

DUBBO FIELD NATURALIST & CONSERVATION SOCIETY INC.



Fostering interest, knowledge and enjoyment in natural history and conservation since 1977

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CONCERNS ABOUT REPORT ON ECOLOGICAL INTERVENTION, Brigalow and Nandewar State Conservation Areas

Dear Mr Wilde,

The Dubbo Field Naturalist and Conservation Society Inc. (DFN&CS) would like to thank you allowing the public to make comment on the Draft report *Active and adaptive cypress management in the Brigalow and Nandewar State Conservation Areas* (the report).

As an organisation of over 80 people we have deep links to the areas considered in the report, particularly Goonoo SCA. Some of the very early activities of the DFN&CS in 1977 were related to the Goonoo Forest, and our activities have continued over time including various activities around Malleefowl, Glossy Black-Cockatoos, vegetation survey, advocacy on behalf of the forest against harvesting for a proposed Aluminium Smelter and the National Parks management of the forest.

We consider that in principle, the intervention in locked up stands of Cypress (either species) to be a valid management action. However this support is heavily dependent upon the nature, objectives, decision-making and monitoring around such activities. As such we have some deep concerns some of the content of the report as below.

1) Lack of resourcing to implement appropriate fire regimes

We note these areas have only recently been brought under the management of National Parks (as a result of the 2009 instrument), and question that if these thinning activities were of actual commercial forestry benefit then they would have been implemented by NSW State Forests prior to 2009.

Section 10.5 of the report discusses the benefit of improved planning and implementation of appropriate fire regimes in the forests. We submit that National Parks have clearly not been adequately resourced to achieve a mosaic of fire managed areas. We see no reason that, if undertaken with sufficient focus and resourcing, that this one measure could adequately deal with the Cypress stands.

We would like to see a clear recommendation that prior to more invasive interventions discussed (e.g. clearing/thinning) that fire management be **properly implemented** and

results monitored and assessed. This would involve the NSW Government providing adequate resources to get this job done, something that has been clearly lacking. We are aware of serious staff shortages in the Dubbo National Parks office, with currently only one full time Ranger spread across thousands of hectares of SCAs and Nature Reserves in the area.

We note the SCA don't even have Plans of Management as yet, something that would seem critical to understanding the assets being management and prescribing management actions.

Doing the current management properly, then checking if that works (or not) would seem to be a more prudent and cost-effective option than implementing more ecological and commercially risky interventions.

2) Data Used for Forest Assessment

There have been concerns raised by some DFN&CS members about the quality of data arising from aerial photography, particularly in relation to the changes in Goonoo Forest as a result of recent fire activities. We would suggest that this should be reviewed to ensure the level of cypress stands is fairly accurately known.

If LiDAR is to be, or was, collected to enable the calculation of canopy cover then we'd appreciate that information being shared with the group currently working on Malleefowl in the Goonoo Forest (including the National Parks Ranger). This data could be used to locate Malleefowl mounds.

3) Control of thinning operations

Obviously thinning using machinery is a key recommendation of this report and was a key inclusion in the assessment.

We strongly oppose any proposal to harvest 'Production' logs from a conservation reserve – this activity can, and is, undertaken on State Forest and private land so is not required in any reserves (SCAs included) that are managed for conservation as a first priority. Taking 'millable' logs would undoubtedly result in a negative ecological outcome and should not be considered further.

Despite concerns about the rationale behind this component (Point 1), we do not have an ethical objection to thinning for ecological objectives with outcomes of harvesting contributing to Biochar or wood pellets where it is properly undertaken. However we find that *Table 24* is lacking detail and does not provide enough certainty about the methods to be employed.

We request this table of 'principles' be augmented with significant and non-negotiable controls using current science and practice information to ensure ecological assets are not compromised. Such controls are stated for stock grazing (Section 10.4.4) and should be also done for this proposed method. These should include, at minimum, a set of quantitative limits on this practice to give certainty to those (Managers and commercial harvesters) considering this method of ecological intervention. This should include:

- the percentage per stand to be removed - to allow the gradual, staged removal rather than rapid removal, to allow fauna (e.g. woodland birds) and flora (e.g. groundcover to minimum bare ground) to adjust.
- minimum distances to waterways to any works (suggested 100m)
- maximum sapling diameters, suggested 10cm DBH

- no harvesting of non-cypress species, minimum disturbance to native saplings, shrubs and groundcover. No removal of mature non-cypress trees (e.g. box and ironbark).
- permanent retention of a proportion of thick cypress stands within the forest matrix to ensure habitat complexity, suggested that you match this to the NSW Native Vegetation Act I.N.S. ruleset.
- avoiding works on steep slopes (X% slope)
- no works within 1km of known Malleefowl mounds or nesting Glossy Black-Cockatoos and avoiding area of high cultural heritage value or other resources critical to threatened species.

Without such assurances to maintain terrestrial and aquatic ecosystem health we do not support the proposal. Stating that these principles will be implemented by 'Managers' is too vague and considered unacceptable.

4) Goonoo Malleefowl

Of key concern for DFN&CS members are the Goonoo Malleefowl, listed as Critically Endangered at a national level. Locally, there is great concern that our disjunct and restricted population of this species is on the brink of failing, with only very limited recent records known. There is a NSW Government 'Save our Species' project in relation to them being currently planned.

Malleefowl require quite specific fire regimes (low fire frequency) and their habitat needs in Goonoo are relatively poorly understood. To give this population every chance at survival, we would advocate for very careful consideration of impacts to this species prior to *any* interventions in Goonoo Forest, whether by fire or otherwise.

5) Controlled Grazing

We support the statements in the report that grazing with stock offers only very limited and arguable ecological benefits in woodland systems. We cannot see adequate justification for this activity in any of the four shrubby woodland-dominated SCAs and do not support its inclusion as a proposed management practice in this context. If it is to be considered, the monitoring effort around its application would need to be quite significant.

6) Ecotourism impacts

We contest that that the impact to ecotourism and amenity in Goonoo Forest as result of ongoing ecological thinning or grazing would exceed the potential ecotourism gains from ecological changes.

We note that one reason that Goonoo SCA is not as frequently visited as other National Parks in the area is that NSW OEH National Parks have developed no, or very limited, visitation facilities. This has been a concern of DNF&CS since National Parks took over Goonoo. We simply haven't seen the resulting employment gains outside of NSW OEH itself in our area due to lack of National Parks interest and investment in ecotourism.

7) Lip Service to Monitoring

While we understand there are high technical demands in doing so, we find that the section of the report dedicated to monitoring (Section 13.3) lacks the necessary rigour to be effective. Additional time and energy should be put into better stating the existing monitoring undertaken in these four areas, stating specific monitoring needs around each proposed intervention and what mechanisms, agreements and methods should be used to determine how monitoring is to be resourced, planned and implemented.

We thank you again for allowing public comment on this document. We would be happy to be involved in further consultation processes for this report. We are also happy to provide further information or clarification on any points raised above.

Yours faithfully,

Tim Hosking
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