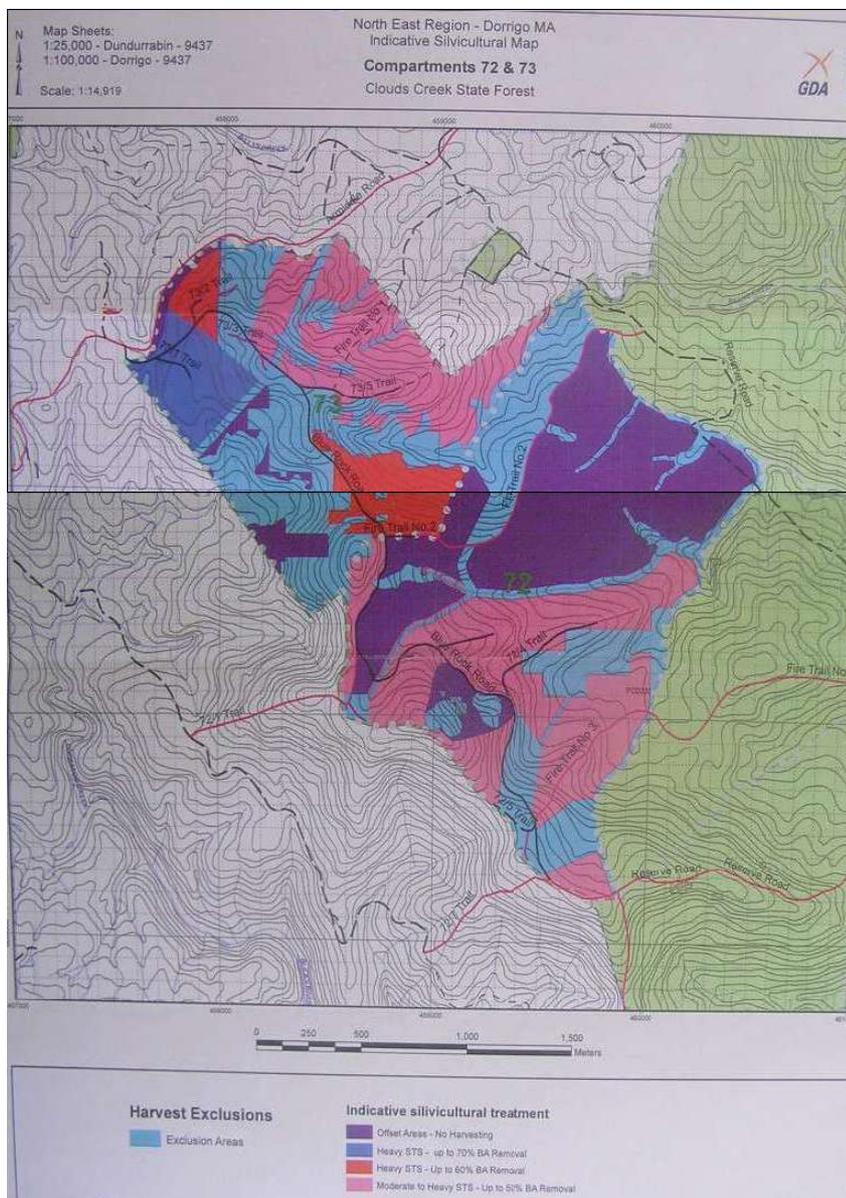


Report on Logging Plans for Compartments 72 & 73 of Clouds Creek State Forest

The Clarence Environment Centre has analysed the above harvest plan, and undertaken a preliminary on site assessment, and have asked the Crown Forests section to act as a priority to end the virtual clear-felling of state forests, as detailed below.

Proposed heavy logging

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



The new map, titled “Indicative Silvicultural Map”, shows 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 that 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 area had been logged in forests containing 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 that remaining 18 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 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 likely be logged within the next two years. This over-logging, which is happening across the entire forest estate, is being driven by the highly unrealistic timber supply contracts that has already seen Forests NSW twice in dispute with Boral over non supply, the latest claim reportedly rumoured to be in excess of half a billion dollars.

At left is the mapping in question, showing the area of heaviest proposed logging in dark blue and red, at the northwestern point (top left), which other maps shows to be New England Blackbutt forest, a primary Koala feed tree species, and also where other mapping shows the most koala records have been compiled. That issue is covered below.

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 at breast height greater than 20cm. 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 understorey 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 limbs of retained trees 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 isolated in the clear-felled landscape and 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, and post harvest soil disturbance, undertaken to promote regeneration, loosens the soil around their under-developed roots.

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 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, with significantly 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, and 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.

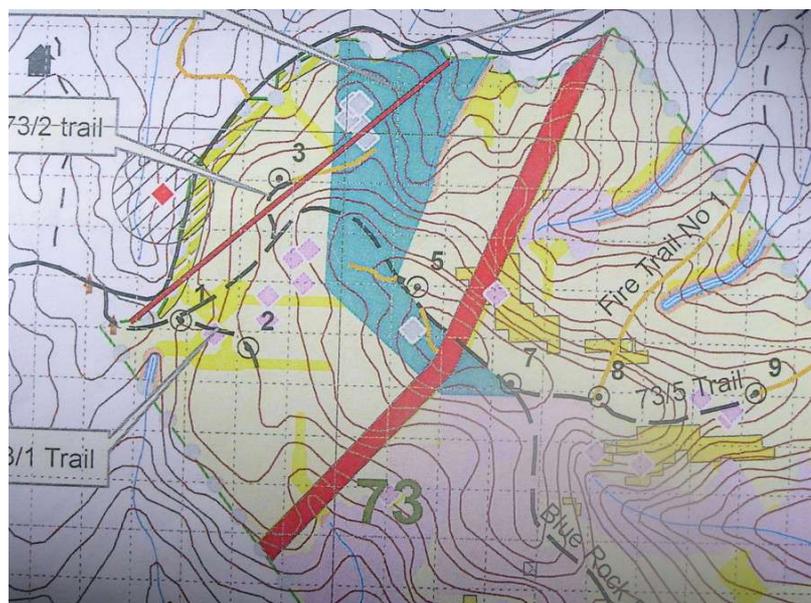
They do not undertake targeted surveys for Koalas, although we assume they are required to record incidental sightings, that is left to a 'qualified' person working 300m ahead of logging operations, who is required to undertake the following:

“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.”

At right is part of the Operations Map for Compartments 72 and 73, and the broad red line is a cleared electricity transmission line. The pale lilac diamond shaped icons represent Koala records, and other mapping shows that section to be dominated by a primary Koala feed tree species, New England Blackbutt.

Incredibly, this area of known Koala habitat is to be subjected to the heaviest logging (see map on page 1), 70% of basal area will go, which will see the canopy reduced by 80% or more.



70% of timber and 80% of canopy will be taken from this Core Koala habitat.

In reality, if the pre-logging search for Koala droppings has been preceded by heavy rain, many of the scats could have 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 is annihilated, with more than 80% of canopy removed.



The area of identified core Koala habitat where high intensity logging is planned. 70% of basal area will be logged, equating to 80 to 90 percent canopy loss. Virtual clear felling.

The vegetation mapping of the area as New England Blackbutt forest was confirmed by us at our site inspection, but the area was also found to contain another primary feed species, Tallowwood. Therefore we believe the planned 70% logging rate is unacceptable.

No doubt it will be explained that an experienced operator will precede the logging by 300 metres to check for Koala scats beneath trees at 10 metre intervals. However, we believe this will never happen because the understorey is too dense (see above photograph) and, as has already occurred elsewhere, work on foot will be excused for Occupational Health & Safety reasons.

As stated in previous reports on logging of forests across the Dorrigo Plateau, the region is internationally recognised as a biodiversity hotspot, and these forests have been identified and mapped in the Northern Rivers Regional Biodiversity Management Plan as “refugia” zones for priority conservation efforts, to provide a buffer against climate change.

The intensity of logging that is occurring, sometimes in small areas within protected rainforest communities, is severely compromising the integrity of those rainforests, destroying crucial Koala habitat, and habitat for of a wide range of forest fauna, and causing major fragmentation of forests across the landscape.

The Bell Miner Associated Dieback (BMAD) is already occurring across the Plateau, with dead and dying trees visible along the roadside two kilometres north of compartments in question. Current logging activity ignores advice of the the findings of the BMAD Scientific Working Group, on which Forests NSW is represented, and the findings of the NSW Scientific Committee, which has found that logging, across the entire north coast region, is triggering the disease.

The IFOA urgently needs to be reinforced to fulfill its intended purpose, to achieve Ecologically Sustainable Forest Management. The first 5 yearly review of that Approval, due in 2005, was 4 years late, from memory that process was only begun in 2009, and we made a submission to that review, yet to date we have been unable to determine if that review has actually been completed.

We have earnestly requested some form of intervention from the Minister's Department to put a stop to this process which, while probably not totally illegal, is certainly way outside the intent of the legislation which calls for a maximum 40% basal area removal, and is proving to be so environmentally damaging.

Compiled by
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