



**NSW  
NATIONAL  
PARKS AND  
WILDLIFE  
SERVICE**

Ms Georgia Beyer  
Toonumbah Environment Centre  
Lot 2, Toonumbah Forest Road  
**TOONUMBAH via KYOGLE NSW 2474**

Our reference: F/207 po:mgj  
Your reference:

Dear Ms Beyer

**Re: Sooty Owl Site in Compartment 116 Beaurie State Forest**

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Thank you for your correspondence dated 4 October 1994 regarding the above. Northern Region officers subsequently confirmed that presence of a Sooty Owl during a field inspection of this compartment.

The Service has raised the matter with State Forests to ensure adequate protection is afforded to the nest or roost tree during the planned logging operation. This will involve a variation of the licence to include roost and nest site protection measures outlined in the Department of Planning's Kempsey Wauchope EIS Determination.

State Forests will undertake further survey work to clarify the nature (roost or nest) and location of the tree.

A copy of a Field Data Book with Data Entry cards is enclosed to facilitate entry of your fauna records onto the Service's Wildlife Atlas data base.

Thank you for your interest. Should you have any enquiries please contact Tony Meggs on (066) 42-0641.

Yours sincerely

**RUSSELL COUCH**  
Manager  
Threatened Species Unit

18.10.94.

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Head Office  
43 Bridge Street  
Hurstville NSW  
Australia  
PO Box 1967  
Hurstville 2220  
Fax: (02) 585 6555  
Tel: (02) 585 6444

## HAIR ANALYSIS

AREA: Beary State Forest

**MATERIAL** Predator scats

No.	Date	Locality	Scat	Contents	Comments
1	Oct 94	Cpt 116	Dog	<i>Isodon macrourus</i> - hair + bone fragments - & grooming hairs of <i>C. familiaris</i>	
2	"	"	Dog	<i>Hylogale betes</i> - hair + bone fragments - and grooming hairs of <i>C. familiaris</i>	

PAID  
\$16

Georgia -  
 Sorry to disappoint, but these  
 were not owl pellets! They were typical  
 scats of a large dog/dingo. The prey was  
 interesting, though - but not endangered,  
 sorry!

D. Barker

# TOONUMBAH ENVIRONMENT CENTRE

Lot 2 Toonumbah Forest Rd  
Toonumbah via Kyogle NSW 2474  
Ph 066 333 292

4 October 1994

Mark Carron  
District Forester  
State Forests  
Urbenville

RE : CPT 115, 116 BEAURY STATE FOREST

Dear Mark,

on a recent visit to compartments 115 and 116, Beaury SF to survey for fauna, several members of the Toonumbah Environment Centre heard a Sooty Owl calling from several locations around the stand of Dunn's White Gum near log dump 'E'.

The distinct calls were heard just after sunset suggesting that the Sooty Owl is nesting in one of the huge hollows in the E. dunnii stand.

We also found numerous 'fur-balls' (balls of fur and bones regurgitated by owls) along the road near log dump 'E'.

We understand that it is a condition of s120 licences that State Forests notify National Parks and Wildlife Service of the presence of any endangered fauna within licensed compartments, accordingly we formally request that you notify NPWS of this sighting.

As you will be aware we have already recommended that the stand of White Gum near log dump 'E' be reserved for reasons of floristic rarity. The Toonumbah Environment Centre believes that the likely presence of a Sooty Owl nesting hollow in the White Gum stand is another important reason to reserve this stand from logging.

Due to the imminence of logging in this compartment, the TEC requires that action be taken immediately to protect the habitat of the Sooty Owl, by delaying logging in Compartments 115 and 116 until such time as the exact location of the nest site can be ascertained.

Looking forward to your immediate reply.

Yours sincerely,

# TOONUMBAH ENVIRONMENT CENTRE

Lot 2 Toonumbah Forest Rd  
Toonumbah via Kyogle NSW 2474  
Ph 066 333 292

4 October 1994

Paul O'Conner  
Regional Office  
National Parks and Wildlife Service  
Grafton

RE : CPT 115, 116 BEAURY STATE FOREST

Dear Paul,

on a recent visit to compartments 115 and 116, Beaury SF to survey for fauna, several members of the Toonumbah Environment Centre heard a Sooty Owl calling from several locations around the stand of Dunn's White Gum near log dump 'E'.

The distinct calls were heard just after sunset suggesting that the Sooty Owl is nesting in one of the huge hollows in the *E. dunnii* stand.

We also found numerous 'fur-balls' (balls of fur and bones regurgitated by owls) along the road near log dump 'E'.

The Toonumbah Environment Centre has already recommended to State Forests that the stand of White Gum near log dump 'E' be reserved for reasons of floristic rarity. The Toonumbah Environment Centre believes that the likely presence of a Sooty Owl nesting hollow in the White Gum stand is another important reason to reserve this stand from logging.

Due to the imminence of logging in this compartment, the TEC requires that action be taken immediately to protect the habitat of the Sooty Owl, by delaying logging in Compartments 115 and 116 until such time as the exact location of the nest site can be ascertained.

Looking forward to your immediate reply.

Yours sincerely,

Georgia Beyer.

# TOONUMBAH ENVIRONMENT CENTRE

Lot 2 Toonumbah Forest Rd  
Toonumbah via Kyogle NSW 2474  
Ph 066 333 253

12 September 1994

Mark Carron  
District Forester  
Urbenville Management Area  
NSW State Forests

Dear Mark,

I write in response to your comments made in correspondence, 8/8/94.

## **RAINFOREST ROADING**

Whilst your comments upon the proposed rainforest roading cannot be repudiated, I would like to further impress upon you, our desire to see the utmost sensitivity employed whilst upgrading and utilizing roads.  
We take it in good faith that no 'snigging' through rainforest will actually occur.

## **DUNN'S WHITE GUM**

With respect to *Eucalyptus dunnii*, I acknowledge that some effort has been made previously to reserve the species, but I cannot share your confidence that the species is adequately reserved.

Whilst you formally refuse to further reserve Dunn's White Gum I ask that extra sensitivity be employed when marking and removing in the areas near log dump "F" and "H".

**The Toonumbah Environment Centre requests the stand near log dump "E" - an almost pure stand of dunnii - be reserved from logging.**

I note that in your response to my last letter, you failed to specifically address the market value or marketability of the species' seed. ~~also~~, or the phenomena of insect dieback.

## **BOOYONG AND HOOP PINE REMNANTS**

Of most notable concern in your letter of reply is your non-acceptance of buffer strips to protect rainforest stands.

Given recent developments, I use your paragraph "The harvesting plan states quite clearly that "" Trees shall not be fallen into Rainforest and logging machinery shall be excluded"", as an obvious point of departure to re-iterate the Environment centre's request that a buffer strip be implemented into the Harvest Plan for compartments 115 and 116.

As Foreman Weaver, Foreman Creighton and Forester Schubert were quite clearly shown, trees are felled into rainforest on a regularly occurring basis. At this juncture I would like to point out that this represents a potential breach of your licensing under section 120 of the National Parks and Wildlife Act.

Whilst Forester Schubert has accepted the the need for a buffer strip in in compartment 260 Toonumbah State Forest, we feel it is even more pertinent to apply this prescription to the operation in 115 and 116.

I re-state emphatically all of the justifications in my previous letter. Particularly the points that the rainforest in 115 and 116 is in itself a buffer to the plantation and that the claims made in the Harvesting Plans' fauna prescriptions that logging impact upon Schedule 12 species will be mitigated can only be validated if a buffer strip is left extant.

Rainforest is precious and there is precious little rainforest left. This is now a commonly held public perception.

Even with the installation of a 20m buffer zone an insensitive contractor could still successfully violate the integrity of a rainforest stand.

**Given the above the Toonumbah Environment Centre formally requests a Buffer Strip, along the edge of all typed Rainforest, the length equal to the height of a mature tree or at least 40m, be installed, as an area reserved from logging.**

#### **BLACK-STRIPED WALLABY.**

I have no confidence in the validity of your statements that there are no records of the species for the area. The paucity of your information on any faunal matter is well known.

I believe there are strong suggestions that this area is indeed part of an area that can be considered a stronghold for the Black Striped Wallaby. The entire Beaury population ( possibly as low as 20 specimens ) may well be isolated and as such restricted to a small area that includes 115 and 116.

Your comments on being concerned about the field application of our recommendation and your doubt of providence of additional benefit are curious given that our recommendation exactly mirrors your own Management Plan, 2.2.3.3/9 page 62.

As the Black-Striped Wallaby's preferred habitat includes Rainforest margins I **recommend that providing extra possible protection for the species is yet another strong justification for implementing a buffer strip of one mature tree height around rainforest.**

#### **BLACK BREASTED BUTTON QUAIL**

The precarious future of the Black-breasted Button Quail is another extremely significant case in point. This is a species, listed nationally as threatened, known to inhabit the area, with a confirmed sighting by Glen Holmes at the southern section of the Tooloom Scrub Flora Reserve in the late nineteen eighties. This species requires further special consideration.

**The Toonumbah Environment Centre formally asks that a survey for the Black Breasted Button Quail be conducted prior to logging.**

I would like to take this opportunity to state my uneasiness in your confidence in general of the correctitude of your prescriptions and plans of management and your blank assurance that prescriptions are always implemented correctly on the ground.

In your letter of reply, you failed to specifically address the phenomena of insect dieback. I would like to know what steps your office is proposing to contain this \*  
logging related dieback. this paragraph deleted.

I look forward to further correspondence, particularly addressing the potentially confrontive issue of Rainforest Buffer Strips.

Yours Sincerely

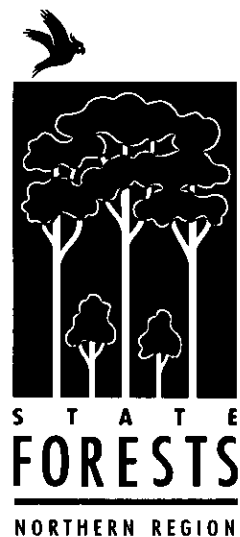
Tim Somerville  
Toonumbah Environment Centre.



Your reference  
Our reference DO 508 Scott Schubert

8 August, 1994

Tim Sommerville  
Toonumbah Environment Centre  
Lot 2 Toonumbar Forest Road  
TOONUMBAR via KYOGLE  
NSW 2474



State Forests of  
New South Wales

Urbenville District  
23 Beaury Street  
Urbenville NSW 2475  
Phone (066) 34 1318  
Fax (066) 34 1334

Dear Sir,

In response to your letter received at this office on 4.7.94 I would make the following comments.

### KEMPSEY/WAUCHOPE EIS

The Kempsey/Wauchope EIS was specific to those Management Areas, as such it is not considered appropriate to adopt all of the conditions of the Kempsey/Wauchope EIS determination for operations in the Urbenville Management Area.

Whilst the comments of the Toonumbah Environment Centre are appreciated it should also be noted that Compartments 115 and 116 Beaury State Forest have been licensed under Section 120 of the National Parks & Wildlife Act.

### RAINFOREST ROADING

To answer your concerns on this subject I make the following comments:

- It is not intended to snig through rainforest types.
- All the roads through rainforest type in this compartment already exist and are currently open.



No disturbance to the rainforest canopy anticipated, some clearing of undergrowth that has grown onto the road shoulders may be required. This is unlikely to exceed the 6 m stated in the Kempsey/Wauchope determination.

- The roads are used for forest access and will not be replanted following logging. They will be drained according to the Standard Erosion Mitigation Guidelines for Logging (SEMGL).

### **DUNN'S WHITE GUM**

It should be noted that Dunn's White Gum (*Eucalyptus dunnii*) occurs in both the Tooloom Scrub and Captains Creek Flora reserves in this locality, with Tooloom Scrub Flora Reserve containing some 68 ha of this type. The species is considered adequately reserved in this Koreelah Range area.

The white gum types in Compartments 115 and 116 contain other species, notably Blue gum and show evidence of past logging with subsequent regeneration.

Considering the above I believe that there is no requirement to reserve the white gum types from logging.

Some white gum stands will remain undisturbed – particularly in filter strips and in the 40 metre "Flora & Fauna Protection" strip.

### **BOOYONG & HOOP PINE REMNANTS**

It is not accepted that a buffer be left along all rainforest stands. The determination of the Kempsey/Wauchope EIS set a buffer of 20m width for all unlogged warm temperate and cool temperate rainforest.

The "dieback effect" associated with rainforest edges in warm and cool temperate rainforest has not been evident in sub-tropical rainforest. Some members of the sub-tropical rainforest community are known to quickly revegetate disturbed areas within and adjacent to rainforest.

The rainforest stands in question have been disturbed in the past and buffers would not apply if the Kempsey/Wauchope determination was used as a precedent.

The harvesting plan states quite clearly that "Trees shall not be fallen into Rainforest and logging machinery shall be excluded". This will be enforced.

The selective nature of the operation will mean that in some cases there will be 20 metres or more of undisturbed forest adjacent to rainforest stands.

SETIIPACT  
Forests.

applied (239) RAPIC  
T.S.F.

5120  
licensy.

ETS in  
prepack

BLACK-STRIPED WALLABY

I appreciate your concerns in regard to the Black-striped wallaby. State Forests have had some discussions with the National Parks & Wildlife Service on a prescription for this species.

I have no records of the Black-striped wallaby occurring in these two compartments, or any suggestion that it may be part of the stronghold for the species.

There have been records of this species from both forested and cleared land in the Wallaby Creek catchment.

C Plaleau.

Unangan

Sth Gellbra.

The intent of the harvesting plan is to minimise understorey disturbance adjacent to cleared grassy areas. I have some concerns about the field-application of your suggested condition and am doubtful that it would provide any additional benefit to the species in question.

Small population

I recommend that you discuss the prescription further with Forester Scott Schubert.

40m Mature tree height.

Operations may commence in these compartments in late August. I look forward to hearing your views on my reply to your letter.

no  
population of  
beauty.  
isolated  
population

Yours faithfully,

Glen Holmes

recently

not confirmed recorded Sydney

Black breasted

Butter Quail

forest  
understorey

antipodean

(magus)

barren side T S F Reamer  
eastern scrub

3/4/88 - Special coordinator to  
do a survey.

S. Schubert

For: Mark Carron  
DISTRICT FORESTER  
URBENVILLE

U.M.P. Kern

Black Striped Wallaby

P 62.9

10m

P 87 para (2)

naturally threatened

1 OCT. (4 NOVEMBER)  
by end.  
SEPT.

# **TOONUMBAH ENVIRONMENT CENTRE**

**Lot 2 Toonumbah Forest Rd**  
**Toonumbah via Kyogle NSW 2474**  
**Ph 066 333 253**

Scott Schubert  
Forester  
Urbenville Management Area

July 1994

Dear Scott,

Subsequent to our across the counter conversation in Urbenville office on June 10, I am now writing to formalise the Toonumbah Environment Centre's Recommendations for the proposed harvesting operation in Compartments 115 and 116 Beaurie State Forest No. 2.

**Given that under the Timber Industry (Interim Protection) Act 92 scheduling an E.I.S. for the Urbenville Management Area was meant to be completed by December 1993 and that now some 6 months later the completion date of the E.I.S. is still indeterminate, we feel that it would be prudent of your office to adopt, as an interim measure, all the latest precedents in forest management.**

These precedents are mainly to be found in Planning Minister Robert Webster's determination of the Kempsey / Wauchope E.I.S. dated 25 March 1994.

## **Rainforest Roding**

Of particular relevance to proposed activities in Compartment 115 and 116 are conditions 65, 66 and 67 which pertain to roading, snagging and burning in Rainforest and Rainforest Buffer Strip Areas.

Of particular concern is the central southern part of 115 which is dominated by a remnant stand of Typed Booyong / Hoop Pine Forest. This stand will be traversed by Sly's Road to gain access to log dump "G". Rainforest is also crossed to gain access to log dump "F" and the greater part of 116 north of log dump "E".

**The Toonumbah Environment Centre requests that conditions 65, 66 and 67 are applied to the current operation and strictly adhered to.**

### **Dunn's White Gum**

On June 10, I also made mention of the Type 51 Dunn's White Gum. These stands occur in the north-eastern part of 116 (near logdump E) the central northern section of 116 and the south-western section of 115.

All three stands, the first two in particular, lie adjacent to or are surrounded by existing special emphasis areas and areas reserved from logging. Dunn's White Gum has a listing in Rare And Restricted Flora due to its very limited range. The claim in the Urbenville Management Plan 1986 that it is adequately reserved is open to debate.

Of primary concern is the species susceptibility to insect dieback, particularly by the Christmas Beetle.

The potential market value of the species' seed far outweighs even a value-added product of its timber.

Given the above and the fact it would be a convenient opportunity to further reserve a rare and restricted species the stands in 115 and 116 can easily be incorporated into the existing adjacent special emphasis areas.

**The Toonumbah Environment Centre recommends that all three stands of *Eucalyptus dunii* be reserved from logging.**

### **Booyong and Hoop Pine Remnants**

Our greatest concern in the proposed operations within the management area generally, is the long-term viability and maintenance of integrity to small remnant stands of Booyong Association and Hoop Pine Rainforest.

Small stands such as those occurring in Compartments 115 and 116 are at obvious risk to a variety of deleterious environmental factors ranging from the more subtle impact of wind disturbance to the totally destructive impact of fire.

Logging right up to the edge of these stands greatly facilitates the encroachment of such adverse impacts.

**The greatest violation to the integrity of these stands is trees (usually tall specimens of *Lophostomen confertus* or *Eucalyptus grandis*) being felled directly into them - a phenomena constantly observed by members of this Environment Centre. This was most recently observed in**

**compartments 249 and 250 of Toonumbah State Forest - Major breaches of which you will be notified in separate correspondence**

Apart from the obvious immediate destruction that this felling causes, the entry of fire from even a top-dress burn is facilitated. It is ironic that the very narrow strips of Booyong that surround the Tooloom plantation should be further placed at risk to fire disturbance as these strips are in themselves acting as a buffer against fire to the plantation.

The incremental deterioration of Rainforest and its margins is violating prime habitat for numerous endangered species. Species are not always restricted to a specific forest milieu and these margins or eco-tones are critical as they provide "the best of both worlds" to numerous animal and bird species.

Claims made in the harvest plan's fauna prescription that logging impact upon Schedule 12 species will be mitigated can only be validated if a Buffer Strip is left extant.

**Given all of the above the Toonumbah Environment Centre formally recommends that a 20-40 metre Buffer Strip along the edge of all typed Rainforest Stands be installed as an area reserved from logging.**

As the area is of known importance to macropods and is adjacent to, or can be itself considered, a habitat stronghold for the rare Black Striped Wallaby. **We consider a 10 metre Buffer Strip of wet sclerophyll <sup>ever</sup> adjacent to open grassy areas be retained with no logging to take place.**

Given the imminence of harvesting in 115 and 116, I ask that you respond to this letter as a matter of urgency, to inform us of what actions you will be taking upon our recommendations

Yours sincerely,

Tim Somerville  
Toonumbah Environment Centre