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Date: 2nd April 2019

Minister in charge of Forestry
NSW Government
Sydney
(emailed to Minister for Planning, the Hon Rob Stokes)

Dear Sir

Concerns re proposed logging in Clouds Creek State Forest

The Clarence Environment Centre (CEC) has maintained a shop-front presence in Grafton for 30 years, and has a proud history of environmental advocacy. The conservation of Australia's natural environment, both terrestrial and and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

Over that past 25 years our members have fought to protect the magnificent wet forests in the surrounding tablelands and ranges, and have played a significant part in the successful establishment of national parks, and declared world heritage areas that are the envy of the world.

When learning of the proposed imminent logging of Clouds Creek State Forest for the third time in as many decades, we were naturally concerned for, not only will that logging negatively impact the forests concerned, but will also place neighbouring conservation reserves at serious risk.

Koalas

The first concern relates to Koalas, which have been in dramatic decline in the area since the late 1990s. It was then that Forests NSW, having been integrally involved in negotiations for the Regional Forests Agreements (RFAs), made the decision to log as much of the identified old-growth forests as possible before they were to be "locked up" in 2000.

The extensive fauna surveys that were undertaken across all state forests in the lead up to the RFAs identified Koalas across all those highland forests, not just Clouds Creek. However, the devastating logging that occurred in the late 1990s, and again a decade later, has taken its depressing toll, with local residents reporting that Koalas are now rarely seen, or even heard.

In 2016, the Environment Protection Authority commissioned a survey of Koala habitat at Clouds Creek and surrounding forests. The subsequent report, "*Koala Habitat Mapping pilot*", fails to make any attempt to gauge whether Koala numbers were declining or otherwise. explaining:

"The usual assessment for determining koala generational persistence, in line with the International Union for Conservation of Nature (IUCN) criteria for assessing perceived population declines over a time period of three generations (IUCN SPS 2001)", claiming that attempting to establish any trend at that time, "was not practical given the low number of records in some (earlier) periods compared to the later period 1996–2015". They then concluded that: "In the absence of a more comprehensive survey dataset from all time periods, limited observations can be made".

Nevertheless, the report correctly identifies that, *“the precautionary principle and logic demands that this is seen as an absence of survey effort rather than an absence of koala persistence.”*

While the report itself fails to estimate Koala numbers, there have been reports that those conducting the survey were hard pressed to find any Koalas in the Clouds Creek area. This is in line with all other available evidence, including the current Ecology Report on the the three compartments that found only 2 sites with evidence of Koalas (scats).

There was sufficient evidence at one of those sites to even trigger a declaration of a “Koala High-use Area”, but all those scats could have come from a single animal spending a few days in that particular location which, of course is now marked as an exclusion zone. However, more than 6 months later, a survey of that high-use area by volunteers from the Clarence and Bellingen Environment Centres, could find no trace of Koalas, no scats or scratches on trees, even old ones.

In conclusion, all the evidence points to a Koala population in crisis, which will be pushed to the brink should the proposed 12 month logging program, including intensive logging, across multiple compartments proceed.

Bell Miner Associated Die-back (BMAD)

A recent visit to compartments 122 - 124, the first to be logged, revealed areas of Bell Miner associated dieback (BMAD), with Bell Miners active throughout gullies across all 3 compartments. The image below clearly shows the extent of the problem with dead and dying trees everywhere



A Clouds Creek neighbour, Meredith Stanton has spent almost her entire life in the area, and lives on Wirriri Road, only a short distance from the above compartments. She has studied and recorded the movements of Bell Miners and their devastation for years and explains:

“The area of dieback at entrance to Marks Camp Rd is marked on the harvest plan as Type 46 - Sydney Blue Gum, and on the Silvicultural Plan it is mapped for “Single tree selection” (which generally means fell remaining trees, remove understory and scarify ground for seed bed).

The same treatment occurred here in Cpt 68 during the 2009-2013 harvests and the Bell Miners then moved into the 40m wide mapped Creek to Ridgeline wildlife corridor (incidentally, this is also near where latest koala sightings have occurred in 2014, 2016).

Bell Miner activity peaked here on my place around, 2003-07, then after blue gums on my creek line died off, the birds moved into CCSF Cpt 68, causing more dieback, before NSWFC's STS treatment chased them west to a retained wildlife corridor.

I rarely hear the Bell miners at home now, as they persist higher up the ridge to my west in Cpt 68. Can hear them when driving out. Now Bell Miners are thriving in the regrowth after 1998 logging of mapped HCVOG (high conservation value old-growth).

In my opinion the dieback is how the slower growing Tallowood - Brushbox dominated stands develop as an over-storey for (eventually) rainforest gullies”.

Forestry Corporation is fully aware that canopy reduction is a major driver of the BMAD process, yet the harvest plans for this latest logging makes no mention of the problem. With BMAD threatening to decimate Eucalyptus forests across NSW, this omission is, in our opinion, totally unacceptable.

These are just 2 of many concerns we have with the on-going destruction being wrought across the forest estate, and we ask that you, as Minister responsible for the health of these forests, call an immediate halt to the planned logging at Clouds Creek.

Yours sincerely

John Edwards
Honorary Secretary,