

Comment on the Shannon and d'Entrecasteaux Draft Management Plan - 2005 by the Institute of Foresters of Australia

Background

The Institute of Foresters of Australia (IFA) is the organisation representing Australian professional foresters. The organisation was formed in 1930, has active branches in all of the Australian States and the ACT, and is governed by an elected Board. A requirement of membership is that members have University level qualifications in forestry or a closely related scientific discipline, or extensive relevant practical experience in forest management or forest science. The IFA is an advocate for better forest management in Australia, for high professional standards in forest and woodland management and for the active management of our forests for all values. Current membership is approximately 1200. Members are employed throughout Australia, and overseas, and in a variety of occupations, including native forest, plantation and national park management, research, bushfire management, land care, education, public service administration, private forestry and industry. The age and experience profile of our members ranges from new graduates to retired men and women with over 50 years of experience in forestry, park, wildlife and land management in Australia. The WA Division of the IFA has several members each with many years' experience in managing southern forests for the Forests Department/ CALM.

Three IFA members were directly involved in preparing the South Coast Reserves Plan - the forerunner to the d'Entrecasteaux National Park – and the Western Australian division of the IFA was the body which first put forward the concept of the d'Entrecasteaux National Park.

This submission draws on the combined experiences of these and other members.

Overview of the draft Management Plan

The draft plan is a complex document and difficult to read. It is expansive on the theory of sustaining biodiversity and but short on operational forest and parkland management proposals.

A land management plan needs to be a concise practical guide for positive action by CALM staff in the field and it must reflect the expected funding available. This plan is basically negative, giving inordinate attention to the curtailment of human and domestic animal intrusion.

Separate management plans should be prepared for each of the two national parks. The Shannon National Park has large areas of high forest while the d'Entrecasteaux National Park is predominantly open coastal “flats” with scattered wooded hills, punctuated with beaches, sand dunes, wetlands, inlets, estuaries and lakes. They are very different ecologically and in terms of their interaction with the public.

The high forest in the Shannon National Park was largely harvested for timber in the 50s and 60s using a selective silvicultural system that in many areas has not resulted in sufficient regeneration to restore the character of the original old growth forest. In these areas, the dense impenetrable undergrowth and sparse tree cover will never match the attraction of coastal scenery. Radically differing fire management strategies are needed to restore the natural features and biodiversity of the two parks.

The draft plan highlights the significant difference in the hydrology of the two parks by stating that the groundwater on the Shannon plateau responds relatively slowly to seasonal differences in rainfall while in the coastal and wetland areas, the groundwater systems respond more rapidly to rainfall.

The draft plan focuses strongly on attractive aspects of coastal management of the d'Entrecasteaux National Park but fails to address the needs of the high forest in the Shannon National Park.

The draft is a useful reference work on the theories on which park management can theoretically be based. But it fails as a specific working management guide for the two National parks.

The draft is beautifully (and expensively) produced with high quality maps and tables, lavish design and layout and comprehensive appendices.

Specific Comments

11. Biogeography

Acquiring more land to add to the parks may assist to ensure a CAR reserve system but also adds to the problem that currently CALM is unable to properly manage the areas it has already.

15. Soil and Catchment Protection

The stated objective is to protect and conserve the quality and quantity of soil and water within the parks, particularly the wetlands systems, the rivers and estuaries and the coastline. This is to be achieved by expansion of, and focussing on, the coastal areas and consulting with other government agencies. No details are provided for soil and catchment protection of the forested areas of the Shannon National Park. This is a curious omission, as the original reason for reserving the Shannon was to "preserve" an entire river catchment.

17. Native Animals and Habitats

"Working with other agencies and private industry to ensure that extractive industries within or adjacent to the parks do cause adverse environmental impacts" [page 35 item 7] must be an unintended error. It is hardly a sound prescription for conserving flora and fauna. Since commercial timber harvesting was banned, all the potential industry operations [except the keeping of feral bees] are in the coastal areas of the d'Entrecasteaux National Park.

Bee keeping with feral bees is not in keeping with the conservation of biodiversity or habitats, and is thus not compliant with the objectives of the plan, or the CALM Act.

21. Diseases

A greater threat to the biodiversity in the d'Entrecasteaux National Park than feral animals, frequent fire or domestic dogs is the dieback (*Phytophthora cinnamomi*) disease. It is staggering to think that the extent and probable expansion of the disease has yet to be mapped, given its potential impact on the flora and its influence on the provision of access to the park.

This issue should be a priority issue in the management plan. Far greater emphasis and financial commitment is required to address the impacts of dieback and its management, and the plan should be setting out detailed requirements for CALM to urgently address.

22. Fire

Uncontrolled high intensity bushfire is a threat to all values of all terrestrial parks in Western Australia. This fact is not emphasised in the draft management plan, despite

the fact that the plan's principle fire management objective is to maintain conservation values.

The plan indicates that bushfire management is to be achieved by implementing a "Regional Master Burn Plan". The RMBP is not appended so there is nothing in the draft plan to say how fire will be specifically managed in these two parks. There is no mention of the differing needs of the two parks, the serious backlog in fuel reduction burning, the frequency of burning cycles desirable in high forest or the need for frequent low intensity burning of the coastal areas to re-establish savannah grasslands.

The historical review skates over the fact that the lovely park areas inherited by CALM were the product of thousands of years of regular burning by aboriginal people, and a century of burning and grazing by cattlemen.

The submitted fire philosophy is dominated by the idea that fire frequency must not be shorter than 2 to 4 times the maturing (seeding) age of the slowest species. It then equates this minimum fire frequency to minimum rotation for the whole type. This logic is seriously flawed, as it fails to recognise that if burn intensity is low, burns are patchy and some areas inevitably have a longer burning cycle.

The plan incorrectly argues that past fire frequency must have been longer than historical data suggests, because "fire-sensitive species still exist". This denies the well-known fact that the shorter the fire-interval, the milder the fire and the greater the likelihood of patchiness and longer 'internal' fire return times. Longer rotations will have exactly the opposite effect, as heavier fuels accumulate and fires are more intense and less likely to leave unburnt areas.

The bushfire management philosophy underpinning this management plan will lead to:

- Longer between-fire intervals across both parks;
- More uniform and more intense fires as a result of higher fuel loads because of less frequent burning;
- A loss of those communities that depend on short rotations (the savannahs);
- Serious damage to communities vulnerable to high intensity fire, such as old growth karri.

None of these outcomes is desirable. In the pursuit of maximising biodiversity at the site level, the draft plan sets up the loss of diversity at the landscape level.

Under this draft plan, in the d'Entrecasteaux National Park, the only fire regime that will not be represented is the one that was the most common in pre-European times and which is essential to maintain the savannah grasslands, once common in the park, but now almost absent. They are also the most endangered community types in Australia. Not only will the frequent fire regime not be practiced on a management scale, the draft plan makes no mention of even attempting to undertake it at a demonstration scale.

One large high intensity fire is all that it takes to destroy a savannah and replace it with a thicket – to return it to its previous condition is likely to take at least a hundred years of careful low intensity burning. A fire management plan that makes no

provision to maintain the savannahs and indeed provides every condition to promote their destruction, is unacceptable and must be modified.

24. Non-indigenous Heritage

According to the draft Plan, protecting and conserving the non-indigenous cultural heritage of the parks will be achieved by protecting, maintaining and restoring non-indigenous cultural features of educational or historical significance.

If this is the case, we do not understand why the Burnside Fire Lookout and as much as possible of the Shannon sawmill and town site have been destroyed. These are the most significant non-indigenous heritage features of the Shannon National Park. Only the man-made dam is preserved and that has a far greater impact on the environment. Its main attraction is a source of marron for tourists. [Although these are at little risk. Snaring is the only allowed method of catching marron and the waters of the Shannon dam are so dark with tannins that snaring is impossible].

The bulk of this section of the draft plan is irrelevant to Shannon NP

27. Recreational Use

Camping within the parks. Of the 33 camping areas listed on page 108-109 only two - the Shannon Townsite and one other unspecified "*remote natural area*" with "*no facilities*" on the Shannon River - are not in the d'Entrecasteaux National park. Thus the objective to provide a range of quality camping opportunities in the parks is not adequately addressed for the Shannon National Park.

32. Mining and 33. Commercial Fishing

All the mining tenements and petroleum exploration licences [page 121] and commercial fishing areas are in the D'Entrecasteaux National Park. This section of the draft plan is irrelevant to the Shannon National Park.

35. Scientific and Research Use

The stated objective of encouraging and assisting external researchers where the outcomes are relevant to the Department, is nothing more than opting out of the Government's responsibilities to fund and conduct the research itself.

CALM should be undertaking research in these areas with its own resources, including the major wildlife research facility at Woodvale. This plan could also be a vehicle for promoting the re-establishment of an effective multidisciplinary research station at Manjimup, as used to be the case until recently.

The outcomes of the research should be relevant to management of the park and meeting management objectives, not "to the Department" as stated.

37. Rehabilitation

Restoring degraded areas to as near a natural state as possible by closing roads, involving the public in rehabilitation programs and using local flora will do nothing to rehabilitate thousands of hectares of forest that has been disturbed by selective logging in the Shannon National Park nor to restore the vast areas of savannah grasslands in the d'Entrecasteaux National Park that are becoming extinct by the application of a burning regimes based on flawed logic.

This section of the plan needs to consider the big picture of degraded ecotypes and should be completely re-written.

38. Beekeeping

Beekeeping is acknowledged as having an impact on park values but the plan is to continue to support it by researching its impact, applying additional conditions, renewing old sites, allowing some new ones and liaising with the industry. The "precautionary principle" that was applied as a basis for closure of the timber industry, banning domestic dogs and constraining many forms of recreation does not appear to apply to the deliberated release of feral bees in the parks.

If this plan is to be consistent in its treatment of different land uses or practices, bee keeping should be banned in the two National Parks.

Conclusions

- The draft management plan shows a lack of balance between the two parks. Preferably there should be two plans.
- The draft management plan lacks specific actions and finite commitments
- The plan fails to adequately address the requirements for research, management staff and funds
- The plan fails to identify and properly prescribe for the most serious injurious agency: dieback
- The plan does not provide an adequate response to the risk of fire, or the need for fuel reduction and ecological burning.
- The plan is long-winded and should be rewritten as two separate and concise plans spelling out management action for each of the National Parks.
- The sections of the plan devoted to detailed academic theory about biodiversity are not appropriate in an action plan, nor should they have been given special status of inclusion in an official publication. This academic material should be offered as a separately published (and clearly designated as unrefereed) "discussion paper" which can then be subjected to peer review by scientists and managers.

The IFA recommends a major reworking of this draft plan before it is taken to the next stage.

We would be pleased to assist the Conservation Commission in this project.