a lesser extent multi-day walks are features of the park ... The large size of the park combined with the diversity of attractions across the landscape contributes to further opportunities for multi-day walks. A proposed Trans-Otway Walk linking Lorne and Apollo Bay is of great interest to walkers and would expand the range of experiences available”. This theme was continued at page 43 (Recommendation A1) thus: “That the ... Otway Ranges Park ...

(b) be managed to provide for, in particular, the following activities:

- (i) bushwalking, including the development and maintenance of walker-only tracks suitable for short and longer walks and walk-in campsites ...
- (iii) ... dispersed camping in appropriate locations”.

The thread continues at page 81, viz: “Bushwalking clubs proposed the development of new walking tracks, most notably the Trans Otway walking track ... Such long distance walking tracks will require improved facilities including designated campsites and signage ... The growing popularity of bushwalking and the recommendations for the Otway Ranges National Park encourage the development and maintenance of walker-only tracks suitable for short and longer walks, as well as the provision of walk-in campsites”. Page 82 elaborated on the latter point: “VEAC’s recommendations for the Otway Ranges National Park provide for walk-in campsites ... as well as opportunities for dispersed camping at the land manager’s discretion ...”

In view of how little of the VEAC vision for tracks and campsites has made its way into the Plans, we feel very considerably short-changed in this regard, and would urge you to revisit the VEAC investigation report and come up with plans more qualitatively and quantitatively in keeping with what VEAC clearly had in mind.

Shared Tracks

We notice your comment that “Most designated tracks are for walkers only, but some are shared with horse riders or cyclists, or both” (1st column, Management Plan p49). We merely wish to say in regard to this practice that while we can see that in a way this might increase the length of tracks available to us (for which we are not ungrateful), we do not view such arrangements as optimal because of safety considerations. Also, unless shared paths are properly designed and managed, sharing may detract from the enjoyment of each of the different kinds of user. Bushwalking Victoria has been developing guidelines for design of shared trails and criteria for the assessment of the safety and amenity of such trails. We would be happy to consult with park managers and other users on this subject.

PART TWO - ENVIRONMENTAL ISSUES

Park Borders

We have concerns about the demarcation of borders between the Great Otway National Park and the Otway Forest Park and zones and overlays within Great Otway National Park, given the often very different types of recreation which are allowed in each section. We think that there is every likelihood that hunters (see 1st column, Management Plan p59), campers with horses, dispersed camping folk or campers in areas without designated fireplaces, for example (see Table 2, p15 Management Plan), could

well stray from Forest Park into National Park without realizing they had crossed a perimeter, and pursue their activities in areas where they were prohibited. Worse, if they had a fair idea they'd crossed a boundary, they could always argue if apprehended that as there are no borders marked in the bush, they had no idea they'd crossed from a permitted to a prohibited area. While signage on roads and walking tracks will be valuable in this context ("Park boundaries are marked at most access points by signs" [2nd column, Management Plan p74]), it will not serve to prevent occasional inadvertent or intentional transgressions in the bush proper. The prohibitions you envisage in the Management Plan are based on such objectives as conservation of natural and cultural values, maintenance of water quality, retention of reference areas as scientific baselines, and safety of park users (a special concern with hunters), so that accidents/misdemeanours of this nature are not trifling matters, and we trust that policing in this sphere will be carried out efficiently and effectively. We see that you express your own concerns about park boundaries in the penultimate paragraph of the 2nd column on page 74, viz: "Further community education will be necessary to improve awareness of park boundaries, especially in areas which are now a part of Great Otway National Park", and we would certainly agree with that.

Fragmentation

We note your expressed concerns about fragmentation (2nd column, Management Plan p25), yet do not see any reference in your Plans to an intent on the Government's part to buy up private land contiguous to the National Park if it comes on the market. We would have thought that this should be a basic National Park management objective if the Government is completely serious about the effects of fragmentation on the flora and fauna of the Otways. We would accordingly urge you to lobby the Government to provide the necessary finance, and to adopt mechanisms to facilitate the acquisition of land adjoining the National Park, especially land linking presently dissociated sections of the Park, and for you to document those arrangements in the final Management Plan. In this general connection, we should add that we greet with favour your promise to undertake revegetation in those areas which are currently government-controlled (1st column, Management Plan p27; 1st column, Management Plan p29).

Road Quality

The state of some National and Forest Park roads is such that it is hard to pick the 2WD/4WD difference in places, and more bitumen roads wouldn't be any more environmentally damaging than the "potato patches" which pass for roads in some parks areas. We see that "Recent research suggests that some service increases at key visitor sites are needed ... particularly track surfaces" (2nd column, Management Plan p47), and that the "quality of access roads and tracks" appears as part of the second key factor for setting priorities for interpretation in the table at the top of Heritage Plan p23, and as the eighth item in Table 7, Heritage Plan p26. It seems pretty obvious that improvements are needed in this arena. We observe that "The process for identifying changes to the management of roads ... will involve consultation with key user groups and other stakeholders" (1st column, Management Plan p45), and we hope that BWV is consulted on such matters. That consultation may be assisted by your providing us with a copy of your "Roads Management Plan" (2nd column, Management Plan p44). We applaud your resolve to "Give priority to providing good 2WD access to heritage (and natural) sites in visitor nodes with high existing or potential visitor numbers and a range of facilities" (1st column, Heritage Plan, p20). However, we suspect that if you improved access and facilities, the visitor numbers would increase at other sites, so that this prioritization is more random than it appears at face value, and in its way is an encouragement towards inertia with regard to sites other than those enjoying current popularity.

Firewood

We note with disappointment that following "the phase-out of saw log and residual wood harvesting on public land" you still intend to retain the following features as key elements of the Management Plan:

- "Continued public access for sustainable levels of minor forest resources, including firewood, and opportunities for sustainable use of identified natural resources in specified areas" (2nd column, page v).

It is recognized throughout the environmental community that firewood collection (even "fallen dead wood" [2nd column, p51 and 1st column, p52 Management Plan]) is inimical to the sustainability of ecosystems as it diminishes the quantity of decaying material which goes back into the soil to nourish plants, and which is available to insects, which form the foundation of the faunal food chain. It is also the basis of fires, including campfires, which may get away and cause disastrous damage to the environment. We would

accordingly like to see firewood collection phased out as well (we note that you yourselves are concerned about “over-collection of firewood” – 2nd column, page 51, yet you still envisage providing fireplaces [2nd column, Access Plan p18; 1st column, Access Plan p33; 1st column, Access Plan p34] and even firewood [1st column, Access Plan p32; 2nd column, Access Plan p34]).

We are also worried about the “use of identified natural resources in specified areas”, which appears to us to give you carte blanche to allow mining, quarrying and other extractive activities anywhere in the Parks, which we cannot believe could be “sustainable”. It worries us further when you indicate that you will “Provide an appropriate and sustainable network of roads for ... authorized resource extraction” (1st column, Management Plan p42; 2nd column, Management Plan p44). We note that this will include for “firewood collection” (2nd column, Management Plan p42), about which we have expressed our unhappiness above. We think that if you are determined, contrary to our hopes, to continue to allow firewood collection, you should restrict it to the Forest Park, as per your comment “Firewood collection areas in Otway Forest Park provide firewood for campfires in the Great Otway Park and Otway Forest Park” (1st column, Management Plan p65), and not go down the route of Firewood Collection Proposal 4 – “Firewood collection areas will be established in Great Otway National Park for collecting small amounts of fallen dead wood to use in approved campfires in Great Otway National Park” (2nd column, Management Plan p65). We think your proposals in this connection are literally ‘playing with fire’.

Stock Grazing

We greet with favor your undertaking to “phase out stock grazing in the Great Otway National Park” and to develop “A revegetation program ... to provide priorities for the revegetation of cleared or degraded areas” (1st column, Management Plan p71). However, we are very much against your Grazing Proposal 3 – “Following the cessation of grazing in Great Otway National Park, consideration will be given to permitting continued access to water points and access between areas of private land for former licensees, where this does not significantly impact on park values” (1st column, Management Plan p71). We are firmly of the belief that if you do allow such access, you might as well have continued to allow grazing in the National Park, as cattle do untold damage to vegetation around water sources through trampling and pugging, selectively graze on fire-resistant flora (thus actually encouraging the spread of wildfires), spread weeds and soil-borne pathogens, cause soil compaction, initiate or exacerbate erosion, and contribute to sedimentation and pollution of streams. Because of these factors we are not pleased that you intend to allow “low intensity grazing to continue [in Otway Forest Park] where it is pre-existing and consistent with conservation and recreation objectives” (1st column, Management Plan p71). We cannot see how grazing could possibly be consistent with conservation objectives, and we see nothing sacrosanct about pre-existing customs; on that argument we should still allow mining methods which destroyed the terrain and poisoned water systems because it was once an accepted practice. Further, your proposal for revegetation of previously grazed sites goes out the window if you again allow cattle into such areas.

Earth Resources Activities

We agree that you should classify the Otway Forest Park as restricted Crown land in Schedule Three of the Mineral Resources (Sustainable Development) Act 1990 in order to provide consistency with the accepted VEAC recommendations on earth resources activities (1st column, Management Plan p73). We are hopeful that if approval is vested in the Minister for Environment and Climate Change rather than the Minister for Resources, there will be greater environmental empathy in earth resources activities decision-making. We think that your “Earth Resources Proposal 2 – Ensure all earth resources sites are adequately stabilized and rehabilitated either progressively or at the conclusion of operations” is totally laudable, but it is our experience that this sort of prescription is more often breached than obeyed, particularly if the latter alternative is adopted; you are more likely to keep the company honest if you insist on progressive stabilization and rehabilitation.

Walking and Camping with Dogs

We think that walking or camping with dogs should have no part of a National Park management zone set aside for “**Conservation** [emphasis mine] and Recreation” (Table 2, p15 Management Plan). Dogs can scare, maim or kill Park fauna, while their scent can upset native animals’ foraging paths and breeding patterns. Their droppings are a walking hazard and a nasal affront, while their belligerent or gushy behaviour can be upsetting for many of the people they encounter. We are not keen, furthermore, on their appearance in the Otway Forest Park, not least of all because we presume they may be even less likely to be sensitive to National Park/Forest Park boundaries than their owners. The notion of off-lead dogs being “under effective control” (1st column, Access Plan p43) is pie in the sky, and cuts no ice with us. We do

not think it appropriate that dog access (even on-lead) should be permitted at a walk-in camping area like that at Lake Elizabeth or on the Lake Elizabeth shared (walking/cycling) track (Table 13, Access Plan p36; Table 17, Access Plan p45; Figure 2, Management Plan back sleeve), both of which are in the National Park, in the West Barwon Reservoir catchment area, and near a quite rare geomorphological feature (a landslide-created lake); we accordingly reject Option 2 for these sites. We do not enjoy meeting dogs or their leavings on our walks and our walks traverse both National and Forest Parks.

We have seen that dogs are to be banned from Kooyoora State Park (Kooyoora SP Draft Management Plan February 2008, Part 6.7, p32), and we think that this sort of blanket prohibition is entirely appropriate for the Great Otway National Park, particularly if your proposal - to allow them 39,265 hectares of contiguous Forest Park (28%, or almost a third of the planning area) in which to gambol – gets up. We see that your “Companion Dogs Proposal 6” specifies that “Dog owners and walkers are required to carry dog faeces collection bags and to pick up after dogs at all visitor sites, campgrounds, tracks and beaches” (1st column, Management Plan p56; 2nd column, Access Plan p43). Our experience of this rule, which applies in a number of urban parks here and overseas, is that it is more honored in the breach than the observance. If you must have dogs in either National Park or Forest Park or both, then this rule must be adequately policed. Because we think that dogs are antithetical to paramount park values, and if we must choose between the devil and the deep blue sea by opting for either your Option 1 or Option 2 in Table 17 Access Plan pp44-45, then we go for Option 1 in all cases, as “prohibited”, which we think is totally appropriate, appears more often there.

Four-wheel-driving.

We are also less than enthusiastic about four-wheel-driving and trail-bike-riding being allowed in the Great Otway National Park given its zoning (Table 2, Management Plan p15) for “**Conservation** [my emphasis] and Recreation”. We are uneasy about networks of 4WD tracks being located in areas containing threatened fauna and flora (Appendix 1, Management Plan p91); examples are Ford River, Upper Gellibrand Forests and Barwon Downs. Surely 4WD driving and trail-bike-riding can be undertaken in areas less environmentally-sensitive than the Great Otway National Park (or even the Otways overall). It seems bizarre to us that you seem to be self-congratulatory about your “network of rough vehicular tracks and numerous river crossings” (1st column, Access Plan p11). Because we consider that 4WDs and water purity in catchment areas are always incompatible, we choose your Option 1 in both cases in Table 3, Access Plan p13.

Trail-bike-riding. Memorandum of Co-operation/Understanding

Your intention to develop a memorandum of co-operation with “the peak amateur trail bike riding body in Victoria” (2nd column, Management Plan p46; see also 2nd paragraph, 1st column, Access Plan p15), which is AMTRA (the Australian Motor Trail Riders Association), is a laudable objective. However, in view of its meagre coverage of trail-bikers in this State, and the undisciplined behaviour of many trail-bikers, perhaps you should make access to the Otways dependent on membership of AMTRA or one of its affiliates. We see that you have an arrangement somewhat along those lines with 4WD clubs under certain circumstances (penultimate paragraph, 1st column, Access Plan p12; Table 1, 1st entry, 4th column, Access Plan p13) and also with horse-riding clubs (Access Plan pp48-49). Your arrangements with the Hang-gliding Federation of Australia (1st column, Access Plan p63) also have some similarity.

Signage

We do not think that your resolve “To investigate the installation of signage within the parks to encourage vehicle use of authorized roads” (1st column, Management Plan p45) goes far enough. We would like to see this read: “Install signage within the parks to encourage vehicle use of authorized roads.”

Aircraft

We share your concern about aircraft noise, and hope that you are able to establish appropriate flight paths and heights (1st column, Management Plan p62).

Horse-riding access and horse-camping

Likewise, we hope that horse-camping areas will be “identified within the forest park” (2nd column, Access Plan p7; 1st column, Access Plan p49) – never mind “and **preferably** [emphasis mine] outside the national park” (ibid first of those references). Make it “definitely outside the national park”. The damage that horses can do to vegetation (trampling, selective grazing, soil compaction, erosion, pugging, stream sedimentation and pollution, weed and soil-borne pathogen-spreading and animal habitat degradation) will be concentrated in their camping areas, and none of that should happen within a national park principally dedicated to protecting native flora and fauna. With regard to Table 19, Access Plan pp50-56 re horse-riding access, because of the range of environmental concerns outlined above which horses raise, we plump for all your Option 1 proposals here as, in the rare cases where there are differences between Options 1 and 2, the first options are always more environmentally-attuned. Having said that, however, it should be placed on record that there is little or no choice in nearly all cases, so that much to do with horse-riding has been presented to the reader as a *fait accompli*. We particularly endorse the unqualified Option 1 “Prohibited” for Lake Elizabeth Track (Table 19, Access Plan p52) for reasons similar to those outlined under the rubric “Four-wheel-driving and Trail-bike-riding” above.

Location of High-standard Accommodation

We are inclined to hear alarm bells when we read the likes of “The *Draft Nature-based Tourism Strategy* (Tourism Victoria 2007 [in relation to which we supplied a submission] identified that a key opportunity for increasing nature-based tourism in the Otways is to increase provision of high standard accommodation and amenities **in proximity to key natural attractions of the parks** [emphasis mine]. The development of a small suite of high quality nature-based tourist accommodation products including standing camps/wilderness retreats will be explored” (2nd column, Access Plan p31). The major concern is in relation to the emphasized passage. For example, this type of accommodation has been constructed to house people exploring Uluru, but is located well away from Ayers Rock, and we think that respectful kind of distance is appropriate in relation to any iconic scenic feature in any national park. The same is true of Yosemite National Park in the USA. The lodgings are in the valley, several km away from scenic wonders like Half Dome and the Nose of El Cap, and with at least minimal walks to other stunning features like Yosemite Falls. If such lodgings are located too close to the feature, they will spoil the integrity of the ambient landscape and turn people away, effectively killing the goose that laid the golden egg. We are less opposed to “The development of nature-based accommodation or an Eco-Lodge **adjacent to** [emphasis mine] Great Otway National Park” (2nd column, Access Plan p6), but not actually in it, provided that it does not obtrude on park landscapes.

Authorized Activities

We don't like the sound of your “Assess the effectiveness of conditions on authorizations in protecting park values and seek review of authorizations if necessary to arrest impacts” (1st column, Management Plan p74). This sounds very much to us like closing the door after the horse has bolted. If you “Monitor authorized activities to ensure conditions of authorization are met” (ibid), and the conditions have been well thought through, you shouldn't have any impacts to arrest.

Research, Monitoring and Recording

At various stages throughout the Draft Management Plan, serious research, monitoring and recording deficiencies are identified, eg:

“Models of climate change impacts indicate how core habitat may change [we are appalled at the habitat implications in Table 3, Management Plan p17], but how this translates into risk to species and populations is unknown” (1st column, Management Plan p16);

“Earth science values are not well understood in the planning area and a better understanding is required in order to effectively plan for facilities such as walking tracks” (1st column, Management Plan p20);

“The removal or damage of geological features in the parks is not permitted, but sites could be inadvertently damaged if their locations are unknown ... Map [ie undertake mapping of] sites of geological and geomorphological significance ...” (1st column, Management Plan p20);

“Vegetation surveys have been undertaken at several locations in the parks, although most areas have not been thoroughly surveyed. A systematic assessment of vegetation condition across the parks has not been undertaken” (1st column, Management Plan p26);

“Increase knowledge of significant fauna and threatening processes ... the identification of significant fauna values is essential ... Fauna surveys have been conducted in some parts of the planning area, but many species such as the Spot-tailed Quoll are elusive and information about their habitat requirements is incomplete” (Part 4.6, Management Plan p27);

“Improve the effectiveness of pest and disease management by increasing the knowledge of pest species through research, record-keeping and monitoring ... Monitoring programs will be implemented to enable the effectiveness of key management programs to be evaluated and to inform adaptive improvements” (2nd column, Management Plan p31; 2nd column, Management Plan p32);

“*Phytophthora cinnamomi* ... has not been mapped in detail” (1st column, Management Plan p32);

“The risk of spread [of Myrtle Wilt] is *thought* [emphasis mine] to be increased by soil disturbance such as road-making and nearby forest harvesting ... Avoid activities that *may* [emphasis again mine] spread Myrtle Wilt” (1st column, Management Plan, p32; 2nd column, Management Plan p33);

“Assess the likely the [sic] impacts of feral cats on prey species ... and investigate the application of new cat control methods currently under development” (Management Plan, p33); and,

“Oral history research ... will provide important information to help guide the management of socially significant sites” (2nd column, Management Plan p38).

As efficacious management of the parks cannot possibly be carried out without the knowledge base which relevant research information would provide, we would urge you to expeditiously proceed to fill in the gaps in your understanding which have been identified above by initiating appropriate research, monitoring and recording activities forthwith. This has to be done now: rhetoric is not enough. Your band-aid solution of “adaptive management” as you are wont to describe it (in several places, eg Management Plan pp32-33), sounds like ‘trial and error’ to us, and you just cannot afford to make mistakes with endangered or critically-endangered plants and animals.

PART THREE - OTHER MATTERS

Community Consultation

We have examined the membership of the Otways Landscape Community Council (OLCC) and have formed the opinion, in view of the fact that “Visitors from outside the region account for 65% of visitors to the area” and that “Of these, 87% are from Victoria and 60% are from Melbourne” (2nd column, p6 Management Plan), that there should be a Melbourne-based organization which has strong connections with the Otways represented on the Council in addition to the more locally-focused personages who currently constitute the committee. We think that BWV, which is numerically strong, contains clubs which cover the area and dozens of other clubs which also frequently visit it and utilize its walking trails, would be an ideal candidate for such a position were it to be created. Please give this suggestion serious consideration. Alternatively, were any other advisory committees in addition to the OLCC created, we might be represented on one of these, particularly since VEAC in their Angahook-Otway Investigation recommendation about “advisory committees” (p31, Investigation), observed that such committees could deal with issues like “track access”. We see that at Part 9.2, Management Plan pp76-78, you indicate an intention to “Engage people in park management at a variety of levels suitable to their interests and be transparent about what is and is not negotiable in park management decision-making [hyphenation mine]” and propose that “Communities be offered a variety of options for participation in the management of the parks, from hands-on works to engagement in decision-making [hyphenation mine]”. “You further note that “Over time the [Otways Landscape Community] Council will help to refine and improve approaches used to foster community participation [in park planning and care].” We would welcome greater involvement in park management decision-making. In this connection, we see the memorandum of cooperation which Parks Victoria and Bushwalking Victoria have signed as complementary to our representation on a relevant committee, not a substitute for it.

Indigenous Issues

While it has little to do with bushwalking, we do find it prima facie inequitable, that a discrete draft plan, 41 pages in length, has been prepared for non-Indigenous (historic) heritage sites, while Indigenous heritage has been accorded a comparatively dismissive 5 pages (pp34-38 Management Plan) in the body of the Draft Management Plan. Surely a culture that dates back something like 60,000 years in this country

deserves better than that! The Heritage Plan identifies and gives the location of all the known post-European settlement sites (pp29-41, Heritage Plan) so that people (including bushwalkers) will be unlikely to inadvertently blunder into and damage historical remains, but this is not done with Aboriginal relics and special places, so that they are at risk of being accidentally damaged or destroyed. Although such damage is illegal under the *Aboriginal Heritage Act* (1st column, Management Plan p35) and damage by prospectors or fossickers is forbidden under the *Mineral Resources (Sustainable Development) Act 1990* (Vic.) [2nd column, Management Plan p59], damage may occur inadvertently because Aboriginal places and relics are often difficult to identify and you have provided no guide to where they are; it is not much consolation to Aborigines that people in general and prospectors/fossickers in particular may be prosecuted when a site has been damaged inadvertently but irreparably. Neither is it if horses accidentally trample through middens (2nd column, Access Plan p47).

The evidently inequitable treatment accorded Aboriginal matters in the Plans smacks of the indifference Aborigines have had to suffer since the onset of white settlement and their ongoing relegation to a position of lesser importance than the westerners. Their 60,000 years of pre-history is worth 5 pages while the European population's 200 years of history is worth 41 pages! To put the most charitable spin on this inequality, it may be a case of justice being done, but not being seen to be done. We would request that you attempt to redress this imbalance when you come to prepare the final suite of reports. The AAV reputedly has considerable data (1st column p35 Management Plan) which could form the basis of a discrete fourth Parks Victoria Otways Plan based on Indigenous heritage. It is no good just referring to the AAV Register: if Parks Victoria thought it worthwhile to produce a special report on white heritage in the Otway parks, they should also, in order for justice to be seen to be done, produce one on black heritage in the area.

We are slightly heartened by your comment (2nd column, Heritage Plan p19) that “Non-Indigenous heritage values should not be seen in isolation. Through integrated interpretation, the experience of future visitors to the Otways will encompass an appreciation of both Indigenous and non-Indigenous heritage.” Let's hope the Aborigines get a more even break in this context than they've received in the Otway Plans documents.

On a related topic, we see that the Victorian Government is committed to “the exploration of a cooperative management model [with Indigenous communities in the Otways]” but that “such a model” has not yet been implemented (2nd column, page vi). It is four years since the relevant VEAC recommendation and three years since the Victorian Government's response. We would have thought that there has been ample time in the interim in which to get such a model up and running and we would urge you to expedite its implementation.

Still on the theme of Aborigines, it is perhaps not particularly sympathetic towards Aboriginal sensitivities to quote (1st column, Management Plan p34) from the works of George Augustus Robinson (1791-1866), who was responsible for the notorious round-up of Tasmanian Aborigines and their resettlement on Flinders Island (where they died like flies from white men's diseases and were virtually annihilated), then attempted to carry out similar social experiments in Victoria, fortunately with essentially no tangible result, but not for his want of trying.

Heritage balance

It seems to us amazing that of the 181 non-Indigenous historical theme sites in the Parks Victoria database, 119 (66%, or two-thirds) are given over to the extractive industries “Using resources, forestry”, “Mining”, “Using natural resources” and “Primary Production” (Table 1, Heritage Plan p6), all of which have played an ignoble part in the degradation of the integrity of the Otways region, while “Accessing natural wonders” comes in a bad second at 23 (13%, or one-eighth). It seems to us grotesque that sites of a destructive, exploitative nature should be preserved and lauded to a greater extent than the natural wonders in relation to which they have had a parasitic rather than symbiotic relationship. To add insult to injury, it seems that two of the features which appear in the four highest-ranking natural wonders of State significance (Triplet Falls, Melba Gully) may rely at least partially on their relationship with sawmills for their elevated rankings (Table 2, Heritage Plan p7 and Appendix 1, Heritage Plan, pp29-41). It is otherwise difficult to understand why Beauchamp, Hopetoun and Sheoak Falls are adjudged as significant only at the regional level while Triplet Falls are considered significant at the State level. We note in this connection the caption to the photograph at Heritage Plan p2: “Triplet Falls – a key site for heritage interpretation of the timber industry, 2006” and the caption accompanying the photograph at Heritage Plan

p19: "Replica timber tramway trolley at Triplet Falls". We would have thought their attractiveness alone would have given them a place in the State-significance ratings.

The Erskine Falls ranking is very understandable – they are quite beautiful - but we wonder what happened to other falls like Congram Falls, Cora Lyn Cascades (which have "a long history of tourism" [1st column, Management Plan p37], dating back to "the late nineteenth century" [1st column, Heritage Plan p5]), Currawong Falls, Eberwaldt Falls, Elliot Cascades, Henderson Falls, Johanna River Cascade, Upper and Lower Kalimna Falls (again with "a long history of tourism" [1st column, Management Plan p37]), Kyle's Falls, Margaret Falls, Melba Falls, Parker River Cascades, Rainbow Falls, Sabine Falls, Splitters Falls, Stevensons Falls, Stony Creek Falls (shown in the March 1982 RACV "Geelong District Map") and Won Wondah Falls, which don't even appear in Appendix 1 of the Heritage Plan as heritage sites. We note a passing reference in Heritage Plan Appendix 1 to Aire Falls (p29), and to Little Aire Falls in the 2nd column of Access Plan p19 and in Table 8, Access Plan p28, and they might be worth mentions in the Parks Victoria heritage database in their own right. We note that many of the above falls have been written up in the tourist literature of the late 1970s and early 1980s (to which we have access), but the tracks and roads accessing them (where they exist) were established earlier, and they consequently doubtless date from well before then as tourist attractions, and most certainly even earlier as destinations for dedicated bushwalkers. We think that the inclusion of such features might help put them on the map and redress the bias in the Parks Victoria heritage database towards forestry and other extractive industry sites. There is also an untold story, which warrants interpretation, about the rivalry between the Otways and the Yarra Ranges as early tourist destinations, with several waterfalls being identically or similarly-named at both locations.

Besides waterfalls there are other scenic items which are not listed in Appendix 1 of the Heritage Plan. For example, the Forests Commission Victoria was in existence from 1918 to 1983, and its pamphlet "Otways District Forest Drives" (undated but clearly 1983 or earlier), lists several highlights additional to those in Appendix 1, including, inter alia, Mount Cowley ["highest point in the Otways (670m)], Burtons Lookout ["Provides views of the Gellibrand River Valley"] – this is also shown as a feature in the November 1980 RACV "Warrnambool District Map", Wild Dog Road ["As this narrow winding road passes through farmland, magnificent views of the Otways can be seen"], Busty Road ["A loop off the Wild Dog Road providing more commanding views of the coast"], and Shelly Beach. The Forest Commission Victoria's publication "Lorne Forest Park" indicates Castle Rock, The Canyon, Teddy Lookout and Artillery Rocks as prominent features. Their "Lorne Forest Walks" (1982) includes references to Teddy Lookout, Castle Rock, Shelly Beach and The Canyon again, and also the Grey River Lookout. The more recent Victorian Tourism Commission/Lorne Promotions Association brochure "The Great Ocean Road Lorne" mentions again Teddy Lookout and shows Shelly Beach. These are other attractions (and there are many more) which might help correct the skew in the Parks Victoria heritage database towards extractive enterprise sites. You are dead right that "Not all sites of aesthetic value are included in the heritage database" (2nd column, Heritage Plan p9), but we would be prepared to bet that pretty nearly all the forestry ones **are**. We would accordingly like to see a better balance between natural wonders and extractive industry relics in Appendix 1 of the Heritage Plan.

Oddity

We find it rather strange that Table 3, Heritage Plan p11 contains an entry at row 8 given the heritage theme of "Dying" and covering "Small cemeteries" in "Fair-good condition", while at row 10 the entry is entitled "**Living** [emphasis mine] in remote areas" and leads off with "Weeaprounah Cemetery" – "Several graves in good condition". You might like to think about rewording the row 10 theme to obviate the apparent contradiction. "Residing" might be a better word than "Living" in the row 10 context, or you might like to rejig the row 8 entry to embrace Weeaprounah Cemetery and excise it from row 10. Any changes made to Table 3 will have to be carried through to Table 4 rows 8 and 10, Heritage Plan p17 and Table 5 rows 8 and 10, Heritage Plan p24.

Interpretive Materials

We think that in addition to the materials mentioned in the 4th dot point in the shaded box on Heritage Plan p23, trailhead brochures should be specifically referenced. Such brochures can provide excellent directional and interpretive information and have the advantage of being available on the spot. If judiciously crafted, these publications can assist the spontaneous and deliberative walker alike, and serve both heritage and non-heritage visitor requirements.

Geology/Geomorphology

Your geological brief at Part 4.3, page 19 is exceedingly misleading in that it puts the isolation of the Otways “from King Island and Tasmania” down to the “stretching and sinking of the crust during the initial separation of Australia and Antarctica, which began about 130 million years ago”, whereas more recent events are far more germane to what we observe today. This is common knowledge. For example, the ABS notes that “The Aboriginal population of Tasmania [which has been dated back to 35,000 years ago] became separated from the mainland some 12,000 years ago when the sea level rose [following the most recent ‘ice age’ which ended about 11,000 years ago], flooding the Bassian Plain” (ABS 1384.6 – Statistics – Tasmania 2005 – Contents – History – Aboriginal occupation). You might like to expend a little more effort on the geological synopsis so that it more accurately reflects the physiographical realities.

PART FOUR - DOCUMENT PRODUCTION ERRORS

We note some apparent formatting errors in Appendix 1, Management Plan p91: there is no entry under *Recreation sites and landscape* for Kawarren-Barongarook Block, while there are two largely repeating entries, both headed *Nature conservation*, for Western Otways. We also note that several of the cross-references in Chapter 2 of the Draft Recreation and Tourism Access Plan are wrong. Under heading 2, p6, “Section 3.9” should read “Section 3.6”, under heading 4, p6, “Section 3.6” should read “Section 3.5”, and under heading 8, p8, “Section 3.8” should read “Section 3.7”. Table 21, Access Plan p56 contains three roads that have no current status, which doesn’t seem very likely to us. There are a number of grammatical errors, mainly to do with the omission of hyphens from related words, eg (correct version) “horse-riding”, “bike-specific” and putting them in where they shouldn’t occur, eg (correct version) “to take off and land”, and the use of “however” as a run-on.

We note your “Bushwalking Proposal 4 – A memorandum of cooperation between park managers and the peak amateur bushwalking body in Victoria [us – BWV] will be developed, to enable ongoing liaison on park and bushwalking management issues” (2nd column, Management Plan p50). It will also be “implemented” (ibid). Page 25 of the Access Plan (1st column), however, tells the reader that this memorandum has already been signed! The fact is that it was signed in November 2007, so you should correct the Management Plan to bring things up to date in that document.

We trust that you will give our above comments and suggestions your serious consideration, and genuinely take them into account when formulating the final versions of the Plans.


David Reid

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Bushwalking Victoria