

Two Peoples Bay Nature Reserve Draft Management Plan

1. The Plan proposes a change in purpose from Nature Reserve to National Park.

The Draft presented to the Corporate Executive presented that as an option but argued for maintaining the present status. The Corporate Executive decided to modify the Draft Plan to present their preferred option only. The Minister announced this proposal pre-emptively in Albany about two weeks before the Draft Plan was considered by the National Parks and Nature Conservation Authority!

There is no good rationale for this change of status.

The Two Peoples Bay Nature Reserve has long been considered the jewel of the Nature Reserve system. It was established as a Nature Reserve in recognition of its very considerable nature conservation values (at that time the only known population of the Noisy Scrub Bird). Subsequent research has further emphasised the nature conservation values by revealing the presence of other rare/threatened species and communities in the context of improving knowledge of other conservation areas in the South Coast Region.

The Two Peoples Bay Nature Reserve Draft Management Plan itself contains some significant inconsistencies in relation to this particular proposal by emphasising the nature conservation values and the importance of the populations of rare birds yet, at the same time, proposing increased public access and usage in areas containing those rare birds. The immediate impact of pedestrian access to additional rare bird habitat areas may be relatively benign (although it is acknowledged that *Phytophthora* is spread by foot traffic), but other Departmental policies such as the emphasis given to protection of human life in National Parks will almost certainly lead to implementation of management regimes that compromise nature conservation values.

The Two Peoples Bay Nature Reserve does have a level of public use inherited from the time of its establishment. This has been allowed to grow especially over the last 5-6 years; in fact catering for this public usage has been given priority in such things as the development of roads and visitor facilities, in the fire management activities and in the apparent acquiescence to requests for beach access and access by commercial fisherpersons.

There is a real danger that the proposed change in purpose with the commensurate change in management emphasis towards facilitating (increasing) public useage and away from nature conservation will lead inevitably to a loss in nature conservation values.

What reasons might there be for the change in purpose from a Nature Reserve to a National Park?

Firstly, it is argued that National Parks are held in higher esteem by the public than Nature Reserves. This may be a consequence of the public debate about mining in conservation reserves that has occurred in Western Australia over the past 6-7 years. But it is a rather trivial basis for the recommendation. The counter-argument is that the Two Peoples Bay Nature Reserve presents a wonderful opportunity to improve the attitude of the public towards Nature Reserves.

The change in purpose may lead to an increase in resources allocated to the management of the area. Indeed there has been an attitude amongst operational staff that the Reserve has been over-resourced and so resourcing has declined over the past 5-6 years. Allocation of resources should be on a needs basis where needs for conservation purposes (especially for the management of rare and threatened species) should rank as highly as (if not more highly than) needs for providing for recreation. If the

Management Plan contains commitments to particular operations then those should be resourced irrespective of whether the area is a National Park or a Nature Reserve.

Consider the following scenario which, in these times of fiscal restraint, is highly probable: the area is changed to a National Park and there is a consequent increase in public useage yet additional resources for management are not forthcoming. Existing limited resources will be directed to managing burgeoning numbers of visitors and, as a consequence, nature conservation values will deteriorate.

A further rationale for the proposed change of purpose may be that it would resolve one of the Department's industrial relations problems. At present the situation exists at Two Peoples Bay Nature Reserve where a Reserves Management Officer, a public servant, lives on the Reserve and works side by side with National Parks Rangers employed under a Miscellaneous Workers Union award. Surely the way to solve an industrial problem is not to sacrifice nature conservation values!

The Draft Management Plan contains proposals to capitalise on the nature conservation values of the Two Peoples Bay Nature Reserve in a very entrepreneurial way eg through the promotion of the reserve as a major eco-tourism site. Are these proposals the basis for the decision to change the purpose of the Reserve? Should the Reserve become a zoo? Is it sensible to potentially jeopardise the nature conservation values of the place for the purpose of making money for the Department? And even if it is argued that the money will be spent only in the Reserve, is the potential risk to the nature conservation values worth it? Is the concept of making money in the way that is proposed philosophically sound?

Finally it may be argued that the existing levels of public useage are inconsistent with the purpose of Nature Reserve and/or that the proposals for public use in the Draft Management Plan including zoning arrangements will be incompatible with the purpose of National Park. The counter-argument is that if a level of public useage is agreed to in the Management Plan then it has legal status irrespective of what the Conservation and Land Management Act states should be the management objective for a Nature Reserve.

An important argument for keeping the Reserve as a Nature Reserve is that it provides a strong justification for constraining public use: it sets before the public quite clearly the view that, at Two Peoples Bay, the highest priority for management is the conservation of natural values. As time goes on it will be important to have legal and technical reasons for not acquiescing to the increased demands for public access.

Is there a shortage of National Parks and coastal recreation sites in the vicinity of Albany such that public absolutely needs access to the Two Peoples Bay Nature Reserve? Clearly the answer to this question is no. The public has access to West Cape Howe National Park, Torndirrup National Park, Princess Royal (Albany) Harbour, Oyster Harbour/King River, Gull Rock National Park, Nanarup, the northern end of Two Peoples Bay to Betty's and Norman's Beach, Waychinicup National Park and the Waychinicup Inlet and Cheyne Beach. (Inland there are major recreational opportunities at the Porongorup National Park and the Stirling Range National Park). It is true that Two Peoples Bay Nature Reserve has features that are unique etc. But there is a danger that if access to the Reserve is too easy then it will come to be regarded as just another National Park, just another picnic site. It would be far better to highlight the differences, the special values, by maintaining its different purpose and title and by clearly translating those differences into management.

Two Peoples Bay was created as a Nature Reserve in preference to a National Park, despite the presence of the Casuarina townsite and despite the very strong opposition of parts of the local community including the squatters, in recognition of the over-riding importance of the place for nature

conservation. That importance has not diminished with time; rather, with further research the Reserve has become even more important. For example it is still the major repository of the rare Noisy Scrub-bird and the only natural, persistent population. It is the source of birds for the translocation program; a program designed to share the risk of extinction but one which serves to highlight the importance of the Two Peoples Bay Nature Reserve.

It is recommended that the Draft Management Plan indicates the preferred option to maintain the present purpose of the Reserve as a Nature Reserve

2. The Two Peoples Bay Nature Reserve Draft Management Plan proposes a series of use zones which support the concept of the Reserve becoming a National Park with increased visitor useage and access. It is argued, however, that the proposed zoning is not consistent with the stated objective of according priority to nature conservation.

At present, two major areas of the Reserve are gazetted Prohibited Entry/Limited Access: the Mt Gardner area to prevent interference with the Noisy Scrub-bird and the Moates Lake area to minimise the spread of *Phytophthora*. This means that a permit is required for access; however the requirement has not been policed but it has made it possible for local staff to prosecute people driving 4WDs in these sensitive areas.

The Draft Management Plan acknowledges that one of the greatest potential threats to the nature conservation values of the The Two Peoples Bay Nature Reserve is the spread of *Phytophthora*. It also draws attention to the potential for the disease to be spread by vehicle and by soil on shoes. Surely the response to the *Phytophthora* problem is to restrict access to the greatest possible part of the Reserve.

It is recommended that the Draft Management Plan provide for two levels of access: Prohibited Entry, throughout the majority of the Reserve; and Education, to include the areas presently accessed by the public.

3. The Fire Management section of the Two Peoples Bay Nature Reserve Draft Management Plan proposes unspecified fuel reduction activities over an area of about 500ha of what is recognised to be prime habitat for the Western Bristlebird, a species that is declared threatened under the Wildlife Conservation Act. The total population of this species is estimated to be less than 1000 of which the Two Peoples Bay Nature Reserve contains about one third. The fire management proposals clearly have the potential to impact severely on the Western Bristlebird; they also have the potential to seriously degrade the vegetation over this large section of the Reserve in the medium to long-term ie 10-15 years and beyond.

The proposals for fire-fuels management are unspecified in terms of objectives and rationale. If fuel reduction is proposed, what levels of fuel are regarded as safe or optimal for the types of native vegetation found in the isthmus area and on what basis are they proposed? What are the criteria to be employed in deciding management strategies?

The original fire management plan for the Reserve, devised in 1976, was a marked departure from the standard approach that had been applied on Government land to that time (particularly State forest) and involving broad-scale fuel-reduction burning on a regular, rotational basis. The Two Peoples Bay Nature Reserve fire management plan was based on the notion of minimal burning/intervention

through strategic fuel reduction coupled with a comprehensive programme of research and monitoring to permit improvements in future fire management planning and implementation.

When the original plan was devised, the population of Noisy Scrub-birds on Mt Gardner was the only one in existence. The fire history of the Reserve revealed the major risk to the birds was from fires emanating from the farmlands to the north and west of Mt Gardner and from the picnic area and Little Beach. The approach was to isolate Mt Gardner from farm sources of fire by constructing the Strategic Fuel Reduced Zone through the isthmus and to substitute gas barbeques for wood fired ones. Slashed firebreaks were maintained around Little Beach and an improved program of education, surveillance and liaison was implemented.

The situation regarding the Noisy Scrub-bird has now changed: there are now many populations of Noisy Scrub-birds; the attitudes of adjacent landholders and the local community towards fire management on the Reserve have changed and the capacity of the Department to suppress fire has improved substantially. It is questionable, therefore, whether the Strategic Fuel Reduced Zone is the most appropriate approach to fire management.

The original ie 1976 fire management involved a review of the operational outcomes and the results of the research and management at the end of the first rotation of burning. There is no evidence that a serious attempt has been made to do this and to incorporate the findings into this new plan.

The research on effects of fire in the Strategic Fuel Reduced Zone show:

- *the study burn reduced above-ground biomass from 15.5 tonnes/ha to 3.2 tonnes/ha;
- *the subsequent regeneration was severely and adversely affected by unconstrained grazing by Grey Kangaroos-after 5 years the above-ground biomass in grazed areas was only 1/2 that within the grazing enclosure, some highly palatable important species had been eliminated and many species of weeds had invaded;
- *fire fuel loadings exceeded 8 tonnes/ha after 4 years and 10 tonnes/ha within 6 years. In other words, if the target for fire management is to keep fire-fuel loadings below 10 tonnes/ha, the practise of fuel reduction burning is effective for no more than 5-6 years; and
- *studies of the biology of the plants and animals at this and nearby sites suggest that, from a purely biological point of view, 12-15 years are required for regeneration after fire.

Subsequent work has shown that a second fuel-reduction burn within 10 years causes more marked deterioration of the native vegetation and that this deterioration is exacerbated by kangaroo grazing.

In essence the studies showed that fuel reduction burning is not a preferred option for fire management but that if it is employed it must be done judiciously ie strategically, and only when accompanied by control of kangaroo grazing either by fencing or culling. In other words, no kangaroo control-no burning!

A preferred approach to fire management in the isthmus area involves: *upgrading the track to Sinker Reef to provide safe and ready access for firefighting and to create a permanent and effective firebreak. Public access can be controlled by gates and/or creating an entry trap that is impassable to conventional vehicles.

*slashing a 100-150m strip immediately to the west of the present Strategic Fuel Reduced Zone. This should be accompanied by a monitoring program designed to examine effects of slashing on fuel loadings and nature conservation values.

The whole of the Fire Magement section is out of step with modern notions of conservation management- this is reflected in the stated objectives which emphasise protection of anthropocentric

values and maximising populations of Noisy Scrub-birds. This emphasis appears to be linked to the proposals to change the Reserve to a National Park and to promote eco-tourism ie converting it to a zoo. Priority should be given in all aspects of management to maintaining/conserving the full range of plant and animal communities, the landscapes that support them and the ecosystem processes associated with them. Where there is a conflict between conservation of the biota and protecting human values, the conservation objectives should have priority through the acceptance of a higher level of risk associated with those human values. Visitors should be advised that they enter the Reserve at their own risk and there should be an expectation of danger and risk associated with the experience of using a Nature Reserve just as there is with wilderness areas. Finally, it should be noted that there is no scientific basis for any proposal to use fire to maximise populations of Noisy Scrub-birds. It is a maxim that promoting one species to maximum population levels will disadvantage other species. Therefore the proposed objective should not be supported.

There are a number of other problems with the Fire Management section that are unsatisfactory and reveal a tendency to merely adapt practices used in forested regions of the State rather than developing strategies and practices that are appropriate for conservation areas and areas with non-forest vegetation. The Two Peoples Bay Nature Reserve Draft Management Plan provides the opportunity for the Department of Conservation and Land Management to develop an innovative and imaginative fire management programme that builds on the results of local research and experience and technological developments from around the world. In fact the international conservation significance of the Reserve demands it.

It is recommended that the proposals for fire management in The Two Peoples Bay Nature Reserve Draft Management Plan not be accepted and that the Department be directed to review options in a paper to be presented at the next meeting of the National Parks and Nature Conservation Authority.

4. The Two Peoples Bay Nature Reserve Draft Management Plan identifies the spread of *Phytophthora* as a major threat to the nature conservation values of the Reserve. Yet the Draft Plan proposes greater levels of human activity throughout the reserve than exist at present. For example, at present much of the Reserve is gazetted as Prohibited Entry/Limited Access. Under the proposals in the Draft Plan, these areas would become Special Conservation or Natural Environment zones in which access would be permitted and even encouraged.

It is recommended that the Draft Management Plan denote the majority of the Reserve as Prohibited Entry in order to raise the level of protection of the biota from *Phytophthora*.

5. The Two Peoples Bay Nature Reserve Draft Management Plan proposes further promotion and development of the Reserve as a tourism and educational resource. Whilst this may appear worthwhile, the actual proposals have great potential to impact adversely on nature conservation values on the Reserve in the immediate timescale and into the future.

The stated objectives under Day Use- Facilities and Access (p77) include ..."promote and facilitate recreational activities such as picnicing..."

An approach to public access and use of the Reserve that is more in keeping with the very considerable nature conservation values of the place would be to phase out general public use and

particularly activities such as boat launching and change the emphasis quite clearly and deliberately towards conservation with limited access related to conservation and education about conservation.

The phasing out of recreational use of the reserve, perhaps better described as a reduction in support, could be achieved through subtle disincentives. For example, the current picnic area is often congested with parked cars and boat trailers and the area is rendered somewhat unsafe by these and by the movement of vehicles through to the beach. The Draft Management Plan proposes redevelopment of this picnic area without addressing seriously these problems.

An alternative might be to construct the proposed car park well back from the beach and then close the road from there to the beach for parking ie set-down only a spring loaded gate to be constructed across the road at the picnic ground end of the car park. People wishing to launch boats would have to open the gate to gain access to the road, launch their boats and then return their cars and trailers to the car park and walk to the beach. People wishing to picnic would have to park away from the picnic area and walk to it (set down access if necessary). People wishing merely to see the scenery would be discouraged from driving through the picnic ground by the presence of the spring-loaded gate but would be able to walk.

The use of Two Peoples Bay for porting commercial fishing boats should cease (and that part of Two Peoples Bay should become a Marine Reserve).

It is recommended that the sections of the Two Peoples Bay Nature Reserve Draft Management Plan dealing with Community Relations, Recreation, and Commercial and Other Use be reviewed to make them more compatible with the primary nature conservation objectives of the Reserve and with the existing purpose of the area as a Nature Reserve.