

From: [Jack Flanagan](#)
To: [NRC](#)
Subject: TRIM: NRC Draft Report - Active and Adaptive Management of Cypress Forests
Date: Wednesday, 16 July 2014 3:08:57 PM

To the NRC,

This draft report neglects to justify the need for 'active and adaptive' management of native white cypress forests in these conservation areas. Where laws preventing the logging of native tree species may prevent freeholders from increasing the land available to them for agricultural purposes, such legislation should not be circumvented using the guise of ecological recovery.

Scientific literature on this topic is limited and can therefore offer no conclusive justification, and furthermore those papers which do investigate these issues commonly reveal a range of benefits associated with cypress stands at dense, thinned, and removed stages. Should this management plan go ahead, it would be beneficial to conduct scientific studies into the issues you propose to be dealing with, including: efficiency and ecological impact of a variety of removal methods (not just monetary costs associated), the biodiversity supported by stands at various densities, and the soil properties in a similar range of stand conditions. In fact, a study conducted by McHenry *et al.* (2006) in volume 285 of the *Plant and Soil* journal titled 'Soil and vegetation response to thinning White Cypress Pine (*Callitris glaucophylla*) on the north western slopes of New South Wales, Australia' actually concluded that both dense and thinned stands provided significantly higher carbon storage compared to uncolonised areas. Perhaps the perspective taken by this draft report focused on local industry and landowner concerns to the detriment of broader environmental issues.

Furthermore, based on the cost analyses provided and previous method implementations, it would seem that controlled burning (at a minimum of \$50 per hectare) is the best option in terms of both minimising cost of removal and the secondary benefit of reducing fuel loads. Despite this, the report advocates logging over a 7 year period with potential for extension of this time period pending future success. Surely the cost recovery and material for services programs would not be required to such an extent if the most effective removal method of fire were employed? It is worrying that an ecological issue such as this appears to be driven by landholder desire for personal wealth increase and potential economic gain to the logging industry from expansion into native stands. Additionally, the recommendation that legislation be amended so that thinning residues be considered renewable energy sources is an insult.

This problem, if at all it is one at all, is not one of how best to serve local land holder and industry interests. Before the monetary gain associated with logging has been considered (as it has evidently been in the multiple tables and options forwarded by this draft report), the reality of the situation in terms of the broader environmental setting must be empirically assessed.

Yours respectfully,
Jack Flanagan.