

HAMILTON FIELD NATURALISTS CLUB
Private Bag 105, Hamilton 3300

Graham Parkes
Ranger-in-charge
Black Range State Park
Po Box 18
Halls Gap 3381

10 April 1998

**Submission on
Black Range State Park Draft Management Plan**

Hamilton Field Naturalists are well acquainted with this area – for instance our members found the aboriginal art sites in the 1960's and we made detailed submissions on this area in 1976 to the then Forests Commission Victoria (Draft Management Policies) and in 1981 to the LCC. We have visited the area frequently, as it is an exceptional place for the winter display of many heath species, acacias including Varnish Wattle (*A. verniciflua*), and in other parts of the Park, for experiencing the unique open Box-Gum woodland environment.

General comment

We are encouraged by the statements in the Draft Plan that ecologically-based fire management prescriptions will be developed to conserve significant fauna and flora species and plant communities; that a Rock Art Site Strategy will be developed; that pest plant and animal strategies will be developed; and that recreation will remain low-key but with better facilities and interpretation information. These aims are applauded and supported by us.

However, the Draft is short on specifics, with little detail as to what Parks Victoria will do and how it will be done. A cynic might say that a manager could leave this Plan in the bottom drawer without ever looking at it, and still think that he/she had conformed with its objectives! This criticism is, of course, not confined to the State Park Draft Management Plan for this Park; it seems to be common to the other Draft plans released.

It is with some concern that we note, in reading the Draft Management Plan in relation to our submissions then, how little progress has been made in those 20-odd years towards better nature conservation management practice and in improving the representation of vegetation units in the Park! We will allude to specific points in our submission.

Specific comments

1. **Park name**

There are too many "Black Ranges" in Victoria; at least 5, with two in SW Victoria! The problem could be overcome by using the aboriginal name for the area – **Burrunj** or **Burrunj Range** (Anon 1990). The Plan should aim to rectify the fault. Attempts should also be made to restore names of other features in the area, including Cherry Pool which is an anglicised corrupted version of **Djarabul**.

2. **Status and boundaries of the Park**

We believe that the Plan should indicate a plan for the incorporation of the entire Black Range State Park area – and much of the surrounding State Forest – into the Grampians National Park. There are many reasons for this, as discussed below.

The Black Range SP – supplemented by the adjacent "State Forest" area – contains the most extensive area of Yellow Box woodland/grassland in the State. The Grampians also contains some Yellow Box grassland but the major areas are River Red Gum. This is poorly represented in other National Parks or conservation reserves. This fact is not acknowledged in the Draft Plan and is a serious omission. Our club stressed this in 1981 and others (*e.g.* Lunt 1995) have noted the importance of these grassy woodland areas, but management still appears ignorant of the fact. Lunt makes the point that these areas are managed as "grazing ecosystems" with no burning. Most of these areas have been converted to agriculture. The fragments that remain have undergone "ecological segregation", with some species depleted or eliminated. Lunt states that "all remnant grassy forests and woodlands have been grazed by stock, so that at best the policy can only maintain the impoverished remnants of 150 years of stock grazing". This is, of course, true of the Black Range woodland which has been unmercifully flogged

by sheep up to the present day. The Plan should make a major feature of the Yellow Box (*E. melliodora*) and River Red Gum woodlands. This can hardly be done whilst some of these areas continue to be treated as sheep grazing runs. The Draft Plan needs to address this vital issue - nowhere has the Draft indicated an awareness of the conservation significance of this issue.

Over 99% of the indigenous vegetation in the grassy forest and woodlands in SE Australia has been destroyed, primarily as a result of management practices that are detrimental to the species. Lunt contends that a program of regular burning and grazing by kangaroos (not stock) on parts of the grassy woodlands should be the long-term aim to restore the species diversity of these important relics. Archer (1997) reminds us that the way this is done is important to the result: the traditional aboriginal fire-stick methods created a mosaic of different aged vegetation which had great diversity.

The existing boundaries specifically exclude the Box-Gum woodlands from most of the Park, thereby diminishing their status! A glance at the Plan map, in association with a vegetation map, shows that the significant area south of the road from Cherry Pool to HGH Corner is not in the Park. Nor are the very substantial areas north of Rees Road and the Black Range Road. This is a major conservation concern that should be addressed in any future plan for this area. Fire control was once given as a reason for excluding these areas. That has never been a reasonable excuse because there are a multitude of kangaroos and wallabies in the area and sheep grazing is not required for vegetation control.

The State Forest areas north of Rees Road and the Black Range Road should now be incorporated into the Park. It may have been politically expedient to exclude them in 1981 but those times are gone (see HFNC 1981). Action is required to plan the conservation of species that are important to the State. There are also important areas of Desert Banksia in part of this zone that require protection from fire – as noted in the Draft Plan for the Park.

It is interesting to re-visit the HFNC submission to the LCC (1981), to see that no action has been taken to re-dress obvious deficiencies in the vegetation units represented in the Park ..."*omission of the Yellow gum/Yellow Box woodland from the proposed park seriously diminishes the variety of habitats and plant communities available for conservation of fauna, and also seriously diminishes the proposed park's scenic values. There is more to a National Park than rocks and scrub*".

The area between the present Grampians NP and the Black Range SP should also be combined together to link the area into a single management zone – a corridor to preserve future biodiversity. This action was also proposed and justified by HFNC in 1981. It is time that some active and sensible planning was done to rectify the mistakes that were made in 1981 when this corridor was simply listed as State Forest and treated as a grazing run. This area contains a stand of Grey Box (*E. microcarpa*), Yellow Gum (*E. leucoxydon*) and a few Bulloak (*Allocasuarina luehmanni*) – two of which are notable for their rarity in the area and Yellow Gum is also poorly represented in the Park. The area south of Cherrypool (Djarabul) is particularly important.

The Black Range State Park is presently under the same management as the Grampians NP, and has the same fire plan, so there do not appear to be any obstacles from a management point of view.

3. **Summary and Appendix 1**

Mention is made in the Summary of "significant flora and fauna species". However, Appendix 1 does not include regionally and locally significant species. These species are not considered in the final management plan (compare this with the Dergholm SP Draft Management Plan). More importantly, these are not considered in the Draft Management Plan.

For example, Beauglehole (1984) lists "rare-interesting-restricted species" for the Black Range:

Billardiera bignoniaceus (Orange bell-climber)

Cheilanthes distans (Bristly cloak-fern)

Cyphanthera anthocercidea (Large-leaf ray flower)

Dampiera lanceolata (Grooved dampiera)

Gonocarpus meyanus (Hairy raspwort)

Howittia trilocularis (Blue howittia)

Lepyrodia flexuosa (Twisting scale-rush)
Pimelia stricta (Gaunt rice-flower)
Pultenea patellifolia (Mt Byron bush pea)
Senecio hypoleucus (Pale fireweed)
Vittadinea australasica (New Holland daisy)

We do not think that is a complete list (see also (15)) but do not have the time to do the job the consultants ought to have done!

4. **Natural values** (p.1)

We believe that there are more than 6 rare or threatened species (see comments on Appendix 1). We think that there are also more than 260 vascular species (have you asked Cliff Beaglehole for his list for the area?). The native grassland areas associated with the Box-Gum woodlands has not been mentioned (see above) – this is a major deficiency in understanding of Park values.

5. **Park vision** (p.3)

The emphasis of the plan appears to be marketing and tourism, not conservation. Thus, the statement on Park Vision (p.3) could have been written by a tourist promoter. It is scarcely adequate for the Park. In view of the relative inaction over ecological management of the Park in the last 20 years we are not comforted by the statement that "*the future of the Park is assured*"!

6. **Management directions** (p.3)

How will "significant cultural sites be protected"?

How will a "system of ecological burning for the conservation of significant species be investigated and implemented"? And when? Will it include grassy woodland areas inside and adjacent to the present Park boundaries (State Forest)? If not, then that is a serious omission – this is a major requirement to ensure conservation/improvement of this restricted resource.

7. **Park protection** (p.3 and p.10)

How will the Horsham Regional Fire Protection Plan be implemented if you are going to "*develop an ecologically-based fire management system for the Park*" (p.10)? At present these appear to be mutually exclusive! We applaud the sentiments (p.10) – they have been a long time coming. But surely the Draft Plan should state (p.10 – Management Strategies) that "*The Horsham Region Fire Protection Plan... will be adapted to provide a sound ecological basis for conservation of plant and animal communities*" before being adopted"?

If there is an urgent need to implement a new fire plan then there is ample evidence now that certain plant communities demand different fire regimes. There is no need to postpone changes to the presently inadequate plan until some indeterminate future date when more research will be done. That will certainly mean another 20 years inaction. After the EV mapping is completed (p.6) the further steps outlined in the Draft should merely be used to fine-tune the system that is implemented now, on the basis of what is known.

8. **Management zones** (p.3)

This device has serious flaws. Inspection of the map informs us that the "conservation" zone is based on the rocky outcrops! Is that just an expedient basis for "walking only" access? Can 4WD vehicles go anywhere in the "conservation and recreation" zone? Are there no significant plants/communities elsewhere that require protection? We do not think that they are all within the "conservation" zone. This zoning process requires more thought.

9. **Resource conservation** (p.6)

The Draft states that "*ecologically-based fire management prescriptions are being developed*" and that this work requires completion of EVC mapping. Until that is done there should be no move to implement Regional Fire Plans that have little ecological basis. The Management Plan should not be released until this mapping and evaluation work is done. We also draw your attention to the need to consider the requirements for the grassland species – see Lunt (1996). Sheep grazing is no substitute for appropriate fire management. Fire can not be used where sheep deplete the ground cover each year. This practice on the State Forest borders to the Park should be stopped.

10. **Fauna** (p.7)
The bird tally for this Park should greatly exceed the 116 suggested in the Draft. Are water birds included? The Park does extend to the Rocklands Dam. The Western Vic. Field Naturalists Association has conducted bird surveys for the area. Murray Gunn would also probably have lists.
11. **Cultural heritage** (p.8)
There is, in fact, clear pathway access to Wildman Cave. One problem with the work done in making this path beyond that shelter to the larger shelter further north, has been the increasing amount of graffiti on the walls. If efforts had been made to remove these marks then the public would be discouraged from the habit. This is going to be a serious problem elsewhere, too. This area must be cleaned up. There is evidence of aboriginal motifs at the large shelter (this site is not mentioned in the Draft) but they will be lost. We do not believe that the final Management Plan should be released until the Rock Art Site Committee have made management recommendations.
12. **Pest plants and animals** (p.11)
What steps have been taken to eradicate the goats? If *Phytophthora* is a potential hazard, what steps will be taken to restrict vehicle access to some areas in the winter?
13. **The Park Visitor** (p.13-17)
How can the "aims" be achieved without an adequate ranger presence? In our experience, ranger visits to this area are very few indeed. What level of ranger activity is proposed?
- Visitors should not be permitted to camp in, or near, rock shelters where there is art work. Failure to stop this practice is certain to lead to site degradation (p.15, p.17). This is very evident at Black Ian's Rocks north of the Black Range. Significant art work there has been severely degraded by campers.
14. **Boundaries and adjacent uses** (p21)
What does "consolidate Park boundaries" mean?
One way of "minimising conflicts between Park values and surrounding land use" is to absorb the State Forest areas into the Park - for the reasons given in (1) above.
15. **Appendix**
Rare or threatened flora (Appendix 1) – this seems to be incomplete.
Grevillea lavandulacea (Black Range form) x *G. alpina* is a natural hybrid here. *Asterolasium phebaliodes* (Downy Star-bush) occurs here and at Golton's Gorge. Blotched sun orchid *T. benthamiana* occurs here (vulnerable) as does Rock wattle (*A. rupicola*) and the Large-leaved ray-flower *Cyphanthera anthocercidea* (eastern margin of cliffs). A form of Mint bush *Prostanthera denticulata* also has an occurrence here. Cliff Beaglehole would have information on other rare plants here and should be consulted for records subsequent to his 1984 lists.

Regionally significant species – see comments in (3) above concerning this omission.

References

Anon (1990) The restoration of *Jardwadjali* and *Djab wurrung* names for rock art sites and landscape features in and around the Grampians National Park. A submission to the Victorian Place names Committee. Koorie Tourism Unit, Victorian Tourism Commission.

Archer, W.R. (1997) "A variation on the view expressed in a manuscript published in the Victorian Naturalist relating to fire and indigenous land management". *The Victorian Naturalist* **114**, 192-195.

Beaglehole, A.C. (1984) "The distribution and conservation of vascular plants in SW Victoria". Western Vic. Field Naturalists Clubs Association. Portland.

Lunt, I.D. (1995) "European management of remnant grassy forests and woodlands in south eastern Australia". *The Victorian Naturalist* **112**, 239-249.

HFNC (1981) Second submission to the Land Conservation Council on the Grampians Area: October 1981 (Hamilton Field Naturalists Club).