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Dear Sir/Madam

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SUBMISSION - REVIEW OF CURRENT POLICIES RELATED TO RECREATION IN DRINKING WATER SOURCE CATCHMENTS

The Forest Products Commission (FPC) wishes to expresses its apprehension to supporting the proposed increase in recreational activities within drinking water source catchments.

The FPC currently manages pine plantations throughout the Perth Hills, Swan Coast and south west, all of which supply up to 1,000,000m3 of resource to the WA Timber Industry through State Agreement Acts and contracts. The planning of operations to satisfy the State's obligations must take into account social, financial and environmental aspects, all of which support the FPC as being a Government Trading Enterprise certified with an Environmental Management System (ISO 14,001).

This submission will use the experience and knowledge gained over the past 9 years of managing plantation operations to illustrate the complex nature of integrating recreation with forestry and the levels of management required to ensure the following:

- The integrity of catchment protection is not compromised
- The provision of continued management of the States pine asset is included with the implementation of any management strategy for recreation activities.
- The protection of the States pine resource is not compromised with increased access by the general public.

Examples illustrating existing deficiencies in management and therefore increased risk to catchments will include the Gnangara and Pinjar Off-Road Vehicle areas within the Swan Coast plantations and unauthorised recreation activity within the Wellington catchment including the Brunswick plantation.

Please find below the FPC's submission to the Terms of Reference:

1. The social, economic and environmental values and costs of recreation access, where possible, to Perth Hills and South West drinking water catchments, including the costs and benefits to public health, water quality, recreation, indigenous culture and management options;



Plantations managed by the State form part of the landscape within many of the catchment areas and are regularly the point of focus for varied forms of recreation whether it be off road vehicles, hiking or mountain bike riding and in the past rally championships. The exposure and availability of these activities in plantations draws ever increasing numbers of the public into plantations. Coinciding with this is the increasing population and growth to the Perth outer metropolitan areas in addition to the residential estates surrounding south west towns. Where once the plantations stood isolated, they are now a selling point and a backdrop to sprawling development.

As such the following are seen as ramifications of recreation use within plantations:

- Inadequate management and enforcement of regulations to ensure the recreation activity does not pose a risk to the productive potential of the plantation estate (e.g. fire).
- The increased dumping of rubbish (including vehicles) which are commonly burnt and left. The Gnangara off-road vehicle area is the highest concentration of wildfires within the plantation. The dumping of rubbish at this site is constant as a result of free, open unrestricted access.
- Inadequate planning when implementing recreation areas within plantations that do not cater for closures in the event of forest operations, burning activities or fire evacuations placing visitors to the site(s) at risk. Within the Gnangara recreation site, operations are commonly avoided due to the degree of uncontrolled interaction between motorbike riders and harvesting/hauling equipment. Should operations occur in these areas, damage through vandalism of the harvesting equipment can be up to and in excess of \$1000 per week with in some cases machinery being shot in addition to attempted arson.
- Unauthorised activities such as the use of dirt bikes or highly modified 4WD's during the winter selectively target highly challenging sites such as steep terrain, fire breaks and low lying areas subject to inundation. All of which become heavily eroded and inaccessible to fire fighting equipment. This therefore places the suppression capacity, personnel attending the fire and the plantation asset at risk.
- The advertising of locations within catchments for unauthorised activities on the web increases the exposure of environmentally sensitive sites venerable to erosion contributing to the sedimentation of waterways. The Brunswick plantation contains many valleys and surrounds the Brunswick River. Boggy sites are continuously targeted by modified vehicles to the point of becoming inaccessible and non-trafficable even during the drier periods.
- A lack of resources and inadequate budgeting by land managers for the ongoing yearly repair of fire breaks, maintenance of gates/signage and access roads is also a point of concern should more recreation be considered. This is demonstrated at the Wellington catchment where gates restricting traffic are constantly damaged to a point of becoming ineffective. In cases like the Brunswick plantation, the FPC spends up to \$30,000 annually to enable access to harvesting sites. This is on top of the outlay the FPC provides to the Department of Environment and Conservation (DEC) for the maintaining of strategic access for fire suppression equipment. DEC Wellington District in the past has gone to the lengths of installing signage campaigning for users to consider the damage caused to fire breaks and their value to not only the safety of fire fighters, but also the role firebreaks have in assisting wildfire suppression and prescribed burning activities.

- Currently there is little regulation of specific recreational activities in the Swan Coast plantations in relation to the Fire Danger Index (FDI) which gives an indication of the rate of spread in the event of a wildfire. DEC as the FPC's principal fire prevention and suppression agency advises the FPC of the FDI each day in all districts during the fire season which is then used to apply forest operation (harvesting) restrictions. However similar restrictions are not applied to recreational activities acknowledged as being the main contributors of wildfire (whether intentional/illegal or otherwise). As seen with the Mundaring fires of Feb 2005, over 300ha's of plantation was affected (not including surrounding State Forest). With the combined effects of soil disturbance from pine salvage operations and complete removal of soil stabilising ground litter and vegetation, the catchments were highly exposed to sedimentation. The FPC requires restrictions to higher risk recreation activities taking into consideration the FDI.
- 2. State, interstate and international legislation, policy and practice for recreation within public drinking water source areas including information relating to population health benefits and impacts;

No comment from the FPC.

3. The range of community views on the value of water and recreation in public drinking water source areas;

Items listed in point 1 adequately address the FPC's views.

4. The costs and benefits of alternative water quality management strategies and treatment for water catchments containing recreation; and

No comment from the FPC.

5. Possible recreation sites/opportunities available outside the Perth Hills and South West drinking water catchments.

The FPC wishes those items from point 1 be considered in conjunction with point 5.

In general the FPC acknowledges the need for recreational areas for a growing WA population and therefore supports the conditional implementation of activities. For the most part the FPC considers the majority of proposed recreational activities to be of benign nature in terms of its potential impact to the State's pine resource and catchments. The FPC, however, sees this as an opportunity to better develop and manage exiting (gazetted/authorised) sites for those more destructive activities leaving those benign in nature for the catchments.

Should you have any queries regarding the above or attached, please do not hesitate to contact Michael Lobb (Manager – Swan Supply Cell) on

Yours sincerely

Gavin Butcher

EXECUTIVE MANGER OPERATIONS

10 December 2009