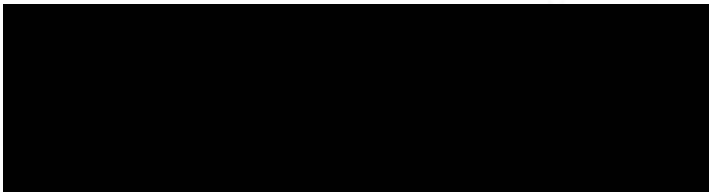


24 March 2015




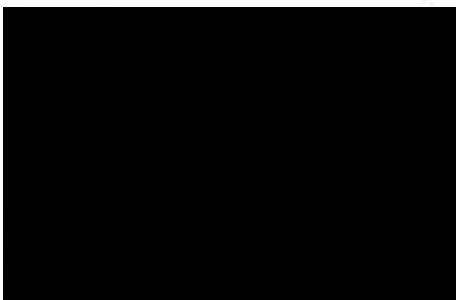
Dear 

Thank you for the opportunity to provide comment on the Western Coastal Board's Western draft Regional Coastal Plan.

I commend the Western Coastal Board on the draft plan which identifies the important coastal values, the issues and risks to these values, and possible management responses.

As the manager of marine protected areas and the majority of coastal land in Western Region, Parks Victoria employs the principles of Integrated Coastal Zone Management (ICZM) to underpin planning and management. The aim of ICZM is to integrate planning and management in the coastal zone across the land and sea interface, so that catchments, coastal lands and marine waters can be treated as one biophysical entity. The principles of ICZM are that coastal management and development will consider environmental, social and economic implications in an integrated way, and that decisions are made with a long term view. I note this is entirely consistent with the draft Western Regional Coastal Plan.

Attached is a table of more detailed comments which are provided in good faith to add value to the draft plan. Should you require clarification or wish to discuss any of these further, please contact 



Parks Victoria (Western Region) comment to the Western Regional Coastal Plan 2015 – 2020 Draft

Section	Support	Support with change	Comment	WCB proforma category
1.1 Introduction	✓		1st paragraph, Minister title is incorrect, should read Minister for Environment, Climate Change and Water. Appendix 1. Appendix 1 needs updating - Ngootyoong Gunditj Ngootyoong Mara (South west Management Plan) date is 2014 (not 2013). Shipwreck Coast Master plan could also to be added.	issue
1.2 Figure 2		✓	Suggested change: remove foreshore management line/ layer, this is well illustrated in Figure 8.	
2. 1 Coastal values		✓	Environmental Values, paragraph 2, suggested change: ... 'Manager's focus their efforts on managing risks to highly significant habitats. Habitats heavily impacted by human activity are difficult and costly to protect. Often the best habitat protection outcomes occur in areas of the coast with lower human activity'...	action
2.1.1		✓	Recommended inclusion: Section would benefit from explanation of the purpose of Marine National Parks including naming MNPs.	issue
2.1.2		✓	Recommended inclusion: This section is lacks information on faunal values and biodiversity, and mention of key parks to protect these systems including Discovery Bay MNP, Port Campbell MP and Pt Addis MNP. Suggested change: An increased emphasis on foreshore as a unique ecosystem inhabited significant-species protected in the region including Hooded Plover. Section would also benefit from more description of intertidal ecosystem habitats ( rocky shores and rock pools) supporting diverse marine life and seabirds, replacing the content in last paragraph on how people make use of the foreshore (because the section is titled Foreshore Ecosystems) Discovery Bay Coastal Park could be added to the list - long expanse of protected sandy foreshore and dune system in far west.	
2.1.3		✓	Recommended inclusion: Add Aire River and mouth (a designated Heritage River under the Heritage River Act) to noteworthy examples. Also section would benefit from description of hinterland environmental values and catchment processes, e.g. Water	issue

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			<p>flows, water quality.</p> <p>Suggested change: The last paragraph describes town's farms and management rather than the hinterland and catchment values and processes that directly relate to the health of coastal and marine environments.</p>	
2.2.1		✓	<p>Suggested change: Aboriginal cultural heritage of the region is extensive and rich. Suggest that the content in the draft plan relating to aboriginal cultural heritage is disproportionately low (relative to historic heritage).</p> <p>Recommended inclusion: Gunditjmara should be mentioned, Native Title and Traditional Owner settlement could be mentioned.</p> <p>Suggested inclusion: This section would benefit from a separate sub heading, such as: Traditional Owners bringing together natural and cultural values- working on country. Suggest case study on Pg. 14 should be moved to this section, it would be a better fit. The current case study is less on cultural tourism and more about planning process in partnership, 'Sea Country', and explains cultural values.</p>	issue
2.2.2 Figure 4.	✓		<p>Suggested change: diagram could better emphasise the natural coastal /rural/ coastal forest characteristic of the region.</p> <p>E.g. 'Facilities' should include camping areas, viewing platforms and lookouts, ocean walks and boardwalks.</p> <p>'Vegetation' should refer to the widespread vegetation communities of the region including coastal heathlands, coastal dune scrub and saltmarsh. The relatively smaller seagrass areas and mangrove communities? Not often experienced by visitors to the western coast.</p> <p>Highest 'water quality' and best estuary and river health condition flow from areas protected by National Parks and protected areas.</p> <p>Parks Victoria's <i>Healthy Parks Healthy People</i> philosophy encompasses links between health and wellbeing and time spent in the natural environment. Consider using a <i>HPHP</i> case study insert rather than the Melbourne Water visitor satisfaction figure.</p>	issue

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2.3	✓		<p>Suggested change: Suggest sourcing more recent data on construction than 2006 if possible.</p> <p>Also, renewable instead of 'Alternative' energy and that wind power is beyond being established, it is well established in the region.</p>	issue
2.4 Community coastal values		✓	<p>Suggested change: Figure 5 Community coastal values listed could relate better to the text.</p> <p><b>E.g. Environmental column:</b></p> <ul style="list-style-type: none"> <li>- Ramsar values listed are not mentioned in the text and are not close to the coast in Western region.</li> <li>- suggest biodiversity instead of 'diversity'.</li> <li>- Suggest include shorebirds, marine animals</li> <li>- Seagrass meadows are not widespread in the region</li> <li>- suggest 'Water quality hot spots' and 'Algal blooms' are threats not values</li> </ul> <p><b>Economic column:</b></p> <ul style="list-style-type: none"> <li>- Suggest include farming and timber plantations (pictured in figure 3).</li> </ul> <p>The figure 5 lists values and plans but does not identify processes of threats interacting with values and how agencies make decisions →prioritise → invest.</p> <p>Section would benefit by better clarity on whether the diagram lists values and plans or whether it illustrates a process.</p>	issue
3 The dynamics of the coast	✓			
3.4	✓			
4 Managing regional visitation pressures and maximising access				
4.1	✓		Suggested change: (Paragraph 1) Support the intent of this statement; however the	issue

Parks Victoria (Western Region) comment to the Western Regional Coastal Plan 2015 – 2020 Draft

Section	Support	Support with change	Comment	WCB proforma category
			section could more clearly communicate the need for tourism strategies to consider, and include sustainable levels of service and visitation. Suggest cross referencing to 4.3 Draft Shipwreck Coast Master Plan example.	
4.5	✓			issue
Chapter 4 – Visitation Actions Table		✓	Suggested inclusions: 1a and b, Add Parks Victoria as partner agents. 3a, b and c add Parks Victoria as partner agents. Parks Victoria manages approximately 70% of the coastline. Parks Victoria involvement would be critical to planning for visitor infrastructure planning. 3a, b and c suggest Parks Victoria is added to Partner Agents based on significant extent of land management responsibility for resilient and vulnerable parts of the landscape.	action
5 A regional approach to foreshore management	✓			
5.1	✓			issue
5.2	✓		Support Otway Eden as a case study for 'working together' theme. Suggest linking this section with 7.1 through a cross reference. Section 5.2 discusses agencies working together and governance but the images are of volunteers – A bit of a disconnect.	action
5.3 Foreshore Management Actions Table		✓	Suggested change: Action 2 – Please reword as “Work with Parks Victoria and Traditional Owners in preparing multi park plans that include coastal areas.” In appendix the action is to be done by 2020, on page 20 it is 2018? <b>Parks Victoria management plans are developed according to an agreed schedule based on the life of a plan (usually 10 years).</b> <b>Parks Victoria cannot commit to having all plans (coastal) completed by a fixed date as the planning schedule is ongoing.</b>  Suggested inclusion: Action 4&5 - Add Parks Victoria to Partner Agents to these rows based on significant role as coastal land manager.	action
6. Regional scale	✓			

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planning for Coastal flooding and erosion				
6.3		✓	Suggest inclusion: add Parks Victoria to Partner Agencies into actions 2 - 4d based on PV being managers of much of the land affected by flood and coastal erosion (e.g. PV manages areas featured in images)	action
7 Supporting communities caring for the coast	✓			
7.1	✓		Support paragraph 3 (Pg. 27) stating the need to support, encourage and resource community involvement in coastal management programs especially in the area of citizen science.	issue
7.2 Implementation Actions Table		✓	Suggested change: Implementation Actions? Are these not one in the same? suggest 'Actions to Support Communities' Suggest adding Parks Victoria to Partner Agents in actions 1a and b and 3 due to Parks Victoria's significant role as a coastal manager in the planning area.	action
8.0 Monitoring evaluation and reporting		✓	Suggested inclusion: Para 2, (page 28) add Parks Victoria. Parks Victoria's State of the Parks Survey aims to assess and analyse priority park condition.	action
Chapter 4 (table) Visitation Actions		✓	Suggested change: Add Parks Victoria to Partner Agents (2a and b and 3) The recommended Visitor Demand Framework would benefit from consideration of visitation and asset infrastructure in parks along the coast. Also see comments above in Chapter 4 – Visitation Actions.	action
Chapter 5 (table) Foreshore Management Actions		✓	See suggested change section 5.3 above.	action
Chapter 7 (table) Implementation actions table		✓	See comment under for 7.2 above.	action
Maps		✓	Figure 2 Suggested change: Recommend removing foreshore management line /layer from Figure 2. The thick green line reduces clarity of the primary coastal planning and	

Section	Support	Support with change	Comment	WCB proforma category
			<p>management layer and duplicates foreshore management representation in Figure 8.</p> <p>Alternatively, for Parks Victoria managed foreshore sections, use a hashed overlay to reflect dual coastal land and foreshore management and planning responsibility.</p> <p><b>Figure 3 (Pg. 7)</b></p> <ul style="list-style-type: none"> <li>- 'Parks' colour patch in legend is not a good match to corresponding map.</li> <li>- Not all symbols and illustrations shown on the map are included in the legend.</li> <li>- Some spp illustrated but other iconic species are not. E.g. no Hooded Plover, at Belfast Coastal Reserve (Victoria's second biggest population )or other characteristic coastal spp including Rufous Bristle Bird and White Bellied Sea Eagle.</li> </ul> <p><b>Figure 8</b></p> <p>Support identifying foreshore management responsibilities on Figure 8.</p>	
<b>Appendices</b>				
Appendix 1 table 2		✓	Suggest change: change ' Park reserves' to Parks and reserves with management plans	
Appendix 3		✓	Suggest change: change 'Otway National Park' to Great Otway National Park and add environmental and cultural values of national and state significance.	