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# **SUBMISSION**

to

**The Department of Environment, Climate Change, and Water**

on

## **The Curracabundi Wilderness Proposal**

To  
Curracabundi Wilderness Assessment,  
Director North East  
DECCW, Locked Bag 914,  
Coffs Harbour, NSW, 2450

Compiled for the Clarence Environment Centre  
by John Edwards  
Honorary Secretary  
Date: 17<sup>th</sup> December 2010

# Submission on the Curracabundi Wilderness Proposal

## Foreword

This submission supports the proposed Curracabundi Wilderness declaration which we see as an effective move to combat ongoing species decline and deprivation of biodiversity generally.

In his Foreword to the 2010 Review of the Threatened Species Conservation Act, the Environment Minister, The Hon Frank Sartor explained that: *“Slowing the rate of species loss is not a simple task. In this International Year of Biodiversity, we can reflect on our achievements and renew commitments to protect biodiversity. As a state rich in natural diversity, New South Wales has a significant role to play.”*

*Positive moves to reduce the current loss of biodiversity have been made: legislation has been passed to end broad-scale land clearing and ensure that urban planning is environmentally sound and improves or maintains biodiversity values; **the area protected by national parks has been greatly expanded**; and local action by community groups and individuals continues to make significant contributions.”*

This recognition of the benefit of national parks to protect biodiversity is encouraging, particularly when considering, as the Minister did in his foreword that: *“Biodiversity provides us with important economic benefits and is also a defining feature of our nation and heritage. It helps us to access clean water and air, healthy soils, food and medicinal resources; to resist disease; and to adaptively respond to threats such as climate change. Nature’s plants and animals are an intrinsic part of our land and culture and we have a responsibility and a strong interest in their conservation. Key industries, including agriculture, fisheries, biotechnology and tourism, depend on it.”*

## The Benefits

Wilderness declarations are of even greater importance to conservation, in that they reduce the amount of impacts that are allowed in comparison to national parks. Likewise, it has long been accepted that conservations areas need to cover significantly large areas to become viable and self-sustainable. The proposed Curracabundi Wilderness meets this criteria.

Wilderness areas are better protected against ‘edge effects’ than are smaller, more isolated or fragmented areas and so Curracabundi's reservation offers native wildlife a better chance of survival against the impacts of climate change.

Reservation of the Curracabundi Wilderness is also an essential stepping stone in the forest corridor linking other wilderness areas along the Great Dividing Range, and will have the added benefit of helping to protect the unique serpentinite vegetation in Watchimbark Nature Reserve from *Phytophthora dieback*.

## Recreation

Any management plan for wilderness areas must concentrate on their core purpose, conservation. However, consideration must be given to effective weed and vertebrate pest control, as well as fire management, and human visitation.

A recent survey undertaken by the Department has shown that walking; picnicking and dining; sightseeing; undertaking rest and relaxation, and enjoyment and appreciation of nature, are the most commonly undertaken activities. However, in recent years there has been pressure on the Department to open national parks and wilderness to tourist development and inappropriate, high impact recreational activities such as mountain biking, not to forget recreational hunting.

DECCW is fully aware of the impacts that will result from these activities including erosion, destruction of vegetation, reduced water quality, disturbance of wildlife, damage to cultural and historical sites and park infrastructure, potentially life-threatening to other park users, the introduction of weeds and soil pathogens into new areas, fragmentation of the landscape, and littering.

Some of the above activities are also undertaken at night which adds another dimension to these highly inappropriate activities. A recent discussion paper on mountain-biking mooted possible “events” attracting up to 1,500 riders and thousands of spectators over a period of a week or more. These types of activities must not be allowed.

One major concern for Carracabundi Wilderness is the suggested excisions for 4WD vehicles and horse riding access and development at Christies Hut. As already identified, Vehicles and horse riding cause noise pollution, soil erosion, and stream siltation. They spread pathogens such as *Phytophthora cinnamomi*, and weeds, with particular concern for the potential to spread Scotch Broom (*Cytisus scoparius*) from Barrington Tops National Park into Carracabundi if the National Trail route option through the wilderness is developed. This would be altogether incompatible with the aims of wilderness declaration.

In this case, we believe the National Trail should retain its current route via Nundle, which would also prevent attacks on Brush-tailed rock-wallabies by dogs that currently accompany riders, something we understand is highly likely to occur if the Christies Hut development goes ahead.

### **Other considerations**

We understand there is the potential to expand the wilderness to its full potential of around 40,000 hectares by linking the wilderness with the 3,670 hectare Romeyko reserve and improving the forest link to Watchimbark Nature Reserve. If so we believe a reservation Action Plan is needed to include this action.

**In conclusion** the Clarence Environment Centre fully supports the Carracabundi Wilderness proposal, and urge consideration and adoption of the above suggestions.

We thank DECCW for the opportunity to comment.

Yours sincerely  
John Edwards  
Honorary Secretary