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Planning Coordinators
Walpole Wilderness Area and Adjacent Parks and Reserves Management Plan
Department of Environment and Conservation
Locked Bag 104
Bentley Delivery Centre
BENTLEY WA 6983

Dear Sir and Madam,

**Comment on the Walpole Wilderness Area and Adjacent Parks and Reserves
Draft Management Plan - 2006**

The Institute of Foresters of Australia is the body representing professional foresters throughout Australia. Many of our members have been engaged for decades in the management of the forests subject to the Walpole Wilderness Area and Adjacent Parks and Reserves draft management plan. This submission draws upon extensive practical experience and professional understanding of forest conservation and protection planning.

An Overview

- The IFA strongly supports conservation of forests. We are supportive of the National Reserves System program and development of a Comprehensive, Adequate and Representative reserve system. We are also supportive of productive use of forests managed so that this conserves the forests.
- Designation of the Walpole Wilderness Areas does limit the productive use of the forests. The draft Management Plan excludes harvesting timber products while permitting almost all other uses including mining. This is unjustified given that timber harvesting has not threatened the conservation of these forests hitherto.
- The plan fails to justify the designation of a wilderness area. Such a designation in fact adds nothing to the values of the area if it were simply a national park with a few roads closed.
- The title should be 'Walpole Wilderness Areas and Adjacent Parks and Reserves', to avoid the misleading impression that there is a single and expansive area of wilderness.
- A land management plan needs to be a concise practical guide for action by DEC staff, other stakeholders and the visiting public for field operations and activities. And it must reflect the expected costs involved in its implementation. In contrast the draft gives inordinate attention to Departmental instructions that apply to all reserves and national parks, it is difficult to read, being too expansive on the theory of sustaining biodiversity and lacking on operational forest and parkland management action.
- Inclusion of the Shannon National Park in the WWA and not the d'Entrecasteaux National Park is illogical.

- The extent of old growth forest does not appear to be correct.
- The fire policy places too much emphasis on the impact of fire on the understorey vegetation (which is known to be supremely well adapted to periodic fire) and does not appear likely to protect the forest from large high intensity wildfire.
- The question of renewal of senescent high forest is not addressed.
- The draft fails to provide specific working plans for the parks and reserves concerned. It is a useful reference work on the theory on which park management generally is based but these details largely duplicate all other recent management plans.
- The draft Plan fails to give appropriate recognition to the economic, social and cultural values associated with the sawmilling industry in the WWA. Parts of the WWA substantially supported the development of the townships of Denmark, Walpole and Rocky Gully. It is inappropriate to pretend that it is a pristine wildness of Old Growth Forest which has never seen an axe or heard a chainsaw ring. The truth is, this wilderness has been extensively disturbed by forestry and it has been sustained to the present in excellent condition.

Specific Comments

The title implies that most of the area is wilderness while in fact less than 9% of the WWA is so designated. A more appropriate title would be “Walpole Wilderness Areas and Adjacent Parks and Reserves” [WWAS].

3. Planning Area

There is already a single management plan for the Shannon National Park and the d'Entrecasteaux National Park. The addition of the Shannon National Park to the WWA [but not in the planning area] and exclusion of the d'Entrecasteaux National Park is confusing and illogical. The d'Entrecasteaux National Park is predominantly open coastal plain with scattered undisturbed wooded hills, punctuated with beaches, sand dunes, wetlands, inlets, estuaries and lakes in keeping with the characteristics of the WWA. In comparison the Shannon National Park has large areas of high forest that have been regenerated following timber harvesting that have less in common with WWA values where just 2% [your figure] has been intensively harvested. Logically the d'Entrecasteaux National Park should be included in the WWA and possibly the Shannon National Park should be excluded. [Note: Because of these differences, Valuwood's comment on the draft management plan for the Shannon National Park and the d'Entrecasteaux National Park submitted that separate plans for each park would have been more useful management tools].

The draft Plan proposed to reclassify 21,450 hectares of State Forest and Timber Reserve to Forest Conservation Reserve. There is no documented justification of this action. The draft Plan identifies that 46% of the Warren Bioregion is in a formal conservation reserve. Any need to increase reserves in the Jarrah Forest bioregion should be in the northern jarrah forests where they are threatened by clearing for mining. The State Forest and Timber Reserves are secured as forest in perpetuity. The management can be consistent with the objectives of the WWA. However, placing these areas into the FCA unnecessarily reduces future options for forest management.

4. Key Values

The Red Flowering Gum *Corymbia ficifolia* is arguably Australia's most widely known tree throughout the world but its lone source doesn't rate a mention here.

Why does apiculture not rate as a key economic activity?

There are many economic values in the WWA which were not given any recognition in the draft Management Plan.

6. Vision

Again the global significance of the Red Flowering Gum is overlooked.

7. Legislative framework

The IFA is supportive of the National Reserve System. The draft Management Plan goes well beyond the requirements of the NRS and CAR system identified through the RFA process.

10. Performance assessment

The KPI's for all forest management should include criteria for social and economic sustainability as well as environmental criteria.

11. Proposed Tenure, Purpose, Vesting and Boundary Changes

There are 39 proposed additions to the planning area. The IFA is actively supportive of secure tenure for forests. However, the draft Plan refers to "providing maximum security of tenure and contribute towards the establishment of a comprehensive, adequate and representative reserve system". The existing status as State Forest and Timber Reserve is adequate security of tenure and allows future flexibility of management which would not be possible under the Forest Conservation Area. The CAR system was already secured in the Warren Bioregion through the RFA process. Acquiring more land to add to the parks may dilute the problem of ensuring a CAR reserve system but says nothing about managing what is already there and the distinct possibility of inadequate funding. The proposals should be objectively assessed against alternative options for land tenure.

19. Native Plants and Vegetation

Information about ecosystems and particular species of interest needs to be made available - perhaps not in the plan but through visitor centres, interpretative material, and supporting documents. In particular to inspect specimens of *Eucalyptus brevistylis* and the variations in the colour of the remnant *Corymbia ficifolia*. The Florabase site provides distributional information for individual species and is available on-line through Naturebase website. This should be made explicit in the plan.

21. Ecological Communities

The absence of a definition of old-growth from the plan is a serious weakness, and there is plenty of information that was assembled for the RFA. The claim that there are 33,803 hectares of old growth karri forests in the planning area is challenged. Mature trees in most of the areas of old growth karri were killed in the 1937 fire and dense vigorous regeneration resulted. [Personal records from A.C. Shedley who was forester in charge at the time and personal experience of P.N. Shedley who was forester in charge of the area from 1952 to 1958]. That means much of the so-called old growth is regrowth that is less than 70 years old.

Visitors to the WWA cannot use the Plan to locate the areas of genuine old growth forests. The two “nationally important wetlands” are named. Why is the “one Ministerial-endorsed threatened ecological community” not named?

We are supportive of no loss of flora species in Threatened Ecological Communities especially the Mt Lindesay-Little Lindesay Granite TEC.

25. Fire

Implementing the Regional Master Burn Plan is a major plank of the fire management strategy. Because it is not appended there is nothing in the draft plan to say how fire will be specifically applied to the wide range of conditions that exist in the WWA. There is no mention of the intense fires needed to regenerate senescent karri forests. Is no renewal envisaged for the duration of the Plan? Or is it to be left to unplanned natural events? Or should we wait until they die of old age before addressing the problem? The problems associated with the renewal of native forests are too important not to be addressed in a management plan. The draft plan is strong on theory but completely lacking in detail.

The submitted fire philosophy is dominated by the needs of the understorey species. The trees don't rate a mention.

The CALM philosophy is likely to lead to:

- Longer rotations than historical records would indicate
- More uniform and more intense fires as a result of higher fuel loads because of longer rotations
- A loss of those communities that depend on short rotations [e.g. the savannah grasslands].

In the pursuit of maximising biodiversity at the site level everywhere, the draft plan ignores the loss of diversity at the landscape level.

The draft plan states that “*regimes, including prescribed burning since the 1960s, may have already contributed to changes in biodiversity.*” There is no evidence to support this. A more accurate statement would be “*Abandoning the regular burning practiced by aborigines and the early coastal graziers has already contributed to changes in the original biodiversity. Returning to the regimes of more frequent burning may assist in restoring the original biodiversity.*” An example is the virtual replacement of savannah grasslands by coastal thickets due to less frequent fires.

31. Visitor accommodation - campfires

Fires must be prohibited during the declared wildfire season. The risk of accidental escape is too high.

32. Visitor fees

The user pays principle should apply to tourism as it does to other commercial activities in forests. There should be a KPI to monitor and evaluate the economic sustainability of tourism in the forests.

33. Commercial operations

There is no adequate justification to terminate the existing low impact leases. Licences should be self funding and economically sustainable.

37. Mining

The IFA is supportive of the policy to prohibit mineral and petroleum exploration in National Parks and Nature Reserves. The IFA would support extending this policy to prohibiting extensive forest clearing for mining in all tenures of public land.

42 and 43. Beekeeping and flora harvesting

Apiculture is acknowledged as having significant adverse impacts on park values while 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. Obviously the "precautionary principle" that was used as an excuse to axe all timber harvesting for fear that it *may* cause damage to biodiversity and the similar arguments submitted for excluding flora harvesting does not apply to the keeping of introduced bees and flora harvesting. To be consistent, the keeping of introduced bees and flora harvesting should not be permitted in National parks.

PART I. MONITORING AND IMPLEMENTING THE PLAN

48. Research and Monitoring

Systematic monitoring of the ecosystems in the WWA is essential. The Forestcheck program is quoted in the plan as a possible framework, but this is currently paid for by the Sustainable Forest Management output program in DEC and by the FPC. Neither source of funds would be available to conduct monitoring in the WWA.

The DEC should be responsible for the monitoring program and the results should be published. There is nothing in the draft that spells out how the plan will be implemented. Although research and monitoring are required to successfully implement the management plan, they do not constitute implementation. Why is there no mention of the staff, materials and equipment required to police the Plan, carry out burning, road maintenance, rehabilitation, manning of visitor centres and the numerous other functions that are the real management tasks? The costs associated with research and monitoring need to be estimated, including outsource costs.

Glossary

Not offering *your* definition of "old-growth forest" is surely a significant oversight. Other jargon words used that do not appear in a dictionary or in the glossary are "relictual", "geodiversity", "geoprocesses" and "phytogeography".

Appendix 6. Conditional burning areas

The IFA has previously written to DEC that areas where fire is deliberately excluded should not be termed Fires Exclusion Reference Areas. Exclusion of fire is not a natural state for reference in WA forests and the term is misleading. We recommend adoption of the term Fire Exclusion Study Areas.

CONCLUSIONS

- The detailing of academic theory for sustaining biodiversity masks the specific needs for action in the planning area. Such theory should be offered as a separate document for application to all parks and reserves and include details such as lists and locations of endangered species, the Master Burn Plan and silvicultural prescriptions.
- There needs to be finite commitments, not only to actions required but also to the provision of staffing and funds to implement them.

- This and other recent draft Management Plans [for example the Shannon/d'Entracasteaux and Wellington drafts] do not constitute functional forest management plans to be used as working documents guiding the activities of the managers. Instead they are an extensive partisan documents which attempt to justify a particular policy position without presenting alternative management strategies. Once the management policy has been identified a functional management plan will need to be developed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Wettenhall', with a stylized flourish at the end.

David Wettenhall
Chair, IFA WA Division

30th November 2006