

Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Monday 10th February, 2014

Amendment to the Priorities Action Statement Office of Environment and Heritage PO Box A290 Sydney South NSW 1232

Dear Sir/Madam,

The Blue Mountains Conservation Society supports the recommendations of the Colong Foundation in regards to the protection of the Camden White Gum *Eucalyptus benthamii* and the estimated 145 Threatened Species, Ecological Communities and Populations within the Greater Burragorang CMA subregion including the Kedumba Valley area described.

Within the Kedumba River area the Office of Environment and Heritage list the following Ecological Communities in their Threatened Species data base.

- New South Wales Moist shale woodland currently listed as an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995 and Critically Endangered under the Environment Protection and Biodiversity Conservation Act 1999.
- **Robertson Basalt Tall Open-Forest** currently listed as an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995 and Endangered under the Environment Protection and Biodiversity Conservation Act 1999.
- Shale/Transition Forest currently listed as an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995 and Endangered under the Environment Protection and Biodiversity Conservation Act 1999.
- **River-Flat Eucalyptus Forest** currently listed as an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995 and not listed under the Environment Protection and Biodiversity Conservation Act 1999
- Swamp Oak Floodplain Forest currently listed as an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995 and not listed under the Environment Protection and Biodiversity Conservation Act 1999.

In saying this, how is it possible that the Office of Environment and Heritage would consider placing unknown pressures upon these listed Threatened Species and or Ecological Communities. The ability for these terrestrial species and communities to survive in semi or totally aquatic environments is not documented at all. Many of the Camden White Gums will certainly provide habitat for many arboreal animals as well as Bird species.

The loss of an already Threatened Species which contributes to the overall Ecological Community of the Kedumba Valley will certainly have ramifications. Many other species may fall by the way side due to

flood inundation and most probably through the loss of Ecological Community key stone species and or Communities.

It is also documented by the New South Wales Office of Environment and Heritage that 145 Threatened species and or Threatened Ecological Communities are found within the Burragorang CMA sub-region. This includes the listed Ecological Communities above along with Flora and Fauna species many of which are endemic to the Blue Mountains World Heritage National Park.

Flora and Fauna species are described as 66 listed as Vulnerable, 29 as Endangered, 5 as Critically Endangered and 2 as already Extinct. Ecological Communities and Populations are described as 11 Endangered Ecological Communities, 1 Critically Endangered Ecological Communities and 1 Endangered Population (Office of Environment and Heritage 2014).

To not prescribe the precautionary principle to the above listed 145 Threatened Species, Ecological Communities and Populations is an utter contradiction. These species have been identified by the Office of Environment and Heritage and classified as Threatened.

The Office of Environment and Heritage is the authority which is charged with protecting these unique, diverse and many endemic Species and Communities of the World Heritage Blue Mountains National Park. It will certainly be not far from an Environmental disaster if these Threatened Communities and Species are lost forever in these near pristine untouched parts of the World Heritage Blue Mountains National Park.

These Species whom are listed as protected under state and federal law should certainly be given more consideration from the Office of Environment and Heritage.

Regards,

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Mr Nakia Belmer

Threatened Species Officer, Blue Mountains Conservation Society.

