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29th April 2008

Mr Hamish MacLennan
Chief Ranger
Murray Central District
Parks Victoria
PO Box 3100
BENDIGO MAIL CENTRE VIC 3554

Dear Mr MacLennan,

**BUSHWALKING VICTORIA (BWV) SUBMISSION ON THE KOOYOORA STATE PARK
DRAFT MANAGEMENT PLAN FEBRUARY 2008**

Thank you for your letter of 17 March 2008 advising of the release for public comment of the Kooyoor State Park Draft Management Plan, enclosing information about the form submissions might take, and inviting input from Bushwalking Victoria by 19 May 2008. Thank you also for the hard copy of the report, receipt of which was recorded in our office on 28 March 2008. The lead period allows BWV sufficient time to make a meaningful response to the document, and we are duly grateful for your consideration in this regard. It is my responsibility, as President of BWV, to consult within and without the organization as necessary and provide submissions on such matters. I am accordingly writing on behalf of BWV in the representation which follows, and am conveying BWV's views on the items discussed.

BWV represents the common interests of over 80 Victorian bushwalking clubs, with in excess of 10,000 members. It also aims to proactively represent 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 Plan, which is comprehensively informed and articulately presented. BWV is very supportive of most of the elements of the plans you outline, but, that having been said, there are a few areas of the report, and its accompanying papers, upon which BWV would like to constructively comment, and these are addressed as follows.

Consultation process

We note your statement in your letter of 17 March that "The Draft Management Plan was prepared in consultation with a range of stakeholder and interest groups, agencies and the broader community", and we are disappointed that we were not consulted as a numerically strong and keenly interested group. Many of our member clubs over the last several decades have regularly held walks in the area now encompassed by the Kooyoor State Park, a beautiful place indeed, and we have a profound and abiding interest in the manner in which the Park will be managed into the foreseeable future. We observe also, your resolve to develop and maintain "Strong cooperative relationships ... with communities or groups that are interested in the park's management to support and strengthen their appropriate involvement" (second dot point second column page 8), and we would hope that BWV will be amongst the parties you consult in the future.

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

Bushwalking Victoria Inc. A0002548Y ABN 88 344 633 037
Formerly Federation of Victorian Walking Clubs (VicWalk) Inc.

Tourism

We find it strange that you see parks like Kooyoora as “not ... major tourism attractions in their own right”, but having “great potential as a complementary product for people who come to the region for other reasons, such as seeking social, recreational, sporting or heritage experiences” (second column, page v and similar at page 22 1st column). We see parks like Kooyoora, which have superb natural beauty, as having the potential to be major tourism attractions in their own right (like Mt Buffalo or the Grampians) if they were ever touted in that light rather than as an adjunct to some other attraction. It is all in the way they are sold. You might like to liaise further in this connection with Tourism Victoria, who think of the general area merely as a “Goldfields product region”, and with the Bureau of Tourism Research, which does not see tourism activities in the region as focusing on anything other than “sites associated with the region’s gold and settlement heritage” (1st column, page3). While it suits us as walkers not to have a landscape swarming with tourists, we feel that you, and Tourism Victoria, are missing the point with some of our major scenic attractions: they can stand on their own feet if they are properly presented, without any necessity for them to be artificially propped up by local heritage or recreational experiences. It seems almost sacrilegious to suggest otherwise. Terrick Terrick National Park, Warby Range State Park and Chiltern-Mt Pilot National Park are examples of other ruggedly beautiful Box-Ironbark Parks like Kooyoora which in our view are totally underdone from a tourist point of view. There seems to be little aesthetic focus, feel for landscape, geomorphological appreciation, or love for the bush and its creatures in the tourist authorities’ views of the region which you are uncritically citing.

Road system

It is something of an indictment of the present status of the road system in the Kooyoora State Park that “The current facilities and bitumen road” were “built in the 1960s and 1970s, ..a reminder of the work of [a] dedicated local band of community members” (2nd column, page 1).

What has been improved or initiated in the interim? What value-added has Parks Victoria brought to the road network since it took over the original State Park in 1985 and the expanded State Park in 2002? Why haven’t there been improvements to a road system which is far from ideal? We note that your intentions in Table 3 page 25 are for maintenance of existing roads except for Leach’s management vehicle road which you are proposing to let deteriorate a bit further. This is hardly an impressive program. The only 5B road you have is the Melville Caves Road (which we note with approval you are proposing to reseal). With the exceptions of the Mt View Road and Bread and Butter Track, which are 5Cs, all the other roads for which you are responsible are 5Ds or worse. Loddon Shire Council roads are almost inevitably at a higher standard than yours, often 5Bs. We do not understand why roads in national/state parks have to be amongst the worst in the country. Once you have constructed a road in such a park you have already breached the integrity of the countryside, and putting a layer of bitumen on it won’t make it any worse from a conservation point of view, whereas it could be a godsend for the springs and shock-absorbers of a 2WD. Please aim to improve the roads in the Park.

You mention that “The main use of the internal park road network by visitors is for car touring, horse riding, walking and access to scenic sites and park facilities” (6.2 page 24), and while we welcome the extra range of tracks this affords walkers, we would record the fact that shared facilities like this raise safety concerns for us, and extra dedicated walking tracks would be far better from a safety point of view.

Recreation amenity and facilities

We view with favor the liberty walkers and bushwalkers are accorded in your scheme a in Table 2 page 10, and we roundly applaud your prohibition relating to dogs (Table 2 page 10 and 6.7 page 32). We are less enthusiastic about 4WDs and motorbikes/trail bikes being given the same liberties as bushwalkers, particularly when you are referring to overlays containing large old trees whose hollows provide havens for birds and arboreal animals, areas frequented by Powerful Owls, and gully vegetation fauna refuges whose protection we would have thought would have been seriously compromised by the presence of intrusive recreational vehicles.

Your Table 4 page 29 recreational facility proposals, with the exception of those for the Melville Caves picnic area and camp ground, are very modest; with the bar set so low you should have no trouble surmounting it. Nothing much is changing, with facilities ranging from very basic to basic in all locales other than the aforementioned. You are not encouraging people to frequent areas other than the Melville Caves section, but at the same time are bemoaning the risk of having too many people roaming that area. You could lessen the supposed risk by making other places more attractive to users. In any event, we do not see much risk attached to “impacts of large groups camping and walking through the Hills Herb-Rich Woodland and Metamorphic Slopes Shrubby Woodland of the Melville Caves section” (1st column page

14) when it is the area of the Park exclusively served by designated tracks (nine of them: 6.4 page 29), boasts several roads and also has a substantial camping ground.

While on the subject of tracks, in relation to which your Table 5 proposes no upgrades, you might like to consider transmogrifying one or more of the informal tracks leading to Mt Kooyoora's summit and the one going to the Courtyard area into formal tracks, with appropriate signage; that will overcome your concerns about "erosion and fragmentation of the vegetation" (6.4 page 30). We support your proposals to provide signage for tracks and to construct a track linking the Eastern Walking Track to the Melville Caves Camp Ground.

We note that the Melville Caves Picnic Area is supplied by springs, but that "In normal years the springs cease to flow ... during summer", and that "In drought years they may stop flowing completely" (4.3, page 12). We see that there are two septic toilet blocks here (6.3, page 28), so we hope and expect that there is a permanent supply of water to flush them. Connectedly we observe that "Drinking water is not supplied or available in the park and visitors need to bring their own drinking water" (2nd column page 28), and we wonder if more could not be done with regard to water collection during the wetter months.

Park fragmentation

We note your observation that "The park is highly fragmented" (1st column, page 3), but at no stage in the report do we note that you have a policy of acquiring land to make the park continuous if appropriate land comes on the market. We would think that this should be a crucial ingredient of your management plan, as managing a fragmented park, and attempting to influence intervening landholders to adopt environmentally-friendly practices with a view to creating continuous habitat and wildlife corridors between disjointed areas of the park, must be difficult indeed, whereas continuity of the land administered, which could be achieved by buying up appropriate properties as they became available, would alleviate much of the pressure which the existing situation must create. We note the Loddon Shire Council overlays that apply to private land adjoining the park (4th complete paragraph, 2nd column, page 37), but it would be better if you had such land within the park. We very much favor revegetation programs that assist connectivity (second complete paragraph, 1st column page 40) and pest plant and animal eradication programs that cross park boundaries.

Environmental management

We have commented in other submissions on the statement that State Parks aim "to protect viable samples of the State's natural environments" (2.2, page 3) and we will do so again here as we still don't know the answer. Does this mean that if you consider there are so few of a species left that you do not regard the group as 'viable', you will consign it to extinction? We would have thought that you would do everything in your power to save a species, by captive breeding programs and the like, even if it were down to the last breeding pair. On your reasoning, would we consign the Helmeted Honeyeater to the scrapheap because its numbers were down to less than 100? We sincerely hope not!

You remark that "No comprehensive flora survey has been carried out in the park" (2nd column page 13) and that "No comprehensive survey of the park for fauna has ever been carried out" (second column page 15). We would have thought that this was highly unsatisfactory, making park flora and fauna management a game of blind-man's-buff, and we would urge you to carry out these surveys as a matter of critical urgency. There also seems to be a serious lack of relevant research informing some of your management activities. You note that "The ecological burning requirements for the park are not known" and that "lack of knowledge about the impact of pest plants on specific species is also a threat to the park" (page 17). Surely you should turn your attention to addressing these research deficiencies as a matter of very high priority; otherwise, as with your dearth of animal and plant surveys, you are flying blind.

It seems futile to even think about "establishing a Brush-tailed Phascogale Management Area in the park" when several recent surveys have failed to record any (2nd column page 15). It would make sense only if in fact you found some.

We see that you have undertaken to encourage "Research into the impact of native grazers on vegetation communities in the park ..." (last dot point page 7), and we too share your interest in the conundrum, "What do you do if you see a critically-endangered animal about to eat a critically-endangered plant?"

Firewood and campfires

We see that you wish to encourage visitors to bring their own firewood (second column page 14), and we understand where you are coming from on this ("loss of habitat from firewood collecting" [1st column page 16]). However, there is always the possibility that that practice will introduce exotic pathogens like Cinnamon Fungus into the park. Some Parks have provided firewood for campers, and that is one way

you can be sure you know where the wood originated. However, all wood fires run the risk, particularly in the warmer weather, of getting away and causing mass destruction of flora and fauna, and we would see non-solid fuel stoves as a safer option. We accordingly do not favor your proposal to "Permit solid fuel fires ... in communal fireplaces at Melville Caves Camp Ground" and "Permit the collection of firewood for campfires in the Melville Caves section" (6.5 page 31).

Indigenous culture

We note that you have surveyed Melville Caves and Whela North blocks for Aboriginal relics, but have yet to do so in other areas of the Park (2.3, page 4). We would urge you to do this as soon as possible, as otherwise you have no guarantee that your prospecting overlay and provision for other recreational activities will not bring about disturbance of places and objects sacred to our Indigenous compatriots. It is no use reviewing practices once the damage has been done (last dot point, 6.10 page 34).

Historical Records

Despite the 1889 records fire, you should be able to ascertain *who* was buried in the Kingower cemetery (although probably not the exact plot *where* they were buried) (page 20) from death records held by the Registrar of Births, Deaths and Marriages. Registrations of deaths (as well as births and marriages) and burial details were originally sent into Melbourne by local registrars, so that Kingower records should be easy for the Registrar to separate out (for a price). If you are interested in following this up, contact the Registrar.

Mining

We view with serious trepidation the suggestion that the park might be mined for minerals and/or petroleum at some time in the future (page 41) and we vehemently oppose such a move. We believe that once an area has been recognized as a State or National Park or Nature Conservation Reserve in order to protect its native flora and fauna, mining and other extractive activities, which we see as totally antithetical to the concept of environmental conservation, must be excluded.

We trust that you will genuinely take into account the above comments in formulating the final Management Plan.

Yours sincerely,

Signed

David Reid

President
Bushwalking Victoria