



PRELIMINARY COMMENTS ON DRAFT FPP

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Rod Hill & Brett Warren
Forestry Tasmania
Melville St
Hobart TAS 7000

PRELIMINARY COMMENTS: MORE TIME IS REQUIRED TO ENABLE OUR GROUP TO PROPERLY ASSESS THE DOCUMENTATION

Dear Mr Hill and Mr Warren

We require additional time to review the draft FPP. Six days to review this critical document is not appropriate or acceptable.

Forestry Tasmania and the Canaways Creek Community Group has a serious conflict regarding TN026C that requires dispute resolution with an external independent mediator. In particular we would like resolution. The Forest Practices Plan does not address our core concerns or recognise the issue from a residents perspective, specifically regarding:

1. Impact on primary drinking water quality and supply
2. Impact on habitat of vulnerable species (particularly for the Wedge-tailed Eagle, bats, spotted quoll, Eastern barred bandicoot, Tasmanian Devil, Platypus, and in stream fish movement, possible stag beetle presence, to name a few)
3. Inappropriate clearfell in a steep and erosive water catchment
4. The potential impact of high intensity burning
5. The incomplete geological evaluation of the catchment
6. The lack of recognition of the impact on the local community

Please inform us how you will address the Australian Forestry Standard (AS 4708 Supplement1), particularly the A-4.2.3 Good neighbour clause to resolve this dispute.

We believe we will suffer material disadvantage from impacts to water supply as well as direct environment impact and harm. The consultation process has not resolved or dealt with our core concerns.

We are also extremely concerned that the geomorphology of this area is too sensitive for the proposed operations. Evidence of operations in nearby surroundings support this conclusion, including the presence of sink holes, highly erodable soils, etc.

We believe it is essential that Forestry Tasmania ensure that the operations do not contravene the "Geomorphology Manual" by Kevin Kiernan; 1990.



In general we would like to see the draft FPP be clearer in its commitment to implement protection measures, including in the first instance:

- Rewording of “Should” statements to “will” statements
- Removal of “Where-ever practical” statements
- Removal of “All reasonable effort” statements
- Amendment of “The contractor is encouraged” to “The contractor will” statements

The draft plan does not allay our concerns that the cable and ground based forest operation you propose will cause environmental harm and nuisance in our local catchment and impair the quality of our drinking water.

The three-year draft plan in the Fire Management Evaluation document for TN026C provided with the Forest Practices Plan includes additional extreme silver culture operations for TN026A & TN026B that have not been included in any of our previous discussion. It appears these operations include minimal habitat or environmental protections for our catchment. These proposed operations and this lack of communication is another area of dispute that requires resolutions under the Australian Forestry Standard (AS 4708 Supplement 1).

ADDITIONAL ACTIONS

GENERAL

- Assurances that a Sediment Control Plan would be prepared (Forestry Tasmania Media Release dated August 7, 2007) have not been adequately met.

ACTION: Insert a requirement into the General requirements section stating that Erosion & Sediment Control Plans are required to be prepared prior to the start of any operations.

- There has been no attempt to understand the impact of this project on the local community. Clearly the responsiveness and concern of the CCCG indicates that there is potential for significant negative impact.

ACTION: That FPP revise their approach to the development of this FPP to take notice of community concerns and needs. Specifically to avoid clear felling and burning.

- Slopes in the coupe to be logged are 26°, with logging occurring on slopes below 19°. As you know the landslide hazard threshold stated in the Forest Practices Code is 15°.

ACTION: Exclude areas of high slope >14° from harvesting.

B.1 LOCATION

- 30 meter road width is excessive.



ACTION: Change width limit to 5 meters (a truck is only 3 meters wide and passing bays are included). This change would then need to be made throughout the document).

- Culvert construction must be designed to ensure minimum impact on water quality and fish movement.

ACTION: Include restriction of culvert to slopes substantially less than 2%. Independent research recommends that this is necessary to allow any degree of fish passage (*Stream biological Research at Warra*: Davies, P., Cook, L., Risdon M., Walker, R. 2001).

B.5 FELLING

- 30-meter road width is excessive.

ACTION: Change width limit to 5 meters (a truck is only 3 meters wide and passing bays are included). This change would then need to be made throughout the document).

B.7 STREAMSIDE MANAGEMENT

- Our concerns for water quality and erosion and sediment control are serious in nature and not without considerable justification including opinions of professionals who provided advice in previous Forestry Tasmania documents. (Natural and Cultural Values Evaluation Sheet No 6. Soil and Water, revised by Chris Barry 8/2/2007 and Brett Warren 25/9/2007).

ACTION: Insert a requirement into the streamside management section stating that:

- An Erosion & Sediment Control Plan is required to prepared prior to construction
- Implementation of the Erosion & Sediment Control Plan is ensured with regular monitoring by FT and local residents.

- There is a clause stating "The Maximum clearing width of 15 metres should apply"

ACTION: Amend to "The Maximum clearing width of 10 metres *will* apply"

- There is clause stating: "Road construction activity should limit the impact on (tramway) site.

ACTION: Amend to "Road construction activity *will* limit the impact on (tramway) site.

- There is reference to the "Tramway Creek".

ACTION: This is not on the map - please provide more details as to the location of the "Tramway Creek".

- Some streamside reserves are set to 30 metres



ACTION: All streamside reserves will be 50 metres.

- There is a clause "Machinery will not enter within 30 meters of the stream"

ACTION: Amend to prohibit any entry or removal of trees or vegetation from any part of any stream reserve.

- In *Class 4 streams and drainage lines*, there is a clause that states, "These stream will be protected by a 10 meter machinery exclusion zone".
- ACTION: Amend to "These stream will be protected by a 30 meter machinery exclusion zone and any entry or removal of trees or vegetation from any part of any stream reserve will be prohibited".

R. 8 RESTORATION

- Snig tracks occur outside the maximum clearing width, the following procedures will be carried out: Snig tracks will be restored and drained in accordance with the FPC for moderate to high" erodibility soils.

ACTION: The geological assessment of moderate to high be changed to high since the geological assessment is known to be inaccurate.

ACTION: Obtain an independent assessment of the areas geology and the development of appropriate control measures.

C. 1 LANDINGS

- The section includes 8 Landings

ACTION: Reduce the number of landings to 5.

NATURAL AND CULTURAL VALUES EVALUATION SHEETS

- There is no identification of species other than trees. Has an on-site assessment been conducted?

ACTION: Conduct a thorough vegetation assessment to ensure that no priority species exist in the proposed forest operations area

1. FLORA

OTHER FLORA ISSUES – EFFECTS ON RESERVES

- In states that reserves is not applicable. This contradicts the statement in the section on Wildlife Habitat Strips that says that there is an identified Informal Reserve.



- The draft FPP states that no species are known or were located during operational planning for this area.

ACTION: Request copies of any ecological assessments/ surveys be provided to the CCCG

- Spotted quoll habitat found but not protected

ACTION: Request a survey be conducted

- Goshawk habitat found but not protected

The Forest Practices Board Fauna Technical Notes states that Goshawk habitat includes Eucalyptus obliqua wet forest (page 1 of Flora notes that the coupe have Wet Obliqua forest)

ACTION: Reserve additional forest habitat clumps of 2-3 hectares

ACTION: Monitoring / Surveys

There is not mention on the bats that live there.

WILDLIFE HABITAT CLUMPS

Given the area contains habitat for the grey goshawk, quolls, eastern barred bandicoot, and the Tasmanian Devil etc, it s requested that strategic clumps be provided to reduce the impact to these vulnerable species.

PRESCRIPTIONS

ACTION: We request that burning be excluded from all operations.

ACTION: Need to change "Although no nests have been found" clearly some have been found.

The prescriptions for the Grey Goshawk indicates that it is very likely that they are present. It is highly unlikely that contractors are trained (or willing) to see such evidence.

ACTION: Survey to determine presence of birds and other priority species.

3. GEOSCIENCE

We believe suspect that there are B type triggers - There are sink holes, springs, and cracks in the area.

ACTION: Do a more thorough survey to ensure that sinkholes and springs will not present a danger to workers and equipment.

Why would they list the Karst Atlas Map, Behind the Scenery, and Forest Sinkhole manual and not consult them?



5. LANDSCAPE

The Coupe is also visible from Mt Field National Park which is not mentioned.

ACTION: Conduct a visual analysis.

6. SOIL AND WATER

DOMESTIC WATER SUPPLY CATCHMENTS

Consultation has not addressed the communities concerns for ensuring water quality is protected.

CLASS 4 STREAMS

Recommendations include “cable harvest may occur across the reach of the stream”. This will impact our drinking water and is unacceptable.

ACTION: Prohibit cable harvesting across the reach of the stream.

PRESCRIPTIONS

Add the above actions and add:

ACTION: Change all streamside reserves to 50 meters including for Stream 1 (due to the presence of erosion features).

(d) this is the first mention of restoration works.

ACTION: Prepare an erosion and sediment control plan that includes restoration activities in consultation with the CCCG.

D.2 FAUNA

ACTION: We request that burning be excluded from all operations to protect habitat and avoid risk of fire spreading to our properties.

ACTION: Need to change “Although no nests have been found” clearly some have been found.

The prescriptions for the Grey Goshawk indicates that it is very likely that they are present. It is highly unlikely that contractors are trained (or willing) to see such evidence.

ACTION: Survey to determine presence of birds and other priority species.

D.6 SOIL AND WATER

- Culvert construction must be designed to ensure minimum impact on water quality and fish movement

ACTION: We request that no culverts or construction occurs in streams. If they are to



proceed, then it is critical that the plan includes a restriction of culvert to slopes substantially less than 2%. Independent research recommends that this is necessary to allow any degree of fish passage (*Stream biological Research at Warra*: Davies, P., Cook, L., Risdon M., Walker, R. 2001).

ACTION: Change all streamside reserves to 50 meters including for Stream 1 (due to the presence of erosion features).

E. 1. ESTABLISHMENT

As communicated on many occasions, the Canaways Creek Community Group is extremely concerned that burning activities will cause environmental harm, impact water quality, and pose a risk to our properties.

ACTION: Use an alternative approach to burning.

E. 2. RESTORATION

Vacating the Coupe

ACTION: Prepare an erosion and sediment control plan that includes restoration activities in consultation with the CCCG.

E. 3 PROTECTION OF GROWING STOCK

ACTION: Clarify what "appropriate action" means and if necessary add a prescription that prohibits poisoning. Consider relocation of native species.

ACTION: Prepare a fire management plan.

MEMORANDUM

- ch:400-000 These drawing are impossible to understand.
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FIRE MANAGEMENT EVALUATION

This section does not take into account community concerns or even note that we will be affected and have repeatedly requested a more responsible approach.

MAP

The large clear felled areas in the upper catchment and their impact on the creek has not been shown or discussed prior to this plan. We would like to see what is planned for this area.



MEMORANDUM: CANAWAYS (NOT CANOWAYS) CREEK CROSSING

It is difficult not to be extremely concerned about protection of water quality in Canaways Creek given that the approach is to have wordy statements that are not site specific.

- “the actual opening will far exceed this requirement”? What does this mean?

ACTION: Prepare detailed Erosion and Sediment Control plans for each crossing in consultation with the CCCG.

ADDITIONAL COMMENTS

Slopes in the coupe to be logged are 26°, with logging occurring on slopes below 19°. As you know the landslide hazard threshold stated in the Forest Practices Code is 15°.

Forestry Tasmania documents indicate the soils in this area to be of moderate to high erodability. Our experience is that the soils in this area are highly erodable in nature. The impact of logging on the neighbouring catchment on similar soils but lower slopes resulted in long term negative impacts on the quality of drinking water and the aquatic life in the creek.

We are very disappointed at the lack of Erosion and Sediment Control planning by Forestry Tasmania given the importance of this catchment for our local community drinking water supply.

Given the nature of the site and the proximity to our privately owned lands and buildings, we would also like to re-emphasise our request that burning not be used as a clean-up method on this site. We would welcome the opportunity to work with Forestry Tasmania to use this project as a pilot for alternative regeneration methods.

Small and important concessions have been reached, and we are grateful for those, but there is opportunity for much greater attention to the impacts of these operations on the local community on the part of Forestry Tasmania. With respect, draft documents provided to us suggest Forestry Tasmania considers its communications with the Canaways Community Group to constitute Community Consultation. To us Community Consultation means that core agreements based in real compromise are reached and we don't believe this has occurred.

We believe inclusion of a thinning operation and increased buffer zones would present a genuine compromise to minimise likely and actual environmental harm and strongly request Forestry Tasmania change the harvest prescription to include a thinning operation.

We note and appreciate your commitment to present the Forest Practices Plan to the Canaways Creek Community Group for review prior to submission to the Forest Practices Authority. We would like to arrange for this to take place at a mutually convenient time.

We note and thank you for the following commitments which Forestry Tasmania has already made to the Canaways Creek Community Group:



1. That all soil and debris produced in the road construction process to be trucked out.
2. That creek crossings are to be timber construction using methods preventing disturbance of the creek bed, and water runoff resulting from road construction.
3. That there will be no use of chemical pesticides or herbicides in any of the Tyenna operations areas.
4. To include re-habilitation in the roading, harvesting and re-forestation in the FPP
5. To include roading, harvesting and re-forestation schedules and final inspection dates in the FPP
6. To provide the CCCG with the current Special Values Reports and supporting material.
7. That Forestry Tasmania supervises all road construction to the description provided, on a daily basis.
8. To implement a joint CCCG/Forestry Tasmania inspection program.
9. To restrict log truck movements to specified hours.
10. To use the email list provided by the CCCG to disseminate information, including providing the water monitoring program results to date, as was agreed.

As you know, Forestry Tasmania has a general environmental responsibility to take all steps practicable to prevent or minimise environmental harm or nuisance arising from its activities.

Sincerely

For the Canaway's Creek Community Group