

The Friends of Trigg Bushland, Inc
PO 249
North Beach, WA 6920

30 October 2014

City of Stirling
By email: stirling@stirling.wa.gov.au

Dear Sir/Madam,

Re: Trigg Bushland Reserve Draft Management Plan - Comments from the Friends of Trigg Bushland, Inc - October 2014

The Friends of Trigg Bushland are very grateful to have been provided the opportunity to make comment on an earlier draft of the Trigg Bushland Reserve Draft Management Plan, and acknowledge that many previous suggestions have been implemented. We very much appreciate the positive attitude of the City of Stirling in allowing local stakeholders to provide early input whilst plans are in a formative phase.

The Friends of Trigg Bushland also applaud the model used for community consultation, and believe that it should be used as a model for any further plans which impact any part of Bush Forever Site 308:

- Early consultation before plans are drawn up for public comment, including
 - face to face meetings with stakeholders and planners; and
 - opportunity to review initial drafts of documentation prior to release for comment.
- A long public consultation period, including
 - Signage on-the-ground throughout the bushland advising of the consultation period;
 - QR codes so that people can easily find the documentation on the City's website, and
 - An open day where people can come and talk about the proposed changes in person,
 - at a location within the affected area, and which is
 - fully staffed by CoS and planning professionals, including senior staff.

We hope that this style of community consultation is adopted by all departments of the City of Stirling for any future issues which affect any part of Bush Forever Site 308.

The following comments are from open consultation within the membership of the Friends of Trigg Bushland, and include many sources. We are very pleased to also include comments which have been forwarded to us by Professor Bill Loneragan.

Comments on the Draft Management Plan:

1. The Management Plan ('MP') should encompass both the Trigg Bushland Reserve ('TB') and all of the adjacent land which comprises Bush Forever Site 308 ('BFS308'). The title of the report should reflect this. While we welcome the fact that all of South Trigg Reserve is included in TB, we also note that the Figure 1 Assessment Boundary does not include all of BFS308.

The MP should specifically note that there are significant portions of non-bushland within this area, but that Bush Forever covers all significant native vegetation within the boundaries of a

site, even if on private land. This means that the foredunes at Trigg Beach and the secondary dunes alongside the existing access road to Trigg Beach carparks are covered by Bush Forever legislation, as also are significant trees within Millington Reserve. We strongly recommend that this report be amended to include all of Bush Forever Site 308 in its scope.

2. The Recommendations and Management Strategies are, in general, limited in scope to what is likely to be achieved within current budget constraints. We believe that the MP should be aspirational, and include best practice strategies. Major issues which should be included or expanded are:
 - a. The burgeoning pressure on urban bushland due to population growth, urban infill, and the effects of climate change and reduced groundwater. These can be expected as the major threats to urban bushland over the next ten years, which should be the time frame for this report. These threats, and the management strategies used to mitigate these threats, should be clearly explained in the report. The issues and arguments raised in the MP will be necessary in future years to justify CoS policy and expenditure.
 - b. Recommendations should be expanded to further reduce current fragmentation by removing informal tracks and restricting access where appropriate - while monitoring bushland for additional areas which may need to be restricted in future.
 - c. There should also be a strong recommendation that no further fragmentation occurs in future, and that walkways, playgrounds, access roads and other infrastructure are inappropriate in any of the sectors of BFS308.
 - d. The report should recommend historical fire mapping and innovative fire management techniques. As 85% of fires are caused by man¹ there need to be specific recommendations to mitigate bushfires ecologically (weed reduction) and socially (education, citizen watch) as well as provide specific plans for bushland recovery when a bushfire does occur. It is pleasing to note that the MP recommends post fire flora and fauna surveys and specialised post fire weed control, and recognises the extreme changes in flora that can result from too frequent fires.
 - e. Weed mapping has been included in the report, but should be given a priority, and should include a soil analysis to identify seed banks - weeds and as well as native species. It should be noted that only certain areas have been mapped for weeds in recent years, which has allowed the explosive growth of certain weeds (eg bridal creeper) in areas which have not been surveyed.

It is particularly important that these recommendations are made in this report, as it will provide a basis for decision making by CoS non-professional management in future years. Fire, weeds, climate/water change and population pressure are the major negative influences on urban bushland and need to be addressed with priority recommendations. With the mooted policies that Perth will grow 'up, not out' in future, our remnant bushland areas will become even more important.

3. Earlier Management Plans should have been incorporated into the MP. What is missing is a section that reviews the earlier work; something that indicates which strategies have been effective, those that haven't, and if it possible to say why. Even a table that indicated, for example, that various weeds, feral animals have increased/decreased would be useful.

¹ Bryant C 2008. *Understanding bushfire: trends in deliberate vegetation fires in Australia*. Technical and background paper no. 27. Canberra: Australian Institute of Criminology.
<http://www.aic.gov.au/publications/tbp/tbp027/>

4. As the draft MP recommends, the legal stature of the City of Stirling as Manager and the legal details of the reserves comprising Bush Forever Site 308 need to be corrected and formalised as a matter of urgency. In particular, the designated purpose of each reserve must be amended as a priority from 'recreation' to (at a minimum) 'passive recreation.' We also agree that the section of bushland on Elliott Rd should be included in BFS308; we have inquired but can find no relevant reason why it was not included initially. We applaud the City of Stirling for taking the initiative on this issue.
5. Threatened and Priority Ecological Communities form arguably the most important parts of BFS308, and it is appropriate they are recognised in the MP. The *Callitris preissii* TEC (page 29) in the southeast of Sector 1 has been confirmed by recognised by local experts², the Australian Heritage Database³, and prior management plans – as well as members of FoTB who have been resident in the area for nearly 50 years and recall the *Callitris preissii* in this area as large old trees at that time. There may be some confusion with planted *Callitris preissii* in the southwest part of Sector 1, however this difference is made apparent in previous management plans (1988, 1991).

The MP calls for the *Callitris preissii* TEC to be investigated and for further management practices to be put into effect. We believe that this should be done as a matter of priority, particularly as this TEC is extremely fire sensitive.

6. Classification of the quality of the bush in BFS308 is not always consistent with our experience. Clearly, areas which have previously been assessed as 'pristine' in the Bush Forever literature (in the South Trigg Reserve) have not been investigated; these areas are dense and virtually inaccessible and are not likely to have changed significantly since originally assessed. They appear to have been overlooked in this survey.

Nearly half of the bushland in Sector 2 is classified only as 'Good' which makes it one of the most degraded areas in BFS308; we note that the MR acknowledges that this area was burnt by a very hot fire in January 2013, and is still regenerating, which we believe is appropriate. The classification of bushland is a very important issue with potential ramifications for decision making in decades to come.

7. Recommendations regarding wildlife could be stronger given the presence of protected/threatened species in BFS308. Specific recommendations about access reduction and fire mitigation should be made so that these species are given the best chance possible of survival.

While we applaud the recommendation that BFS308 be declared an area where dogs must be kept on lead, we also know from practical experience that a large proportion of dog owners will ignore this rule. Simply making the recommendation is insufficient.

In other bushland reserves, areas have been fenced with wide wire mesh to provide additional protection for particular species from dogs, and similar measures should be discussed in the MP. In addition, other issues related to dogs should be noted, eg, there has been some discussion that dog faeces is high enough in soil nutrients to harm certain plant species, such as orchids.

Cats are a major contributor to fauna loss, and although education is recommended regarding the Fauna Protected Buffer Zone, there should be further recommendations regarding monitoring and enforcement.

There is strong evidence of quenda and echidna populations in Trigg Bushland. They must be protected from out of control dogs.

² Greg Keighery, pers.com.

³ <http://www.environment.gov.au/topics/heritage>

8. There are recommendations that no further facilities be provided in BFS308 and that the area be used primarily for walking and dog exercise. We agree completely with this.

However, problems associated with the dual use path, the lookout, beach carpark and surf lifesaving club should be specifically referenced and the need to ensure that population pressure from increased beach use does not affect the bushland. This should include the parts of BFS308 that are to the east and west of the beach carparks and surf club. There should also be some consideration given to appropriate treatment of the lookout.

9. There is a recommendation for no further fencing within BFS308. This is not supported. Virtually all of BFS308 is perimeter fenced except for Sector 4. This area has only one internal pathway fenced which, due to the duress of constant vandalism, CoS re-built to provide formalised access to internal 'goat tracks.'

There should be specific recommendations of strategies to reduce the 'off track' traffic in Sector 4, particularly as it under-fenced in comparison to other parts of BFS308. In particular, the constant widening of intersections between 'goat tracks' and the main paths should be addressed, if not by fencing, then by bollards or other means. These intersections currently fan out up to five times the width of the track itself. To recommend no action whatsoever is in our view inappropriate, particularly since Sector 4 is in a two year trial with further fencing to be put into place depending upon the results. To pre-empt this trial is potentially disastrous for bushland protection.

Ironically, the only recommendation made in regard to fencing is to remove old fencing in Sector 4, fencing which is particularly effective. As it is visually unobtrusive, being wire mesh fencing and set back into the bush, it has never been the source of complaint nor has it been vandalised. Instead, it has simply done its job for years. Perhaps instead of getting rid of this fencing, we should be looking at it in a new light – not as flimsy or temporary, but rather as a visually non-intrusive and therefore a more effective and useful form of fencing.

10. The comments regarding climate change are sensible; we really do not know what the long-term effects will be but whatever they turn out to be, it is more likely that disturbance due to fire, weed invasion and human activities will impact adversely on the native vegetation - structurally and floristic composition. A comment here along such lines would be useful to emphasise where priorities should lie.
11. There are references in various places about information on specific topics being made available. Where these refer to matters such as Dog Acts, cats etc it is clear where the information is to be found but an area which requires some more attention is 'education'. The MP is vague about who will do this, for example, can local schools be involved/approached, senior citizens groups, etc, or will it simply be a brochure issued by the City of Stirling? Alternatively, the Community Bush Restoration events run by the City of Stirling have been very effective community educational exercises. Education is often used as a catch-all cure for problems – but who is to do it, how they will achieve it and how effective it will be are key issues which are not mentioned.
12. There are new and innovative methods of reducing the number of bushfires which include social activities as well as ecology management techniques. These need to be researched and included as part of the MP. Fire prevention is not something that can just be left to chance, as in the past, with no more preventive action taken other than placing posters. Prevention needs to be actively pursued as a target and strategies continually managed if fires are to be prevented.
13. While we agree that the 'goat tracks' in Sector 1 and 5 should be closed and rehabilitated, we believe that this recommendation should be made for all similar tracks in BFS308. It should not be limited to any sector.

It should also be noted that where 'goat tracks' have been semi-formalised, specifically the 'Nature Appreciation Trail' in Sector 4, there has been further degradation of the bushland. This 'goat track' is being monitored and may be closed in future, subject to a two year trial. This trial should be discussed in the MP. Formalising other tracks in a similar fashion will probably lead to further degradation of the bushland.

14. The recommendations to build barriers on both sides of West Coast Highway are strongly supported, subject to final design. We believe that more emphasis should be put on the management of vehicle and foot traffic along West Coast Highway in this report.

15. Typographical corrections:

- Inconsistency between p(ii) *Conostylis pauciflora* subsp *euryrhipis* (s) and Table 4 *Conostylis pauciflora* subsp *euryrhipis* (3)
- p30 Recommendation 5.1 *Callitris preissii* should be in italics.
- p36 §2.4.9 para3: *Armillaria* is used as a common name on 4 occasions and in such a context would be shown in normal type-face but in the previous para where *Phytophthora* is also used as a common name there it is shown in italics. Therefore it would be preferable to use *Armillaria* as the latin name, hence in italics.
- p37 para2 - fungi is plural and there is only one survey, therefore 'A fungi survey' would be better phrased as 'A fungal survey' or 'A survey of fungi'.
- p45 para 2, line3 should read: designated dog

Conclusion

Notwithstanding our remarks above, we applaud the City of Stirling and in particular the Natural Areas Management staff and their contractors for the hard work and diligent consideration evident in what is a well-presented and illustrated, very clear and generally concise Draft Management Plan for Trigg Bushland, and for the exemplary way that the consultation process has been conducted.

Yours faithfully,

Nina McLaren
for the Friends of Trigg Bushland
30 October 2014