



6<sup>th</sup> October, 2018

VEAC  
GPO Box 527  
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***'The loss of Victoria's biodiversity poses an unacceptable risk to human and ecosystem health, and dramatically reduces our ability to cope with major ecological threats.'* (Victorian Greens Biodiversity Policy, Principle 6)**

Dear Members of VEAC

Thank you for the opportunity to comment on the Central West Investigation Draft Proposals Paper, released for comment in August 2018.

### **We heartily endorse**

- the proposed creation of three new national parks, and believe that this should be extended to Mt. Cole State Forest and the Wellsford State Forest.
- the aspects that protect the rights and interests of Traditional Owners, native title holders and Aboriginal Victorians, and their cultural values.

### **Why not Wellsford National Park?**

We refer you to our original submission for the details of the argument put forward for changing the status of the Wellsford State Forest to Wellsford National Park. Through gathering additional information for the Central West Investigation submission it has become even more evident that the conservation values of the Wellsford warrant National Park status in order to achieve:

- maintenance of biodiversity – The CWI draft proposals paper acknowledges this on pages 114, 116 noting that the *Wellsford as a whole* supports key threatened species, including the brush-tailed phascogale, pink-tailed worm-lizard, lace monitor, Ausfeld's and whirrakee wattles, and a range of woodland birds such as swift parrot, chestnut-rumped heathwren, brown treecreeper, hooded robin, speckled warbler and crested bellbird.
- protection of habitat – The CWI draft proposals paper acknowledges (p. 53) that climate change is "likely to impact....reduced growth rates of trees", and we would add reduced recruitment.
- careful management of this valuable natural asset on the doorstep of Bendigo - Better levels of staffing in National Parks provides greater protection of biodiversity values.
- Effective management plans to safeguard the integrity of the forest – e.g. Parks Victoria rangers have instituted plans, with the help of community volunteers, to decommission illegal mountain bike tracks in the Bendigo National Park at One Tree Hill, whilst they are not enabled to do the same for the myriad of unsanctioned mountain and trail bike tracks in the Regional Parks surrounding Bendigo.
- preservation of the forest for as long as is possible in a warming world.
- No new bee keeping leases to be issued



We see no cogent reason advanced as to why the whole of the Wellsford should not be National Park.

However, as the Recommendations are for two different land classifications, neither National Park, we shall respond to those suggestions.

### **Response to Draft Recommendations D5, C2 (a) and (b)**

It should be noted here that we think these proposals would lead to a degradation of current biodiversity and habitat for the following reasons:

- The Wellsford Nature Reserve does not comply with the general recommendations for nature reserves as laid out on p. 69 (a) (iii) – “provide for low levels of recreational use consistent with strict protection and conservation of those values”. And yet trail bike riding and mountain bike riding is permitted in the proposed Wellsford Nature Reserve. These activities are totally unacceptable in a Nature Reserve as they will encourage HIGH levels of recreational use INCONSISTENT with STRICT protection and conservation (see following points). If four wheel driving in the Nature Reserve is allowed on roads other than specified in the general recommendations, the proposals should specify for what purpose e.g. hunting for pest animals as part of an authorised control program. Experience in Bendigo parks has shown that if the Nature Reserve is to mean protection of “significant natural ecosystems, species /geodiversity features” (p.69 CWI Draft Proposals) then trail and mountain bike riding must be specifically excluded.
- Weak provisions for the protection of biodiversity within the Nature Reserve and the Regional park in that four wheel driving and trail bike riding is allowed not only on vehicle tracks open to the public (which presumably have proper drainage to mitigate erosion, siltation through run off etc) but “on other roads and tracks as specified by the land manager”. This is vague and impossible to manage with the inadequate level of staffing provided to Nature Reserves and Regional Parks, thereby virtually sanctioning motorised vehicles anywhere that is not “off road” in a very sensitive and fragile ecosystem.
- Totally inadequate control of mountain bike riding because it is allowed in the Nature Reserve and the Regional Park and would destroy the integrity of the forest as it now exists. Note 5 in the ‘Conditionally Allowed’ provisions shows mountain bike riding is permitted “on other roads, tracks **and paths** as specified by the land manager”. This gives a signal to mountain bike riders that they can use even kangaroo tracks to carve out new runs, which would translate into unfettered creation of tracks everywhere by mountain bike riders as has been the case in many of the other Regional Parks created in 2001(see Appendix 1 White-ant forest values by Richard Goonan, President of the Bendigo Field Naturalists Club). We find this provision totally unacceptable as it shows a disregard for the identified natural values that led VEAC to recommend the creation of a Nature Reserve contiguous with the Mt. Sugarloaf Nature Reserve. Should the Regional Park recommendation go ahead we believe it will not preserve or maintain current biodiversity values, but will indeed threaten



the biodiversity and health of the Big Trees area and the Mt. Sugarloaf Nature Reserve.

- It is impossible to police and maintain boundaries between the Nature Reserves and the Regional Park. Nature Reserves (supposedly) have a lower level of recreational use, but there would be no way that the public could know this, and the paucity of rangers means that public use would not be monitored.
- A network of mountain bike trails, unsanctioned and unsupervised, would promote invasive species adapted to disturbance, and destroy sensitive indigenous understorey, erode soil, promote siltation and fragment habitat.
- Domestic Firewood Collection must not be allowed in the Wellsford as this adds to the destruction and fragmentation of habitat. Also, there is no time limit mentioned to provide a brake on the practice. *Greens policy is that native forest must not be used as fuel.*
- There is no need to allow prospecting in the proposed Wellsford Regional park as by their own admission, prospectors say there is no gold in the Wellsford (see Appendix 2, Bendigo Advertiser Sept. 7, 2018). Again, unnecessary disturbance to no avail.

### **Conclusion**

The Bendigo Greens applaud the steps taken to provide greater protection for the Pyrenees, Wombat and Wellsford. We would like to see the whole of the Wellsford area in National Park. If this is not to be, we urge VEAC to strictly specify the limitations to firewood collection and recreational uses in line with the gazetted recommendations for Nature Reserves and Regional Parks, and in line with the arguments presented in this submission.

Yours faithfully,

Ben Goldsmith and Nathan Wingrave  
Co-convenors, Bendigo Greens