



Submission to Great Otway National Park & Otway Forest Park Draft management plans

2nd June 2008

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The Otway Ranges Environment Network (OREN) is pleased to make a submission to the draft management plans for the Otways.

1 Missing specific flora and fauna and other issues.

It is the view of OREN that much more detail about the Otway flora and fauna values must be included in the final plans. The additional information would be similar to issues already covered by the existing Otway Forest Management Plan (OFMP). The current OFMP includes descriptions, map and photos of some of the key Otway flora and fauna values.

It is clear that a standard format is generally used for National Park Management Plans but this format is a step backwards from the detail provided in the past Otway Forest Management Plans which included photos within the body of the report to help explain the values. The new Otway plans should be educational guides as well as management guides. Some specific values need to be described in detail rather than disorganised within the document so only a few knowledgeable people will ever understand.

The proposed new plans are clearly a step backwards from the point of view of informing and educating the community about specific nature conservation values of the Otways.

Some of the key flora and fauna values included in the OFMP that have no specific detail in the proposed new plans are:

Tiger Quoll (See OFMP section 6.3.4)

Tall Astellia (See OFMP section 6.2.3)

Brookers gum (See OFMP section 6.2.3)

Heathland communities (See OFMP section 6.2)

Cool Temperate Rainforest Communities (See OFMP section 6.2.1)

Otway black Snail (See OFMP section 6.3)

At a minimum, all the existing information in section 6.2 and 6.3 of the OFMP must be updated and included in another special chapter in the "Caring for the Otways and you" plan. There should be a specific section about each flora and fauna value, including photos. Threats to these flora and fauna values need to be clearly stated and measure put in place to ensure the values are protected.

The following specific issues need to be included in the new plans however the inclusion of flora and fauna values should not be limited to these.

1.1 Cool Temperate Rainforest

A description and map showing the location of rainforest in the Otways should be included. Additionally a map and description of all ten Otway Rainforest Sites of Significance as defined by Cameron and shown in table 6 of the OFMP (Section 6.2.1) needs to be included in the new management plans. A description of threats to Otways rainforest should also be included; threats such as fire, climate change and the Myrtle Wilt disease (See OFMP section 8.4.3). Additionally management measures to ensure the long term protection and survival of Cool Temperate Rainforest should be included.

1.2 Tiger Quoll

The location of Tiger Quoll SMZ/SPZ should be identified, and information included about Quoll threats, habitat requirements and past quoll number survey results. Further work on tiger quolls in the Otways should also be outlined in the plans.

1.3 Heath Communities

There are extensive vulnerable heath land communities. Specific mapping should be provided to show where these communities are located. There are real threats by recreational vehicles use such as 4WD, motorbikes and mountain bikes. The management plan needs to incorporate specific details of how these threats are to be managed.

1.4 Aire Heritage River and Corridor

There is a good description of Heritage River values for the Aire River. However there needs to be a map showing the location of the Aire heritage river corridor.

Recreational aircraft is one activity that is not compatible with the Aire Heritage River corridor. (See 5.2 below).

There should be a statement within the plans requiring the draft management plans for the Aire heritages river to be finalised.

1.5 Geology and Geomorphology (Lake Elizabeth)

The details included in section 6.7 of the OFMP need to be updated and included in the new plans. Section 4.3 of the new draft management plan should be called Geology and Geomorphology.

There should be a detailed description of the significance of Lake Elizabeth under the heading of geomorphology and an historic background regarding the lake's formation by a land slide in the 1950's.

The current description of Lake Elizabeth in the draft heritage plan Appendix 1 does not describe the geomorphology in any detail and is not accurate as there is no mountain ash forest growing around this lake.(Manna Gum does grow around the lake and looks like mountain ash.)

1.6 Old Growth Forest

A description or explanation and importance of old growth forest needs to be included in the plans. There should be recognition within the plan of old growth areas within the Otways, such as the Big Trees Reserve in the West Barham. (See OFMP section 6.3.2). There are other areas of old growth in the Otways that were mapped by VEAC and are also indicated in the senescent forest age class as part of SFRI mapping conducted over the last decade.

Given there is still uncertainty about the status and extent of old forests in the Otways there needs to be formal on-ground survey work carried out. There should be community involvement in this process which would determine the true extent of old growth forests in the Otways. This will aid with the long term management and should be a goal of the new plan.

2 History: role of conservationists/community in forest protection

2.1 Issues with historic documentation and perspective

There is much written in the Draft Heritage Action Plan of the role of logging in the history of the Otways. However there is very little recognition of the community's roles in the ban of logging for woodchips and sawlogs, and the creation of the Great Otway National Park and Otway Forest Park.

The community has been actively influencing how the Otway nature conservation values should be managed at a political level for at least the past two decades. This political involvement is the reason for the creation of the Parks and the end to logging and indeed why we are writing submissions for a new Management Plan for the Otways.

Hence the plans must acknowledge this history of the Otways. The following sentence needs to be added to Section 1.2 (in italic red).

1.2 Creation of the parks

The Victorian Environmental Assessment Council (VEAC) commenced an investigation relating to Angahook–Lorne State Park in 2002. *In 2002 the Victoria State Government was re-elected with new policies to end logging in the Otways and expand the existing Otway National Park; these Otway policies were a response to community pressure around logging and woodchipping in the Otways..* Hence the purpose of the VEAC investigation was later expanded to encompass additional tasks, including the investigation of a single national park in the Otway Ranges and the addition of State forest areas to the protected area network.

The addition of this sentence at the beginning of the report would set the scene and the rest of the plan must include more detailed information on this critical element of the history of the Otways. At this stage, the only reference to the role of the community in ending logging and arriving at this point in the history of the Otways is a single paragraph on page 5 of the Heritage Plan;

Beginning in the 1980s, an active environmental movement advocated the cessation of logging in the Otways and protests were held at a range of sites in the forest including Ciancio Creek, Sabine Falls, Wild Dog Ridge and Riley's Ridge (www.oren.org.au). The Victorian Environmental Assessment Council subsequently undertook a major study which recommended declaration of the Great Otway National Park and Otway Forest Park.

There is no reference in Appendix I of the Heritage plan of the to former protest sites Ciancio Creek, Sabine Falls, Wild Dog Ridge and Riley's Ridge. These must be added to Appendix I table along with Triplet Falls (the place where the Premier announced an end to logging in 2002 and where, in retaliation, loggers vandalised trees on a tourists walking track in 2003).

The historic background must include the act of aggression by way of the vandalism of Triplet falls in 2003.

There needs to be more detail about the role of the "environmental movement" in the creation of the Great Otway National Park, with equal amount of text as is dedicated to history of logging. This is an important contemporary issue that is still very much of interest today.

Additionally there should be a description of the issues for which the community wanted an end to logging in the Otway; these should include the effect of logging on the Otways as domestic water catchments for 300 000 people, the fact that logging was woodchip-driven, and destruction of nature conservation values by logging.

NSW Government documents acknowledge the role of conservationists in the protection of native forests and outline the issues that were crucial to this history. The Victorian government should do the same rather than attempting to “brush it under the carpet”. An example of NSW documents is included below.

Protests and conflict over forest management practices, the scale of woodchip operations and the loss of old-growth and wilderness values became common in the 1970s. The junction of the Forestry Commission diversion trail and the original Wog Wog forest trail was the site of a major confrontation between conservationists and forestry workers in the 1980s. The Coolangubra Protest site witnessed a symbolic battle over the issue of logging and development of old growth forests in south-east NSW. These protests were instrumental in raising awareness of forestry issues in Australia. This awareness led to the declaration of several national parks over former state forest areas and eventually to the reservation of the South East Forest National Park.

<http://www2.nationalparks.nsw.gov.au/parks.nsf/ParkContent/N0111?OpenDocument&ParkKey=N0111&Type=Xk#top> (As accessed 2 June 2008.)

2.2 Triplet Falls historic values

OREN is appalled that signage to describe the vandalism at Triplet falls was removed. The scar on the scenery is dramatic and an explanation is required. Permanent signage must be installed, and the fact that vandalism occurred must be acknowledged and dealt with in the Management plans. The Plan should also state that it would be advantageous to determine who was responsible for the vandalism and charges made.

As it stands currently, interpretation along the Triplet Falls walk acknowledges the roles of the logging industry. However there is nothing about the events that led to the inclusion of the area as a National Park and ban on logging. These needs to be acknowledgement that Triplet falls was the site of the following significant events.

- Announcements to end logging and create a Great Otway National Park. (November 2002) ,
- There was a significant act of aggression and vandalism (March 2003).
- The opening Great Otway National Park (December 2005).

This is an issue that OREN and many in the community will not allow to be forgotten.

3 Demise of the native forest logging industry on Public land

As of the 31st May 2008, all public land native forest logging in the Otways came to an end. All references to sawlog harvesting and woodchip harvesting need to be deleted as they will no longer be relevant. This includes references on pages v, 3,14 “Caring for Country, The Otways and you.”

Also OREN thinks there is no need for the statement on page 38 under Section 5.3 *Social values*.

Some people are concerned that the creation of Great Otway National Park will adversely affect social values, while others believe that social values will be enhanced.

When the Victorian public went to the State polls in 2002 it was the opportunity to vote for the creation of the Great Otway National Park and the end to Otways logging. This Victorian government was elected with a mandate to create the Great Otway National Park. The legislation that created the Great Otway National Park was passed through parliament with support from both the Liberal and Labor political parties in 2005. Hence it was clear that although a vocal few are opposed to the creation of the Great Otway National Park, the vast majority support its creation. Unless the actual numbers of people who are supporting and opposing the creation of the Great Otway National Park can be provided with this statement, then the statement should be deleted as it is vague and a misrepresentation of broad public sentiment.

The flowing extract from page 3 has factual errors and needs to be edited or deleted.

The parks are within the Surf Coast, Corangamite and Colac Otway Shires. The creation of these parks, combined with the earlier government decision to phase out sawlog and woodchip harvesting on public land, has significant economic and social implications for these shires and the Otways region. There are specific implications for industries associated with tourism, recreation, sawlog harvesting, woodchip harvesting, sand, gravel and stone extraction, mining and export, agriculture, fishing and apiculture.

- The announcements to end logging and create a new National Park were made at the same time (6 November 2002 at Triplet falls by the then Premier of Victoria Steve Bracks) .These decisions were not made at separate times as implied by the this statement.
- There statements that phase out of logging and woodchipping “*has significant economic and social implications for these shires and the Otways region*” is highly presumptuous as logging has only just been ended. Hence no-one can yet make the claim the decision to end logging has had an economic impact as sawlog and woodchip licence commitments have been maintained since 2002. The State government has also provided \$2.7 million to compensation to the native forest logging industry in a restructuring package to offset economic impacts. So where is the evidence that there has been an economic impact? Is this just a propaganda statement from within DSE bureaucracy? Please either produce some factual evidence or delete this statement. Facts regarding the economic consequences this would need to discuss the positive economic benefits due to the increased level of both tourism and the promotion of tourism that the region has enjoyed over the past 5 years.

4 Recreational Vehicle Use

During the logging debate, it became clear to OREN that roading associated with logging activities was identified as having the largest impacts on soil erosion which impacts on water quality in streams. This is well documented and mitigation measures are included in the Codes of Forest practices and Forest Management Plans.

However the same impacts from logging roads also apply to roads used by recreational vehicles. Hence now, post-logging, a major impact on nature conservation values in the Otways is the use of recreational vehicles; 4WD, motorbikes and mountain bikes.

OREN acknowledges that 4WD users enjoy the challenge of difficult driving conditions however it is our strong contention that the environmentally destructive 4WD driving must not compromise the Otway Parks' conservation values.

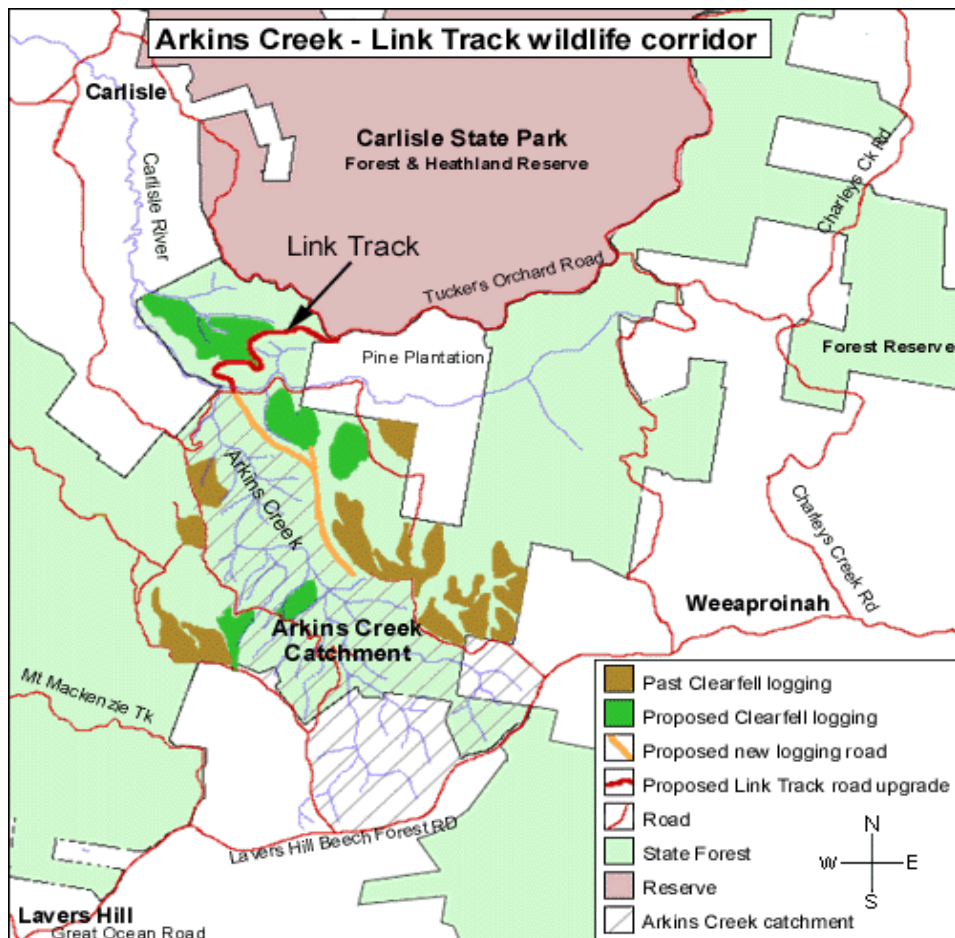
Conservation groups need to be formally included as stakeholders when discussion occurs regarding management of 4WD in the Otways. (See Section 6.0 below)

Specific issues with recreational 4WD use are as follow:

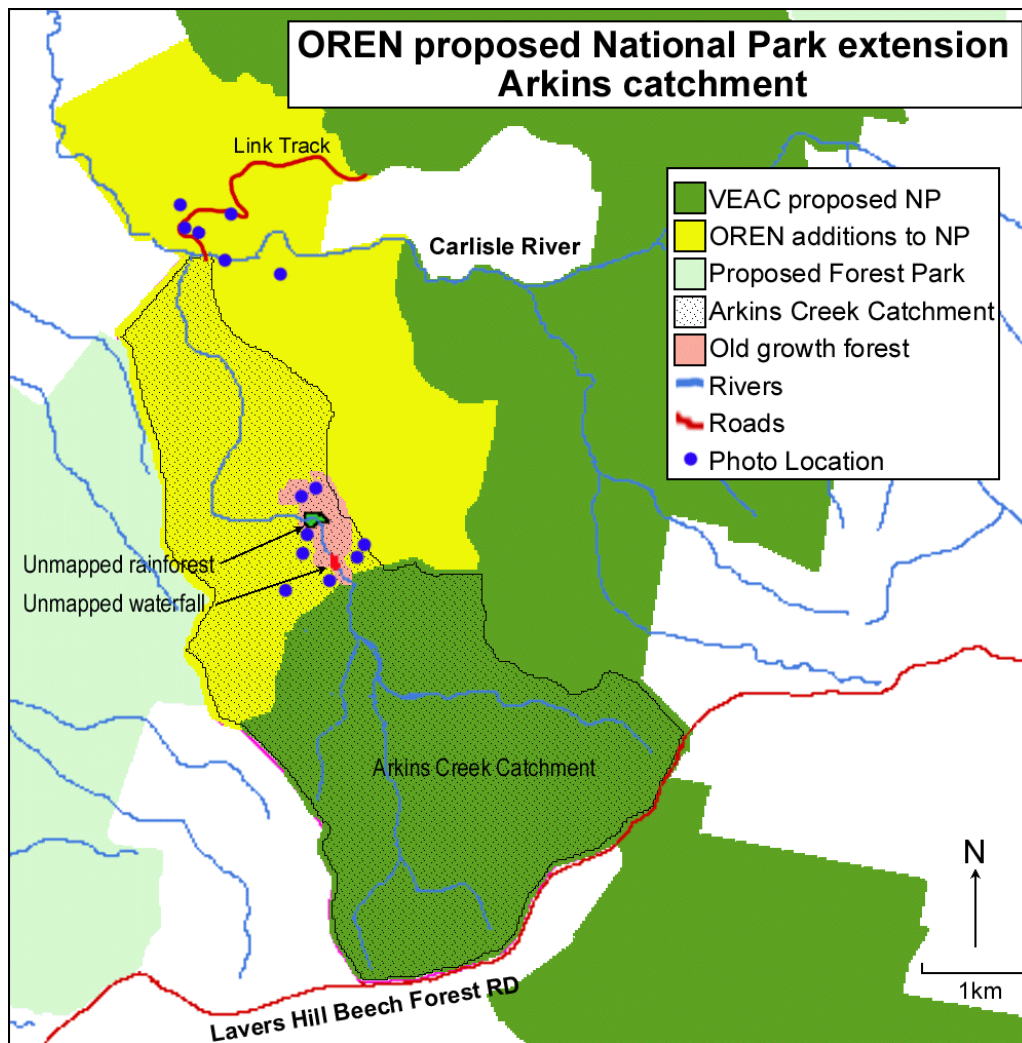
4.1 Proposed Link Track 4WD camping ground

Since 1999 conservation groups have taken a keen interest in the preservation of the Link Track area. OREN is totally opposed to the development of the Link track area has a 4WD camping area.

The Link Track wildlife corridor joins (or links) the southern end of Carlisle State Park to the north-eastern end of the Arkins Creek catchment with a strip of forested public land. The Link Track wildlife corridor varies from two kilometres at its widest to one kilometre on the Carlisle River. To the east of the Link Track wildlife corridor is a pine plantation and to the west, cleared agricultural land.



Map of Link track area from year 2000 when logging was proposed.



Map from OREN submission to VEAC regarding nature conservation values of Link Track area

OREN argued strongly in a submission to VEAC in 2004 that Link Track should be included in the Great Otway National Park for both its strategic nature conservation values as a habitat and wildlife corridor. This was accepted in the final VEAC recommendations for the Otways . (November 2004)

Hence the strategic nature conservation values of the Link tack area would be significantly undermined if a 4WD camping area was constructed. Given the size of the Dandos camping ground, a minimum 2ha would have to be cleared of undergrowth adding to further fragmentation of the Otways forests. This is completely unacceptable given the strategic position of Link Track.

Delaneys track on the south side of Carlisle river is currently overgrown. The development of a 4WD camping ground at the end of Link track combined with the new unused bridge access to the south side of Carlisle river will potentially encourage the overgrown section of Delaney's track to be reopened by recreation vehicles.

The pictures 1A and 1B are just a couple of the many pictures on a 4WD website showing a trip to the Otways. They highlight the sort of environmental vandalism conservationists are deeply concerned about. The fact these photos have been put on a 4WD website clearly show the 4WD clubs enjoy creating mud holes in the Otways to challenge their driving skills.

Allowing the construction of a 4WD camping ground in the Link Track area will encourage this sort of environmental vandalism to occur on Delaneys Track and Link Track. This is totally unacceptable given the National Park status these areas have recently earned.



Creek crossing in what looks like heath type country, claimed to be in the Otways. Note the clear fresh water flowing from the right into muddy pool, compared with the muddy water flowing down on the left. (Photo from 4WD website see www.fwdvictoria.org.au)



People watching the spectacle of a 4WD driving through mud hole, claimed to be in the Otways http://www.bellarine4x4club.org.au/gallery/main.php?g2_itemId=3537

The Draft Recreations and Tourism plan incorrectly claims that Link Track site has had a “previous history of camping use or disturbance”. (See Table 2 on page 13).

From 1999 to 2004 there has been no evidence that the site was used for camping or 4WD use. Also at this time there was no evidence the site had already been cleared for use for camping. Link Track effectively ended at the Carlisle River.

Between the years 2000 and 2004 the site was effectively closed off to the public as the area was scheduled to be logged. In 2002/2003 a logging bridge was constructed over the Carlisle River and about 50 trees cut across Link track to prevent vehicle access. To date vehicles still cannot get into the Link Track area. Hence any camping in the area would be a very recent activity.

The photos below show the Link Track area.



Small clearing on south side of Link Track Bridge that was constructed so logging could occur in Arkins Creek catchment. Jan 2003



General condition of understorey that would have to be destroyed to build 4WD camping ground. June 04.



Trees felled onto Link track to prevent vehicle use after bridge was constructed. Jan 03.

4.2 Curtis Track Cumberland River Catchment

After discussions with DSE, it is OREN's understanding there are about three stream crossings where 4WD vehicles have to drive through rivers. Two of these are in the Barwon Catchment (Geelong's Water Supply catchment) and one is on Curtis Track in the Cumberland River.

The Curtis track crossing is an extremely muddy situation on the upper Cumberland river. For a long time OREN members have been concerned about the impact of recreation vehicles on Curtis track in the Cumberland River catchment. This site is extremely difficult to cross with 4WD, at the best of times, and has become a bit of a 4WD challenge track. This is totally inappropriate given the National Park status of the Otways.

Over the past decade OREN members have witnessed, on at least two occasions, the need for the RACV to rescue bogged 4WD at this location. Winches and chains are required to pull out bogged 4WD drives; these cause further significant erosion.

OREN is of the strong view that Curtis track be either permanently closed or closed until a bridge or ford is constructed over the river to minimise erosion.

There needs to be acknowledgment in the new park plans that all stream crossings are to be upgraded to stop erosion and mud flowing into rivers.

4.3 Fuel price and the future of recreation 4WD use in the Otways

There are many reports citing that the recent dramatic rises in both diesel and unleaded fuel are permanent and that this may impact the future of recreational 4WD sport. There is strong evidence now that current fuel price increases will reduce the amount of driving we all do.

Evidence in the USA shows that the rise of fuel price in general is decreasing the amount of recreational driving (See Australian newspaper, 24 May 2008 *US driving falls first time in 30 years on oil prices.*).

A report from internationally recognised investment banking and securities firm Goldman Sachs expects that the use of recreation vehicles will decline with an associated decline in discretionary spending due to sustained high fuel prices.

As these broader energy supply constraints begin to become binding on a global basis, demand somewhere in the world has to be reduced, cut or forced to substitute into an alternative fuel. This dynamic can only be achieved through higher prices and the markets that are impacted the most are the ones that are the most price elastic – discretionary driving, leisure travel and industrial applications.

Goldman Sachs: Energy Watch: May 16 2008

Hence there is a need to look closely at the need for more development of recreation 4WD tracks and camping areas in the Otways in light of the current impact of rising fuel costs. It cannot be assumed to be business as usual in the future.

4.4 Mountain Bikes

OREN is outraged at the impact Mountain bikes have had on old growth grass trees at Gerangamete near Forrest (See figure 4 Cycling Touring Routes & Mountain Bike Tracks).

This type of recreational sport must not be allowed to compromise the natural environment. The map (fig 4) in the draft recreation plan still shows intensive use of the Gerangamete for cross-country bikes. A detailed map of Gerangamete needs to be drawn up to show the location of bike tracks.

Conservation groups need to be formally included as stakeholders when discussion occurs regarding the construction of future mountain bike tracks in the Otways. (See Section 6.0 below)

4.5 Motorbikes

There has been an increase in the use of recreational trail bikes in the Otways over the past decade. In particular there appears to be a deliberate practice of seeking to illegally trail blaze new tracks to open up overgrown tracks and ridge lines. There needs to be more active enforcement and monitoring of this activity. To aid this surveillance and report back, OREN suggests conservation groups work more closely with Parks Vic and DSE staff (See Section 6.0 below)

5 Tourism Issues

In general OREN supports forest-based tourism initiatives in the Otways that do not compromise the environment. However there are a few issues.

5.1 Trans Otways Walk

OREN supports the concept of a Trans Otway Walk in the Otways. The concept of such a walk has the backing of a substantial segment of the community.

Development of the track near cool temperate rainforest and waterfalls needs to be of a high standard to protect environmental values. The track needs to be designed to prevent the use of unauthorised trail bikes.

5.2 Helicopters and aircraft.

While supporting the overall inclusion of management of recreational aircraft with the plans (Section 6.13 draft management Plan) there should be “no go” areas in many parts of the Great Otway National Park. These should include:

- Aire Heritage river corridor
- Olangolah
- Wilddog valley
- East and West Barham
- Cumberland, Kennett Wye River and St Georges Catchments
- Sheepy Creek catchment
- Clearwater Creek and Calders creek catchments.

The Aire heritage river corridor has been identified by the community as a high priority area where recreational aircraft should not be permitted. As was demonstrated by the controversy that occurred when there was a planning permit proposal to allow helicopter joy flights down the Aire river to leave from the Otway Sky walk.

6 Formal Consultation with Conservation Groups

Section 9 of the draft plans deals with community consultation. OREN disagrees with the recommendation/action that the Otway Landscape Community Council (OLCC) be given the role of determining how community consultation strategy will be developed.

OREN is of the firm view that the community consultations strategies as recommended in the Victorian Environmental Assessment Council (VEAC) final recommendations for the Otways, be fully adopted.

OREN notes that :

- OLCC does not represent specific stakeholder groups or interests,
- OLCC had a very limited terms of reference
- the minister, not the community, determines the membership of the OLCC.

However OREN appreciates the good work undertaken by OLCC in bringing the community together to help develop new management plans for the Otways.

From 2003 -2004 OREN was represented on the Victorian Environmental Assessment Council community reference groups along with 4WD and trail bike users groups. During the VEAC process it was clear that the specifics of how issues like how tracks were to be used needed to be resolved in the formation of management plans and on-going consultations with stakeholder groups.

Hence VEAC's Angahook-Otways Investigation Final Report made a series of specific recommendations requiring stakeholder groups to be consulted on an ongoing basis. These recommendations are:

R1: PUBLIC LAND-USE

(c) existing management coordination mechanisms be retained and where necessary improved or supplemented, and opportunities for community involvement enhanced (see also Recommendations R10-11 below and Recommendation A2).

R11:ADVISORY COMMITTEES

That an advisory committee or committees, representing community needs and expectations, be established to provide input into decision-making within the Otways public land management framework.

VEAC provided a discussion and definition on what constitutes a 'advisory committees':

Membership of the advisory committee(s) would include, but not be limited to, representatives of the Indigenous community, environment and recreational user groups, relevant industry representatives, and local communities.
(See page 100 of VEAC Final Recommendations for the Otways)

Hence the new Otway Management Plans need to formally recognise the need for an advisory committee with key stakeholders as specifically recommended by VEAC. Failure to do this will be a breach of the VEAC final recommendations.

The advantage of this semi-formalised relationship is to send a signal to the broad community that management authorities are also working closely with people who hold the

conservation interest of the Otways as a priority. For example members of OREN have a wealth of knowledge regarding the recent history the Otways. This includes knowledge of nature conservation issues, track locations, conditions and an extensive network of local residents across the entire Otways landscape who know their own 'backyards' very well.

Groups, including OREN, have already been involved in past stakeholder consultation processes for the Otways. Precedents already exist. Examples include:

- In the years 2000 - 2002, former Environment Minister Garbutt set up Regional Reference Groups (See Ministers press release, 27 July 2000). OREN was formally involved in the "Otway Regional Forest Reference Group" along with other stakeholder groups.
- As discussed above, OREN was represented on the Victorian Environmental Assessment Council community reference groups for the Otways between 2003-2004.

Hence when issues such as the location of 4WD tracks (as outlined on page 46 of the draft management plan) are discussed, the reference groups along with management authorities in a joint effort, can discuss the location of 4WD and motorbikes tracks.

OREN notes that there is a memorandum of understanding between 4WD clubs and Parks Victoria regarding communication.

Parks managers and Four-Wheel-Drive Victoria have signed a memorandum of cooperation to maintain a positive and constructive working relationship to preserve and enhance four-wheel-driving in Victoria in an environmentally and economically sustainable manner. The memorandum sets up the Four-Wheel-Driving Committee as a forum for discussing and agreeing on recommendations for consideration in management decisions. At the regional level, a group of regional representatives has been formed to discuss and make recommendations on local issues.

From page 43 of "Caring for Country. The Otways and you."

OREN requests a similar formal communication arrangement in the form of a memorandum of understanding also be established with conservation groups.

7 Regeneration of clearfell logged areas

A considerable amount of the area now occupied by the Great Otway National Park and Otway Forest Park has been subjected to clearfell logging. Some of these areas have not “regenerated”. For example, areas where protests successfully stopped all the coupe from being logged may have small areas that did not get replanted as DSE had the view at the time, that logging would recommence in the future.

Additionally some areas have just failed to regenerate.

This is a potentially sensitive issue. There should be some statistical information within the plans regarding how much of the two park types have already been logged and the decades that logging occurred. This sort of information is already available on Forest Explorer online, however it should be included in the Otway Management Plans.

There needs to be identification and remediation strategies to ensure that all the ecosystems they were destroyed by clearfell logging are given the opportunity to regenerate.

Many old logging road need to remain closed as they are dead end roads that were only constructed for the logging activities.