

Belfast Coast Draft Management Plan

Submission by John Miller

41 Cox Street, Port Fairy 3284

Jmiller3350@gmail.com

Ph: 0427 871 714

I have read the Belfast Coastal Reserve Draft Management Plan January 2018 and make the following comments for consideration in the preparation of the Final Management Plan.

My comments are specific to particular sections of the plan. Where appropriate I have lifted sections or words from the plan with the section number and heading and added my comments below the quote.

1.1 About the draft management plan

The Belfast Coastal Reserve Draft Coastal Management Plan is a strategic guide to the management....

The document is inappropriately named – it is not a management plan, it is a strategic guide as stated. While the document does set the overall directions for management it does very little to direct management responses to specific issues.

What needs to be asked is: could I manage the reserve based on the instructions in the document?

I do not think the answer is yes.

I understand that “management plans” are a requirement for areas managed by Parks Victoria but to refer to the current document as a management plan is misleading. I further understand that there is a composite management arrangement for the planning area, which is a problem in itself but probably beyond the scope of the plan to address, so those groups may have other requirements for the document but a management plan should specify management actions – ie what will be done. Not what will be considered, thought about, consulted about or gathered from others if they just happen to do any investigations. As an example in Section 4.4 strategies: *Build capacity for the conservation of Aboriginal cultural heritage, site protection and restoration*. What is that actually telling the land manager to do? How is that measured? How do you or the public know if that has been achieved (whatever it means).

Good planning should be S.M.A.R.T.

S – Specific

M – measurable

A – attainable

R – Relevant

T – Timely

The plan does not pass this test.

Solution: Call it a strategy and have the strategy require that specific plans, with aims and actions, be developed for each of the strategies.

2.1 Vision

Para 5:

The natural values of the coastal landscape have been maintained and enhanced.

If this is part of the Vision I see no evidence within the document of any attempt to identify and understand the natural values of the planning area. All that seems to be planned is to *sort-of* manage the stuff that we know about and gather information serendipitously from others, but only if they think of it first.

Where is the leadership in this? What does PV or the other managers want to know about the planning area to ensure it is managed appropriately? As the plan says later in Section 5.2 *Marine Ecosystem: Marine habitat mapping has not been conducted for the planning area.....* but there no strategy to indicate that you actually want to know what is being managed? Merely supporting a volunteer group does not cut it and is an abrogation of responsibilities.

3.1 Management zones

I am generally in support of the management zones, and their locations, as proposed with two exceptions:

- Racehorse training is a commercial operation and if it is to be retained (more of that later) it should be within a commercial (or development) zone. Call a spade a spade. It is not recreational.
- I think the southern shore of Belfast Lough should be within the Conservation Zone. It is an important samphire area potentially important for Orange-bellied Parrot and is better placed in the Conservation Zone to ensure that potential recreation activities do not encroach on this area

4 Cultural landscape and living heritage

Generally in agreement but again wishy-washy goals with no solid actions.

5.1 Managing coastal ecosystems

We could argue all day about the risk matrix and what sits where but it seems to provide a reasonable basis for management decision making. The problem is that the plan has not responded to the risks as set out. If, as the table indicates, horses provide an extreme risk to coastal dunes and resident and migratory shorebirds even following remedial management actions, why is the plan even considering these uses as appropriate?

While it is noble to have a goal of undertaking invasive weed management through:

- *Prioritising treatment of new and emerging weed species infestations e.g. Sicilian Sea-lavender;*
- *Staged control of priority woody invasive weeds e.g. reduce Coast Wattle;*
- *Containing the expansion of Marram Grass.*

What is the specific, measurable and attainable goal? Reducing infestations by 20%, 50%? Containing Marram Grass – really? Has the infestation been mapped so we know what it will be contained to? How will it be “contained”?

What is the staged control of wattle based on? Zoning; specific sites; roadsides?

There is no direction or even broad guidelines for management as to how to prioritise control measures. Will Warrnambool Council prioritise similar areas to Moyne?

5.2 Managing marine ecosystems

Why is this section even in the plan? The preamble talks about everything except what is happening within the planning area and the goals provide no instruction to find out what is happening within the marine environment other than the establishment of a volunteer group. This is unsatisfactory and no basis for management.

And I have no idea what the following goal means:

- *Support an integrated, catchment based approach to improve water quality and reduce both aquatic and marine pest plants and animals, including marine and aquatic mapping, monitoring and research activities to inform management decisions e.g. EstuaryWatch*

Not bad when it is not even known what the marine pest plants and animals are or where they are in the planning area.

5.3 Water management

Again, largely waffle except for the reference to the existing Merri Estuary Management Plan. But why not make it a goal or strategy (or whatever) to ensure the existing plan is implemented. At least that would be something concrete for management actions.

Strangely the single goal states:

Water levels in the Lower Merri are managed to maintain resilience and aquatic values in the wetlands and estuary.

Good, and feeding off the existing plan, but no mention of the Belfast Lough except as a strategy to maintain its water quality. Why is this not a goal or broaden the goal to include all waterways?

And, how exactly will the water quality in the lough be maintained when it is completely outside the scope of the plan to have any influence on water coming down the Moyne River?

5.4 Fire management

What might be the aim of a planned ecological burn? What is being targeted for both reduction and enhancement? It seems that fuel reduction burns are not proposed (at least it is not stated that they are). So, if ecological burns are a possibility then managers need to know what ecological feature might be targeted and how it could benefit to make any sense of a possible ecological burn. Surely this was discussed and canvassed during the preparation of the draft plan?

And what of the risks? A management burn could end up with Coast Wattles germinating all over the place and therefore (presumably) a more intense and costly weed control program following a burn. This has not been included or addressed in the risk matrix, and it should be, to highlight to managers the risks associated with the action.

5.5 Climate change

Great to see it has been thought of but there is nothing in the plan for the management of this issue. The bottom line is that nothing can be done within the reserve for climate change except for the protection of infrastructure, and it seems that that only means car parks and tracks for this reserve.

The goal should just be to protect facilities, the rest is wasted verbage.

6 Recreation and use

Generally pretty happy with this section of the plan. I would suggest however that “Bush walking” includes beach walking which should be added to the “only on designated tracks or on the beach”.

Regarding recreational horses (identified as an extreme risk in the risk matrix even after management), personally I would remove them but I understand that this may not be possible in the current climate. But it would be nice to know, and have it explicitly stated in the plan, that if resident and migratory shore birds are being adversely impacted then recreational horse riding will be banned. The plan needs to take a position – what is more important: shore birds and international agreements (JAMBA, CAMBA) or horses?

The saving grace for recreational riding at this stage would seem to be the low numbers and sporadic impacts as compared with commercial racehorse training. I have further addressed this in Section 6.5 below.

A few comments to consider:

- Why is commercial horse training included in *Table 6.1* and mentioned under *6.4 Site Strategies for Golfies; Killarney Beach; Levys beach access; Kellys Swamp Track between Big Baldy and Spookys beach access; and, Rutledges Cutting, Gormans Road carparks number 1, 2 and 3.*
 - It is an Authorised Use (Section 6.5) and not a recreational use.
- Rutledges Cutting, Gormans Road carparks number 1, 2 and 3: *Permit small numbers of horses training under license at Ruteledges Cutting to provide for local trainers that have historically used the reserve.*
 - What is a small number? This must be specified – it is a management plan for heaven’s sake.
 - “History” has nothing to do with good management. The fact that things have been done historically does not mean that is appropriate or suited to the current reserve.
- *Kellys Swamp Track between Big Baldy and Spookys beach access: Licence horse training at Hoon Hill - conditional upon adequate risk management and compliance. Monitor compliance and periodically review conditions of use.*
 - Do I assume this is a typo and it is supposed to refer to recreational horse riding?
 - What is adequate?
 - How will adequate be judged or measured?

- Compliance with what?
- What period for review? This must be specified otherwise it will not be undertaken. I suggest annually.
- What are the conditions of use and on what basis would they be altered?

6.5 Authorised uses

Beach training of racehorses

I quote from the plan:

Paragraph 3: The racing industry contributes to the local economy through employment and support to local businesses. Thoroughbred racing in the south west region brings benefit to the local economy. A size and scope study from 2014 revealed that the racing industry generates more than \$97 million in the area, employs more than 950 people full time with almost 4,500 involved as employees, volunteers or participants (Warrnambool Racing Club 2016). The 2017 Warrnambool May Carnival injected over \$10 million into the local economy, attracting over 30,000 people, of which 68% were attendees from outside the Warrnambool region (Warrnambool Racing Club 2017).

Sophistry at its best! The plan is supposed to be about the proper management of the Belfast Coastal Reserve, not about the grand economic claims of the Warrnambool Racing Club (WRC). The WRC claims are completely irrelevant to the development of a reserve management plan and should be removed from the final plan.

The only purpose I can see in incorporating such specious information is as an attempt to sway readers into supporting a ridiculous proposition. It is a non-sequitur to attempt to link the dollar value of an industry to the management of a coastal reserve. Who do you think is being fooled by these types of statements?

I may be a bit equivocal about recreational horse riding in the reserve but I am completely unequivocal regarding commercial horse training.

Commercial race horse training should not be permitted at any location within the reserve or on any other beaches or dunes in the region. It is a commercial operation that has no place within a public reserve.

There is no requirement for a phase out period – they should just go. Given the value of the industry to SW Victoria it would seem they should have no problem in providing purpose built training facilities in a place where there are no conflicts with ecological processes or the “visitor experience”.

A little bit on shore birds as it relates to commercial racehorses

A range of wading birds, including the Hooded Plover, use the beaches within the reserve. However, it seems that the complete emphasis has been placed on the nest location of Hooded Plovers with little or no regard to the other components of their habitat or other shore bird species. The birds, including Dotterels, Sanderlings, Sandpipers as well as the Hooded Plover and others gather food from the sandy beaches right down to the low water mark. The area between high-water mark and the ocean is not dead sand with no use other than for horse riding. The Plan pays no heed to the macro-fauna, meio-fauna or micro-fauna that inhabit the sand and, amongst other important ecological functions, provide

the food for wading birds. To countenance or encourage the ploughing of the beach daily by commercial racehorses is ecological vandalism and an abrogation of responsibilities under our international bird treaties such as JAMBA and CAMBA.

It is a relatively simple process to record nest locations, put up temporary fences and count eggs and breeding success but this should not be the end of our attempt to protect the species that either permanently or periodically use the beaches. There is no point in providing great protection for a nest when we condemn the hatchlings to starvation due to destruction of their feeding habitat.

That is why I am totally opposed to commercial racehorse riding on the beaches and within the reserve. I do not object to horseracing or those who are involved with it but I do object strongly to a public resource being used for commercial purposes particularly where there is such a demonstrable deleterious impact and risk. The plan recognizes the risk (at least in part) to the shore birds but then does not apply management actions to adequately avoid the risk.

Back to the plan statements....

Goal: *Authorised uses of the Reserve are managed to minimise the effect on values and visitors.*

The goal should be amended to:

- Authorised uses of the Reserve are managed to avoid or minimise the effect on values and visitors.

Strategies:

- *Permit horse training under license at Golfies beach (as shown on Map 6) from dawn to 10am Monday to Friday, with a maximum of 50 horses per day December 1st to March 1st and a maximum of 20 horses per day March 2nd to November 30th.*
 - Delete as totally unacceptable. But at least some numbers were provided.
- *Permit small numbers of horse training under license at Rutledge's Cutting and Killarney Beach to provide local trainers that have historically used the reserve.*
 - How many is small numbers?
 - History has absolutely nothing to do with proper management.
 - Strategy should be deleted.
- *Permit horse training under license at Levys beach and Hoon Hill as shown on Map 6.*
 - How many?
 - What conditions?
 - Strategy should be deleted.
- *Licence conditions for racehorse trainers and tour operators to include comprehensive protections for cultural values, natural values and other beach users. Revoke licence for continual levels of non-compliance.*
 - The plan offers nothing to show there is a "comprehensive", or even a good, understanding of the values so how can comprehensive protection be provided? Empty words.
 - Revocation of licences for continual levels of non-compliance is not required. One strike and you are out. And what is a continual level?

- *Review beach nesting bird monitoring results to inform licence conditions e.g. Hooded Plover density and fledgling success as an indicator species.*
 - Good, but where is this going? What are the triggers. If one nest gets stomped is that enough? What happens if no fledglings are recorded?
 - How often is it reviewed? I assume annually but need to specify.
 - Indicator of what? It is a resident bird – how does that indicate what is occurring with migratory species?
- *Close the beach to horse training and riding groups when Hooded Plover nests extend onto narrow sections of beach used for training, or when climatic conditions or tidal conditions make access unsuitable.*
 - So, every high tide rangers will be down at the beach directing horses. Really? Do we really think PV or other managers will be available to suitably manage this?

This last point really summarises the tangles that have been inflicted on management through keeping horses on the beaches. Get rid of the horses and it becomes that much easier – and better – to manage.

6.7 Information, interpretation and education

- *Ensure facilities are maintained and ‘fit for use’ and that any new assets comply with Australian standards, Industry standards and building codes and regulations. Upgrade, replace or withdraw from public use those that do not.*
 - What new “assets”? The only “assets” specified in the plan are car parks roads and tracks. If that is what is meant then say it. This would allay fears of other development within the reserve that has not been flagged in the management plan.
- *Support citizen science programs and increased active use of the Reserve by educational institutions to develop knowledge on the area and inform the education and interpretation program.*
 - What about PV *et al* actually finding out about the reserve they are managing rather than rely on “citizen science”.

6.8 Tourism partnerships, marketing and promotion

- *Provide for tour operator licences in the Reserve that utilise the range of available activities, subject to the protection of native flora, native fauna, built assets, natural features and cultural heritage places.*
 - It is assumed that this would be an Authorised Use and should therefore be included in Section 6.5.

7.1 Coordinated management

- Undertake a 5-year review of implementation of the plan – with reporting against high priority strategies provided by responsible agencies.
 - There are no **high** priority strategies in the plan. There are immediate, medium, long-term and as required strategies. Is it assumed that Immediate is the same as high? If not, it needs clarification.
- Explore opportunities for consolidation of land management arrangements as they arise.
 - This should be a High (or immediate) priority. Mixed responsibilities leads to mixed results.

8.1 Research and monitoring

Goal: *Monitoring and evaluation improves management decisions and techniques through enhanced ecological, cultural and visitor use knowledge.*

I do not see a goal here. What I see is a questionable statement. The right things need to be monitored in the right way and then acted upon with the express aim of minimizing adverse impacts and enhancing good outcomes for the identified issue.

- Develop monitoring criteria for key ecological measures, informed by conservation planning and State of the Parks.
 - Good – but what are the key ecological measures for this reserve? These should not be defined by State of the Parks or other high level governmental reporting instruments but by local conditions and what is happening in Belfast Coastal Reserve.
 - All the supporting, encouraging, facilitating – why cant the managers lead this and do it?
- Use knowledge gained from research to refine management practices e.g. investigations into the effectiveness of invasive species control programs and techniques.
 - How many times do we need to research weed control and what works? It has been done. It is now time to get on with it. The plan should identify the weeds that are a threat; instruct that they be mapped and priority control areas be defined based on some defensible reasoning (ecological, recreational, whatever) and then measure how effective it was. This is not hard, it just requires taking a position.
- Support research into the impacts of climate change on coastal areas and mitigation measures that could be applied in the Reserve.
 - I really look forward to seeing how this is implemented in the reserve.

Summary

In summary, the management plan fails to provide a clear, cohesive and defensible set of management actions. Broad statements do not constitute a management plan. I sincerely hope the final management plan will consider my comments and observations and incorporate specific, measurable, attainable, relevant and timely actions.

The plan should be a working document that identifies the problem/issue, what is known about it issue, what needs to be known about it, the aim of management, specific actions that will be undertaken to achieve the aim and how to know if the aim has been met.

Remove the waffle. It is not judged by the eloquence of the prose but rather the appropriateness of the management aim and the likely effectiveness of the actions in achieving the aim.

Remove the sophistry. This is pretty easy – just talk about the planning area.

Most importantly for this planning area: Remove commercial horse training from the reserve immediately to protect the ecology of the reserve and comply with our international agreements.

I would be happy to discuss my comments with the planning team should that be desired.

John Miller