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Mr Brian Doolan
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Dear Mr Doolan,

'NGOOTYOONG GUNDITJ, NGOOTYOONG MARA' SOUTH WEST MANAGEMENT PLAN

Thank you for your letter of 7 March 2012 to Bushwalking Victoria inviting participation in the development of a management plan for the subject region.

BWV represents the common interests of over 70 Victorian bushwalking clubs, with in excess of 8,000 members. BWV also aims to proactively represent the interests of all recreational walkers in Victoria as well as walkers visiting from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery 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.

BWV appreciates your having provided lists of possible discussion points in the resource papers, and has addressed selected points sequentially in the dissertation which follows. BWV comment extends to matters outside the parameters of walking and the environment when they impact on its role as a responsible corporate citizen. Some discussion points are not addressed as they do not impinge on matters which are of significant interest to Bushwalking Victoria.

Invasive Species

What values may be under increased pressure from pest plants and animals as a result of Climate Change?

Native plants and animals that are less impervious to drought, fire and storms than invasive species will be at heightened levels of risk under conditions of climate change. Feral animals like wild pigs, goats, deer, foxes, rabbits, wild cats and dogs can be expected to put increasing pressure on native animals and plants in harsher meteorological situations, while native animals like kangaroos, wallabies, wombats and brush- and ring-tailed possums, which have a history of survival under difficult climatic conditions, will put pressure on other native species less able to

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tolerate protracted extreme weather. Endangered native animals and plants, because of their smaller populations, will be at maximum danger from pest plants and animals.

What are the natural and cultural values that are important and need protection from pest plant and animal threats?

Regarding the natural values, which include, very importantly, native flora and fauna, it is first necessary to determine which endemic and exotic species exist within the South West area boundaries. Research is seen as one of the supporting elements for goals like containment or eradication (foot of page 1), and while University of Ballarat research (top of page 2) has identified threats, risks and priority areas for the South West area, it is clear that more research is needed. As DSE's *Actions for Biodiversity Conservation* are geared to "accumulate knowledge about threatened species and communities" and "track the progress of management actions", while (page 6) there is a need to ascertain whether feral cats are increasing in number and whether feral pigs actually "feed on small native animals and birds", and (page 7) to "increase understanding of the extent and impact of high risk invasive species" as well as to "collect baseline data on occurrence and distribution of invasive weed species in areas of high conservation priority". There is very clearly some critical information which you still do not have which needs to be obtained as soon as possible to guide future management actions.

As to cultural values, there will be Aboriginal sacred sites, kitchen middens and ancient campsites that are unsigned, unprotected, and subject to damage by burrowing, trampling, and vandalism. New sites tend to come to light after fires, so that there are likely to be more out there which are as yet unmarked. The whole area should be surveyed to identify all such sites, and, where appropriate, signage and protective fencing should be constructed to prevent damage by animals and humans. Spraying or slashing might be employed if such features are in danger of becoming overgrown.

What specific pest species do you consider as priorities? Which values do they impact upon, and how?

Feral cats have a devastating impact on native birds, where, because of their tree-climbing ability, they pose a much greater threat than other introduced animals that essentially can only predate terrestrial creatures. In addition to birds, cats prey on diminutive native animals, and the young of larger species. Their stealth, agility and speed over short distances makes them a formidable killing machine. Every effort must be made to eradicate these lethal pests from the South West region. One can only deplore the irresponsibility of people who have abandoned unwanted domestic pets in the wild, but to dwell on that does not help to address the current situation. While these cats might keep rabbit and mice populations down (unfortunately some of the mice will be native species), these are problems which must be dealt with separately: cats just do too much damage to native species to be let off the hook because they may be helping control other introduced pests. Professional hunters must be employed to get rid of these exotic predators. To say, rather smugly, that "in some areas they may have reached a state of equilibrium within their habitats" (page 6) is appalling when their state of equilibrium relies on the deaths of untold numbers of native birds and terrestrial animals.

Foxes also have a devastating effect on native ground-dwelling animals. Glenelg Ark 1080 baiting is very effective against this pest and should be continued, along with the employment of professional hunters.

Rabbits, goats, deer and feral pigs have a debilitating impact on native plants and grasses, and professional hunters should be used to help limit their populations, while for the rabbits specifically, new biological weapons will have to be developed to attempt to control their numbers now that they have developed immunity to myxomatosis and the calici virus.

Of the invasive plants, **blackberries** are probably the worst, and widespread chemical spraying programs should be employed to control them.

Are there new and emerging pests that need identifying? How can the community help land managers?

Parks Victoria can help the community help them by producing coloured brochures depicting emerging plant pests and asking the community to report any incidences to PV. PV can then work with landowners to eradicate the problem plant varieties before they get out of hand. Community volunteers, duly trained by PV in identification and treatment of the pests, can also help parks' managers in extraction or poisoning programs. Bushwalking Victoria, for example, works with PV to manage grey sallow willow in the high country, while some of its member groups are dedicated to keeping a particular area free of a specific pest, e.g. boneseed.

What native species are impacting on natural values, and how should this be managed?

Kangaroos are probably the worst culprits, and judicious culling by professional shooters should be employed if their numbers rise to a level where they are seriously jeopardising the survival of native grassland and scrub.

Natural Values

How do we continue to ensure Gunditjmara Traditional Owners are involved in partnership and that their knowledge is shared and respected?

This is a matter of ongoing consultation with the Traditional Owners, training up of local Indigenous people to take on ranger-type positions, conducting cross-cultural training to ensure that non-Indigenous staff are exposed to Indigenous knowledge of the area and how to manage it, employing trained Indigenous staff as guides and rangers, and drawing up legal partnership arrangements with the Traditional Owners.

Which of the planning area's ecosystems, habitats, flora or fauna species or communities, geology and geomorphological features as well as landscapes are the most important to target management actions?

The Mt Napier-Mt Eccles volcanic area consists of a large and interconnected geological and geomorphological complex that begins north of Mt Napier and finishes 15km out to sea as Julia Reef. It takes in the Harman Valley lava flow from Mt Napier (which includes the Byaduk Caves and Wallacedale tumuli/lava blisters) and the Tyrendarra Flow from Mt Eccles. These flows (though some 20,000 years apart) join southwest of the Byaduk Caves to form a continuous basaltic relic some 40km long.

Both of the mountains are more than simple scoria cones; they are accompanied by such features as parasitic and spatter cones, explosion and lava fountain craters, lava caves, tunnels and canals, blister caves, eruption pits, gas vents, sinkholes, natural bridges, dykes, barriers and crater lakes. Many of these features are of national or world significance, yet not all are encompassed by the National or State Park boundaries, leaving them vulnerable to quarrying (one of Mt Eccles' subsidiary cones has been completely quarried away, and there has been other quarrying at both sites, utterly destroying the geological and geomorphological integrity of the area) and unregulated access, with attendant danger of deliberate or inadvertent damage.

There have been pleas for extension of the Parks to take in all these features since at least 1980 (Mines Department Victoria Geological Survey Report "1977/9 Scoria and Tuff Quarrying in Victoria" by D A McKenzie, August 1980), a theme also taken up by Joyce and King of the Geological Society of Australia Inc Victorian Division in the December 1980 publication "Geological Features of the National Estate in Victoria: An inventory compiled for the Australian

Heritage Commission” , and by Brotchie (“Vanishing Volcanoes”, *Habitat*, Vol. 9, No. 3, ACF June 1981, pp 24-25). Despite such entreaties, many of these important physiographical formations remain unprotected, and it is hoped that their occurrence within the ‘Ngootyoong Gunditj, Ngootyoong Mara’ South West region will lead to greater protection of the whole of this unique volcanic complex.

Mt Napier is the youngest of Victoria’s volcanoes at 7,200 years old (Birch, “Volcanoes in Victoria”, Royal Society of Victoria, Melbourne, 1994), while wood from river gravels under the Tyrendarra Flow from Mt Eccles has been dated at 19,300 +/- 600 years (Gill [1979] quoted in Joyce and King, op cit, p105), and facts like these should be included in explanatory signage at access points at or near the sites. From a walker’s rather than solely a conservation viewpoint, it would be nice to see efforts made to create a track, at times (with owner permission) traversing private land, following the lava flows from Mt Napier and Mt Eccles to the sea.

Quite apart from its geological/physiographical importance, Mt Napier is a magnificent component of the landscape near Hamilton, with, from various angles, its almost perfectly conical shape (though not its height) reminiscent of other notable volcanic cones like Mt Egmont in New Zealand and Mt Fuji in Japan. It is a prominence which could be made much more of in statewide and local tourist literature to attract visitors to the area and their dollars into the local economy. This is also true of the stunning Lake Surprise at Mt Eccles, as well as the very impressive (after rain) Wannan and Nigretta Falls which are also in the southwest area.

How can the community assist in the management of climate change impacts which can threaten the natural values of the planning area?

The community can best do this by staying away from environmentally-fragile areas and climate-change refugia. These locations should be identified by appropriate signage, complemented by locked gates at vehicular and pedestrian access points, while native fauna will still be free to move from one area to another. While BWV normally advocates a policy of ‘freedom to roam’, we acknowledge that this principle may have to be subordinated to that of environmental survival in a situation of inexorably advancing climatic change.

Which of the planning area’s natural values and threats are the most important indicators of ecosystem health to target our monitoring programs?

The most important indicator is how endangered species of flora and fauna are faring, but there has been insufficient research undertaken to date to enable its easy measurement.

As in many other areas of the planning papers, there are admissions in this paper that there has to be more research conducted into various aspects of natural values before conclusions can be drawn about what courses of action are best for them. In the first paragraph under “Managing Threats to Natural Values”, page 5, there is an acknowledgement that “considerable uncertainty” applies in managing natural environments and, disappointingly, the last paragraph in this segment is ambivalent as to whether the referenced species and EVC analysis has taken place, is taking place, or will take place. Perhaps you could clear this up in later planning papers.

In the first paragraph under “How Do We Know if We Are Meeting our Ecosystem Management Objectives?” there is further admission about the need to improve knowledge “about the health of our protected areas and the effectiveness of our management actions as part of adaptive management”. “Adaptive management” = “action research” = “trial and error”, and we would hope that research precedes management actions rather than succeeding them. When you are dealing with endangered flora or fauna you cannot adopt a policy of “trial and error” or you could send an entire species into oblivion.

It is noted, too, under “Directions”, page 6, that you still need to identify climate change refugia and to improve your knowledge of the potential impacts of climate change.

It seems there is so much which is unknown that without relevant research behind you, you are playing a dangerous game of blind man's buff. You must devote the necessary time and acquire the money needed to conduct the requisite research if you are ever to manage the area competently. There is much rhetoric about the need for research in management plans all over the State, but it appears to be a case of much talk and little action.

Roads and Access

What changes to road and track maintenance would improve your visit to the planning area? Can you give examples?

BWV would like to see all roads, duly signed with appropriate speed restrictions and cautions concerning wild life.

While Deakin University research in 2003 (page 3) saw roads as sources of ecosystem damage, there is no indication in your paper that bitumen roads are any worse in this regard than gravel or earth ones. We note (page 1) that DSE Road Plans and Guidelines "set minimum road maintenance standards for public roads", which apply to those you manage in parks under delegation from DSE, and it seems to us that it is a pity that the bar is set so low as the condition of many roads in National and State Parks throughout Victoria could be improved.

Well constructed and maintained roads, whether sealed or unsealed should ensure all-the-year-round access to trailheads by 2WD vehicle not only for walkers but for car-tourers, cyclists, picnickers, surfers, beach-lovers, anglers – in fact the very kind of clientele you would want to draw into the planning area for economic reasons.

We do not want walking-tracks bituminized or concreted or dressed with a compacting agent like Lilydale mix (except for disabled access), preferring them to be as natural as possible, but we have no objection to roads being so upgraded. We do not object to disused roads being reverted to bushland.

Would you like to see additional orientation, directional and information signage?

In keeping with our support for renaming of Mt Eccles NP as Budj Bim NP, we also support Gunditjmara Traditional Owners' aspirations for using Indigenous names for roads in the planning area (page 4). While they obviously did not name these 30,000 years ago, such names would be consistent with an Aboriginal title for the Mt Eccles National Park, the rights they have under Victorian Native Title legislation within the planning area, and the Budj Bim Trails that are already recognized. Accordingly we would welcome road signage that carried Indigenous titles.

Road and track signage cannot be overdone in public-access areas like much of the South West region. It is very annoying to be following a road on a map and find that there is no sign where another road or track joins the one you are on, and you don't know if it is a minor, unnamed trail that was meant to be omitted from the chart or a road that is on the map but hasn't been signposted. Perhaps such innominate roads should be given an arrowed sign pointing up the road you are on and reading "X's track 300 metres", or similar, so that you will know it isn't X's Track itself.

Another problem which all-too-frequently occurs with road signs throughout Victoria is where you see a sign saying "X 30km, Y 55km, Z 80km", then a bit further along the road one which says "X 15km, Z 65km", with no indication at all as to what has happened to Y. Similarly signs to key attractions (page 4) are not always consistently applied through intersections. Yet another difficulty occurs when you come out of a minor road onto a major one at a T intersection and there is no indication as to whether you need to go right or left to get to a particular destination; you can go many km in the wrong direction until you get to some place you didn't want to go to at all.

As to information signage, there is plenty of scope for additional signs locating and explaining aspects of the rich volcanic landscape around Mt Napier and Mt Eccles, and the geological origins of waterfalls like Nigretta and Wannan, as well as a number of coastal features.

It is not quite clear from this paper whether walkers are permitted to walk on “Traditional Owners’ properties and the three Indigenous Protected Areas” (page 4), although, as these are served by MVO roads, with “Walkers ... generally permitted to use ... management vehicle only roads”, and Aborigines having “non-exclusive rights” (page 2) under Native Title arrangements, it looks as if we are. However, in the “Cultural Heritage – Cultural Landscape” paper (page 3) Traditional Owners’ properties are described as “Gunditjmara-owned private property”, which would suggest that there is no freedom to roam there. You might like to provide elucidation on this point in follow-up papers, and appropriate signage at those sites.

Water and Catchments

What critical water and catchment values are most at risk due to climate change?

As in other resource papers for the region, in this one there is also evidence of a lack of research upon which to base sound conclusions about what is at risk and how to best remedy the problems. At page 4 you note in relation to acid sulphate soils that “little information exists about the extent of these soils in inland areas in the planning area”, while in page 6 there is the concession that “The knowledge and information on climate change is continually changing and increasing”, pointing to ongoing but hopefully lessening knowledge gaps, and at page 7 it is mentioned that “in the Glenelg Hopkins CMA area, a review of the regional river health strategy including estuaries and wetlands” is yet to be undertaken. Given the knowledge gaps which exist, it becomes extremely difficult for anyone to give meaningful answers to such questions.

It is virtually certain, however, that intertidal species will be severely affected by decreased run-off and rising sea levels, with salinity bound to increase in estuarine areas because of these two factors operating together. Unfortunately these effects are slated to occur at rates which will make it virtually impossible for relevant species to adapt to the changing conditions, while their global occurrence will mean that species will be affected in all areas, not just the South West, and the possibilities for natural estuarine refugia seem minuscule. Perhaps creation of artificial refugia may be possible, and you may like to turn your mind to how that might be achieved.

Lakes and waterways are likely to suffer desiccation, which will affect not only visual landscape values, but the survival of aquatic and amphibious species and migratory wading birds that enhance the experience for visitors to the region. Environmental flows will become progressively more difficult to organise (with accompanying growth of noxious algal blooms), and town water increasingly harder to supply. Water use will have to be more and more strictly regulated, with irrigators having to use drip rather than spray systems and cutting their usage to bare minima, and householders suffering draconian restrictions on domestic use. Underground aquifers will deplete, and artesian and sub-artesian supplies commensurably decrease. Many plants will suffer dehydration effects, and may only survive in floral refugia. Bushfires will become more regular and intense, putting endangered plants at increased risk of extinction, while compromising the purity of water run-off, and increasingly severe storms will cause severe vegetative damage and produce significantly more lightning strikes. While these storms may have short-term beneficial outcomes for water catchments and flows, increased evaporation and faster run-off will tend to nullify these effects. Exotic plants and animals may adapt better to climatic change than native varieties, putting further pressure on endemic species that will already be struggling to survive.

Rises in sea level and more frequent and larger storm surges will also cause coastal inundation which will drown or destroy Aboriginal sacred sites and kitchen middens along the foreshore, so that cultural sites having their original focus on the sea will in all likelihood disappear from the

region. Increased erosion from more frequent and severe storm activity, superimposed on bushfire damage to vegetation, will seriously threaten such sites in more inland areas.

In short, every water and catchment value and associated value in the region will be in a situation of severe risk in a scenario of rapidly advancing climatic change.

What places in the planning area might offer higher levels of species persistence under climate change (whether species re-radiate from these or not)?

All species require water, and the places that will hold residual water the longest will be those most likely to offer higher levels of species persistence. A fair analogy would be oases in the desert.

What areas may be the sources from which species radiate as a result of climate change?

These are likely to be the same areas as those mentioned under the previous question.

How should refugia in the planning area be protected?

By excluding visitors and exotic animals by (where applicable) signage (together with appropriate enforcement) and fencing, and eradicating pest plants within the area.

Visitor Experience

How should visitor experiences be offered across land tenure?

Through consultation and agreement with other land managers including farmers. This may involve the erection of stiles over farmers' fences to aid walker access, and cattle grids if motorised access is being provided, constructing paths and 2WD tracks where appropriate, offering inducement to the landowners for allowing access to some special feature, erecting appropriate directional and interpretive signage as well as warnings about keeping to the path/track and not damaging the feature or the landowner's property, and to the extent possible, policing visitor behaviour in the area.

Are changes required to the current mix of visitor experiences and/or sites offered? If so, what changes are required, and why?

To aid accessibility it would be nice to see more 4WD tracks changed to 2WD. Designating tracks as 4WD can serve as an excuse for not maintaining roads to a more acceptable standard; that may save PV money, but doesn't help the average visitor. We would, of course, also like to see more extensive networks of walking tracks in the Mts Napier and Eccles and Nigretta and Wannan Falls areas, and lengthier ones presenting more challenge to dedicated bushwalkers including the suggested Harman-Tyrendarra lava flow and Falls walks referred to elsewhere in this document.

We note that the Kanawinka Global Geopark, which essentially covers the Victoria-South Australia volcanic region, was declared the 57th Member of the Global Network of National Geoparks assisted by UNESCO on 22 June 2008, and we hope that the publicity generated by their website – www.kanawinkageopark.com - and their published literature will add to what you and other government and private bodies produce to bring more visitors to the volcanic area and engender better connectivity and attract better facilities throughout the South West planning area. The Kanawinka publication "Volcanoes Discovery Trail Victoria and South Australia" (undated) indicates that Mt Napier still has no public toilet, unlike Mt Eccles, which does (so do Wannan and Nigretta Falls).

The Great South West Walk is a terrific initiative, traversing both coast and hinterland, and popular with BWV member groups. The Great South West Walk Friends Newsletter of March

2012 indicates that maintenance and enhancement of the track and campsites is receiving ongoing input from PV and volunteer groups, while the Camperdown BWC newsletter of Autumn 2012 notes PV rehabilitation work on part of the trail following a bushfire in 2011, and we hope that needed maintenance of and improvements to the track and its facilities continue to occur.

Should there be a greater investment in the highly-visited sites at the expense of those less popular? If so should a best practice approach rather than historical existence of the site be a driver?

It may be that the reason that some sites are undervisited is because they lack the ease of access and quality of facilities available at the highly-visited sites, so that if you provided better facilities and access at the less-visited sites you may find that the number of visitors to them would rise. Another factor is how well promoted different sites are: the less-visited may be that way because no one knows about them. The answer here is to better publicize them. No, we do not think that in the current circumstances there should be a greater investment in the highly-visited sites at the expense of those less popular. However, if the less-visited are put on a level playing field with the highly-visited ones in terms of access, facilities and publicity, and after a reasonable period of time they still continue to be less visited, you might then have some argument for concentrating resources at the highly-visited sites.

There are also some areas which, for environmental conservation reasons, should always be less visited. That does not mean that the facilities which exist there should be razed and investment directed towards more highly-visited sites on a “best practice” basis. This has a nasty flavour of economic rationalism about it, and we especially do not support such action in relation to environmentally fragile sites.

Should there be a greater investment in some experiences at the expense of others in the planning area? If so, which experiences should receive more investment and which less – why?

We think that the more environmentally-damaging activities like 4W-driving and trailbike-riding should be minimized, and less ecologically-impactive activities like walking and cycling encouraged. 4WDs and trailbikes are a major contributor to gully erosion, and air and noise pollution, with attendant deleterious effects on native vegetation and animal life.

Is there a need to improve visitor information and orientation at key towns or locations that are the gateways to the parks, reserves and Gunditj Mirring Traditional Owners' Aboriginal Corporation and Winda Mara Aboriginal Corporation properties and IPA major destinations? If so, which ones and what sort of information?

Centres like Nelson and Portland should carry as much information as possible about the Great South West Walk, while Hamilton and Portland should provide a wealth of informational and interpretive literature about the Mt Eccles and Mt Napier volcanic complexes and nearby Aboriginal properties and IPAs, including access arrangements where appropriate. Places such as Hamilton, Casterton and Coleraine should be supplied with informative brochures about Wannon and Nigretta Falls, including their geological origins. Other smaller towns which have information centres should be supplied with similar informational literature for features in their vicinity.

We note with approval, in this context, your “priority actions”, “many” of which “have been implemented”, (“Sustainable Tourism” paper, page 6) for a Budj Bim Interpretation and Orientation Centre at Heywood, smaller visitors’ and interpretation point and self-guided tours at Tyrendarra, a more intensive education/training centre and guided walk based at Kurtonitj, and “Longer guided immersive tours associated with Lake Condah including trail from Mt Eccles NP”. All visitor information should be complemented by comprehensive directional and interpretive signage at or near the sites.

Bushwalking Victoria also believes that PV needs to update its Park Notes/Visitor Guides. Despite huge improvements in publication and printing technologies in the past 10 -15 years the PV publications remain essentially black and white. It is high time that PV moved into the 21st Century and produced information in full colour, includes quality colour photographs of key features at the various sites as well as maps providing orientation, direction and access arrangements.

PV also needs to ensure consistency between different forms/sources of information for visitors, ensuring for example that directions, distances and walking times are consistent between published information, information panels, trailhead signs and track signs. While literature may already be supplied at a number of these centres, there is always room for improvement in the quantity and quality of the information.

What visitor experiences do you think should be offered on Gunditj Mirring Traditional Owners' Corporation and Winda Mara Aboriginal Corporation properties and IPAs?

This should be determined by the Aborigines themselves in consultation with PV, DSE, the State tourism authority, local councils and local community groups, but one would hope that it would include Aboriginal guides explaining aspects of Indigenous culture of which there are still relics on their land. We support the proposed World Heritage Nomination for the Budj Bim National Heritage Landscape (page 6) and the exploration of associated opportunities (page 7).

Recreation Activities

What activities could be provided or extended to encourage four season use?

BWV believes that the creation of additional walking tracks would increase the area's usage throughout the year. Thematic walks like the Harman-Tyrendarra lava flow walk proposed above, and a Nigretta Falls-Wannon Falls waterfalls walk might be possibilities. The coastal area is already well-served by the Great South West Walk, but the hinterland is less well served, although there are short walks at Mt Eccles and Mt Napier, and these could be connected and extended to form the longer volcanic walk. New Zealand has a volcanoes walk in the North Island which it is understood is quite popular, and a Napier-Eccles walk may attract a similar geologically-switched-on sort of clientele. Interpretative signage en route would complement both the falls and flows experiences. There is a common theme here as the falls are also relics of volcanicity.

What types of recreational use can be explored to help Parks Victoria, Gunditjmarra Traditional Owners and DSE design/implement/support recreation activities that support community health? (This includes links to recreational works conducted by Local Government Authorities, e.g. creating a path between two areas to encourage user movement between locations without using vehicles.)

Walking is an activity which patently supports community health, and the suggestions in the preceding paragraph, which would link by walking track areas not presently so served, are totally in line with the theme of this discussion point.

What is the process for defining shared use, e.g. bicycles and horses, bicycles and walkers?

BWV believes that recreational walkers, like other users, have need for trails dedicated to their particular activity as many of their needs and wants are distinct from and not always compatible with those of commercial and other recreational users. However BWV also acknowledges that shared use trails have a place in the tracks network. Whether mixed use is possible or desirable for a track will depend on a range of factors that need to be considered through a proper

consultative process that involves affected stakeholder groups. Please refer to BWV's Shared Trails Policy at http://www.bushwalkingvictoria.org.au/forms/Shared_Trails_Policy.pdf

How can groups that undertake recreational activities be engaged to become volunteers to undertake works that support their recreational pursuits and the management of the parks and reserves?

PV talks on the area at various regional centres, information brochures, local press outlets and internet sites, could be used as springboards to invite volunteer groups to participate in park management. Bushwalking Victoria has a memorandum of co-operation with PV, and assists them with volunteer activities, particularly but not restricted to track-clearing, throughout the State.

There is certainly potential for conflicting aims amongst the organizations which have MOCs with PV listed at the foot of page 2, although we note your interest at page 7 in "Managing the conflicts between different user groups". Also in the context of different recreational users, we cannot see why dog-walking (page 6) is permitted within Dergholm State Park, running counter, as it does, to your principle of conserving natural values in State and National Parks. On the same theme, we worry about your desire to "Identify and respond to demographic change and expectations" (page 7), when the majority of recreational users (57% according to the survey at page 3 in the "Visitor Experience" paper) think "that the key benefits of parks to the community are the use of parks for recreation and leisure", with the environment coming in well behind.

Sustainable Tourism

What are the opportunities to leverage off the Great Southern Touring Route, Great Ocean Road and Grampians NP?

Reasonable for the first two, not so good for the third, but in any event, to attempt that leverage is to abdicate responsibility for promoting the South West as a tourist destination in its own right. The third day of the Great Southern Touring Route can either be through Peshurst and Dunkeld or through Macarthur and Hamilton. The latter takes it right past the Mt Eccles and Mt Napier volcanic areas, which you can sidetrack slightly to explore, and if you want to promote the South West you should be encouraging the latter route as the third leg of the GSTR (although in truth the Mt Rouse volcanic area on the former GSTR option is pretty good too, and you would be robbing Peter to pay Paul).

The Great Ocean Road starts at Torquay and ends at Allansford, just east of Warrnambool, so that none of it appears in the South West Planning area. The Princes Highway continues the coastal road through to Portland, from whence a minor road takes it through to the brilliant scenery at Cape Bridgewater, and another more or less along the coast to Nelson, providing access to the splendid limestone country that includes the Princess Margaret Rose caves, and the Glenelg River Gorge (with excellent canoeing opportunities) of the Lower Glenelg National Park. The coastal road within the SW planning area could be sold as a scenic route in its own right, not merely as an adventitious extension of the Great Ocean Road.

The Grampians abut the north-eastern reaches of the SW planning area, and Dunkeld, at their foot, is on the GSTR, but it would seem to be drawing a long bow to connect them to the SW planning area, most of whose scenic attractions are to the south of the region. But within the SW area you have wonderful samples of the State's volcanic past (geotourism could be tapped far more), rugged coastal scenery, beautiful limestone country, a major iconic walk (the Great South West Walk), and we believe that these could be successfully promoted in their own right, not merely tacked on to other Victorian features to attract visitors. Concomitant with that promotion, we would like to see all scenic areas better served by discrete walking tracks,

including more long-distance tracks, and related facilities; we have expatiated on this theme in other parts of this submission.

Leveraging off the Port Campbell National Park (page 2) also seems to be drawing a long bow given its distance from the SW area.

Much more could be done to promote the Major Mitchell Trail, which, within the SW region takes in Nelson, Portland and Mt Napier.

What do you think attracts tourists to the planning area?

All the scenic attractions adumbrated immediately above and others you mention under “Effective Marketing”, page 2), cultural attractions like the Indigenous eel farming and permanent settlement relics at Lake Condah, together with adventure opportunities like walking, fishing, camping, cycling, caving, bird-watching, whale-watching, horse-riding, abseiling, canoeing, kayaking, 2W and 4W-driving, guided tours (page 3 and elsewhere).

Fire Management

The ‘Fire Management Discussion Paper’, unlike other papers in the series, does not have a “Discussion Points” section. However, there are several points raised in the course of the paper that BWV considers worthy of comment, and these are discussed in what follows.

At page 1 there are statistics about the causes of bushfires generally, then about the Far South West Fire District in particular. We think that it would be enlightening if the area of land burnt as a result of each cause were also detailed, as we suspect that the 2% of bushfires generally which were due to escaped planned burns on public land may have accounted for a disproportionately large area of total land burnt. We would also be interested to know in terms of the Far South West Fire District what causes and percentages are buried in the 35% of fires not mentioned in the paper and what areas of land burnt applied to each cause in that District.

At page 2, the new target of 385,000 hectares per year of fuel reduction burns across the State represents only 4.5% of the 8,578,033 hectares of public land in Victoria (derived from “Remnant Native Vegetation Investigation Discussion Paper”, VEAC, East Melbourne, June 2010, p 33), and with major conflagrations now happening in the State every 3 years (2003, 2006, 2009), only 13.5% of our public land would have been prepared for wildfires by the time the next major fire occurred. This analysis hardly provides much cause for complacency, and when it is realised that there are 14,063,955 hectares of private land not in the target (62% of the total land in the State), then only 1.7% per annum of the State’s land area is being protected by targeted fuel reduction burns. This does not get remotely close to a position of genuine preparedness for major wildfires, which as we all know, are no respecters of land tenure type.

How measurement of the effectiveness of the increased fuel reduction program (page 2) is to be achieved short of a major wildfire is a matter of considerable interest to us, and you might like to follow up with more detail in subsequent papers. There is also the aspect of fuel-reduction burns not being the same as ecological burns, and you might also like to try to measure the ecological impacts of broad-scale fuel-reduction burns. A precursor to that is to know what species and their numbers you have in the first place, and in many areas throughout the State that has yet to be definitively established. Ecological burns must at best be extremely difficult to manage given that some species are fire-susceptible, others fire-resistant, while yet others are fire-dependent, and they may all occur on the same parcel of land.

You mention (page 2) that maintaining the network of roads and management tracks essential for bushfire suppression and management of planned burns is “a key element of fire protection”. We do not doubt this, but our experience of such tracks is that many have been allowed to deteriorate to the point where they no longer offer ready access to the seats of fires. While fire fighting from the air may have overtaken the need for this sort of access to some

extent, it is not comforting to note your stated reliance on such tracks given their often less than satisfactory condition.

Gunditjmara Cultural Values

In what way can the broader community work together with Gunditjmara Traditional Owners, Parks Victoria and DSE in managing the cultural landscape of the planning area?

We note (page 1) that “Only a small percentage of the planning area has been effectively surveyed for cultural heritage”, and that you seem to be somewhat dependent on bushfires to uncover Indigenous cultural sites previously not found (ibid). This is a poor state of affairs, and it would seem to us that volunteers, exposed to short training courses on how to identify sites, might work with archaeologists and appropriately-trained PV and DSE staff, and Traditional Owners, to survey and record cultural heritage sites throughout the region. The problem with not identifying such sites is that they can be inadvertently damaged; the problem with identifying and marking them is that they will then need protection from intentional damage. Protecting them is nonetheless crucial as an element in the preservation of the rich and diverse Indigenous cultural heritage that is located in the South West region. Once sites are discovered, the Traditional Owners will want to have a large stake in their preservation, and that is totally appropriate, but the broader community can certainly help in locating them. None of this activity should be ventured upon without the approval of the Traditional Owners, with whom regular consultation should be conducted. We note the composition of the Budj Bim Council (page 3), and view that as a step in the right direction.

Volunteers can also help with the eradication of invasive plants. Bushwalking Victoria, and some of its member clubs separately, are already, in collaboration with PV, involved with this type of activity elsewhere in Victoria. School and Friends groups are also active in this field. CVA takes on projects which might easily embrace this sort of activity. There is no reason why these sorts of assistance could not be more actively encouraged to help in the South West.

How can the broader community be engaged in Gunditjmara Traditional Owners’ cultural values/history?

Through helping identify and record ingredients of those values and that history with the Traditional Owners’ consent. Oral history is one such ingredient, and this is something which cannot be put off indefinitely. People die before their stories can be collected, and the contribution they may have made to regional history is gone forever. It is therefore very important that the recollections of older members of the Indigenous community be collected as soon as possible. Because of an oral tradition which goes back tens of thousands of years, these recollections may tap elements of prehistory, and in an environment where, sadly, there is social disintegration amongst numbers of Indigenous communities, these stories may be lost too if they are not captured now. Cultural mapping (page 4) is another area where the broader community may help the Traditional Owners.

Climate Change

What are the natural, cultural, social and economic values in the ‘Ngootyong Gunditj, Ngootyong Mara’ South West Management Plan that you consider to be the most at risk and should be protected?

The question of “what should be protected?” might be better framed as “what can be protected?” It seems that intertidal biological communities will be virtually impossible to protect because of rising sea levels and decreased freshwater run-off, with attendant rises in salinity, although they are the communities that are most at risk and perhaps should receive greatest

protection were that possible. We note that “there is much that is currently unknown about the scale and timing of climate change on Victoria’s marine systems” and “salinity concentrations” (page 2), but though present indications are not good these are further areas for additional research.

Aboriginal coastal values are also greatly at risk and likely to disappear, although, again, there is no doubt that they should be protected were it possible to do that. Social and recreational use of the region will also be very difficult to protect when waterways and lacustrine areas are drying up, something over which land managers will have next to no control. Attendant on this drop in visitor frequency will be a commensurate decrease in economic input into local businesses and accommodation outlets. Again, in a situation of diminishing incentive to go to areas that are becoming progressively less attractive to visit, it is difficult to see what land managers can do to prevent this from happening. The outlook is rather gloomy, with those things most at risk least likely to be capable of being protected. While we would love to see the building of “ecosystem resilience” (page 4), it is difficult to imagine how that can be achieved.

How do we manage parks in a rapidly changing environment?

While not giving up on those things that it is very difficult to protect (see immediately above), park managers should still attempt to attract visitors by pointing to those features which will be enduring, like the splendid volcanic relics at Mt Eccles and Mt Napier, and coastal scenery that will change, but will still retain land forms that people will want to see, beaches they will want to frequent, and seachange elements that have always attracted large numbers of people to coastal areas.

How much intervention should be done to adapt to climate change (e.g. restoration, safeguarding drought refuge)?

Despite Steffen (page 1), as much as is humanly possible. We are looking at mass extinctions otherwise, and a colossal diminution in the variety of life forms not only in the investigation area, but globally, a scenario we do not wish to visit on our descendants. Measures like habitat restoration projects, captive breeding programs and extensive native flora nurseries, although artificial, are preferable to extinctions on an unprecedented scale. But of course, preceding action we need basic research, and we note your desire to “Identify and map refugia for threatened/endangered species” (page 4), a very necessary precursor to intervention of any sort.

How do you see recreational access changing in the face of climate change?

There must be less of it in order to protect what will become increasing numbers of endangered species. We can also expect that if the environment becomes impoverished because of climate change that visitors will be less anxious to come. For both these reasons we would expect the number of visitors to fall away. There are already those who prefer virtual reality to genuine reality, and it is likely that against a backdrop of desiccating climate change, more people will turn to their computer for escape rather than the then not-so-great outdoors.

Renaming Mt Eccles NP as Budj Bim NP

What are your thoughts about renaming Mount Eccles National Park as Budj Bim National Park?

In view of the fact that Mt Eccles is a misnomer to begin with, a misrepresentation of Mt Eccles, there is nothing sacrosanct about the existing title. Furthermore, the notion of reverting to

names which preceded European settlement has been gaining in popularity for many years, and we therefore have terms like 'Uluru' for Ayers Rock and 'Gariwerd' for the Grampians. Renaming Mt Eccles NP as Budj Bim NP would therefore merely continue a movement that has been gaining momentum for quite some time.

Much has been taken from the Aboriginal people over the last two centuries, often including the names they had attached to features of the natural environment as long as 30,000 years ago in Victoria, and earlier in the north of the continent. We need to give them back more than we have done to date, and names are an area we can readily address in this context. Interestingly, Aboriginal stone tools have been found embedded in tuff deposits at Tower Hill, Warrnambool, which erupted 30,000 years ago: the Aborigines were there for the births of that and more recent volcanoes like Mt Eccles and Mt Napier. We think that that gives Aborigines a better claim to naming rights than people who didn't arrive until many thousands of years later. In short, BWV supports the proposed renaming.

Cultural Heritage – Cultural Landscape

The discussion points listed for this section do not raise issues that particularly resonate with Bushwalking Victoria. However, there are a few contextual matters on which we would comment.

We note at page 2 the commissioning of a Cultural Heritage and Social Values Assessment, which we feel cannot help but inform decision-making about the area into the future, and we firmly support it.

We see that you mention Traditional Owners having witnessed the eruption of Mt Eccles (top of table page 4), but they would also have witnessed the birth of Mt Napier 20,000 years later, and there is no mention of that.

We observe that you see Lake Condah weir restoration as an opportunity (page 7), and we trust that this will not detract from the authenticity of Indigenous relics in that area.

As aforesaid, we wholeheartedly support moves to seek nomination of the Budj Bim National Heritage Landscape as a World Heritage Site (ibid).

Vision

What are the key natural and cultural values and features of the planning area that need to be given priority?

The construction of facilities at and better promotion of the Mt Napier volcanic complex. Better access to and promotion of the eel traps and associated settlement at Lake Condah.

What is your vision for the planning area?

Better integration of access to the many scenic features the SW contains, including better walking track connectivity. Better promotion for the whole region, not as an adjunct to other tourist areas but in its own right.

How do you want to be involved in managing the parks in the future?

Bushwalking Victoria would like to be represented on consultative committees for the area that deal with its environment and its bushwalking opportunities.

What do you think the plan should achieve – environmentally...?

Improvements in ecological protection generally, eradication (if possible) of pest plants and animals, identification and protection of climate change refugia , and the conducting of comprehensive environmental research to underpin management decision-making.

We trust that you will genuinely take our comments into consideration in formulating follow-up papers.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Chris Towers". The signature is written in a cursive, flowing style.

Chris Towers
President
Bushwalking Victoria