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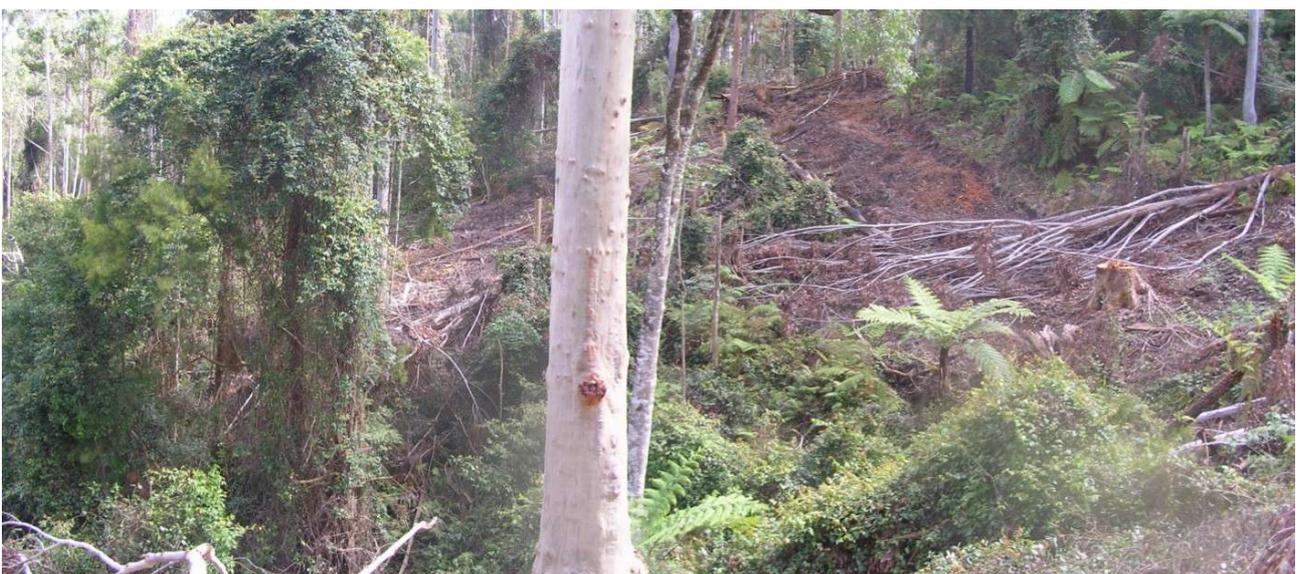
Date: 28th March 2012

Report on logging in Compartments 120 and 121 of Clouds Creek State Forest

We have already sent your office a comprehensive report of over-logging in these compartments, but to date we have had no response, or advice that your officers intend to investigate our concerns.

In our report we detailed our audit of basal area removal which was found to average 70% in areas where Koala records are marked. We also expressed frustration that large areas of the harvest plan's operations map had been marked "for further investigation". Many of these areas are clearly seen, by the 'kinks' in contour lines, to be drainage lines, allowing Forests NSW to take advantage of the clearly deficient topographical mapping, and claim these to be "unmapped drainage lines". This allows Forests NSW to retain these areas as "Net Harvest Area", rather than being mapped as exclusion zones. Where they are clearly found to be streams or gullies with defined banks, those areas are used to offset the excessive logging elsewhere.

On March 29, our investigators spent less than an hour at the logging site (Compartment 121) and found one of these "unmapped drainage lines" at about GPS 463300 – 6667300 where trees had been felled within 5 metres of the clearly defined gully centre (see photograph below). We believe this is a clear breach, and a full investigation would uncover more of the same.



An unmapped drainage line with clearly defined banks, but logging has been undertaken within what should be a 5 metres exclusion zone (see stump at right).

The harvest plan claims that basal area removal will be below 40% across the tract, claiming “offset areas” and “non harvest areas” will balance the higher rates of logging elsewhere. There is no “offset area” mapped, and we strongly assert that “non harvest areas”, presumably mapped exclusion zones, are not allowed to be counted as an offset.

Other breaches found in our 40 minute assessment included the usual failure to mark up habitat trees (see photo at right and below). We did find occasional “H” and “R” trees, but they were usually along track-sides.



A protected hollow log, likely coming from a hollow-bearing tree, stacked on debris ready for burning

The required number of retained hollow-bearing trees are not there and, in fairness, sufficient numbers were probably not there in the first instance. However, we also observed large stumps, and off-cuts of larger trees with hollow trunks, suggesting they would have fulfilled the definition of hollow-bearing trees and should have been retained. In fact, due to the overall dearth of hollow-bearing trees, all trees with hollows should have been retained.

As usual we found logging debris stacked against unmarked habitat trees and stags, follow-up burning will result in their destruction.

One thing that was clear is that the excessive logging has left these few habitat trees isolated and highly vulnerable to more violent weather events which sees limbs blown off and occasionally the entire tree blown over.



A heavily logged and disturbed area with large recently cut stump in foreground, all that remains of what we believe would have been a hollow-bearing tree.

Koalas

Preferred forest types for Koala, records of Koalas, sightings, and an identified “high use area” are all marked on this harvest plan which, as explained in the Threatened Species Licence (5.2.2 *Koala Mark-up Searches*), requires that “marking-up must be conducted at least 300 metres in advance of harvesting operations”. This must be undertaken by an adequately trained person who must inspect trees at ten metres intervals and “*must include thoroughly searching the ground for scats within at least one metre of the base of trees greater than 30 centimetres dbhob*”.

We have not seen the results of that “marking up”, and do not know if such a document even exists, there were certainly no marked trees in the areas we looked at. Perhaps, tree marking only occurs if scats are found?

Despite the net harvest areas of these compartments being dominated by preferred Koala feed species, heavy STS logging is occurring across the entire tract, measured by our investigators on a previous visit at rates reaching 70% of basal area.

It is important to note that the entire Clouds Creek State Forest, and other State forests in the vicinity, were heavily logged in the late 1990s, some of it mapped as High Conservation Value, immediately prior to the signing of the historic Forests Agreements, and the IFOA coming into effect. That heavy logging is now being followed by the systematic logging of compartment after compartment across Clouds Creek SF, and on surrounding private property. The impacts of this on any surviving Koalas is likely to be extreme, not to mention other threatened species that have been identified as occurring there.

As a result we ask that the operations be investigated as soon as possible, and put a stop to this excessive destruction.

We point out that we have still to receive any response to our previous report on the logging in these compartments, sent to you in early January, or to our report on breaches in Wedding Bells State Forest sent to your offices in July 2011. We would appreciate your keeping us informed of the

outcome of this, and both those previous investigations.

Yours sincerely

John Edwards
Honorary Secretary.

Copy to Minister Parker.