



August 15, 2007

**PROPOSED FOREST MANAGEMENT PLAN, BENDIGO FOREST  
MANAGEMENT AREA: SUBMISSION**

The Friends of the Box Ironbark Forests is a group of 120 members centred in Castlemaine. Our particular interest is the forests and remnant woodlands of the Mount Alexander region.

We wish to make a brief response under the following headings:

**1. Biodiversity conservation**

a. We note that protection of old trees is part of this strategy. We suggest the establishment of a larger SMZ in the region of Hunters Track in the Fryers Forest, where there are numerous such trees.

b. Under 'potentially threatening processes' on page 8 'removal of coarse woody debris' is listed. We would like to point out that such removal is widely believed to be a good fire protection practice, encouraged at least in part by DSE fire management strategy. DSE has been under attack in the Castlemaine media for its belief in the ecological value of coarse woody debris, and on every occasion has failed to explain its position on this matter. We suggest under 'strategic directions' on page 31 the addition of a requirement for DSE to proactively explain its position on the relationship between ecology and fire. Such explanations should form part of the interpretation materials listed on page 23.

**2. Fire and Research**

We note the mention of *Guidelines and Procedures for Ecological Burning* on page 16, and the strategy to 'further integrate ecologically-based fire regimes' with asset protection burns. We wish to emphasise that the 'available scientific knowledge' is dependent for its reliability on ongoing monitoring and research by DSE on the burns it conducts. Our impression is that on the contrary DSE fire operatives conduct their burns as if knowledge on this matter is fixed and certain, and that they do not adopt an 'adaptive' approach as new knowledge emerges. This, in our opinion, is the result of poor resourcing combined with an apparent belief by some operatives that there is nothing more to learn about fire practice. If 6.5 on page 17 is to be taken at all seriously, then 6.8 should carry an additional sentence: 'Require that all operatives take account of the results of monitoring of previous burns in the relevant area.'

**3. Threatened Species**

We suggest the creation of a SMZ or a SPZ for protection of the Swift Parrot and the Phascogale in the Muckleford forest. This forest is an area of special interest for both these endangered species.



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**4. Heritage Protection**

In our view there should be a SMZ for protection of Heritage at Junction Township at Tunnel Hill, Patten's Reef gold workings, and Sanger's hut and workings, all in the Fryer's forest.

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