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Audit results **Clouds Creek State Forest. Compartment 73.**

Dear EPA

Over the past 3 to 4 years, the Clarence Environment Centre has received numerous repeated assurances from the EPA, and the former Crown Forestry division of the Department of Environment, that your agency is going to take forestry regulation seriously. In fact, allow us to remind you of your list of priority areas published on page 8 of the draft "Crown Forestry Compliance Strategy 2013-2016", which you circulated just last month. They are:

1. ***Water pollution** - protecting waters on and around road and snig track crossings on high order streams (2nd and above and/or sensitive receiving waterbodies)*
2. ***Exclusion Zones** - protecting key Exclusion Zones in*
 - (a) *Western - Forest Management Zones and Threatened Species Protection Zones*
 - (b) *Coastal - Mapped Rainforest, Rocky Outcrops, Riparian Protection Zones and Threatened Species Exclusion Zones*
3. ***Hollow bearing and recruitment tree** retention including quantity, quality / selection and longevity assessments in Non-Regrowth Forests and some regrowth forests*
4. ***Forest health** - Maintaining forest health including through assessing Basal Area retention and consideration of appropriate responses to Bell Miner Associated Dieback*
5. ***Koalas** - protecting koalas and their habitat*
6. ***Threatened Ecological Communities** - improved identification and protection*

On Friday 14th June the Clarence Environment Centre undertook audits of two logged sections of Compartment 73 along Blue Rock Road in Clouds Creek State Forest, where logging has just been completed. The audited area is west of the power transmission line, an area identified in the harvest plan as being subjected to 70% basal area removal. This was approved despite a directive under Forests NSW's Approval that logging not exceed an average 40% basal area removal.

The EPA's refusal to deal with the problem caused by Forests NSW offering 'off-sets' (areas that will not be immediately logged), which allows them to continue these near clear fell operations elsewhere in the forest, is a major contributor to the rapid deterioration in forest health across all state forests, particularly from weed invasion and Bell Miner Associated Dieback (BMAD).

At Clouds Creek, Bell Miner populations have been flourishing and growing for a decade, and less than one kilometre from this latest audit, in full view of the Armidale Road, there is dying forest. Yet the EPA continues to allow 70% basal area logging to occur, which is exactly double the rate that is known to trigger BMAD. So much for priority #4.

The Harvest Plan for Compartments 72 and 73 also identifies 31 historic records of Koalas, a high-use area in Compartment 72, and Compartment 73 as an intermediate-use area.

With the dominant occurrence of Tallowood, and New England Blackbutt in the compartment, both preferred feed species, this is clearly prime Koala habitat. However, given recent reports by NEFA from audits in Royal Camp and Koreelah State Forests, where Forests NSW has blatantly failed to undertake the required scat searches, the failure to find more high-use areas in Compartments 72 and 73 is not altogether surprising.

The harvest plan also identifies that no Australian Group Selection (AGS) logging can occur in Koala preferred forest types. Frankly, we can see little difference between AGS and a forest where 70% basal area logging has occurred. Nevertheless the EPA has allowed 70% basal area logging, so it is hardly surprising that as a result of the removal of large numbers of the Koala's preferred feed trees, our post logging audit also failed to find any sign of Koalas. So much for your priority #5.

Time and again, in response to complaints from the Clarence Environment Centre and others, the EPA has assured us that Forests NSW has been “spoken to” in relation to its failure to properly follow the Threatened Species Licence prescriptions for retention of Hollow-bearing and Recruitment trees (“H” & “R” trees).



The two logged areas audited, are north of Blue Rock Road, between the Armidale Road and the transmission line, site a) surrounding log dump 3 measuring about 2ha and, b) a 1ha site surrounding log dump 5. In both areas numerous freshly cut stumps were measured from between 650mm and 750mm in diameter, see below.



However, only 2 marked “H” trees were observed that equalled those in size. All the remaining “H” trees measured far less, mostly below 500mm diameter, all of which were clearly chosen because they were unsuitable for logging, none were over mature, much less old-growth, and none contained hollows. Certainly, they were not *“selected from the trees with the largest dbhob”* as required under the Licence.

A typical example is pictured at left, where both stems are marked “H” to count as 2 hollow-bearing trees. The smaller trunk measured less than 350mm, and both only just reaching maturity with no hollows at all.

We did find 10 marked hollow-bearing trees in the little more than 2 hectare area a), albeit only 2 that qualified under the Licence, but only 3 “R” trees were observed. There were some 4 or 5 other trees, marked “E”, which may be allowed to double as “R” trees to make up the required 10 per 2 hectares. However, none of those “R” or “E” trees had yet reached the required mature growth stage, so again did not meet the prescription requirement, i.e. *“Recruitment tree” means a mature or late mature tree with good potential for hollow development and long term survival*”.

We have already determined, from speaking with the foresters involved, that “R” trees are generally logged the next time around unless one of the “H” trees have died or fallen in the interim, and a new, smaller set of “R” trees will be marked up instead. This is way outside the intent of the Approval, but you (the EPA) assure us you are powerless to act on it, other than to “speak with” forests NSW and request they do better.

However, the issue of insufficient and inadequate “H” & “R” tree retention in Compartment 73 does not stop there. According to the Harvest Plan, the number of Greater Gliders observed during pre harvest ecological survey was greater than one per hectare, which triggers the Powerful Owl prescription, lifting the required number of hollow-bearing trees to 8 per hectare. This operation has failed to come anywhere close to meeting those requirements. So much for your priority #3.

Of major concern was the logging of a very clearly defined unmapped drainage gully at site a)(see below).



The snig track entering the gully is clearly visible, and having logged an unknown number of trees, the gully has then been filled with logging debris. Two freshly cut stumps were observed in the centre of the gully, and others could be hidden beneath the debris. No exclusion boundary mark-up was observed at this point, but again, the marked trees could have been trampled by machinery.

The gully was marked on the harvest plan as an area “for further assessment (FMZ8)”, which, according to the Plan, would need to be inspected by the SFO, appropriate prescriptions applied under Schedule 4 of the Environment Protection Licence, and noted on the harvest plan. So much for your priorities #1 and 2.

At the second audit site, b) on the northern side of Blue Rock Road, just west of the transmission line, only one marked “H” tree and one “E” (? obscured by mechanical damage) were observed in the one hectare measured instead of the 8 required.

Again, there was evidence of the logging of large trees that could have served as “H” and “R” trees, and in the bare ground of the log dump we saw evidence of cut dead limbs that would have rotted out within the decade to form hollows ideal for gliders and other small fauna (see right). To suggest these larger trees did not contain hollows, would have been a long bow to draw.

As with most logging operations, the waste and collateral damage to standing trees, including trees marked for retention, was enormous.



This waste, when the industry is crying out to be allowed to do the same thing in national parks is completely absurd and unacceptable. Unfortunately, this is not illegal, and the EPA is powerless to act. Or perhaps it could act under vandalism laws?



Damaged trees, the larger tree is marked for retention, but most of the painted bark has been knocked off.



Another clear example of poor "H" tree selection. This tree has no hollows, it has barely reached maturity, and will not form hollows for another 50 years at least.

If we could identify these systemic problems in a brief two hour audit, we feel sure many more would be uncovered by a full scale audit, and we ask that that be undertaken before the entire area is overgrown with vines.

You might also be able to combine that work with looking at an outstanding complaint, made about 2 years ago, in relation to the heavy logging of a Koala high use area in Compartment 120 of Clouds Creek State Forest.

Yours sincerely
John Edwards
Honorary Secretary