

# Hamilton Field Naturalists Club submission to the Greater Gariwerd Landscape Draft Management Plan 2020

The aims of the Hamilton Field Naturalists Club (HFNC) include:

- Respect for Aboriginal history and presence
- Understanding principles of environmental management to protect and conserve the habitat in natural landscapes and where necessary restore degraded natural areas
- Advocating for the natural environment

In relation to the ‘*planning area*’, Hamilton is a major regional township close to the southern end of Gariwerd. HFNC supports most aspects of the Gariwerd Plan but are concerned that timely implementation will be hampered by the lack of resources and a nebulous organisational structure.

Our comments below are mostly directed to specific elements or proposals in the draft plan.

## **A. Aboriginal recognition and implementation of plans**

We fully support the restoration of original Aboriginal names for places in and around the Gariwerd mountains. Without that, any suggestion of paying respect to the First Peoples and their probable 60,000 year occupation of this area is a pretence. This is Australia, not Scotland, England or Europe.

The strongly worded traditional owner’s foreword could have been matched by a more committed *Greater Gariwerd Landscape Management Plan (Gariwerd Plan)* to support the healing process, move to self-determination or to travel the Caring-For-Country journey.

A more committed Gariwerd Plan would acknowledge the main barriers, impediments, resources, key roles, accountabilities and organisational structure needed to implement the plan. The COVID pandemic demonstrated the importance of organisational structure on the successful implementation of management plans and the need to strip out unnecessary bureaucracy. It is encouraging to see acknowledgement (p. 134) of the need to remove systemic and institutional barriers.

One of the sad aspects of colonisation is a propensity for short term reactive political gain and the proliferation of magnificent “fresh vision” planning documents. Poor implementation can reduce the best of plans to one of the worst form of respect, namely tokenism.

In the short time of European influence, colonisation has introduced a big number of Parliamentary Acts, Regulations and other forms of legislation which need to be navigated by the Gariwerd Plan together with consulting a very large number of Federal, State, local government, public authority, agencies, local organisations and adjoining landholder stakeholders.

Given the significance of Gariwerd in the healing and restoration process, then the Gariwerd Plan may need some legislative surgery to remove or bypass legislation, regulations and Government Plans that may hinder the healing process.

More thought needs to be given to managing the Gariwerd Plan (see Item 6.1 on p.134) which is disappointingly vague at this stage of the planning process. The current lack of a formal decision-making body is acknowledged (p.135).

## **B. Measuring the progress of the healing process**

There is mention of Aboriginal Victoria’s Affairs but nothing in the Gariwerd Plan that tracks (or reports against) the Victorian Government’s commitment to improving outcomes for Aboriginal Victorians. [See <https://www.aboriginalvictoria.vic.gov.au/aboriginal-affairs-report> for the reports and data tables, including those for Culture and Country].

The Gariwerd Plan should contain planned reporting of relevant key performance indicators that dovetail into the in Aboriginal Victoria and Closing the Gap reports.

Likewise, Gariwerd Plan should report progress against the key goals of the “Partnership Agreement on Closing the Gap 2019-2029” [<https://www.closingthegap.gov.au/data>]

### **C. Connection and communication**

Gariwerd has many gateways for people to enter. One imperative needs to be a coverage of the Greater Gariwerd Landscape with robust mobile telephone coverage. This would assist with getting permits, alerting visitors to risks associated with where they are in Gariwerd, emergency management and educating people based on their location in Gariwerd. i.e. to enhance the visitor experience but at the same time manage and monitor visitor activity. Any apps need to be more encompassing than just for the Grampian's Peaks Trail hikers.

### **D. Overlays and Special Protection Areas (SPA)**

It should be recognised that wind farms have an impact on the rural vista.

We support the proposed overlays and SPAs.

### **E. Climate change and environmental management/research and monitoring**

It is surprising to see only the briefest of mentions about carbon sequestration by the Gariwerd Landscape. There is scope to quantify the annual amount of carbon sequestered as part of offsetting greenhouse gas emissions.

### **F. Visitor experience**

There is little mention of the commercial development of Halls Gap (main entry point for many visitors). The ad-hoc and unsympathetic development and architecture in the main commercial gateway area does little to compliment the towering Gariwerd cliffs or give a sense of arrival.

### **G. Rock Climbing**

We support the general approach to the control of rock-climbing in Gariwerd. Bouldering is, however, contentious because its adherents do so much damage to the vegetation around the rocks. That activity has to be strictly restricted to rock areas where there is little or no vegetation.

While any permit system should perhaps apply to park users as a whole, regardless of their purpose or activity, with this specific group of people it would ensure that the park rangers know that the climbers have been given reasons for bans in certain areas and instructed in the expectations required of them when climbing in certain areas. While most climbers probably do the right thing, some do not and it is they who need instruction/supervision and prosecution for flagrant breaches of the rules. Of course that approach could apply also to 4WD drivers or other users.

The difficulty with imposition of rules to protect flora, fauna, rock faces or Aboriginal art sites or cultural places is the lack of staff to ensure that the rules are adhered to. It is very rare to ever see a ranger in the Grampians – climbers and walkers are aware of that. Is that going to change?

Chalk should be banned. It has always been contentious; when first used in the 1970's it was at odds with the climb-clean movement. It would be impractical to carry bags of coloured chalk. Many climbs would require a mixture of bright orange, sandstone and black chalk in their bags.

There is an opportunity to help the climbing community develop alternatives given it is unlikely they dip their climbing boots in chalk dust. Hand gloves have come a long way in recent years.

Gariwerd is a world class climbing area, perhaps it is time for developing some world class climbing practices (just like the move from fixed protection to temporary fall protection in the 1970s as part of the move to climb clean).

### **H. Fees**

There is little mention of charging a visitor some sort of fee, which is at odds with the entry policy for the alpine areas or Wilson's Prom. Some sort of payment could be considered as part of acknowledging respect for the place you are entering.

## **I. Control of Pest Animals**

There is no case for continuing to protect Red Deer, or any other introduced animal, in the Grampians. This is a colonial hang-up that needs to be dealt with. Deer are very damaging to many trees and shrubs, and goats and pigs are also a major threat to the park. Control of foxes and cats is also critical. They must be removed, or at the very least controlled to low levels of persistence.

As well, some control of kangaroos may also be needed. The suggestion that kangaroos and the pest animals could be controlled by introducing dingoes to the park is interesting and would probably work. However it is unlikely that adjacent farmers would agree with that proposition. One could, of course, develop a model that might indicate the cost to farmers of loss of livestock to dingo attacks v. the revenue saved through pasture not consumed by kangaroos (as a result of dingo predation). A fence would be impractical and useless.

### **I Duck Hunting adjacent to the SE corner of the Grampians**

We cannot support the suggestion that duck hunting should continue on Bradys Swamp. The Gariwerd Plan puts this area in the *Cultural Conservation Zone* – ‘*areas where the highest cultural landscape values are found, including related natural processes and biodiversity*’. Why, then, would you let hunters loose there, in that beautiful place, to destroy/disturb those wildlife values and possibly the Aborigine relics (a mound and several shield trees, some dead, are found there)?

The proposal to permit duck hunting on the recently restored Bradys Swamp is totally incompatible with the current situation there, following the restoration of Gooseneck Swamp, the Walkers swamp complex and Green Swamp by the Nature Glenelg Trust. To allow shooting amidst those wetlands is incomprehensible – why was it proposed? Apart from general displacement of ducks and smaller waterbirds (including migratory waders at the time when they are building reserves for their long migration), hunters will be dispersing a flock of up to 36 Brolga that currently use Bradys Swamp and Green Swamp, with smaller numbers on Gooseneck Swamp and Walkers Swamp. The birdlife on these swamps has been surveyed extensively over the last 5-10 years and the results have been recorded in Birdata and elsewhere.

This whole area should be a sanctuary where the birds can rest and feed (and be viewed) without being disturbed. Currently, ducks on wetlands that are hunted over – and other wetlands adjacent – do not allow people within about 200 m of them before taking flight. That should not continue here.

We need to move with the times and keep guns out of parks and our wetlands. While some hunters claim that they ‘bought’ Bradys Swamp and Gooseneck (through licence fees) that has no bearing on the case. The Crown Land part of Brady’s Swamp has not been acquired through any such scheme. Gooseneck Swamp, within the park, never held water over autumn after it was drained in the 1960s, so it was never going to be a place for legal duck-hunting. Even in the years from 2015-20, after the closure of that drain in 2014, it has not held any water over autumn when duck-hunting is permitted.

The draft states that ‘*Gooseneck and Bradys Swamp were later fully or partially incorporated into Grampians (Gariwerd) National Park*’. However, we understand that PV has unfortunately NOT claimed the Crown Land half of Bradys Swamp as part of the National Park. DJPR’s Game Management Authority (GMA) has decided to resist any move to end game hunting on that swamp. The GMA attitude is expected to be consistent with their stance on Lake Linlithgow, a wetland that apparently inadvertently lost its Sanctuary status in 1975 when there was a revision of the Wildlife Act. Hunting on Lake Linlithgow was permitted in 2018, despite the presence of 780 Blue-billed Duck and 250 Shoveler, and in Feb. 2019 when there were 905 Blue-billed Duck and 170 Shoveler present. Where were the birds to go? – all the other lakes were shot over. The GMA will not deal differently with Bradys Swamp and the waterbirds on all of the swamps there will be displaced.

Parks Victoria had the opportunity, when the swamp was restored in 2015, to stand up for conservation and press for the inclusion of all of the Crown Land part of Bradys Swamp into the National Park. Nothing was done then. The future is tourism and birdwatching – not duck-hunting.

## **J. Grampians Peak Trail and impacts on the environment**

We are concerned about the impact of new access tracks that are either being proposed – or will be pushed for later – for servicing of the camps and proposed other facilities along this trail. We are

concerned that private enterprise will demand vehicle access that will result in incursion of many more weeds into the heart of the park, disrupt fauna movements and will also detract from the visual amenity. It is likely that there will be pressure to turn the walking track into a trail that can be used by vehicles. We would like to see that proposition rejected in the final draft.

#### **K. Visitor and ecosystem management in the park**

There is a major issue NOT canvassed in the draft report. We believe that the draft plan should explain what NEW level of staffing and funding is needed to manage the proposed new system, given that it cannot satisfactorily cope now, due to the poor funding provided by government. How can PV possibly manage the new proposals, such as:

- *'monitoring visitor behaviour'*
- *'additional attention to environmental conservation measures, particularly pest plant and animal control'*
- *'creating a world-class tourism experience [Grampians Peaks Trail] that provides managed tourism'*

It seems that PV is expecting salvation through *'growth in community volunteering, in particular through citizen science and recreational volunteering, [that] will continue to be vital to the landscape's future management'*

Volunteering (and with no authority to manage visitors) cannot be considered adequate for a National Park of the significance of Gariwerd. Nor can it deliver the environmental management required for the host of smaller reserves that PV manages. It is a pipe dream that, if relied upon, will see our great natural resources degraded and lost

The draft makes the point that in 2019-20, \$592 million was generated in the region from 1.3 million visitors to the Gariwerd NP. It is apparent that a pathetically small amount of that huge sum goes towards adequate management of either people or the environment in the Gariwerd NP. That is mirrored around Victoria. Government wish to milk the cow but not to feed it!

An example of the lack of staff familiarity with the treasures that PV holds in the park, is the tragic loss of perhaps the tallest River Red Gum in Australia, due to lack of clearing debris around it and it subsequently being severely burned out in a wildfire. That once majestic tree is near the site of the former Forest Lodge. Did the staff not know that it was there? Or that such trees need to be protected from fire at their base? Being understaffed, PV was probably unable to look after it or the dozen or so of other great River Red Gums in that area that were damaged by fire within the last 15 years. There is, as observed earlier, also a general absence of ranger visitation to most areas of the park, either to manage people or to survey or manage fauna and flora.

This matter of adequate staff to manage the park and its treasures is clearly a matter that the senior managers of PV should take up with the government. We see the impact of negligible ranger presence evident now in all of the parks and reserves in SW Victoria. One result is a horrific increase in the incidence of hoon damage to the reserves with off-road 4WDs or trail bikes. They know that no-one is there to stop them. Examples include Fulham Streamside Reserve, Dundas Scenic Reserve, Lake Linlithgow, Lake Kennedy, Bryans Swamp, Cobra Killuc Wildlife Reserve, Bradys Sawamp and Eastern Black Range.

#### **L. Camping**

We agree that camping should, in future be permitted only in designated places, where some control can be maintained.

#### **M. Burrunj State Park (Western Black Range) & Crown Lands adjacent to Gariwerd NP**

We have, over many years, urged VEAC and other government organisations to include the Crown Land between Gariwerd and the Burrunj State Park into the Gariwerd NP. Either that or include it in Burrunj SP. The area between the present parks contains the largest area of Yellow Box Woodland (and some Yellow Gum) in SW Victoria – a landscape poorly represented in the Gariwerd NP or any other reserve. A further option, combine all 3 areas as Gariwerd NP. Whatever, the fauna and flora within each park would benefit from having permanent protection of vegetation linking them.

We believe also that there is a strong case for incorporating the adjacent Woohlpooer State Forest block into the Grampians NP. The River Red Gum (*E. camaldulensis*) woodland is categorized as Plains Grassy Woodland, a greatly depleted EVC in Victoria. This landform would greatly add to the diversity of the Gariwerd NP, particularly for River Red Gum and plains ground flora. It would provide a tenth EVC to the Gariwerd NP

### **N Fire Management**

We hope that DELWP has learned from events over many years that their approach has to be altered, if our fauna and flora species are all going to survive. Cultural burning may help with that objective but the principles are unlikely to be adopted by DELWP because the staff do not have the time or patience to wait for the appropriate time to burn. Nor do they seem willing to abandon large-scale burns that appear almost always to leave no unburned patches, or to modify the criteria that served when the climate was wetter, or to burn in the evening rather than heat of an autumn day?

The DELWP practice of ‘blacking out’ unburned areas after a cool burn or wildfire is monumentally inappropriate for wildlife, as is the common practice of setting the fires in a continuous front, ensuring that no patches are left and that few animals will survive the fire. And the final insult to the environment (once common in the Portland region but probably also elsewhere), setting next year’s fire against the boundary of last year’s fire, so that in 3 or 4 years a huge area will have been burned that cannot support much of anything.

Further, the policy of falling any large tree that is ignited in a fire will eventually see the loss of practically all of the habitat trees in the forest or woodlands. Why is it OK to bring in a fleet of bulldozers, but not include one ‘cherry-picker’ with appropriate equipment to put out fires in the tops of these huge, old trees that are homes to at least 80 species of birds and mammals – and an unknown number of reptiles and insects? Where is the environmental objective in all this?

What influence does PV have on the way fires are planned and executed? We note that the draft does state the importance of having long unburned areas as refuges for fauna, in short supply now after the fires of the last 15 years.

### **Reference list**

We noted a few omissions:

- p.x Bird et. al. 1988
- p.35 Bird & Frankel 2005
- p.80 Williams 1988

We also note that recent (2018) important geological information for the Grampians and region produced by Ross Cayley (GSV) has not been cited.

Dr PR Bird OAM

Secretary



Hamilton Field Naturalists Club



(submitted 22 Dec 2020)