



10 August 2014

Natural Resources Commission
GPO Box 4206
SYDNEY NSW 2001

Dear Sir/Madam,

Re: Draft report ‘Active and adaptive cypress management in the Brigalow and Nandewar State Conservation Areas.

The North West Local Land Services (NWLLS) appreciates the opportunity to comment on the draft report ‘Active and adaptive cypress management in the Brigalow and Nandewar State Conservation Areas (SCA). Our comment is detailed below:

Northwest LLS Transitional Regional NRM Plan:

The NWLLS has developed a transitional regional Natural Resource Management (NRM) Plan that summarises the NRM priorities for the NW LLS region. This plan contains a number of targets within the themes of Biodiversity, Water, Land and People. The NRM targets relevant to the area where the SCAs are located and the potential impacts of the proposed SCA management on the targets are discussed below:

Biodiversity Target 1:

“By 2020 there is an increase in native vegetation extent and vegetation does not decrease to less than 70% in less cleared sub-catchments and 30% in over-cleared sub-catchments, and no further regional vegetation community decreases to less than 30% extent, as identified by the 2010 baseline”.

Biodiversity Target 2:

“By 2020 maintain sustainable populations of a range of native fauna species by ensuring that no further regional vegetation community decreases to less than 30% extent, as identified by the 2010 baseline”

Biodiversity Target 3

“By 2020, contribute to the recovery of priority viable threatened species, populations and communities”.

Biodiversity Target 4

“By 2020, no new invasive species are established in the catchment and the spread of key emerging invasive plants and animals is limited”.

Land Target 1:

By 2020 there is an improvement in soil health as measured by an increase in groundcover at the paddock, sub-catchment and catchment scales

People Target 1:

NRM decisions contribute to social well being.

People Target 2:

There is an increase in the adaptive capacity of the catchment community

An analysis of the proposal to actively and adaptively manage white cypress pine forests in the SCAs against the relevant targets in NW LLS's Transitional NRM Plan revealed the following:

- If the thinning of dense white cypress pine was undertaken within ecological benchmarks for the relevant vegetation types then the targets above would be positively impacted.
- If commercial use of ecological thinning residues was allowed then it is likely to have a minor positive impact on both people targets.

The positive impact on all targets from thinning to ecological benchmarks will have a long lasting effect as the thinning will allow the forest to transition into a new steady state within its ecological benchmark. In contrast the commercial use of thinning residues and ecological grazing is only likely to have a minor short term positive social and community impact on the people targets. The short term impact is because the bulk of ecological residues will be recovered in the first thinning treatment leaving little if any ongoing revenue. Additionally, income from grazing for ecological purposes is expected to be limited with negligible economic benefit flowing beyond the contracted grazer, and only available in the short to medium term ceasing altogether once the 'specified ecological outcomes' have been reached.

Ecological Thinning

The NW LLS agrees that in general, thinning dense stands of white cypress pine to an ecological benchmark whilst leaving some thick patches in each area will have a number of positive environmental outcomes including those listed in Table 22. Our specific recommendations with respect to ecological thinning within the relevant SCA's are:

1. That ecological thinning not commence until the areas have been ground truthed and ecological benchmarks have been determined.
2. That ecological thinning and grazing within the SCAs should not commence until results from the trials mentioned in the draft report are available and can inform this process (unless best practice science already exists).
3. That some thick patches of white cypress pine remain to provide a mosaic of vegetation densities across the landscape.
4. The inclusion of ecological thinning and grazing in specific area of SCA must not lead to additional similar management actions elsewhere in the SCA where further ecological investigations have not been undertaken.

Cost Recovery

The NW LLS supports cost recovery from the commercial use of the thinnings from ecological management. However, commercial use of the residue from ecological thinning is unlikely to generate a significant ongoing economic benefit to the communities of Baradine and Gwabegar. The reason for this is once the area has been thinned to its ecological benchmark the follow up treatment will be to remove the white cypress pine seedlings and allow the retained trees to grow to maturity in accordance with the benchmark.

The experience of NW LLS staff in densely regenerating white cypress pine indicates the presence of sawlogs in these circumstances are sparse and would likely be retained to make up the range of stem sizes required by the benchmark. The potential economic benefits should not be overstated particularly as the ground surveys have not been conducted to prove the resource and an independent economic analysis has not been undertaken.. Individuals within the community may benefit if locals

win the works contract but income beyond the initial thin may not be significant. Raising unrealistic expectations will lead to community resentment. If a viable timber industry is a goal then revocation of some of the SCA's back to state forest should be considered rather than allowing commercial timber production in an SCA.

If boosting the economies of the communities is a goal then more sustainable opportunities other than thinning SCAs should be explored.

Grazing management

The areas to be grazed will require installation and maintenance of infrastructure such as fences and water troughs/dams, stockyards. The impacts from the development and maintenance of this infrastructure need to be addressed. Measures also need to be in place to manage the potential of grazing animals to introduce and spread weeds. If grazing is to occur in the SCAs, an impact assessment must be undertaken and grazing should only occur in areas where it will help achieve the intended biodiversity outcomes.

It is recommended that any grazing undertaken must not result in less than 15cm sward height (and not 5cm as proposed in the report) with a minimum 70% groundcover at all times west of Narrabri. In areas east of Narrabri, it is recommended that groundcover be 90% at all times.

Active and adaptive management

Active and adaptive management of large scale dense white cypress pine thickets in the 4 priority SCAs is generally supported due to the detrimental impacts on ecological values and processes from locked stands of white cypress pine. However, the SCAs have been gazetted due to their significant ecological values. Management actions need to be based on best available science and be adaptable enough to cope with changing conditions and up to date research. It is also important to consider the significant time frames (can be 150+years) for regeneration of these areas in terms of achieving the identified biodiversity outcomes. Any proposed management actions should focus on long-term ecological outcomes.

Conclusion:

The NW LLS supports:

- The active and adaptive management of large areas of dense white cypress pine within the SCAs.
- Thinning of dense white cypress pine to ecological benchmarks.
- The commercial use of the ecological thinnings.
- Strictly limited grazing to achieve ecological outcomes within the SCAs providing no other viable option to achieve the ecological goal is available.

The NW LLS does not support:

- Commercial forestry or grazing within the SCAs.
- Extension of the scheme to other SCAs, conservation reserves or national parks.
- The promotion of economic benefits to the local communities without the resource being proven and an independent economic analysis detailing the benefits if any.

Please contact me if you have any other questions.

Yours sincerely



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