

SAVE COLONG bulletin

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THE 10.7% REPORT

The Forestry Commission's Environmental Investigation of Pine Planting in the Konangaroo State Forest, also described as an environmental impact statement, is now complete. Predictably, it is yet another repetition of the Commission's fixation in favour of a pine plantation on the Boyd. The Commission goes so far as to admit that native forest will be replaced by pine plantation and lists clearing of existing vegetation from areas to be planted, heaping debris into windrows and burning, ploughing between windrows, and use of 1080 baits to control rabbits, amongst the operations involved in establishing and managing a pine plantation. But some of these practices do not rate a mention in the environmental assessment. The reduction of the native forest to heaps of charcoal, and the fate of animals other than rabbits which eat the 1080, is of no concern to the Commission.

The report goes on to say that, whilst some will undoubtedly find the replacement of native forest by a forest of quite different appearance adverse, "the Forestry Commission believes that a majority of visitors to the area will find the plantation to be attractive". In this the Commission may be right. There is no public demand for replacement of native forest by pines. It may therefore be anticipated that all, or nearly all, the visitors, will be Commission employees, and there can be no doubt that they will find it delightful.

The economic premises

Throughout the report there is nothing to suggest that the proposed destruction of 5,500 hectares of native forest will have anything but beneficial effects. The benefits are described, not in terms of environmental impact, but in terms of economics. The presumption is that, if economic benefit can be proved, then the environmental impact is favourable. This is, of course, an unacceptable presumption since environmental impact is in no way related to profitability. Much space is devoted to justification of the project on economic grounds. The justification rests on four premises —

1. That self sufficiency in softwoods production is desirable.
2. That the use of Konangaroo will enable processing plants to benefit from economies of scale.
3. That local employment will be created.
4. That pines can be grown more cheaply on the Boyd than elsewhere.
5. That the cost benefit ratio is favourable.

The first premise is inherited from the days before the world started to clamour for our mineral resources, and before the discovery of oil in Australia. In those days balance of payments crises caused by our heavy dependence on rural exports were frequent, and it could be argued that it would pay to subsidise home production of softwoods. We are amongst the world's most efficient producers of iron ore, coal, bauxite, uranium, wool, wheat and steel, but not of softwoods, production of which has to be subsidised from public funds at low interest rates, or by grants of cost-free (Crown) land. Economically we would be better off if we produced more of the primary products which we can export at a profit and, with the proceeds, bought softwoods.

Future plants at Oberon?

The Commission's case for requiring Konangaroo rests largely on its desire to foster processing plants in the Oberon district. These plants are (a) large efficient sawmills, (b) particle board manufacture and (c) a pulping plant.

The Commission believes that, in order to enable these plants to operate with the desired degree of efficiency, a plantation base of 60,000 ha. is necessary in the Oberon district. The Konangaroo site is required, not because it is the only site available to bring total plantings up to 60,000 ha., nor even the cheapest site, but because "it is *among* the most economic sites still available". This is an admission that the desired area could be achieved without Konangaroo.

It is not necessary to extend forest products and plants in order to "create" employment. Investment in *any* industry will do the same. The building of a pulping plant on the catchment area of the long and sluggish Western River system and of the water supply for the proposed city of Bathurst-Orange itself calls for an environment impact study.

Costs of planting the Boyd

The argument that production is cheaper on the Boyd than elsewhere is supported by the statement that "One acre of plantation on Konangaroo is worth approximately \$65 more than an area of equal productivity at Werong or Oberon, and \$90 more than one at Burruga. Alternatively, the equivalent annual income from an acre of plantation at Konangaroo is \$4.25 an acre more than at Werong or Oberon and \$6 more than at Burruga. The method of costing these areas is not given. They are, however, "of equal productivity". The cost difference must therefore lie either in distance from Oberon or land cost. Distance would be a factor at Werong and Burruga, which are further away from

Oberon than Konangaroo, but why compare these places when there are some 800,000 hectares of land within the same radius? The distance factor is only a matter of some 10 miles, and it must therefore be inferred that most of the difference is due to land costs. Konangaroo is Crown land, therefore cost-free to the Commission, and therein lies its appeal.

The benefit-cost ratio of the Konangaroo plantation is assessed by the Commission at 1.18. This, of course, is based on land acquisition at no-cost. If the Commission had to pay market price for Crown land, the ratio would become less than 1, while the estimated internal rate of return would be far below the 10.7% assessed.

Nor can the suitability of the area for parkland be gauged, as the Commission has attempted to do, by present vehicle usage. It is unlikely that any of the State's larger reservations would have been created on the basis of then-existing usage alone. Obviously wilderness potential cannot be gauged by this means. A wilderness is, by definition, the one place where vehicles may be avoided and should *never* be allowed.

What is the value of Boyd plateau land?

The thesis that the Commission has attempted to prove is that a pine plantation on the Boyd would be profitable. If the Commission intended to buy land for plantation, it would be relevant, in fact obligatory, to prove that the return justified the cost. However it is not going to buy the land, and, even if its estimates are accepted, they are irrelevant, because they assume the land has no value. But because the land has alternative uses it has value. It could be subdivided and sold to hobby farmers. It has recreation value, though nobody can assess the amount in dollars of this, or any other land, as park land.

The Commission's simple assertion that, because it believes a pine plantation on the Boyd would be profitable its use for this purpose "represents sound land use and would be in the best interests of the community," simply ignores long accepted principles of public control of land use. The governing principle in determining the permissible uses of land has been the public interest, not the amount of profit the developer could make. This is obvious in the determination of the use of publicly owned land. No area of parkland has ever been reserved because of a favourable cost-benefit ratio. If the use of public land were determined by the revenue it would produce we would have no National Park, no Ku-ring-gai Chase, no Botanic Gardens and no Opera House. In recent years it has been decreed that the use of privately owned land too shall be determined, not according to its most profitable development, but by the type of development which will be in the public interest. Land is zoned residential, industrial, open space, special uses, etc., not according to the profit that could be made, but by considerations of amenity, health, transport etc., and, above all of environmental improvement.

Only one land use considered

The Commission's conclusion that pine plantation "represents sound land use and is in the best interests of the community" is one that cannot be supported by the alleged profitability of the enterprise. The report is not a land use study. It is simply a development application in which only one form of land use is examined. The Commission has neither the capacity or the desire to study any other form of land use. Nor has it the capacity or the desire to study the Boyd in the context of present and future land use needs. No appreciation is shown of the strategic importance of this last remaining extensive montane forest on the central tablelands, of its situation near the geographical population centre of the State, nor of the recreational needs of the 10 million people who are likely to be living in the cities of Sydney and Wollongong and the Bathurst-Orange growth centre within the lifetime of the younger generation. The Boyd has been studied in complete isolation. Alternative uses, alternative parklands, its situation as an embayment within a national park, and its regional relationship to other land uses, have been ignored. To the Commission it is simply a place where it will pay to grow pines and nothing else.

'Safeguarded and enhanced'

The Commission's view is that its pine plantations "have been established without any substantial or significant environmental impact, other than the obvious one resulting from the creation of a new type of forest community". In the opinion of The Colong Committee the natural forest *is* the environment, and its complete removal an act of total environmental destruction. Having destroyed the environment it cannot be "safeguarded and enhanced" by the measures listed in the report. The main such measures listed are:

The retention of strips of native vegetation for a distance of at least 20 metres on either side of perennial watercourses:

This is no "safeguard". It is simply an assurance, which should be unnecessary, that the Commission will adhere to a standard required of private developers. The Water Act prohibits clearing within 20 metres of streams unless permission is granted by the Commission.

Professional landscaping, with a view to *ultimately* maximising the attractiveness and diversity of outlook along this road (which road is not specified). The word "ultimately" is an admission that it will be a long time before the cleared land is clothed in vegetation. The Commission is concerned only with the view from a road. Those who get out of their cars and walk don't count.

Flora reserves, one of 120 ha, one of 40 ha and 5 of 5 ha are to be established: this simply reduces the area of native forest to be destroyed from a stated but unverified 5,500 ha to 5,315 ha.

Sites "locally too steep or rocky for planting, or in other ways considered, after detailed inspection to be unsuitable for planting are to be retained under native vegetation".

It would, of course, be a complete waste of public funds if areas which could not be planted were cleared. It would also be a dangerous, if not impossible task, to use bulldozers on the steeper slopes. Nor could the Commission clear these areas without flatly transgressing the conservation

standards laid down by its own Department. The Boyd, with its high rainfall and low evaporation, is one of the principal catchments of the Warragamba Dam, and hence one of the most important catchments in the State. The Department has decreed that slopes of over 18% on declared catchments should not be cleared. This conservation principle would apply on any important catchment, whether or not it is declared.

Roads are to be constructed with a view to minimising soil loss and stream pollution: this is to be effected by building roads on ridges rather than on sideslopes or gullies: this is simply practical road construction, since construction and maintenance costs are always less if a well graded ridge is available.

Clearing to be restricted to the actual width to accommodate the road formation including cut and fill batters: Surely wider clearing is costly in terms of bull-dozer operation. It also means a reduction in plantation area and is therefore simply uneconomic.

Improvement in disposal of debris: "Some forest roads", the Report states, "present a most unattractive appearance with cleared trees stacked along the timberline". Trees should therefore be heaped and burnt, or pushed back into the forest cover. In other words — don't get out of your car or you might see something you are not meant to see.

The use of borrow pits is to be restricted to "those cases where an economic alternative does not exist". Borrow pits, of course, exist near roadsides only because it is cheaper to obtain fill from the roadside than from elsewhere. They will therefore continue to be located near roads.

Nothing that the Commission, or anyone else can do, can effect anything but a slight diminution in the environmental impact of a road. Destruction of flora is essential to road building, as are related extensive earthworks. Cover and food for native fauna is destroyed, and the sight of dead animals killed by passing vehicles is too common to require elaboration. A road of any sort in a natural area causes major disruption to the natural system. In national parks, roads should be avoided, in wilderness national parks, they are by definition absolutely unacceptable.

Reports from NPWS and SPA needed for balanced inquiry

A most regrettable feature of the present inquiry is the heavy dependence of the Government on the advice of one authority — the Forestry Commission, which is not qualified to advise on alternative land uses, national parks or land use planning. Reports should be called for from the National Parks and Wildlife Service and the Planning side of the Planning and Environment Commission, and these reports should be published. But whatever these Departments advise, the decision on the use of the Crown land on the Boyd should be made in the public interest. The public interest is, if democracy means anything, what the public wants, and, as The Colong Committee has demonstrated over the past five years, the public wants the Boyd included in the Kanangra-Boyd National Park.

NATIVE FAUNA FEEDS ON EUCALYPTS

The following letter to the "Western Advocate" of 27/3/74 by Miss J.M. Wilson is a criticism of an earlier Forestry Commission report on the Boyd. It points out that eucalypts are essential to the survival of a large range of native fauna. She suggests, as has the Colong Committee, the acquisition of unproductive weed-infested grazing land for pine culture. Much of the land infested with Yass tussock could be acquired and used for pine plantations.

Sir,

After reading the Forestry Commission's report on the Boyd Plateau, I beg your permission to make a final plea for the inclusion of the plateau, in its entirety, in the Kanangra Boyd National Park. For, in the somewhat wordy report, three very important admissions are made which invalidate all its important submissions in favour of pine planting on the plateau.

1. The inclusion of the plateau within the park need not necessarily jeopardise its target for pine planting in the Oberon district, since it admits that suitable and adequate alternative land is available. It is true that this land would have to be bought, but surely this initial cost would amount to but a small proportion of the very heavy cost of total clearing, planting, establishing and maintenance of a pine forest till it reaches maturity.

In addition, with the falling off and uncertain income from the farming of unproductive land, many farmers would be glad to be able to sell their land at a fair price. This is particularly so in the case of land heavily infested with Yass Tussock. No owner of such land can afford to eradicate the tussock without financial assistance.

Thus the farmer would be helped and many acres of Yass Tussock, at present a constant and dangerous source of infestation to nearby areas, would be eradicated.

2. Secondly, the Forestry Commission admits that the inclusion of the Boyd Plateau in the National Park would be "marginally" environmentally better than the planting of pines.

Its own lists of fauna proves that the margin would be a pretty big one. For example, the birds mentioned as occurring in dense pine forests are pretty common ones and, for the most part, fall into three categories.

- (a) Birds such as parrots and magpies, which are not fussy in feeding or nesting requirements in any environment and, indeed, are often regarded as pests in some fruit-growing areas;
- (b) Introduced Species, such as the Goldfinch and Blackbird and
- (c) Straight-out pests, such as the Australian Raven, commonly known as the Crow.

The list of animals seen in dense forests is pathetically small consisting of Kangaroos, Wallabies and the Wombat.

There is some emphasis laid on the undercover of grass, which is said to make good food for the marsupials. Does the Commission's expert on fauna, if indeed he exists, not know that most Australian marsupials are not grass-eaters, but feed almost exclusively on the leaves or flowers of species of Eucalyptus? Such animals include the Koala and many species of possum and honey glider.

On the other hand, the Commission's list of fauna occurring in limited pine forests is much more varied, and includes many more of the less common species, such as the Echidna, Cuckoo and Platypus.

I myself have recorded quite a varied fauna in some of the older parts of Vulcan and Kirkenwall pine forests, where isolated Eucalypts have been spared and the beds and banks of the smaller creeks have been left in their original state, so different from the current practice of using the creek beds as dumps for bulldozing debris.

And this is the current practice, with very few exceptions.

3. The third admission of the Forestry Commission is that the Boyd Plateau was originally intended to be made part of the National Park. This decision was allegedly altered because of damage done by bushfires, heavy logging and insect damage.

This is the most involved reasoning of all, because the native Australian bush has an extraordinary capacity of regeneration following all three of these catastrophies.

In fact, all three cases, in moderation, can, in the long run, be beneficial, because of the regrowth they bring about.

The only truly effective destroyer of our native bush is total clearing followed by pine planting. This causes its destruction forever.

CARVING UP THE BLUE MOUNTAINS

Early in 1973 representatives of some 30 Blue Mountains Environment groups met the Chairman of the State Planning Authority. The deputation also included major Sydney based organisations, including Ecology Action, The National Trust, N.S.W. Chapter of Architects and the National Parks Association. It was submitted that unco-ordinated development pressures on the Blue Mountains created an urgent need for a regional planning study, the study area being defined as the whole area from the Colo catchment in the north to Wombeyan Caves in the South. It was proposed that the planning team should be strong in the natural sciences. The deputation was told that, because of lack of funds, priority would continue to be given to planning coastal areas rather than a Blue Mountains study.

\$50,000 planning grant

The decision of D.U.R.D. to grant \$50,000 for a Blue Mountains Strategy Plan, however, enabled a study to be undertaken. Urban Systems Corporation was appointed as consultant to prepare the study. The study report and recommendations are now complete. The recommendations are in the form of a number of "alternative futures" said to be available for public comment. In fact, however they are not available. Neither T.E.C. nor the N.P.A. two of the public organisations most directly concerned, and best qualified to comment, could obtain a copy. A Blue Mountains resident finally borrowed a copy from Blue Mountains City Council, delivered it to Sydney for copying and then returned it to Council. We believe that it should be a condition of future grants that copies of the completed studies be made available to interested organisations. The Colo Shire Strategic Recreation Study, which cost \$10,000 in Federal funds, was obtained by T.E.C. and the N.P.A. only after negotiation.

Unfortunately, neither of these studies are on a regional basis, as they are both confined to shire or municipal boundaries. Contributions from biologically oriented disciplines are noticeably absent. On the other hand pressures from local business interests are all too evident — those who want to make a buck out of the Blue Mountains still appear to call the planning tune.

'Alternative Futures'

The "alternative futures" of the plan are based mainly on population. Present population is estimated at 39,000, augmented by 100,000 visitors during the tourist season. The S.P.A.'s Sydney Region Outline Plan forecast 80,000 people by the year 2000, later raised to 85,000, and the recently exhibited Blue Mountains Planning Scheme is for 185,000. Urban systems proposes 5 "alternative futures" with populations ranging from 47,000 (described as "Future 1 — the maximum conservation baseline") to 247,000 under "Future 5."

The Strategy Plan knocks the upper extremes firmly on the head. It predicts for 'Future Five': almost certain pollution of the Hawkesbury basin, inevitable ribbon development in the Lower Blue Mountains, increasing conflict between resident and visitor recreation, highest bushfire danger and constraints on control programmes, threats to all 'environment areas' due to lack of urban infrastructure, the requirement of up to 12 lanes of highway and railway track quadruplication for commuters, economically exploitable water sources unavailable, capital cost of water supply and sewerage works as high as \$100 m.

At the other end of this spectrum of opportunity, 'Future One' is by no means the 'maximum conservation baseline' it is said to be.

The planners point out that intermediate areas between towns 'are rapidly becoming threatened by ribbon development' (One,9). They call for buffer areas between outlying housing and fire prone bushlands. They record 4,000 to 5,000 septic tanks and 1508 pan closets and a phenomenally low occupancy rate for dwellings. Such factors should lead to a sixth alternative preceding 'Future One' in which outlying private properties were progressively acquired and converted back to bushland while densities were increased in some areas of the towns. This would increase the definition of the 'string of beads' character of the townships, correcting some of the ribbon development and local stream pollution which is much more serious than the report admits. To Sir Edmund Hillary several years ago the Blue Mountain towns were a smear of 'third grade suburbia'.

Conservation case understated

Indeed the Strategy Plan gives the most superficial assessment of the conservation case. Traffic, parking, retail space, population age groups — all are quantified. Yet not even the simplest coli count or turbidity measure is given for the rampant pollution of streams which are headwaters of the Hawkesbury River system — claimed to be the most important catchment in Australia because of the millions living within it. There is no discussion of wildlife, habitat, or the ecology of a landscape which is etched into the consciousness of more Australians than any other.

For a report which lays considerable stress on the importance of natural areas its deficiencies in all but visual assessment of these areas are glaring. The effect of these deficiencies is to show environmental interests to be vague, subjective and unscientific, i.e. unimportant, compared with traditional planning concerns like parking and retail space!

Conservationists will oppose a number of the concepts of the Strategy Plan.

Bushfire Control:

One such concept is the uncritical endorsement of the bushfire brigades. On one occasion when a party of Water Board employees and volunteers brought a fire in Cedar Creek under control it was renewed on a wider front because of an attempt to back-burn on the Narrow Neck Peninsula. On another occasion an aerial control burn planned for minimal flame height, mosaic burning and swamp protection had far different results. Forest litter generally failed to ignite, but swamps were blackened stubble with a margin of crown burn. A talus slope was burned completely, together with forest at the top of the cliffs above.

Broad scale burning to reduce fire hazard may be a useful tool in the more uniform conditions of the Western slopes but it is inapplicable to the varied and rugged topography of the Blue Mountains. Burning in winter is criticized by botanists because Australian plant species may not be adapted to withstand burning at such a time. What are the planners views of the effects of burning on wildlife — on lyre birds in the nesting season, for instance?

Bushfire brigades show a commendable dedication to protecting private property from fire but with a few notable exceptions they need radical re-orientation in their sense of responsibility towards the National Estate.

Access roads

The network of access trails penetrating bushlands goes unremarked in the Strategy Plan, such trails are built for access to powerlines, to gravel pits for road construction and many other purposes. There are hundreds of miles of 'fire trails' on the ridges surrounding Blue Mountains townships and through the National Park and surrounding areas. Built for fire control purposes, fire trails are also used as access for logging Crown lands by Forestry. When Crown lands are dedicated as State Forest their fire trails fall into place as part of the pattern of forest compartments. Fire trail expenditures are thus often a further subsidy to the already over-subsidised Forestry industry.

'Fire trails' provide access for a wide range of degrading uses for natural lands including illegal dumping of wastes (nightsoil, industrial effluent, builders refuse, garbage, etc), taking of rock, sand, earth, timber and flowers, shooting collection of wildlife, bottle parties, car stripping and burning. A former superintendent of Blue Mountains National Park stated that over 60% of fires occurring in the Park in one year occurred on or adjacent to roads, including 'fire trails'.

'Fire trails' are well named. They allow unsupervised access to bushlands by a group generally unskilled in the safe use of fire — the motorised public. Nowadays they also admit the growing number of all-terrain vehicles, which, despite a small proportion of responsible users, have become the ubiquitous threat to natural lands in Australia.

Scenic hotels

Another concept on which Council's conservationist electors will gag concerns an area at Blackheath said to be particularly suitable for a major tourist hotel complex in view of the magnificent scenic views this area affords from the plateau over the vallies and gorges adjacent!

If the hotel overlooks the scenery then it dominates the return view from within that scenery. Thus the windows of the Hydro Majestic heliograph its presence across twenty five miles of wilderness to Kanangra Walls.

Powerlines

Another environmental blind spot in the Strategy Plan is its failure to come to grips with the service corridor problem. In addition to the highways and railway there are several existing powerlines and a 330 k.v. powerline just commencing. This line is to go straight through the major southern 'Escarpment Preservation Area' (A1) identified by the planners. The fact that its route was approved by the State Pollution Control Commission in a closed inquiry should not prevent the planners from making their independent professional recommendation.

The powerline's history gives a good indication of the extent to which Blue Mountains City Council will allow parochial interests to override National Estate values. The Electricity Commission originally proposed the powerline across the tableland through the fringes of Blue Mountains townships, adjacent to existing lines. This was the cheaper route, it interfered least with the scenery but it affected some property values.

Council persuaded the Commission to adopt a route along Cox's River Valley where few ratepayers would be affected. The Commission then produced an environment impact study which persuaded the State Pollution Control Commission that the biggest pylons in N.S.W. would not detract from the most famous views in the State nor intensified access loading damage the area in which bushwalking began.

A first task in the Strategy Plan should be to review the route of, and even the need for, this destructive powerline.

Pressure from 'Borango'

Urban Systems Corporation confirms the fears of conservation groups of pressures on the Blue Mountains due to the proposed Bathurst-Orange growth centre. The Rankine & Hill/W.D. Scott study for N.U.R.D.A. in May '73 recommended that the proposed new city of 300,000 would require the Great Western Highway to be upgraded to 4 lanes through the mountains and would also require a new four lane freeway to be built following....' the existing Bells Line of Road. 'An alternative route for such a freeway would be along the Grose Valley tunnelling under the Darling Causeway to Hartley Vale. Despite its feasibility', Urban Systems comment, 'this scheme would destroy a natural wilderness area and meet much opposition' — a comment which should receive a Planning Institute prize for the coolest understatement of 1974.

Cliff drives

A proposal repeated more often than any other in the Blue Mountains Strategy Plan is for scenic ring roads and cliff drives. This is in direct contradiction of the Plan's statement that a goal in escarpment areas is "to preserve and reduce unsuitable development in visible escarpment areas..." Nothing could be worse, viewed from the other side of an otherwise peaceful valley, than a cliff drive surging with glinting vehicles in many colours, with its car parks breaking up the landscape and its trees dying through destruction of the continuous canopy and thick understorey needed in such exposed conditions.

The result of re-opening the Mt. Banks roads to the motorised public, together with a cliff drive around Anvil Rock and Perry's Lookdown on the other side of Grose Valley would be ludicrous — tourists gazing at each others cars across a mile of space. ('Look darling, isn't that Cynthia's car?') Yet the first is proposed in the plan and the second is one obvious site for a cliff drive.

Blue Mountains City Council has already been granted \$350,000 from D.U.R.D. for 'escarpment preservation'. It will be a disaster for National Estate values in the Blue Mountains if Australian Government funds are deployed to implement projects proposed over many years by that segment of commercial interests which is willing to make a buck out of the Blue Mountains by carving them up.

Of course the public should see these great valleys, as they do in hundreds of thousands already. But continuous motorized access will destroy the escarpments.

Wilderness

Finally, the concept with which the writers of both the Blue Mountains Strategy Plan and the Strategic Recreation Study for Colo Shire have the most trouble is wilderness.

Both groups make great use of the word. Neither know what it means. Their proposals for utilizing it will destroy it.

'Wilderness' is not synonymous with 'natural area'. The U.S. Wilderness Act, 1967 sees wilderness as

- (1) undeveloped primitive land
- (2) possessing outstanding opportunities for solitude or primitive or unconfined recreation
- (3) at least 5000 acres in area or of sufficient size to enable its preservation and use in an unimpaired state.

The absence of man-made developments, in particular, roads, is vital to this definition. Dr. J.G. Mosley, Director of the Australian Conservation Foundation observed: '...even primitive roads are unanimously regarded as incompatible. Roads, even if closed to motorist access, diminish enjoyment by reducing the need for self reliance and insulating the visitor against full contact with the wilderness! (See "Architecture in Australia" — March 1966).

The most precious values to the nation of the Blue Mountains region, particularly to the vast urban populations adjacent, and to many Blue Mountains residents themselves, stem from the several wilderness area it contains. These areas have been vastly reduced by the network of 'fire trails', powerlines, mining and logging access roads built in the last thirty years. It is time Strategy plans proposed ways to conserve wilderness rather than its destruction by yet more roads.

The two strategic studies discussed here form a useful basis for the study envisaged by environment groups in 1972. The need for a Blue Mountains *Regional* Study is now more urgent. The need for a major contribution from the natural sciences has been amply demonstrated.

CLOSED GOVERNMENT

The Total Environment Centre made repeated attempts to obtain copies of documents submitted by a number of developers to government departments proposing chipmilling on the North Coast. These copies were repeatedly refused, for five different reasons:

- That the documents were not satisfactory as environmental impact studies (S.P.C.C. Officer)
- That the documents contain items of commercial confidence (S.P.C.C. Officer)
- Because the study was inadequate and it was by no means certain that approval would be given to export woodchips (D.A.N. Cromer, Director of Forestry and Timber Bureau, 2nd Dec. 1974)
- Because the detail so far submitted was being re-drafted into one comprehensive document (A.C. Hogarth, Export Manager, Allen Taylor and Company Ltd., 20th Nov. 1974)
- Because release of documents during the debate on the Environment Protection (Impact of Proposals) Bill, 1974 could prejudice passage of the Bill (A Federal Parliamentarian)

Had the "principles and procedures for Environmental Impact Assessment in N.S.W." been adhered to, consideration of the proposals should have been suspended until an acceptable statement was lodged, because one of the "principles and procedures" as described in the S.P.C.C.'s publication on the subject is that

"It is the responsibility of the determining authority to ensure that the Environment Impact Statement provides a suitably complete and responsible basis for informing the public before it is accepted from the developer and placed on public display. If it is not considered acceptable by these criteria, consideration of the proposal is to be suspended until an acceptable statement is lodged."

A direct appeal to Dr. Cass was answered and the documents were made available by him on Dec. 14th., 17 days before the closing date for submissions notified by the Director of the S.P.C.C.

The Colong Committee has no doubt that the proposals collectively represent the most devastating threat ever contemplated to the environment of N.S.W. The volume of chipping would be well over 1 million tonnes annually. The area affected, making allowance for the use of portable chip mills, will range from the Queensland border to the outskirts of Sydney, a distance of 500 miles, and extend inland for 150 miles. All proposals claim that quotas will be filled without clear felling, but the sources described, such as 'thinning of suppressed trees', 'removal of unwanted trees', 'removal of unwanted trees on private property', 'land clearances and replanting programmes', 'forest residue from silvicultural and re-forestation programmes', etc. could, and in some cases plainly would, involve clear felling. It seems highly improbable that the required tonnages could be reached by any other means. The result would be that a very large proportion of Australia's most prolific forest area and one of its most important tourist areas, would be reduced to a mess of mud, weeds, suckers, seedlings and saplings.

Thanks to Dr. Cass

The extent and seriousness of this threat could not have been known had the proposals not been divulged, and our thanks are due to Dr. Cass for his action. The refusal by the N.S.W. Government to divulge the proposals will confirm the suspicions of many conservationists that the machinery for environmental assessment is no more than a charade.

Amends could be made by instituting a full open inquiry, and the allotment of funds to conservation bodies to enable them to prepare submissions as detailed and well documented as those of the chip-millers, who are powerful and wealthy combines.

SUBMISSION ON THE NORTHERN WOODCHIP INDUSTRY

The Colong Committee has made a submission to the N.S.W. State Pollution Control Commission on the proposed woodchip industry on the north coast and northern tablelands of N.S.W. The main conclusions of the submission are that:

- Forest and fresh water are Australia's most notable resource deficiencies.
- N.S.W. has the worst record of any State for preservation of Crown forest.
- Forest destruction accelerates soil erosion and stream siltation. It reduces the life of water conservation projects.
- The continued availability of mature eucalypts is necessary for the survival of a large range of native fauna.
- Wood-chipping practices will reduce soil fertility and increase disease susceptibility.
- Reduction of soil cover intensifies the effect of floods and droughts.
- Neither the period necessary for re-growth, nor the composition of re-growth is known with any certainty.
- Re-growth stands are very susceptible to fire damage. If burnt out before re-seeding, entire stands may never regenerate.
- No comprehensive survey of the recreational and scientific potential of forests is available.
- The net cash benefit to the N.S.W. Treasury will be marginal, and no attempt has been made to estimate the social and environmental costs.

THE TRI-STATE TRAIL

The former Minister for Lands and Tourism has announced a proposal for a trail stretching from south to north through the eastern states from Wilson's Promontory to Cape York. (See Sun Herald Nov 17, 1974).

It was stated that co-operation from the Victorian and Queensland Governments had been sought and received and that an investigation programme had been launched. The first section of the trail is to be in central N.S.W. It was hoped that the concept could become a reality to co-incide with the 200th anniversary of Settlement in NSW — 1988.

The trail is expected to provide a popular, healthy outlet for people who love nature, and to provide Australia with an important tourist attraction, walkers from other parts of the world being drawn by the favourable weather conditions and the unique scenery, flora and fauna.

The proposal is not original — it was put forward by Myles J. Dunphy some 50 years ago. It was subsequently re-stated by Allen Strom. But it is pleasing to know they are now supported, if not acknowledged, by our Premier.

There are, however variations in the schemes. Myles Dunphy's proposal included the Brindabella Ranges. But Mr. Lewis' trail evades the Australian Capital Territory and in doing so entirely misses the highest country in NSW — the Snowy Mountains and Brindabellas. Mr. Lewis owes the bushwalking movement a full discussion of the reasons for his choice of route. It would be unthinkable that a 3,320 km trail could be used as another shot in the anti-Canberra war being waged by the Liberal Premiers.

Advice that the track will be about 6 feet wide ought to be strongly opposed by the bushwalking movement. Six feet is a road. Roads, if we may make the point, again are incompatible with the wilderness areas through which this trail will pass. The tendency to use a landrover on such a track will be too much for hard-pressed park staff to resist. A proper width would be two feet.

The Tri-State Trail goes through Kanangra-Boyd National Park, apparently over Mt. Cloudmaker.

If Mr. Lewis had had his way a few years ago the southern view from Mt. Cloudmaker would have featured a limestone mine and crushing plant. Today, fortunately the southern view is intact. But an interdepartmental agreement between Mr. Lewis and the Forestry Commission currently threatens the western view from Mt. Cloudmaker. If this agreement is implemented the western horizons of the Cloudmaker view will be ripped up for a pine plantation. When will they ever learn?

SUBMISSIONS TO SPCC BOYD INQUIRY

Submissions to the State Pollution Control Commission's investigations of Boyd Plateau are due by 14th February. Copies of the N.S.W. Forestry Commission's second Submission titled "Environment Impact Statement" are available for \$5 each from the Forestry Commission.

YOUR ROLE IN SAVING BOYD PLATEAU

Several ways to help save Boyd Plateau are set out in the forms below. You can enrol in the passive resistance force. The target enrolment is 2000 people. Remember we need cooks, drivers and communications volunteers as well as bulldozer fodder.

If you have not renewed your subscription for 1975 to the Colong Bulletin please do so now. If you are financial buy a gift subscription in a friends name. (\$2.00)

The Colong Committee has received approximately \$500 in gifts and subscriptions during January 1975 — a sign that hundreds of people are determined to save Boyd Plateau.

There are many other tasks. Contact a Committee member and discuss some of the other ways to save the heartland of Kanangra-Boyd National Park.

PASSIVE RESISTANCE TO DESTRUCTION OF BOYD PLATEAU FOREST

(Block letters please)

NAME
 ADDRESS Postcode
 PHONES (home) (work)
 ORGANIZATION
 AGE SEX

I offer the following assistance:

Days on Boyd Plateau (state number of days)

(Tick where appropriate)

☐ Sitting in front of machinery ☐ Providing meals ☐ Providing transport

Type of vehicle available

Professional assistance: legal/medical/media/communications/organization:

A list of names, addresses and phone numbers of a group for whom I will act as co-ordinator is attached ☐

I understand the organizers will take all reasonable precautions to avoid injury to persons and/or property but I understand that they take no responsibility for same.

Signature: Date:

POST TO THE COLONG COMMITTEE, 18 ARGYLE STREET, SYDNEY. 2000

The Secretary
 The Colong Committee
 18 Argyle Street
 Sydney, 2000

Dear Sir,

I enclose being my subscription to the Save Colong Bulletin.

I enclose being a donation to The Colong Committee's Fighting Fund.

NAME: (block letters)

ADDRESS: (block letters)

SIGNED: Postcode