

LCC SW, District 2 – 1979 comment on base report

HAMILTON FIELD NATURALISTS CLUB

Submission to the Land Conservation Council

PROPOSAL FOR AN EXTENSIVE GRAMPIANS NATIONAL PARK

OF NATIONAL SIGNIFICANCE.

A. Introduction:

"The Grampians provide some of the most beautiful and diverse habitats for native Flora in Victoria".

(FCV Management Policies for the Grampians, 1977, Pg 6).

The Grampians has the potential to be one of Australia's truly magnificent National Parks. Many people already regard it as such.

On any objective analysis, the case for a Grampians National Park is completely convincing. The magnificent topography and scenery, the superb range of wild flowers (about 1/3 of Victoria's Flora) the wide diversity of habitats and wildlife, the appeal of this area to tourists, campers, bushwalkers, naturalists and rock-climbers alike - these all point to the very obvious fact that the Grampians is an outstanding natural asset, indeed worthy of National Park status. Many visitors assume that it already is a National Park. If the Grampians does not become a National Park, it will not be because it does not come up to the criteria for a National Park that the L.C.C. is looking for, viz:

"An extensive area of public land, of nation-wide significance because of its outstanding natural features and diverse land types, set aside primarily to provide public enjoyment, education and inspiration in natural environments".

(Corangamite Study Area, Final Recommendations, 1978).

Careful reading of the L.C.C. Report on SW Area No. 2 indeed strongly confirms this view. There are "diverse vegetation types, and about 1000 species of vascular plants" (pg 273), "a great diversity of habitats, and a correspondingly large number of animal species" (pg 275). The Grampians are widely recognized as "one of the state's most important nature conservation areas", and have "a very high capability for flora conservation", (pg 276) and for fauna conservation.

In addition, they are "the biggest repository of Aboriginal rock art in Victoria", the mountain ranges have outstanding scenic values and "have a very high capability for recreational use" (pg 279). Pleasure driving, relaxation, camping, picnicing, bushwalking, climbing, nature study etc - the list speaks for itself.

Furthermore, the area has only a moderate to low capability for agriculture, (pg 280) and any further clearing of timber would seriously affect water-catchment values, especially in the area around Rockland's Reservoir. (see Chapter 13 on Hazards). The capability for mineral production is low (pg 283). The area is extremely important for water supply, (pg 283), but there would be no conflict of this with National Park status.

Obviously the Grampians more than meet National Park criteria, and there appear to be no areas of conflict with most other possible conflicting uses, such as agriculture and mineral production. Though grazing and timber extraction have claims on the area at present, we do not believe that these claims justify denying the area National Park status.

We have included the Black Range and the land to the north of Rocklands Reservoir in the proposed National Park (see map) for the following reasons.

- (i) Black Range cliffs, with their novel moss ledges, rare and localised plant species and aboriginal shelter and paintings.
- (ii) Large areas of savannah woodland (red gum, yellow gum) and stringy bark - box woodland (brown stringy bark with yellow gum, grey box, yellow box, red gum). This area is the only large viable area of these woodland types in the Western District.
- (iii) Foothills and heath lands with Callitris banks and spectacular wild flower displays.
- (iv) A number of rare and localized plant species occur in this region.

Also as the L.C.C. Report points out, this area has a high capability for flora conservation; and the gum-box woodlands referred to above have a very high capability for fauna conservation (pg 291). Furthermore, "the link between this block and the Grampians block to the east is very significant for fauna conservation, as it greatly increases the total area and the diversity of the various habitats available". (pg 291) From the L.C.C. Report, it is clear that timber production and agriculture are not viable alternative uses for the area. Grazing conflicts with fauna and flora conservation at present, and any further clearing of the woodlands is ecologically very undesirable because of the increased salting problems that would occur in the Rocklands Reservoir and elsewhere.

B. Present Conditions and Management.

1. Present and Future Production Capacity of Hardwood and Softwood in the Grampians.

The FCV Management Policies Document (1977) states that present annual hardwood sawlog production is about 6000 m³ per annum, potential, sustained capacity of the two pine plantations is of the order of 12,000 m³ per annum, and present capacity of the pine plantations is around 3000 m³ per annum. However no information is given on potential sustained production capacity of the hardwood production zones.

Little light is shed on this in the L.C.C. Report (Chapter on Timber Production, pp 221 - 235), as "no further information on the hardwood resources, such as the volumes and the growth rates of the various stands, is currently available". This is unfortunate, as without this information the potential sustained hardwood production rate cannot be estimated. There is some discrepancy between the L.C.C. Report and the FCV data, as the L.C.C. Report states that the volume of hardwood timber currently produced is only 5000 m³ per annum. Furthermore, in the L.C.C. Report the potential sustained capacity of the Billywing Plantation alone is stated to be the order of 12000 m³ per annum, the potential capacity of the Mt. Difficult Plantation is not given, whereas the FCV Document states the potential capacity of both plantations is of the order of 12000 m³.

Despite this lack of clarity, one conclusion is reasonably clear; the potential capacity of the two softwood plantations in the Grampians is at least equal to the potential hardwood capacity, and may be much more. Table 29 in the L.C.C. Report seems to imply (being generous) that the potential sustained capacity of the hardwood forest might increase up to two times (present productivity 1-4 m³ / ha / pa, potential productivity 3-5 m³ / ha / pa).

If productivity did increase two times, hardwood production in all the Grampians would only equal softwood production in the two (relatively very small) pine plantations.

In other words, potential hardwood production is NOT very significant, present production even less so.

(If the total present annual allocation was cut (18,450 m³), hardwood production could increase further, but this would rapidly deplete the resource if done at present. It is not stated whether a sustained capacity of this level might be possible in the future (when regrowth stands are available) without depleting the resources).

The lack of clarity in the figures available (and the lack of future hardwood potential figures) is very disturbing, as these figures are obviously important to an accurate assessment of the future hardwood potential of the Grampians. On the available data, hardwood production (either present or future) seems of little significance.

2. The Economics of Timber Production.

What of the economics of timber production? How important is it in the Grampians?

The potential for softwood and hardwood production is low to moderate (pg 282) - the softwood plantations probably have at least as much production capacity of all the hardwood production zones (see above). Analysis of the chapter on Timber production (pp 221-235) in the LCC Report clearly shows that Grampians hardwood timber is not of much economic importance to the area. Excluding Stawell Timber Industries (who employ 200 people) the processing of other timber in the whole Study Area provides full time employment for the equivalent of about 25 men (pg 235). Stawell Timber Industries uses principally softwood, and well more than half of its allocation of both softwood and hardwood comes from outside the study area.

We therefore argue that our proposals (see below) to continue the Mt. Difficult pine plantation, allow the Billywing pine plantation to be harvested once, and phase out logging of hardwood species within ten years would have no economic impact on the region. We can see no reason why this would not allow Stawell Timber Industries to continue as a viable industry.

Smaller areas of hardwood (especially red gum) that are on the fringes of the Grampians and are important to small millers (and others) who have no alternative sources of supply may be really more important to the economics of the local areas than the bigger area hardwood production zones in the centre of the Grampians. Examples are around Woolhpooer, and perhaps near Dunkeld. There could well be a case for maintaining smaller areas such as these (especially near Woolhpooer) as hardwood production areas. However, we do not believe, on the evidence we have presented, that there are any sound economic or other reasons why nearly all of the hardwood production zones in the Grampians should remain as such.

3. The Economics of Tourism.

The tourist potential of the Grampians could only increase if it were to be declared a National Park. The Chapter on Recreation (pp 161 - 177) estimates that the total volume of business generated by tourism is

\$3.75 million (page 175). Though the report predicts that growth in the total number of people visiting the Grampians will not continue, this surely is based on the assumption that the status of the area remains the same. Declaration of a National Park in the Grampians, and intelligent promotion by local towns, tourist authorities and the National Parks Service would no doubt lead to a significant increase in the numbers of people visiting the area.

4. Economics of Employment of FCV personnel in the area.

Any economic impact of the reduction of numbers of Forests Commission employees due to the declaration of a Grampians National Park would be avoided by the Forests Commission having a continuing role in fire protection and softwood production, and in hardwood production for ten years. Furthermore, many Forests Commission employees should surely be able to be employed in the National Parks Service Grampians area, and it would be expected that the National Parks Service would need to employ more people than the Forests Commission does presently to manage the Grampians properly as a National Park.

5. Present Management By the Forests Commission.

We consider that it is inappropriate that a government body whose principal charter is timber production should continue to manage an area that so clearly has National Park status, and that has little significance as far as Victoria's timber needs are concerned. This is not to deny that the Forests Commission is capable of managing areas for recreation and conservation purposes, nor is it to deny that the Forests Commission record in the Grampians to date has been generally good in a number of respects, (eg. fire fighting, provision of tourist facilities, construction of roads, responsiveness to public opinion as regards their management plan). However we are worried about a number of important questions concerning their published management plan, and we have reservations about some aspects of their approach to fire prevention, road construction and control of the impact of tourism.

The published management plan of the FCV for the Grampians is deficient in a number of important respects. These include the following.

(i) Conservation of flora:

Very little of the taller dry sclerophyll forest is in a conservation zone (ie. Primitive or Special Feature). Most of it is in the Hardwood Production or Natural Zones, both of which can be logged. Furthermore, of the 16 very small pockets of Wet Schlerophyll Forest (fern gullies), as the Conservation Council of Victoria points out (Every Last Stick: The Future of the Grampians - Conservation Council of Victoria Report June 1979, pg 9) only 4 of these fern gullies could be considered safe from the effects of logging. These (3 on the edge of the Major Mitchell Plateau, and the Silverband Falls area) are all in Special Feature Zones. Four on the edge of the Major Mitchell Plateau and one on Grass Tree Creek are on the edge of a Special Feature zone (just within it), and two in the Victoria Range have had very small Special Feature zones created for them in the middle of a Hardwood Production zone. The question arises: How adequate a buffer do these gullies have? The FCV's managements plan does not discuss this. The remaining 5 fern gullies are either designated hardwood production (Victoria Range, 3) or Natural (Mt. McIvor, 2).

In 1967 our club discovered that the southern-most fern gully in the Victoria Range contained many fine specimens of the Rough Tree Fern (Cyathea australis). (The only previous record of this fern was on Mount William in 1875, though other areas have been located since 1967). The ferns we located in 1967 were subsequently damaged extensively due to logging. There are many other rare plants in the Grampians, including many endemic species, and the FCV's published management plan does not give any guidelines on how these are to be protected.

(ii) Conservation of Fauna:

The same criticism applies here, there are no guidelines in the management plan for the conservation of fauna, especially those species that are rare - for example the brush-tailed rock wallaby. There was a colony of 12 animals near Red Rock (in a Natural zone) in the Victoria Range, which may now be extinct.

(iii) Aboriginal Cave Paintings:

Again, no guidelines for the preservation of these are included in the published management plan.

(iv) Landscape Features:

As logging is permitted in Natural areas, it is difficult to see why the Chimney Pots and Mirrinatwa Gap areas were given this classification, given their proximity to adjacent Primitive zones and their obvious landscape value.

(v) Grazing:

The controls on grazing are inadequate (see discussion in section 7).

(vi) The Cinnamon Fungus:

We believe that the Forest Commission does not seriously consider the very real possibility that the spread of this disease may be directly related to the continued development of roads and the type of control burning practices used in the Grampians. This lack of objectivity is disturbing.

(vii) Timber Extraction:

Clearly, as the L.C.C. Report shows, timber resources were extensively over-utilized after World War II. This partly accounts for the very low present productivity. Good conservation principles were not followed at this time. Will they be followed in the future?

(viii) Zone Boundaries and Management Zones:

It is difficult to avoid the conclusion that zone boundaries have been principally constructed around the actual and potential hardwood areas, as the zone boundaries follow vegetation boundaries closely most of the time. Hence insufficient areas of dry and wet sclerophyll forest are protected from logging and the effects of logging.

The distinction between Special Feature and Primitive Zones is obscure, as on the map many Primitive Zone areas adjoin main roads and other developed features - eg. the eastern side of the Serra Range adjoins the main tourist road, the Victoria Range Primitive zone on the north west side is next door to the Billywing Pine Plantation.

The term "Natural Zone" is inappropriate, as it tends to disguise the fact that such areas can be logged. The description "Low Intensity Timber Production Zone" should be used.

There are no categories for the protection of areas that cannot stand up to a lot of visitor pressure. Primitive Zone does not always cover these areas, and "Special Feature" implies that the area should be opened up to visitors. This would not always be desirable.

There are no zone categories (eg. Reference Area) for the protection of sample areas, relatively undisturbed, of major vegetation types.

(ix) Road Construction:

Though a good system of roads has generally been developed for fire-fighting and logging, insufficient attention has been given to investigating the possible link between road construction and the spread of the cinnamon fungus. Has it been wise to push roads absolutely everywhere? (eg. the Victoria Range Road). Also, a number of vehicle roads are eroding badly - some examples are the Rosea Track Road, the Stony Creek Road, and especially the road to Castle Rock, which has now become an impassable gulley.

(x) Tourist Management:

More consideration needs to be given in the FCV's Management Policies to resolving the obvious conflict between tourism and conservation. Solutions are not simple. Two obvious examples are vandalism of aboriginal rock paintings, and erosion of walking tracks (plus excessive vegetation damage) in the Wonderland / Halls Gap area.

For example, the Mackey's Peak Track leading off from the Hall's Gap Camping Ground is in very bad condition. Heavy visitor pressure has eroded the existing track, (as much as 2 feet in places) and short cuts being made across zig-zags are causing excessive erosion, due to water running down these steep, new tracks. The only evidence of present management is a few remaining pieces of barbed wire, some fading white arrows painted on the rocks, and signs near the camping ground. This is obviously not sufficient to cope with the problem. What is needed is a large man power effort, involving, at least:

(a) restoration of eroded "extra" tracks, using brush matting (eg. tea tree) held in place with fencing wire and metal stakes hammered in to hold the brush down.

(b) signs explaining the situation.

(c) rangers frequently present to help educate visitors.

(xi) Control Burning:

Some areas are burnt too frequently and too insensitively (eg. the Tea-Tree Creek area to the West of the Billywing Plantation). Given that it is important to protect the plantation we nevertheless maintain that this could be more sensibly done.

Furthermore, not enough thought has been given (nor research done) into the use of fire for creating and maintaining specific habitat areas. Does the present burning system for the fringe areas (every 4 - 6 years) adequately protect and conserve all species of all fauna and flora in these areas, especially rarer ones? Are locations of rare fauna and flora known and their needs catered for when areas are burnt? We agree that the Australian flora has evolved in association with fire. The question is: What types of burning practices are

optional for which fauna and flora? The FCV's management policy does not go into these issues. For example, there is historical evidence to suggest that many areas of the Grampians contained far less thick scrub and far more grass-land before European settlement. Jim Willis points out that "Fires, unfortunately all too frequent and severe in the Grampians, exert an important influence upon plant composition. A rapid succession of shrubs produces thick scrubs within three to five years following a fire. This forms dense, highly inflammable ground fuel for subsequent fires". (J.H. Willis in "Flowers & Plants of Victoria", 1973, pg 174).

The same phenomenon has been noted in the Kosciuszko National Park area in N.S.W. where repeated burning produces thick scrub, which eventually (given freedom from fire) will revert to the previous grassland understory species.

Research into this and other issues needs to be carried out in the Grampians, with certain areas protected from fire for much longer than 4-6 years to observe the natural succession. Some species benefit from frequent burning, others do not.

6. Fire Control in National Parks.

Many local people are not aware that control of wild-fires in the Grampians would still be the responsibility of the Forests Commission if the area became a National Park. Indeed, groups in the area have been giving the definite impression to local people that a National Park in the Grampians would mean the end of Forests Commission Fire Protection. This is disturbing.

Statements to the local press by the Divisional Forester at Horsham recently to the effect that a Grampians National Park could mean less efficient FCV fire protection in the region are also disturbing, as this is not necessarily the case. Efficiency of FCV fire protection will largely be determined by the extent of Government provision of men and equipment, irrespective of the future status of the area. If the Grampians were declared a National Park, a gradual transition period to NPS control, with appropriate direction, would ensure continuity of local experience and knowledge.

7. Grazing.

Principal objections to grazing in the area are as follows:

(a) Diminution of plant diversity and numbers.

It is widely recognized that sheep select a diet of different botanical composition to that of native species such as kangaroos and emus (eg. see Griffiths et al. 1974). Sustained or severe grazing inevitably leads to the loss of native grasses (eg. Biddiscombe 1953; Moore 1970; Specht 1972).

We have made a preliminary survey of the effects of grazing by sheep on the understory species (other than Cyperaceae, Gramineae) in an open forest area of Crown Land N.W. of Woohlpooer. This area was selected because it had topography and tall vegetation the same on grazed and ungrazed portion of this Savannah woodland. Examinations of the area were made on 21/9/75 and 13/4/76. The data illustrate the point that grazing reduces both the numbers of species and the number of individuals of each species of ground plants.

	Numbers of individuals / m ²	
	Grazed	Ungrazed
Hypoxis sp.	1.0	3.4
Xan thorrhoea minor	0.5	0.4
Chaemaescilla corymbosa	0.8	3.3
Goodenia geniculata	0.7	22.8
Astroloma humifusum	0.5	0.3
Bossia prostrata	0.6	1.3
Anguillaria dioica	0.2	0.1
Caesia vittata	0.3	0.1
Acacia aculeatissima	-	0.2
Diuris pedunculata	-	0.1
Leptorhynchus sp.	-	0.1
Kennedia prostrata	- (+)	0.2
Leucopogon sp.	- (+)	0.1
	4.6	32.4

Other species found but not in quadrats

Drosera spp.	+	+
Eriochilus cucullatus	-	+
Pelagonium rodneyanum	+	+
Tetrateca ciliata	+	+
Dianella revoluta	+	+
Oxalis corniculata	+	+
Lissanthe strigosa	+	+
Hibbertia australis	+	+
Pterostylis sp.	-	+
Caladenia dilatata	-	+
Tricoryne elatior	-	+
Helichrysum spp.	-	+
Diuris longifolia	-	+
<u>Total number of Species Found</u>	<u>17</u>	<u>26</u>

(Data supplied by Dr. P.R. Bird)

(b) Sedentary grazing leads to a dependence upon grazing to reduce fire risks.

This principle is also well known. The following effects of grazing on native grasslands have been shown by the authors cited above: Warm temperate perennials (eg. Stipa aristiglumis, Themeda, Poa caespitosa) → short season cool temperate perennials (Danthonia spp., Stipa falcata) → cool season annuals (eg. Vulpia spp., Hordeum, Trifolium, Bromus).

Apart from altering the grassland ecology (often irreversibly) the consequence of this change in botanic species composition is to displace the period of flowering and maximum growth from summer back to spring. Danthonia and Themeda have relatively low dry matter yield in spring (eg. Cashmore 1932). The fire hazard resulting from this shift is an annual occurrence, demanding heaving grazing to control the risk. Biddiscombe (1953) has clearly demonstrated that grazing at a high intensity drastically affects ecological diversity.

We believe that where a fire risk might arise, as on a fringe area of forest and farmland - infrequent controlled cool burning would be the preferred fire-control method. A strip of ground could very easily and quickly be burned in this type of woodland.

This practice would incidentally, encourage the survival of native grasses and herbs.

- (c) Grazing system - in the light of the previous discussion we believe that the license system is a very poor one.

Inspection of grazed areas reveals that there is usually no "retention of an effective ground cover" (FCV Grampians Management Policies) nor is there retention of species diversity (a point not made in the Management Policies). While the F.C.V. has attempted to set moderate stocking rates (one sheep per 3 to 12 acres), in practice the rule seems to be flouted. Another problem is one of definition - if the leasee only grazes his area for 3 months then he puts 4 times as many sheep on the area as allowed! With fenced areas this is disastrous - eg. some areas near Cherrypool - with unfenced areas the sheep are forced to range widely for forage.

- (d) Other reasons for our opposition to grazing are the transfer of weeds into the forest (eg. burrs, seeds on wool and in faeces); soil compaction in the forest (particularly in winter); direct adverse effects of trampling; and competition with native animals / birds for grazing and shelter.
- (e) The Rocklands area also supplies domestic water to Wimmera areas - grazing here should not be permitted for that reason either.
- (f) Fencing - the zoning for grazing closely follows the FCV's vegetation map. Yet until late 1975 there appeared to be no effective fence in the whole region that could contain sheep within the prescribed areas. In practice the stock were / are free to wander into the "restricted" zone. (eg. South - North - West of HGH Corner and on the Rocklands north shore). As described earlier the system of grazing has made this situation more untenable than it would otherwise be.

It must be emphasised that the old fences (eg. along Rocklands Track, Black Range Road) do not now function and that in practice the concept of zoning for grazing is almost pure fiction.

References:

- Biddiscombe, E.F. (1953) - Aust. J. Agric Res. 4:1.
- Cashmore, A.B. (1932) - C.S.I.R. Bulletin No. 69.
- Griffiths, M. Barker, R. and MacLean, L. (1974) - Aust. Wildlife Res 1:27
- Moore, R.M. (1970) - "Australian Grasslands" (ed. R.M. Moore, A.N.U. Press Canberra) pp. 85 - 100.
- Specht, L. (1972) - "The Vegetation of South Australia" (2nd Edition) Government Printer.

Recommendations.

We recommend that, with the following exceptions, all of the Crown Land and Reserved Forest in the Grampians Black Range - Rocklands Area be declared a National Park and that it be managed by the National Parks Service. (See attached map).

1. The Mt. Difficult Pine Plantation should be excluded from the National Park and continue as a site for softwood production, managed by the Forests Commission.
2. The Billywing Pine Plantation should be excluded from the National Park and managed by the Forests Commission until the pines are harvested. It should then be allowed to regenerate and be incorporated into the Grampians National Park.
3. The area around Woolhpooer should continue as a site for hardwood production, managed by the Forests Commission.
4. Minor adjustments of the boundaries may be necessary.

Furthermore, we recommend:

5. That fire protection continue, as at present in National Parks elsewhere, to be the responsibility of the Forests Commission in consultation with the National Parks Service.
6. That existing apiary sites continue to be used in the Park.
7. That grazing not continue in the park.
8. That in view of the fact that timber from the Grampians is insignificant in the State's overall forest production, and that local mills have other sources of supply, that logging of hardwood species be phased out of the proposed park within 10 years.
9. That in view of the fact that a Grampians National Park would further increase the already high economic benefits that tourism in the Grampians brings to the surrounding towns, the National Parks Service be given a large enough budget to develop the tourism and recreational potential of the area as much as possible consistent with other management objectives.
10. That the park be zoned and management plans prepared at an early date, and that zoning and management should take into account:
 - (a) the extreme importance of protecting water catchments.
 - (b) the importance of conserving large areas of all vegetation types, and of protecting species of plants that are endemic to the Grampians, rare or of limited occurrence.
 - (c) the importance of protecting habitat for the wide diversity of native fauna, and in particular for - the brush-tailed wallaby, the pereregrine falcon, the potoroo, the smoky mouse, the bluntfaced rat, and the tiger cat.
 - (d) the importance of preserving and interpreting aboriginal sites.
 - (e) the importance of providing first class educational and interpretative facilities.

- (f) The need to zone certain areas for tourism.
 - (g) The need to zone certain areas for less intensive recreation.
11. That adequate funds be made available for ecological research, and in particular research on -
 - (a) Measures needed to control the cinnamon fungus.
 - (b) Habitat requirement for rare and endangered species such as the brush-tailed rock wallaby and the tiger cat.
 - (c) The use of fire to create and maintain habitats.
 12. That small pockets of private land still in reasonable natural condition within the proposed National Park should be acquired wherever possible, and incorporated within the proposed park.
 13. That the National Parks Service be given enough resources to develop the conservation, recreation and educational resources of the Grampians to the full.
 14. Education Areas. Past practice of the L.C.C. has been to designate certain areas as Education Areas. While we are in full support of the concept, many areas recommended for this purpose in the past have not been suitable, and it does not appear that much consultation has been held with local educational bodies and teachers.

We would recommend that before Education Areas are designated in the Grampians, the view of local schools and other interested persons (eg. field naturalists) be sought as to the likely use these could receive, and what locations might be suitable.

Such areas would be best managed by the National Parks Service as part of the proposed park. Provided less sensitive areas were used, and that use was firmly controlled by the NPS, we see no conflict between this use and National Park status.
 15. We would urge the L.C.C. to make primarily an objective recommendation in the Grampians Area, not primarily a political one. Political decisions are surely the responsibility of the State Government.