



Issues that emerged from the public comment with excerpts from submissions to GSCORE

Lack of consultation/no collaboration

- Trail plans in the Porongurup Range are incompatible with biodiversity and cultural values of the region – how could the plan get this far during a consultation process?
- Why was there little consultation for the draft plan within the local aboriginal community when it concerned a cultural site of significance?
- Deeply flawed process
- Missing is a crucial step – turning community consultation into community collaboration. I would term this missing phase something like ‘Joining the Circle: Establishing local partnerships for collaborative trail development’, or perhaps ‘Creating new Paths: Community guidance, collaboration and regional regeneration’. Working together (collaborating) is not about one party being advised what has been determined. Rather, both parties are actively involved from commencement in defining what, where and when development (in this case trails) within the region would be. I suggest the answer is to be found in a community sense that consultation hasn’t led to collaboration and that in fact the community is feeling that the proposal to develop a MBT has been conceived, analysed and promoted with very little community input and thus no opportunity for actual collaboration.

Criteria for trails

- GSCORE and their partners do not have the health of the Heritage Listed Porongurup National Park in their top priorities where it should be.
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- Page 10 'put the user experience first'. This is the wrong way around: put the natural environment first otherwise there will not be any 'user experience' to be had.
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- “Trail projects that highlight a region’s distinctive biodiversity, heritage, culture and landscape score higher on this measure.” Agreed, but not at the expense of destroying or severely damaging these same biodiversity, cultural heritage and landscape values
- No mention of environmental and cultural values other than how you can market [them].
- I do not support the proposal. I submit on the grounds of cultural, heritage, environmental and ecological significance.
- The draft plan does not acknowledge *Phytophthora cinnamomi* dieback infection. Mountain bikes are vectors for the spread of disease and weeds.
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- The region is one of the world's biodiversity hotspots; there is no reference to this. The southwest has the highest concentration of rare and endangered species in the entire continent.
- Land stewardship of this fragile area should be prioritized over tourism & commercial outcomes. **P.1 of 6**
- Advocacy document for more trails as marketing tools for tourist development. A simple word search highlights the absence of adequate consideration of environmental/biodiversity values and conservation threats, cultural heritage considerations and public safety values.
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- Identification of priority trails: pro-development criteria only are cited – environmental nor cultural heritage assessment not mentioned. This is a major failing of the report. Rather than a balanced assessment of trail development in the context of other land uses and priorities, the document is strongly biased towards marketing and tourism.

Page 12: "Creating attractive experiences requires consideration of" was followed by 7 points none of which include sustainability/protection of local environment. This indicates an attitude of thrill seeking and money-making none of which will be useful once the Heritage Listed National Park is degraded and spent

- Adventure sporting activities are not appropriate in any national park.
- There is no mention of conservation values on public land, no mention of climate and conditions that may be dangerous to physical over exertion, and no mention of general management of the trails.
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- At the outset [National Parks] are set aside for diverse community values and interests, including purposes such as conservation and Aboriginal heritage that [are] incompatible with trail location and development.
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- Just because Mountain Bikes are now fashionable is not a good enough reason to make all places, and particularly conservation areas, available to be raced over. Slow speeds, quiet, and awareness of the landscape and its inhabitants, are what contribute positively to conservation of nature and Noongar values.
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- Page 32: "New trail development priorities should focus on the needs of all MTB trail user groups and accommodate riders of various abilities": I strongly disagree. New trail development priorities should focus on sustainability and a guaranteed protection of local flora and fauna. That is why Porongurup National Park became a Heritage Listed National Park in the first place.
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- The proposal is likened to the 7 Stanes in Scotland. The 7 Stanes are predominantly forestry and land reserves with degraded, low biodiverse environments. There can be no comparison with the ancient, biodiverse and fragile environments of the Stirlings and Porongurups. The ambition to replicate it in one of the world's Biodiversity Hot Spots is inappropriate and unacceptable.
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- Scotland has vast areas of highly degraded landscapes. Many Scottish mountains are covered practically by grass alone having been denuded over the millennia by human habitation unlike here where we have some of the richest and most diverse flora in the world.
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- Europe sustained geological upheavals as recently as twenty thousand years ago in the last ice-age, whereby, in contrast, this part of Australia remained untouched by glacial covering and our flora was able to evolve undisturbed for up to **two hundred and fifty million years**. We have many, many thousands more species because of this lack of disturbance.
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- Environmental protection (looking after country) and social considerations (which is also looking after country) can and should be deal breakers if the proposal does not satisfy both categories. This should be the early focus. It would possibly save some grief, after robust analysis, if either one of these would be compromised regardless of technical and cost hurdles being cleared. P.2

Aboriginal heritage and significance

Department of Biodiversity, Conservation and Attractions site states –

Acknowledgement of Country

The Government of Western Australia acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.

GSCORE plan it states –

We recognise the value and heritage, culture and spiritual connection of Noongar people with The lands and waterways on which outdoor recreation takes place.

- The sacredness of this Range to the Indigenous Peoples of this region, their connection to this land for thousands and thousands of years, is something that should not be disregarded. It should be sacrosanct. This in itself should be enough for GSCORE or any person or organisation of true conscience and integrity, [to] genuinely listen to Aboriginal people.
- Evidence abounds that the Porongurups was and still is a spiritual place for Aboriginals. *Boronggorup* was the Aboriginal name for the hills. It is a well-known fact that Aboriginal people identified every valley, hill and watering place with some incident or natural function. Modern research indicates there is more than a grain of truth in some of the legends that have come down from “Demma goomger “(big grandfather) and” Nyitting” (cold) times. There are strong tribal traditions and customs still in play today in respect of Januc (evil man) and Devils Slip. We should respect this cultural and spiritual connection with the Porongurup Range and not seek to further despoil and violate this spiritual ground. It is akin to the desecration of a church or cathedral or sacred/spiritual place of modern religions.
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- Page 33: ‘There is an opportunity to integrate Noongar culture and creative expression at each site to highlight the region’s unique history and landscape’ is incredibly patronising! Just disregard the sacred, create a theme park for mountain bikers to get their thrills and put labels around to pay lip service to a concept the consultants seem to think is apparently beyond the average Australian’s comprehension.
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- Planning Principles ‘acknowledge traditional custodians’ only includes dual naming and cultural interpretation See also p 78. Dual naming is ethnographically naive. Place names of Noongars are multiple, depending upon context.

Granite outcrops/uplands

- Porongurup National Park contains the most sacred Noongar upland in the Great Southern, many threatened species, and knowledge of restoration of damaged native upland vegetation in PNP is in its infancy.

- A unique, diverse and very fragile environment. It is a 'last refuge' for so many species of flora and fauna, the ecology of which has evolved over millions of years.
- Granite outcrops and boulders are particularly fragile ecosystems that support short-range fragile endemic flora and fauna. P. 3 of 6
- contains a diverse range of flora and fauna some of which is still being discovered
- P 12: Hills in the Great Southern clearly targeted for mountain biking: 'The unique opportunity to establish mountain bike trails where elevation reaches between 240-300 metres in various locations has the potential to reap a significant return on investment for the region.' This proposition goes against the fundamentals of Noongar spiritual regard for elevated sites and their biodiversity importance as places of the greatest concentrations of threatened plants etc. From these dual perspectives targeting the hills in the Great Southern for mountain bike trails is the worst possible initiative that could be undertaken by State Government agencies and LGAs
- Each of these proposals targets uplands of significance spiritual significance to Noongars, as well as concentrations of threatened flora and of vegetation whose restoration and repair after damage is poorly understood
- Prof Stephen Hopper from UWA has plainly explained the detrimental effect mountain bike trails would have on the fragile ecosystems that survive on this ancient range. It is high time that we listened to, and respected, the views of the experts. Prof Hopper's warnings were grave and I am incredibly concerned that if the proposal for an MTB trail in Porongurup National Park proceeds it would cause irreversible damage to the fauna and flora that has called the range home for millenia.
- These uplands (*kaat*) are of fundamental importance for Noongar spirituality and for biodiversity conservation. New mountain bike trails should be confined to lowlands and uplands only on cleared country and placed predominantly on private property rather than public reserves set aside for conservation.
- Great sensitivity should be exercised hereon now that the Aboriginal and biodiversity conservation significance of these uplands is documented and well understood. This is contra to Aboriginal religious beliefs. Arguably, visitors should be advised of Noongar concerns about climbing Porongurup and that Elders recommend a no climb policy.
- These are the Great Southern's Uluru in terms of Aboriginal cosmology, especially the uplands of Porongurup National Park.
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- P 33: opportunity to integrate Noongar culture and creative expression at each site to highlight the region's unique history and landscape. As it stands, by assuming that all mountain trail bike developments are desirable, this is a naive and culturally repressive view. What if Noongar cosmology dictates that the trails contravene upland no-go areas?

Over tourism

- We should be stewards of the landnot continue the trend of desecration for economic gain or hedonistic pursuits.
- There is already concerning levels of public visitation, straining existing facilities, high noise levels threatening the bird life and reducing the pleasure and solace of leisurely bushwalking.

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- The sport caters for numerous competitions and competitive racing which also brings with it big spectator numbers which further impinge on a small fragile environment
- In making trails to standards [to accommodate tourists] we in fact remove the challenges and differences. Like our highways, they become standardized and eventually boring. P.4 of 6

National heritage significance

- GSCORE and DBCA, by their own admission, do not recognize the significance of the Park's National Heritage status. The Porongurup National Park was National Heritage listed in 2008 in recognition of its national significance as an ancient mountain range, one of the oldest in the world, with unique flora and fauna.

Degradation/erosion/dieback

- Managing [the Park's] biodiversity in a warming climate is enough to contend with let alone managing it if these proposed bike trails (both downhill and cross country) proceed.
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- potential destruction of fragile habitats; noise pollution and rubbish pollution.
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- The spread of dieback and exotic weeds through Mountain Bikers' creation of unauthorised trails will eliminate many flora species including some species found nowhere else on earth.
- Any further development, earthworks and bicycle tyres pose a genuine risk of spreading or introducing dieback which is a well gazetted nasty pathogen which has led to huge loss of flora in many southern parts of our state.
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- New development will initially bring with it spread of weeds, dieback, erosion, soil compaction, irreparable waterways and granite rock damage, loss of species and more. Further disturbance and overuse coming with the MTB riders' desire for continued trail development will result in this park becoming degraded in less than a lifetime.
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- A number of scientific studies have shown the significant environmental impacts of mountain bike trails on surrounding areas: soil erosion, vegetation and species loss, spread of invasive species, soil compaction and incision (Burgin & Hardiman - 2012, Goeft & Alder 2001)

Park Management/Funding

- DBCA struggles now for funding in order to maintain existing paths and amenities.
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- I oppose the construction of mountain bike trails that divert limited park management resources for the inappropriate location of this sport which will damage park values.
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- Funding restrictions will not allow for adequate care for the Park when mountain bike trails will need monitoring and upkeep.
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- Conservation should be the main focus for funding.
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- The majority of the proposed regional priority trails are new trails or trail networks. This is at odds with DBCA's and LGA's failing struggle to maintain existing trails which is surely the first priority rather than bulldozing new trails on public lands - the focus of this misguided draft.

Opposition to plan

- Due to strong opposition from both the Aboriginal and local community expressed at the recent public meeting [Jan 9 2020], this proposed track should be removed from the master plan and further environmental risk assessment and planning/ investigation would be a waste of time.
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- [The Porongurup Community] is against the development of the proposed downhill track location within the park and on their doorstep. If the proposal is granted, there is very little support you will get from this community.
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- As locals we chose to live here **because** there is none of the high impact, destructive tourism that a lot of other popular tourist spots experience.
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- The Mountain bike trail is not supported. The proposal is not in the public interest
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- Local Noongar people have made it clear that Porongurups is their Mecca.
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- It is well known and was also made very clear at the meeting at the Porongurup Hall that the Porongurup Range is sacred to Aboriginal peoples of the region.
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A range of heart-felt emotion

- Unjustly many believe that 'white' Australians are incapable of love of the land and its values in landscape and wildlife; only Noongars or Aboriginal Australians are seen as having an attachment to the land – this is erroneous – the community of the Porongurup is international in origin and these people love their environment and the Park.
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- Natural environments and unspoiled vistas are rare and endangered and rapidly disappearing from this world. The natural environment of the Porongurup contains in itself gratifications and rewards that will never be found in artificial landscapes. We should do everything possible to retain what remains of this unique, rare and beautiful environment.
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- Singer Joni Mitchell sang of a "Tree Museum". Porongurup is indeed, a Tree Museum with small groves of remnant Karri habitat surviving since the last Ice Age 12,000 years ago. To destroy that for short term gain would be a crime against Nature. It would also be a denial of future generations' rights to experience some of the beauty and wonder of Nature that our generations inherited
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- Our Western Culture and worship of money and the economy has destroyed much in this world that for centuries have been valued by peoples for peace, quiet, solitude, challenging environments both physically and mentally that can assist with transporting people into states of awareness and spiritual growth. Such places are increasingly rare and it is disappointing that GSCORE fail to understand the uniqueness of Porongurup landscapes, preferring to see them as potential theme parks for bikers, copycat thinking again. Experiences have become 'potted' by consultants and travel agents to fit itineraries and budgets between coffees! We flatten the world to accommodate wheelchairs and overlarge houses. We turn contrast and difference into similarity and sameness all to make a buck.
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- Flora and fauna across Australia is under immense pressure from all directions and when I look around WA at the moment with over 7 M hectares of natural bush burnt in WA last year and

already this year racing towards 2 M hectares, any pressure at all is far too much. Even considering adding pressure to the incredible Porongurup's is unthinkable. One thing is certain, all councillors grandchildren will ask one day - how could you even think of such a proposal for, as Steve pointed out, one of the world's iconic, oldest and incredible unique ranges. P. 6 of 6