

Cape to Cape Alliance

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Mr. John Bailey, Chairman
Conservation Commission of Western Australia
Cnr. Hackett Drive & Australia 11 Drive
Crawley
WA 6009

Dear Mr. Bailey

Proposed Logging of Chetser Block

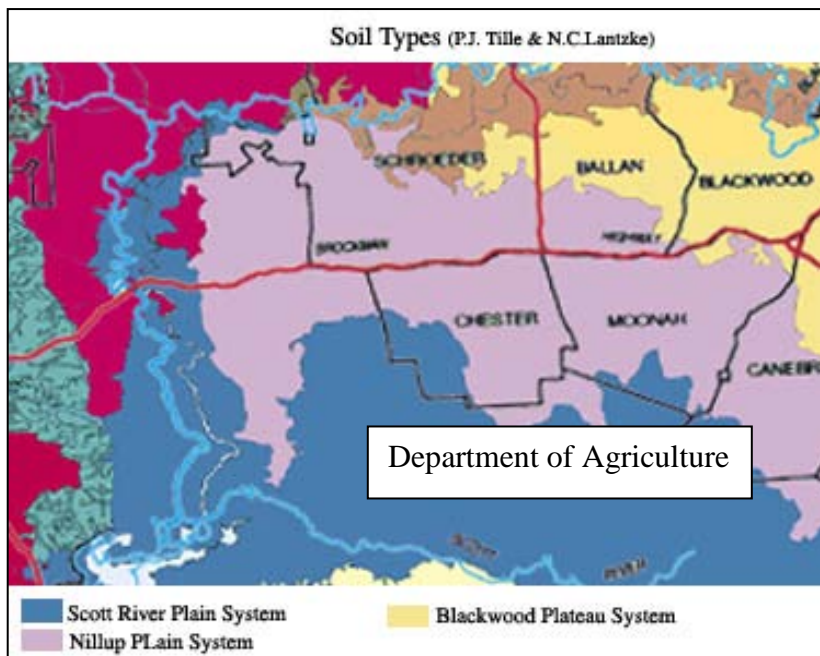
You will be aware that Chester Block, located to the east of Augusta, is proposed to be logged by the FPC. It is projected to yield less than one cubic metre of first and second grade jarrah per hectare. We are most concerned that the vegetation on this block cannot be classified as “forest” and should therefore be excluded from logging.

We refer to the document “Assessment criteria and process for the Conservation Commission review of old-growth amendments” pages 11, 27 and 32 which state that ***“All jarrah woodland whether or not included as old growth in the corporate database is unavailable for logging”***

Woodlands are unequivocally excluded from all logging operations.

The definition of woodlands as accepted by the State and its operational arms (DEC, FPC etc) is that of Muir and Aplin (1977 & 1979) and is that canopy cover is between 10 and 30 percent.

Chester block lies on the Scott Coastal and Nillup Plains.



The Department of Agriculture classifies both the Scott River Plain and the Nillup Plain vegetation as woodlands.

Scott River Plain System

215Sr

South Coast to the east of Augusta (from Hardy Inlet to the Donnelly River)

Landform ↗

Poorly drained coastal plain with dunes and swamps

Geology ↗

Quaternary deposits over Perth Basin sediments

Soils ↗

Wet soils, semi-wet soils and pale deep sands

Vegetation ↗

Heaths, sedgeland and jarrah-marri-paperbark woodland

Nillup Plain System

214Np

Southern Donnybrook Sunkland between the Blackwood and Scott Rivers

Landform ↗

Plain with broad swampy depressions

Geology ↗

deeply weathered mantle over sedimentary rocks

Soils ↗

Wet and semi-wet soils, sandy and loamy gravels and deep sands

Vegetation ↗

Jarrah-marri-paperbark woodland

Also the report “Rare and Priority Flora Search of Proposed Roads in Chester 01 03 Forest Coupe” (DEC, March 2007) states, “*The western area of the forest coupe predominantly comprised of open woodland of Eucalyptus marginata and Corymbia calophylla over Pericalymma ellipticum shrubs over low mixed shrubs, Xanthorrhoea preissii and sedges on brown loam. A similar community with higher understorey was observed on the white sands on grey clay. Damp depressions with a dense understorey of shrubs occurred on the white sands in the central part of the block. To the north the community was much like the western areas of the forest coupe but with Anarthria scabra occurring in the wetter parts of the community.*” This is a description of woodlands and sedgelands. The low overstorey cover is because it is woodland, and not, as has been claimed, due to logging in the 1950’s.

The methodology used by the Conservation Commission to determine canopy cover at Chester was related to its old growth forest status; nevertheless the results have now been used to justify its logging. This is a crude and scientifically inappropriate method for determining whether the vegetation is classified as woodland or forest. When used wrongly (as in this case) the results obtained and conclusions drawn will likely be materially misleading.

The method used “...*was designed to directly record the overstorey and compare any variations with nominated forest or reclassified old-growth forest.*” (P30, “Assessment criteria and process for the Conservation Commission review of old-growth amendments”). The comparison here being made was to the Milyeannup Block, located on the Blackwood Plateau, botanically distinct from the Scott Coastal and Nillup Plains.

Specifically, this method was not designed nor is it suitable or accepted by experts for determining structural classification as defined by botanists. I refer you to ‘Canopy assessment’ and ‘structural classification’ (from “Bushland Plant Survey, B.J. Kieghery”), which has the appropriate methodology and assessment scale used by botanists in this state.

We now request that Chester be subjected to the “review process – changes due to refinement of ecosystem data” (p13 ‘Assessment criteria and process for the Conservation Commission review of old-growth amendments’) and, as required under the process, confirm the findings with DEC.

Until this process is completed it seems clear a moratorium must be placed on logging Chester.

We look forward to your early response.

Yours sincerely,

Peter Lane
For Cape to Cape Alliance
cc Hon Gail Gago, Hon Steve Thomas, Hon Janet Woollard, Beth Schultz, Steve Harrison, Giz Watson