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Crown Forests Division
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Dear Sir/Madam

Report on Operational Harvest Plan for Compartments 72 & 73 of Clouds Creek State Forest

The Clarence Environment Centre has analysed parts of the above harvest plan, and ask the Crown Forests section to act to end the virtual clear-felling of state forests, as detailed below, as a priority.

Proposed heavy logging

Harvesting Plan #3666 for Compartments 72 and 73 at Clouds Creek State Forest contains, for us at least, the first mapping to show that Forests NSW fully intends to log forests at basal area removal rates far in excess of that allowed under the Single Tree Selection prescription outlined in the Integrated Forests Operations Approval (IFOA) (page 11).

The new map, titled "Indicative Silvicultural Map", outlines the fact that logging across these 2 compartments will average between 50% and 70% removal of basal area, while the maximum allowable under the IFOA is just 40%. To comply with the maximum allowable 40%, about 120 hectares of the total (gross) 448 ha, is marked - "Offset Area - No Harvesting".

However, a similar course was followed, minus the map, in neighbouring Compartments 79 and 80 in 2010, where the Clarence Environment Centre complained to the Crown Forests Division, of the then Department of Environment, that up to 80% of basal volume had been removed in forests with multiple Yellow-bellied Glider and Koala records. Crown Forests responded (letter from Gary Whytcross dated March 9, 2011), explaining that as other areas of those compartments had not been logged, Crown Forests had determined that the **average** basal area logged was likely within the allowable 40% limit.

However, in mid 2011, Forests NSW announced its intention to log those remaining unlogged areas, and in Compartment 80 this was completed by the end of the year. In Compartment 79, the unlogged area totals approximately 18 hectares out a total net harvest area of 98 hectares, and Forests NSW has announced its intention to log those remaining hectares this month. Our letter, expressing our outrage that these offset areas were now to be logged less than 18 months after completion of the harvest, received the following response from Crown Forests' Michael Saxon, dated Feb 20, 2012, stating there was nothing that could be done to stop the remainder being logged because, ***"there are currently no limitations on return times for logging"***.

We therefore conclude that, following the logging of between 50 and 70% of basal area in Compartments 72 and 73, the 120 hectare offset area will also be logged within the next two years.

This excessive logging, which is happening across the entire forest estate, is being driven by the highly unrealistic timber supply contracts that have already seen Forests NSW twice in dispute with Boral over non supply, the latest claim rumoured to be in excess of half a billion dollars.

Consequences of heavy logging

For those unfamiliar with the terminology, the “basal area” of timber in a forest is the total area of the cross section of all trees with a diameter greater than 20cm measured at breast height. However, mechanical harvesting, using large tracked machines, sees many smaller trees, and even some larger trees unavoidably knocked over in the process, not to mention understory shrub and herb vegetation that constitutes more than 90% of the forest's floristic diversity. Dead trees (stags) are also very often victims of this process, but more generally this is deliberate, despite the IFOA requiring their retention as habitat.

When this removal of smaller trees and the collateral damage to retained tree limbs is taken into consideration, the percentage of canopy loss is significantly greater than basal area logging rates.

Logging of up to 80% basal area has other consequences which we have documented at Wedding Bells, Clouds Creek and Grange State Forests. Firstly, there is a major removal of support for those few remaining trees. Larger trees, retained as habitat or seed trees are rendered vulnerable to storm damage which sees large limbs broken off in strong winds, or sometimes the entire tree blown over.

In all forests we have observed immature trees that have grown upwards towards the sunlight in a darkened forest, and are therefore 'spindly' in form (tall relative to their girth), simply fall over after heavy rain loosens the soil around their under-developed root systems.

The opening up of forest canopies always promotes an explosion of weeds, usually exotic species like Lantana. These restrict regeneration, and in the worst case scenario, can result in Bell Miner Bird populations establishing which invariably leads to outbreaks of the deadly Bell Miner Associated Dieback disease (BMAD). According to the NSW Scientific Committee's determination of BMAD as a Key Threatening Process, as little as a 35% reduction of canopy cover is a trigger for the disease which, it estimates, threatens up to 4 million hectares of the State's most productive forests.

Another consequence of over-logging is that regeneration will favour faster growing species, something the timber industry prefers, but effectively turns the forest into a monoculture over time, and reduced biodiversity, something the the IFOA was designed to protect.

Koalas

Koalas are in trouble. 200 years of habitat destruction has seen the species reduced to critically low numbers in NSW and Queensland, with many of the remaining populations managing to survive in State forests. However, in recent times we have seen heavy destruction of their preferred feed tree, Tallowwood, in Boambee, Clouds Creek, Doubleduke and Wedding Bells State Forests, with plans in place to log Orara East, Orara West, Ellis, and even more of Clouds Creek State Forest, all of which are known to support Koala populations, with high use areas mapped in most of them.

An identified high use area is protected from logging, and provided with a 20m buffer zone. However, a high use area is defined in the Threatened Species Licence as follows.

“Koala high use area” means an area where any of the following features are located:

i. Three out of any ten consecutive trees inspected are found to have Koala scats beneath them; OR

ii. a sighting of Koala; OR

iii. a tree with more than 20 Koala scats beneath; OR

iv. any trees with Koala scats of two distinctly different sizes beneath.”

It should be understood, that the pre-harvest ecological survey to identify the occurrence of threatened species, usually lasts less than 4 days with 2 ecologists, undertaking random meanders to check for threatened flora, observe bat roosts, undertake night time spot-lighting transects for a range of threatened birds, gliders, and other fauna. Call playback, and frog surveys.

They do not undertake targeted surveys for Koalas, although they are expected to record incidental sightings, that is left to a 'qualified' person working 300m ahead of logging operations, who is required to undertake the following:

“5.2.2 Koala Mark-up Searches

During the marking up of the compartment, an adequately trained person must inspect trees at ten metres intervals. Primary browse trees must be inspected. In the event that there are no primary browse trees, secondary browse trees must be inspected. In the event that there are no primary browse trees or secondary browse trees, other trees and incidental browse trees must be inspected. Inspections must include thoroughly searching the ground for scats within at least one metre of the base of trees greater than 30 centimetres dbhob.”

In reality, if the inspection has been preceded by heavy rain, many of the scats would have disintegrated or been washed away, if Koala numbers are low, which is the norm for they are nowhere abundant in NSW, signs of Koalas could well be missed altogether. Even the finding of 20 scats beneath a tree may result in a “Koala high use area” being just a single tree around which a 20m buffer is provided, while the rest of the surrounding forest sees up to 70% of its basal volume, and more than 80% of canopy removed.

At the northeastern corner of Compartment 73 (Clouds Creek), surrounding GPS 457900 - 6661700, there is a cluster of Koala records marked on the Harvest Plan in an area mapped as New England Blackbutt, a recognised Koala feed tree species, identified in the Licence as follows:

*“Koala food trees shall be leafy, with broad crowns and represent the range of sizes greater than 40 centimetres dbh present and be selected with preference to Manna Gum *Eucalyptus viminalis*, Messmate *E. obliqua*, Snow Gum *E. pauciflora*, Mountain Gum *E. dalrympleana*, Sydney Blue Gum *E. saligna*, and **New England Blackbutt *E. andrewsii***”.*

Despite all this, the harvest plan shows the area will be subjected to the heaviest logging in the entire compartment.

As stated at the beginning of this letter, we urgently ask that Crown Forests puts a stop to these activities and closes the loophole that currently all it to happen. When Michael Hood visited Grafton and Lismore earlier this year, he was accompanied by a Departmental Lawyer whom we understood was looking at the need to tighten the legislation. Is anything happening as a result?

Yours sincerely
John Edwards
Honorary Secretary.

Copy to Minister Robyn Parker