

18 August 2014

Mr Brian Doolan  
Manager, Parks Planning and Procedures  
Parks Victoria  
Level 10, 535 Bourke Street,  
Melbourne Vic 3000

Dear Mr Doolan

***Greater Alpine National Parks Draft Management Plan***

Bushwalking Victoria (BWV) thanks you for the opportunity to comment on this document.

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 organisations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

There is much in the draft plan with which BWV is in agreement, but there are some aspects of the plan with which we disagree.

There are a number of aspects of this document which we find difficult to reconcile with environmental protection of sensitive and vulnerable alpine habitat. These include:

- The prospect of mountain cattlemen having a possible role as environmental advisors
- Cattle possibly being returned to the high country under the guise of fire mitigation
- The expansion of fossicking and prospecting areas within national parks
- Approaches to the control of wild horses in national parks

These and other issues which are of concern to us are discussed in detail below.

***Mountain cattlemen***

We note with dismay, the extent to which the mountain cattlemen and in particular the Mountain Cattlemen's Association of Victoria (MCAV) has been integrated into the proposed Greater Alpine National Parks Draft Management Plan.

Mountain cattlemen have an obvious financial interest in the return of cattle to the high country, and the MCAV has actively campaigned for this to occur. As bushwalkers in the Alpine region, we saw at first hand the damage and degradation caused by cattle, with moss-bed destruction, watercourse fouling and damage to fragile alpine vegetation. Since removal of the cattle in 2005, the high country environment in areas such as Pretty Valley near Falls Creek, has visibly improved.

We are unequivocally opposed to the return of cattle to the Alpine National Parks, and we are deeply disturbed by the degree to which a group like MCAV appears to have influenced this plan. The proposal that parks management should:

- Provide opportunities for mountain cattlemen families to participate in operational management (p57)
- Formalise an agreement with MCAV to share knowledge and foster a strong collaborative working arrangement (p57)
- Liaise with mountain grazing families and MCAV to enhance recognition [of] cultural heritage (p52)
- Seeks to embed an interest group with an agenda of fostering the return of cattle to the Alpine National Parks into the management of the parks themselves.

We find these proposals both astonishing and deeply disturbing.

We observe (Table 4.1, p 25) that grazing and trampling by horses and deer are seen as high-priority threats to park values, yet elsewhere in the report (pp 47-48) there are moves supporting the re-establishment of cattle in the high country under the discredited justification of fire-prevention. Cattle graze and trample alpine vegetation just like deer and horses, and must therefore also represent high-priority threats to park values.

### ***Four wheel drivers***

We note (p 66) that it is proposed to work with “Four Wheel Drive Victoria to support management of the road and track network”, and they receive other mentions in connection with the Wonnangatta Valley (p 64) and track classifications (p 66). We support the work that organisations like Four Wheel Drive Victoria have done to promote responsible driving and track usage by their members, and we hope that any extension of the 4WD track network will be handled carefully and sensitively. However carefully driven 4WD vehicles are large and heavy, and can cause considerable environmental damage if misused.

### ***Trail-bike riders***

We note that in Table 8.2 (p 71) it is proposed to permit trail-bike riding in national park conservation zones as well as in similar zones in reserves. Trail-bikes, being motorised, can cause severe erosion and generate noise pollution. This does not appear compatible with the objectives of conservation zones.

### ***Feral horses***

Wild horses represent a real and increasing threat to the alpine environment. Observation by bushwalkers over the last 5 years has confirmed the rapid growth in numbers, and the increasing severity and extent of the damage caused. Recent reports have included fouling of remote watercourses, damage to track signs, and a nocturnal stampede through a camp area. Horse

numbers have been increasing at an estimated 21% per annum, and we are concerned that the programs proposed to manage the feral horse population will prove to be inadequate.

We believe that the decision, prompted by a fear of public outcry not to implement a program of aerial shooting by professional marksmen is both short-sighted, and ultimately will allow the problem to grow to unbearable levels. The draft management plan, does not, in practical terms, move beyond the application of existing control approaches which have failed to prevent horse numbers continuing their rapid increase.

We draw attention to the obvious illogicality of proposing a program to shoot deer, goats and pigs in the Alpine National Parks, but ruling out such a program for horses, despite the fact that they cause identical sorts of environmental damage.

### ***Wild dogs***

In reference to the strategy “Containment of populations of wild dogs to protect neighbouring properties” (p27) the success or failure of which is to be measured by “Neighbour satisfaction and area treated for wild dog management”.

Whilst we understand the need for such activities, we are surprised that the management plan contains no mention of the measures to be taken by Parks Victoria to manage the population of wild dogs within parks with the objective of protecting native wildlife.

### ***Fossicking and prospecting***

We are opposed to expansion of areas available for prospecting and fossicking in national parks because of their damage to the ground surface and their contribution to erosion and reduction in water quality as well as their potential for paving the way for larger mining operations if viable quantities of mineable material are found. In fact, we would like to see areas already open to these activities in national parks delisted.

### ***Management reporting***

The plan makes frequent references to “regular management reporting” (p31, p33, p36, p40 etc) as a measure against which the success or otherwise of strategies can be gauged.

We would point out that regular reporting is not of itself, a measure. It must be coupled with defined relevant parameters against which success can be measured.

### ***Shared trails***

We see in various areas of the report references to shared trails (eg pp x, 62, 68). In general, BWV prefers walker-only trails, as shared trails can introduce elements of danger that would not otherwise pertain, and reduce the enjoyment of both walkers and other users. We do recognise that shared trails are a necessity in some circumstances. In such cases, clear and consistent signage at trailheads indicating what groups will be using the trails, is important, so that users will be fully expecting and prepared to encounter other types of user along the way.

BWV notes that it is proposed (p68) under strategy ‘Continue to provide tracks for shared use and single use...’ to develop a code of shared use by 2015.

BWV strongly supports such an initiative and looks forward to working with Parks management in providing input to such a code, representing the bushwalking community.

### ***Habitat connectivity***

There are several references to maintaining habitat connectivity in the report (eg pp 31, 34). We would like to see this concept advanced by the purchase when possible of private land which would connect sections of national park and foster such connectivity.

### ***Feature renaming***

BWV would support more renaming of features and areas to reflect Traditional Owners' connections (p 41).

### ***Huts Usage and Etiquette***

BWV notes that a strategy is proposed aimed at "ensuring visitors who do use huts for shelter, refuge and other purposes do so in a safe and appropriate manner" (p53). We would support an active program of building awareness in the wider community of correct and appropriate hut etiquette and offer our services to assist in defining and delivering that program.

### ***Domestic dogs***

We note that the presence of dogs is proposed to be permitted in certain areas of the national parks (p 64). BWV is of the view that dogs have no place in national parks because of their potential impact on native wildlife.

We trust that you will carefully take our views into account in reaching decisions about the final version of the Master Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Walker'.

**Tony Walker, President**