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Manager
Park Planning and Procedures
Environment and Heritage Division
Parks Victoria
Level 10, 535 Bourke Street
Melbourne VIC 3000

Dear Sir/Madam

***NGOOTYONG GUNDITJ NGOOTYONG MARA SOUTH WEST DRAFT MANAGEMENT
PLAN AUGUST 2013***

Thank you for the opportunity to comment on this Draft Plan.

Bushwalking Victoria (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 is impressed with the quality of the report, which is comprehensive and articulate, and there are very many aspects of the report which BWV strongly supports. There are, however, several facets of it that raise concerns for BWV, and these are detailed below.

Public Consultation

We note your intention to rationalise tracks in Cobboboonee and Mount Richmond National Parks (page v), and we look forward to being included in the public consultation process you envisage prior to specific changes being effected.

Adaptive Management

There are many references to "adaptive management" throughout the report (eg page 29). The term has always seemed to us to be synonymous with "trial and error", and when you are dealing with species that are threatened, endangered or even critically-endangered, you

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

cannot be so cavalier. Action needs to be preceded by relevant research, some of the gaps in which you have identified in the body of the Draft Report.

Horse-riding

We see that “maintaining horse-riding access in parks and reserves, especially in Cobboboonee National Park ...” is an issue identified by “Open House participants and the community mapping projects” (page 10; see also pages 53 and 64). We certainly recognise this as an issue also. In our view, horses have no place in National and State Parks or Nature Conservation Reserves because of their cropping tendencies, impaction and pugging of the soil, the effects of their excretions on water quality, their propensity to spread weeds through their dung, their size and scent, which may frighten native animals and interrupt their foraging habits.

Environmental Effects

We do not agree with your oft-repeated aim of “minimising” environmental effects of various strategies you wish to employ. You should be aspiring to achieve NO impact.

Conservation and Recreation

We find it difficult to believe the indication from Table1 (page 15) that Wildlife and State Game Reserve (Hunting) areas are “managed primarily for conservation”. We likewise have always found it hard to reconcile the two components of your “Conservation and Recreation Zone” (page 18), as the latter is bound to produce deleterious effects on the former. You do not think that there will be “significant impact”, but it is almost axiomatic that there will be. By all means have a “Conservation Zone” and a “Recreation Zone”, but not a zone which pretends that these two oxymoronic ingredients can be felicitously amalgamated.

Measures

The use of the word “Measures” throughout the Goals and Strategies tables from page 22 to page 78 is misleading, as it would suggest some form of mensuration. That isn’t the case however: what is evidently meant is the method or means or procedures through which the various strategies are to be achieved. No measurable objectives are given, so perhaps a better word would be “Procedures”.

The “Measures” stated, because they are not quantifiable, scarcely tie management down to specific targets, and in essence the bar is set so low that no effort at all is required to clear it. Particularly prevalent is the procedure “Regular management reporting”, and how this is supposed to “restore ecosystems”, “build ecosystem resilience”, “protect ... climate change refugia” and “reduce kangaroo abundance” (pages 22-25) is completely beyond us. Generic, motherhood statements like this one place no responsibility on management to do anything much, and do not provide yardsticks against which management progress towards achieving related strategies can be assessed. In short, the “Measures” need tightening up in order to furnish management with *specific* procedures by means of which associated strategies can be implemented, as well as containing within their description some method by which progress in effecting the strategy can be measured. For example, the strategy “reduce kangaroo abundance” might have the related procedure “Native animal control program including regular monitoring of kangaroo numbers and the extent of Grassy Woodland regeneration”; “Regular management reporting” doesn’t even get close to describing what needs to be done.

In at least two instances the “Measures” are just plainly wrong. At the top of page 27, the strategy “Work with partners to reduce fragmentation” is accompanied by the Measure “Pest animal control program”. This Measure should surely be “Co-ordinated partnership programs”. At the bottom of page 30 the Strategy “Reduce fox and cat abundance ...” carries the Measure “Area treated for pest plants” which should doubtlessly read “Pest animal control program”. The Measure in the second paragraph on page 32 is inappropriate for the Strategy about ground-disturbing machinery, as this is not used during planned burning, but during fire-suppression operations. Regarding page 45, we think that all the “Regular management reporting” Measures except the first two should be “Activities and programs undertaken with the Gunditjmarra”. Similarly on page 49 we believe that the Strategy “Manage access to Gunditjmarra-managed land ...” should not be followed by the Measure “Regular management reporting”, but by “Activities and programs undertaken with the Gunditjmarra”. Liaising with DEPI (penultimate box, page 72) is not a matter of “Regular management reporting” but of “Co-ordinated partnership programs”. The first, third and fourth Measures on page 74 should also read “Co-ordinated partnership programs”. This slapdash approach to the attaching of Measures to Strategies does not bode well for concerted action to implement strategies through stated procedures. We find the Measures formulaic, unenlightening as to intent and offering no impetus to serious action.

Planned Burns in IPAs

The Strategy in the antepenultimate box on page 38 has PV working with itself to implement planned burns in IPAs. What you mean is “DEPI, PV and CFA work together to implement planned burns ...”

Context Definition of Care for Country

We see real problems in the last sentence of the Context description on page 48, viz: “Looking after country involves caring for all aspects of country – all living things ...” because “all living things” could embrace feral animals and pest plants. Although you are directly quoting from Context, apparently with approval, the wisdom of citing the last segment as it stands must be questioned.

Promotion and Visitation

The relatively low levels of visitation to the South West documented at page 51 point up the need for greater promotion of the area. You note that visitation tends to be concentrated in “the more-developed tourist-orientated sightseeing areas along the coast and river.” What visitors need to know more about is the magnificent volcanic remnants which exist in Stone Country. The Western District and the area just across the border into South Australia comprise the third largest lava plain in the world, with some 400 separate volcanic vents, including, in the southwest area, geologically only recently extinct volcanoes like Mt Eccles and Mt Napier which provide excellent insights into a period of volcanicity that was widespread and violent, enshrined in Aboriginal folklore and preserved in geomorphological relics that delight the eye and literally fire the imagination. The area needs to be constantly and enthusiastically promoted. While we walkers enjoy traversing country not overrun with tourists, we realize that somewhat larger numbers of visitors are likely to bring benefits to us in better signage, facilities and documentation without spoiling the experience for everyone.

Facilities and Visitation

Besides the need for more PR, there is, inherent in your statement about visitors going to the more-developed areas, the need for more facilities in Stone Country. There is virtually

nothing at Mt Napier or Byaduk Caves, and even Mt Eccles, with its dramatic Lake Surprise, is somewhat underdone from this viewpoint. 'Put in the facilities and the visitors will follow' seems to be the way these things work. Where visitors are going is not a measure of interest, but of the level of facilities that have been provided for them. This means that the rationale underpinning Visitor Experience Areas and "visitor sites" (page 53) is based on a false premise and logically flawed. Consequently we are appalled by your Strategy at the bottom of page 54 – "Identify sites that make no significant contribution to VEAs for decommissioning or closure". You envisage such exercises in relation to Cape Bridgewater VEA (page 56) and visitor sites on the Great South West Walk (page 57) and at Mt Richmond (page 61). We would ask that you rethink this issue before proceeding down the proposed paths.

VEA Ratings

Leading on from this, we cannot understand why, amongst the VEAs, Mt Napier SP and the Byaduk Caves should be rated as only "locally significant" (Table 4, page 54) while Mt Eccles, which contains some similar volcanic features (although admittedly with the addition of Lake Surprise) is more highly rated as "Regionally significant". Offsetting the presence of a crater lake at Mt Eccles are two unique features of the Mt Napier complex:

- (i) it is "the highest volcanic point in the Western District Plains," (page 60) with imposing views and crater, and
- (ii) it is the source of the 9km-long Harmans lava flow in which the very extensive Byaduk Caves are located.

You don't even include Mt Napier in the heading at section 6.2.13 (page 60), only mentioning Byaduk Caves; that sells Mt Napier very short. It has much to offer visitors.

Roads, Tracks and Trails

2WDv4WD

Pages 51 to 53 cover the important subjects of roads, vehicular tracks and walking trails, and raise some contentious issues. The mix of 2WD and 4WD roads favours the latter, which is puzzling in that protecting the environment is PV's paramount function, yet your road and track arrangements favour vehicles which are heavier and more damaging to roadways than 2WDs, sometimes display a tendency to stray off road because they have that capability, and cause much more pollution than their 2WD counterparts. There is also an element of elitism, with those who can afford 4WDs able to gain more access to parks and reserves than their poorer 2WD owners. There needs to be more 2WD access throughout the South West area. The Strategy "Maintain the public road network ..." (page 52) is consequently inadequate because there is no provision for improvement of the network in this Strategy. The same criticism can be levelled at the Strategy "Maintain the trail network ..." (page 53). In fact here the trend seems to be going in the other direction, with plans to look at track rationalisation opportunities (op cit).

Shared Trails

There is also the problem of shared trails, which are alluded to on pages 52 and 53. BWV wants dedicated bushwalking trails wherever possible. Sharing trails with vehicles, horses, trailbikes and mountain bikes diminishes the enjoyment of walkers and other users alike, while there is a very significant safety factor involved. We should add that although we very strongly desire discrete walking trails, we would rather share with other users than have no access to an area at all. This is true, for example, of the evolving Budj Bim Trail, which it is envisaged will be used by vehicles, bicycles and walkers (page 55). We welcome the trail, but

regret its multiple use. Where trails like this are for multiple use, signage alerting users to the other types of groups employing the trails should be installed to reduce the likelihood of accidents.

Mt Napier Roads and Trails

While on the topic of roads and trails, it should be mentioned that signage on access roads connecting with Mt Napier walking trails is totally inadequate, and relevant maps are often misleading as well. Map 3A of your report shows a road leading off the Mt Napier Road (untitled on your map, but actually the “Mt Napier Access Road”) that joins one of the two walking trails to the summit. In fact this road is closed to traffic, and although it is accessible by foot, there is no signage which indicates that this is a walking trail that leads to the summit, and there is no parking area at the Mt Napier Road-Mt Napier Access Road junction.

The best access for 2WDs is from the Hamilton-Port Fairy Road, down Murroa Lane, Coles Track and Creek Track then past Menzies Pit to a parking area from which a trail leads to the summit. There is no signage at the junction of the Hamilton-Port Fairy Road and Murroa Lane (or at the alternative access intersection of the Hamilton-Port Fairy Road and Murroa-Buckley Swamp Road) which would suggest that these are roads leading towards the start of one of the Mt Napier walking trails. Neither is there any continuing signage at other intersections on the way in that would suggest this. It is small wonder that Mt Napier is little visited when no one can find it! The roads in, too, are largely of poor quality, which is another dampener for potential visitors. The rating of “locally significant” for Mt Napier probably has its origins in the fact that only locals actually know where it is! This VEA really needs attention; it is currently virtually completely neglected. Brown signs at strategic points would definitely help open up this imposing feature.

Dog-walking

Dog-walking in National and State Parks is inimical to the values you are supposed to be protecting, yet we see at page 63 that you condone dogs on leads in Dergholm and Lower Glenelg National Parks. We would implore you to reconsider those decisions.

Trailbike-riding

We are astounded to learn (page 67) that you are to permit trailbike-riding in Conservation and Recreation Zones and even Conservation Zones in National, State and Coastal Parks and Nature Conservation Reserves. The noise and erosion these bikes engender is horrific, they scare native animal life, they often do not stay within their designated areas, and they should consequently never be permitted to operate in NPs, SPs, CPs and NCRs.

Trailhead Tracknotes

One thing that is missing from the informational services you provide for visitors (page 68) is tracknotes at trailheads. This was once common, but seems to have fallen into neglect. We would like to see it reinstated, as it helps inexperienced walkers to navigate and experienced walkers to appreciate the flora and fauna, culture and physiography of the areas through which they pass.

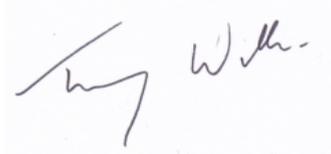
Colour Contrast and Print Size

The appended maps contain a lot of useful information, but are marred by their minimal readability because the print does not stand out against some of the background colours, and the print size is at times too small to decipher without a magnifying glass, e.g. the

altitude of Mt Napier on Map 3A. We also find the blue on green Goal/Strategies/Measures boxes difficult to read, particularly in artificial light. You might like to adopt better-contrasting colours in the final version of the Management Plan.

We trust that you will genuinely take our views into account when developing the final plan.

Yours sincerely

A handwritten signature in black ink, appearing to read "Tony Walker". The signature is written in a cursive style with a long horizontal stroke for the 'y' and a distinct 'W' for the first part of the last name.

Tony Walker
President