

Jervis Bay Regional Alliance

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Further justification for the addition of Tomerong, Currumbene, Nowra and Yerrilyong State Forests to the protected area network in the Jervis Bay region

Introduction

The NSW National Parks and Wildlife Service has assessed the proposal by the Jervis Bay Regional Alliance (JBRA) to add Tomerong, Currumbene, Nowra and the northern section of Yerrilyong state forests to the National Park network as low priority. This desktop assessment has been made primarily on the basis that:

1. Comprehensiveness and representativeness have been achieved in the bioregion (Sydney Basin), subregion (Jervis) and landscape;
2. There are no iconic SOS (Saving our Species) species present.

However, there are a number of other key elements that were not explicitly considered by NPWS assessment but which the JBRA believes have a significant bearing on considering the merits of the proposal. It is our view that when a more holistic assessment of the values of the proposed parcels for reservation is conducted, in the broader context of the landscape and seascape of the Jervis Bay region, the 'bang for buck' in regards conservation gain to investment and area of land removed from forestry is huge. This is particularly relevant in light of the significant amount of money that has already been spent on consolidating the Jervis Bay National Park (JBNP). These are addressed in turn below.

The National Parks Establishment Plan 2008¹

Although currently under review in the form of the Directions Statement: National Parks Establishment 2015-2020 (Directions Statement), the National Parks Establishment Plan 2008 contains several elements pertinent to the JBRA proposal:

1. Comprehensiveness and representativeness are listed as 94% and 77% respectively for the Sydney Basin bioregion, not 100% as asserted in the NPWS briefing;
2. The National Parks Establishment Plan 2008 (Pg. 30) specifically identifies 'consolidating the existing east-west coast to ranges corridor near Jervis Bay' as a priority for reserve building. This was retained in the Directions Statement;
3. Other priorities identified in the National Parks Establishment Plan 2008 (and retained in the Directions Statement) that the JBRA proposal helps to achieve are:
 - *Lands within important water catchments*: Tomerong State Forest drains to Currumbene Creek which enters the Jervis Bay Marine Park; Yerrilyong State Forest drains to St Georges Basin, a recreational fishing haven, while Currumbene State Forest contains part of the Lake Wollumboola catchment, a coastal lake of huge conservation value, the bed of which is already incorporated into JBNP;
 - *Critical landscape corridors*: the NSW reserve network in the coastal bioregions performs excellently in achieving north-south connectivity. However, east-west connectivity is more poorly established due to the historic bias of reservations favouring upland, less fertile habitats. East-west connectivity is likely to become more and more important as climate change impacts increase, because of the inclusion of an environmental gradient that will help species move in response to changes in rainfall, temperature and extreme weather events. The JBRA proposal would significantly enhance east-west connectivity in the Jervis Bay region;
 - *Reserves with very poor boundary configuration*: the boundary of JBNP is highly irregular and results in a high boundary to area ratio;
 - *Poorly reserved ecosystems and critical habitats*: the JBRA incorporates Currumbene-Batemans Lowlands Forest which is a poorly reserved community in the south coast region, and protects waterbodies of national, and potentially international, significance.
4. Adequacy: adequacy refers to the ability of a reserve to achieve the long-term protection of the biodiversity and ecosystems that it was established to protect. Adequacy is influenced by size, configuration, place in the

landscape and surrounding land use. When adequacy is considered, JBNP and the protected area network in the Jervis Bay region are incomplete because:

- It has a high boundary to area ratio;
- Larger reserves are preferable to smaller ones and JBNP is currently small;
- The boundaries do not yet have complete ecological integrity (e.g. align with catchments);
- Surrounding land uses (in this case logging) undermine the function and aim of JBNP and Jerrawangala National Park in regards the conservation of species that utilise the landscape, rather than a specific site.

South Coast Regional Conservation Plan²

Although the South Coast Regional Conservation Plan (SCRCP) has been superseded by the Illawarra Growth Strategy (IGS), there are several ecological elements contained within the SCRCP that were not transferred to the IGS but which are still directly relevant for conservation objectives. Besides the hierarchy of 'protect, enhance, restore' which is directly relevant to removing the threatening process of logging from the State Forests other important elements relevant to the proposal are:

1. Currumbene-Batemans Lowlands Forest is a poorly conserved vegetation community in the South Coast Region. The JBRA proposal would therefore help achieve conservation outcomes by protecting Currumbene and Nowra State Forests;
2. Currumbene Creek is listed as a 'vulnerable estuary'. The JBRA proposal would protect Currumbene Creek via protection of Tomerong State Forest from logging and associated sedimentation risk, in turn protecting the Jervis Bay Marine Park;
3. Jervis Bay is identified as a coastal water body that is particularly significant for conservation and of national significance to shorebirds;
4. Lake Wollumboola, and its catchment, is identified as an important coastal lake and a wetland of national significance. The JBRA proposal would help protect Coonemia Creek, in the Lake Wollumboola catchment, much of which is located in Currumbene State Forest;
5. St Georges Basin is identified as a coastal water body that is particularly significant for conservation, of national significance to shorebirds and a wetland of national significance. It is also a recreation fishing haven. The JBRA proposal would help protect the St Georges Basin catchment by removing logging from Yerriyong State Forest.

Lake Wollumboola

Although reference has been made to Lake Wollumboola in relation to the previously referenced documents, the significance of the lake warrants specific mention. The JBRA proposal is directly relevant to the health and resilience of the lake because it would protect that part of the lake catchment that is contained within Currumbene State Forest. In the context of catchment impacts, industrial logging is to be avoided in such a sensitive environment. It is NSW government policy that the Lake Wollumboola catchment be protected where possible, and a Ramsar nomination was being prepared by the NSW government at the time of writing the South Coast Regional Conservation Plan in recognition of the international significance of the lake.

The Great Eastern Ranges Initiative

The Great Eastern Ranges (GER) initiative seeks to restore connectivity by connecting nodes of public land via private land conservation. The Illawarra to Shoalhaven (I2S) GER corridor is one of the most dynamic in the entire project, and the NSW Environment Trust has recently funded two projects in the I2S corridor, Berry Bushlinks and Thickening the Thin Green Line, to the cost of \$0.5 million each over 10 years. The JBRA proposal would have a direct positive impact on the aims of GER by enhancing connectivity in the Tomerong and Currumbene focal corridors within the broader I2S corridor.

Threatened species

Although we understand the importance of conserving icon species, we do not believe that the absence of an icon species makes a reserve proposal worthless. Our original letter listed multiple species of both state and national significance that the JBRA proposal would help protect. Crucially, logging is a key threatening process to many of these species (for example large forest owls, greater and yellow-bellied gliders, glossy black cockatoos, spotted-tail quoll) by removing hollows and large logs—key habitat features for such species³. The JBRA does not accept the

assertion by NPWS that logging is sustainable and that logging practices will adequately protect logging-sensitive species. Rather, we are of the view that the evidence⁴⁻⁷ strongly suggests that current logging practices violate the principles of Ecologically Sustainable Forest Management and are driving declines of forest species. Therefore the aims of the JBNP, conservation of biodiversity, would be furthered by the JBRA proposal.

Lost timber

The JBRA does not possess an expert in estimating timber volumes. However, in our view the small size of the areas would not result in any significant loss of timber. In fact, the small size and relative isolation of Tomerong, Nowra and Currumbene State Forests make it difficult to see how it would be economically viable to transport machinery, harvest the small volumes of timber and transport that timber for processing. This is particularly true when the harvest plans for Tomerong and Currumbene are analysed: approximately 50% of both areas are Excluded Forest meaning timber yields will be low (we were unable to access a harvest plan for Yerriyong and Nowra).

Recreation and socio-economic implications

The NPWS briefing states that “existing recreational uses may not be permitted were the forests reserved as national parks”. The JBRA notes that the Butterfly mountain bike tracks in Currumbene State Forest is entirely contained within a harvestable zone, while approximately 50% of the Superbowl track is within a harvestable zone. Thus the existing recreation activities are not secure under the current arrangement. Given mountain biking is permitted in other National Parks (e.g. Murray Valley, Garigal National Parks), the JBRA would be open to continued use of the Currumbene State Forest by mountain bikers for the benefit of the community. Similarly, trail bikes and four wheel drive vehicles are permitted to use tracks in Conjola National Park.

Conclusion

The Shoalhaven is the most visited part of NSW outside of Sydney and the Blue Mountains. Jervis Bay drives this visitation as the jewel in the Shoalhaven crown. Yet the Jervis Bay area is experiencing significant development pressure. In this context it is imperative that the state government work in conjunction with local government to show leadership in ensuring that the natural values need not be compromised by development. State-level leadership has been occurring over a significant period of time via the investment in several additions to JBNP (most recently the ‘coathanger block’), ongoing purchase of Heritage Estates parcels and a recently-awarded \$100,000 grant for the restoration of the Heritage Estates. The JBRA proposal builds on these successes, but requires less investment to do so as it is a strategic transfer of public land to the reserve system. We urge the government to continue to show this commitment to ensuring connectivity in the Jervis Bay region and to demonstrate that it is possible to protect natural values while supporting a vibrant local community.

References

- 1 Department of Environment and Climate Change NSW. *New South Wales National Parks Establishment Plan 2008: directions for building a diverse and resilient system of parks and reserves under the National Parks and Wildlife Act*, <<http://www.environment.nsw.gov.au/resources/protectedareas/0852npestplan.pdf>> (2008).
- 2 NSW Department of Environment Climate Change and Water. *South Coast Regional Conservation Plan*. (Sydney, 2010).
- 3 Australian Government Department of Environment. *Petauroides volans - Greater Gldier*, <<http://www.environment.gov.au/biodiversity/threatened/species/pubs/254-conservation-advice-20160525.pdf>> (2016).
- 4 Environmental Defenders Office. *One Stop Chop: How Regional Forest Agreements Streamline Environmental Destruction*, <<http://www.marketsforchange.org/2013/08/one-stop-chop-regional-forest-agreements-failure-has-broad-lessons/>> (2013).
- 5 Sweeney, O. F. *Regional Forest Agreements in NSW: have they achieved their aims?*, <https://drive.google.com/file/d/0B_ZbagoizgizcnNxX2dxeG1ZOU0/view?usp=sharing> (2016).
- 6 Hammond-Deakin, N. & Higginson, S. *If a tree falls: Compliance failures in the public forests of New South Wales*, <http://d3n8a8pro7vhmx.cloudfront.net/edonsw/pages/284/attachments/original/1380667654/110728when_a_tree_falls.pdf?1380667654> (2011).
- 7 Montreal Process Implementation Group for Australia and National Forest Inventory Steering Committee. *Australia's State of the Forests Report 2013*. (ABARES, Canberra, 2013).