

## FACSIMILE MESSAGE

To: John MacGregor-Skinner Fax No.: \_\_\_\_\_From: Gary DarcyDate: 25.3.98 Time: 11.20 No. of pages following: 5Subject: Comments (preliminary)  
on Cpts 196 & 199.NORTHERN  
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Comments:

John -

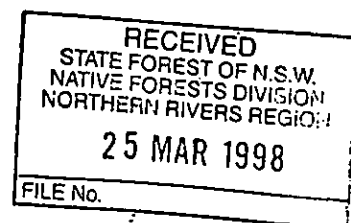
Attached are our preliminary comments  
on the HPs for IDFA cpts 196 & 199  
in Yabbara SF.

For consideration.

Cheers

Received 12.35

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If any pages are missing or illegible please telephone the sender on (066) 515 946



24 March 1998

Regional Planning Manager  
State Forests of NSW, Northern Rivers Region  
PO Box 688  
CASINO NSW 2470

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Our reference: yab196ca/daa/4924-196  
Your reference:

ATTENTION: BOB WILLIAM

IDFA Compartment 196 and 199 Yabbra State Forest

Dear Bob,

As agreed at the North East State Forest Harvesting Advisory Board (NESFHAB) meeting of 17 March 1998, National Parks and Wildlife Service (NPWS) has conducted a review of the draft Harvesting Plan for the IDFA compartments 196 and 199 Yabbra State Forest.

The attached review has been conducted as a matter of urgency due to timber supply problems in Northern Rivers Region. The review details a number of concerns NPWS has with the draft Harvesting Plan as well as data required to fulfil reporting requirements as set out in the 28 February 1998 section 120 licence variation.

I will be available tomorrow, 25 March 1998, to discuss the contents of the review in order to allow for the finalisation of the Harvesting Plan by 3 April 1998 as agreed by the NESFHAB.

Yours faithfully

GARY DAVEY  
Manager, Threatened Species Unit  
for DIRECTOR-GENERAL

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## NPWS Review of draft Harvesting Plan Yabba State Forest, compartment 196 and 199

24 March 1998

Information for HAB members

### Forest Types

There is an inconsistency between the Forest Types (FT) shown on the Harvesting Plan Operational Maps for compartments 196 and 199. The map for compartment 196 shows the area adjacent to compartment 199 to be FT 62b: Grey Gum - Grey Ironbark - White Mahogany, while the map for compartment 199 shows the area adjacent to be Forest Type 74: Ironbark - Spotted Gum. The NPWS copy of the forest type map for the Paddy's Flat 1:25,000 mapsheet shows that there is no FT 74 present in compartment 199 and that areas shown as FT 74 in the Harvesting Plan Operational Map for compartment 74 are FT 62b. This anomaly requires correction.

### Rocky Outcrops

Several areas of rocky outcrops are shown in the Harvesting Plan Forest Type Maps for both compartment 196 and 197. The corresponding Harvesting Plan Operational Maps do not show these areas. These areas must be shown on the HPOM with the corresponding buffer. Further, on page 44 of the Harvesting Plan under the heading Rocky Outcrops it states that no rocky outcrops as defined in the Conservation Protocols are known to exist within accessible areas of the compartments. This statement is not in agreement with the Harvesting Plan Operational Map which clearly shows the areas of FT 234: Rock as being accessible net logging area in both compartments. This requires correction.

### Powerful Owl

The Threatened Species Pre-Roading and Pre-Logging Survey Design (TSSD), received on 24 March 1998, provides details of a Powerful Owl record at AMG 448700E, 6821520. For this record, 300 hectares of potential habitat must be retained within a two kilometre radius. In applying this prescription SFNSW must use the guideline (Attachment A to section 120 TS0005 Licence variation dated 28 February 1998). As an alternative approach to the application of the record based prescription described above, SFNSW may apply a landscape approach as described in the attached guideline (Attachment B to section 120 TS0005 Licence variation dated 28 February 1998).

It is proposed that the prescription for Powerful Owl (for these compartments) state that the boundary of the retained Powerful Owl habitat be marked in the field by the SFO and that trees must not be felled into areas retained as Powerful Owl habitat.

*NPWS review of harvesting plan for IDFA compartment 196 & 199, Yabba State Forest****Cynachum elegans***

The pre-harvest flora survey report by D. Binns, dated 11 March 1998, states that *Cynachum elegans* was found within compartment 199, but the Harvesting Plan states on page 39 that no endangered or threatened Australian Plant species (ROTAPS) are known to occur in the net harvest area. The Harvesting Plan currently does not include any threatened flora prescriptions. No details of the location are provided in either the pre-harvest flora survey report or the TSSD. The Harvesting Plan should provide full details of the location of *Cynachum elegans* and include the relevant threatened flora prescription.

**Tree marking**

There is a section in the plan (page 37) referring to tree marking. The marking of only trees for removal has not been agreed to by NPWS. As such, the requirements under the Threatened Species Protocol and s120 licence to mark trees for retention must apply to this compartment. Please correct the tree-marking and harvest regulation to require the marking of all critical boundaries and retained trees.

**Canopy gapping**

During the moratorium on canopy gapping, Australian Group Selection is considered an acceptable logging technique (harvesting plan page 29). The AGS system allows the creation of canopy gaps that are a range of sizes that *average* about 40-50 metres diameter. Site preparation can include limited felling or tractor pushing of non-commercial trees.

It is not considered appropriate that AGS is conducted in IDFA compartments for the following reasons:

- the technique of canopy gapping is still under review;
- the technique could adversely affect the conservation values of the IDFA compartment; and
- the technique could adversely affect a number of threatened species known to occur in the IDFA compartment.

Furthermore, the Harvesting Plan has not included the results of the Koala survey to determine whether there are any areas of Koala high or intermediate use. Should these areas be found to exist in the compartments, the Koala prescription will need to be applied. This prescription precludes the application of canopy gapping or Australian Group Selection in compartments where Koala high or intermediate use has been recorded. Accordingly, it is premature for the Harvesting Plan to state that "selective logging techniques, including Australian Group Selection (Jacobs 1955) where appropriate must be implemented." The application of this requirement is entirely dependent on the results of the Koala survey.

**Old Growth**

The Harvesting Plan includes a prescription for old growth. The prescription does not follow the intent of the old growth protocol. During negotiations for the protocols it was agreed that for exclusion areas and buffers "All practical precautions must be taken to avoid felling trees

into / over...". The intent was that trees would not be felled over critical boundaries and buffer boundaries. However, it was acknowledged that in some situations accidents happen, and rather than effectively increase the buffer / boundary by the length of the tree to be felled by requiring that trees must not be felled over these boundaries, the wording was changed to "All practical precautions...". However, the intent remains; ie that trees must not be felled over buffers / boundaries.

Given the above, the IDFA status of this compartment, and subsequent 'best practice operation', NPWS proposes the following prescription for the protection of old growth in this compartment:

1. The boundary of the identified old growth forest must be clearly marked in the field by the SFO (where the boundary is adjacent to areas of net logging area that will be harvested).
2. Specified forestry activities must not be conducted in areas of identified old growth forest.
3. Trees must not be felled into areas of identified old growth forest, ie trees must not be felled across the boundary of old growth forest.
4. If a tree accidentally falls across the boundary, all trees within the old growth boundary affected by the fallen tree will be treated as habitat trees. Removal of debris from around such trees must be done by hand.

### Reporting requirements

The 28 February 1998 broad area licence requires (see Condition 9) that the following be included in the Harvesting Plans: ".....those prescriptions and Harvesting Plan Operational Map amendments triggered by the results of the Pre-roading and Pre-logging surveys." The 28 February 1998 broad area licence that: "The Harvesting Plan Map must present, as clearly as possible at the standard scale used, all threatened species records (database search records, SFNSW records and new survey records) and threatened fauna features requiring prescriptions. The Map must also indicate the management actions for each, eg. buffer zones must be indicated."

The Map does not show all the relevant features required and will need to be amended. All threatened species (both flora and fauna) requiring prescriptions or some form of management will need to be mapped. All threatened fauna features (eg. *Allocasuarina* with >30 cones beneath, owl roost site etc) will need to be mapped.

The reporting requirements of the Threatened Species Pre-Roading and Pre-Logging Survey Design have not been met. The data required to be included in the survey report, as set out under the 'Data to record' sections have not been supplied for the compartment traverse; for example no map has been provided showing the location of the threatened flora species *Cynachum elegans*, and no AMGs have been provided of threatened flora records and threatened fauna features. A full review of the Threatened Species Pre-Roading and Pre-Logging Survey Design has not been undertaken at this time, however it will be reviewed when the final Harvesting Plan is submitted for NPWS licensing should the NESFHAB vote to release these compartments. Please ensure that all of the Threatened Species Pre-Roading and

*NPWS review of harvesting plan for IDFA compartment 196 & 199, Yabbara State Forest*

Pre-Logging Survey Design requirements have been fulfilled prior to submitting the final Harvesting Plan for NPWS licensing in the advent of the compartments being released.

### **Connection Corridor**

The connection corridor marked on the Harvesting Plan Operational Map for compartment 196 does not indicate which other drainage system is connected to the one in compartment 196. The Harvesting Plan Operational Map should clearly how the connection corridors establish links between different drainage systems.

### **Species-specific prescriptions**

- There are some prescriptions in the plan that are not relevant to the compartment (eg Squirrel Glider, Brush-tailed Phascogale, Threatened Frogs, certain Threatened Bats). The s120 licence (Condition 9 a) iv.) states that that species prescriptions that are not relevant to the compartment must not be included in the plan. This is to ensure that the plan clearly identifies what is required.
- The following prescriptions were not worded correctly in the plan (sections were missing or the wording was different to that required in the s120 licence): Riparian Buffers; Connection Corridors; Wetlands; Heath; Rocky Outcrops; Significant Food Resources; Caves, Tunnels and Mineshafts; Pre-Logging Site Inspections; Powerful Owl; Sooty Owl; Glossy Black-Cockatoo; Yellow-bellied Glider; Critical Weight Range Vertebrates; and Threatened Bats. Please ensure that the wording and format of all conditions and prescriptions in the Harvesting Plan are consistent with the conditions and prescriptions contained in the section 120 licence variation to TS0005, dated 28 February 1998.
- The following conditions or prescriptions were omitted from the Harvesting Plan: Condition 11: Definitions; and Prescription 12: Other Conditions.