

SOUTH EAST FOREST RESCUE

S T O P P I N ' T H E C H O P P I N '

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Mr David Nicholson
Manager,
Forestry Policy and Regulation
Dept of Environment and Climate Change

22/8/08

Dear Mr Nicholson,

RE: BREACHES OF EDEN REGION IFOA-TSL, CPT 711-2

An audit was conducted on the 17/8/08 on part cpt. 711-2 of Nullica SF and the following breaches were found.

Breach 1;

5.11. Rocky Outcrops and Cliffs

- a) *Specified forestry activities are prohibited within areas of rocky outcrops and cliffs.*
- b) *In addition, exclusion zones of at least 20 metres wide must be implemented around all rocky outcrops more than 0.1 hectare (approx. 30m x 30m), and all cliffs.*

At the location 0742697, 5902537 a rocky outcrop was found that had been logged, photos 597,598,599 on the disk supplied. It was a different type of rocky outcrop than usually encountered. The southern slope from ridge to almost gully, approximately 50m x 50m in size, is almost 100% tightly packed small rocks. The road into the coup along the ridge goes through the outcrop which also continues down the northern slope.

Breach 2

5.6. Tree Retention

f) Non-regrowth Zone Hollow-bearing Tree Retention

- iv. Retained hollow-bearing trees must be selected from the trees with the largest dbhob within the two hectare area and must be live trees and should have good crown development and minimal butt damage.*

Attachment 1 consists of our field notes referring to the following trees. H1 and H2 have no hollows present. H3 has no visible hollows, although could possibly have hollows, but it is not of the largest diameter cohort. H4 has hollows but it is almost a stag. The whole trunk is dead with only 3 very small branches still alive that seem to be coppice growth after the major fire damage suffered. The marking of this tree as a HBT is absurd.

Breach 3

5.6. Tree Retention

g) Non-regrowth Zone Recruitment Tree Retention

- iv. Retained recruitment trees must show potential for developing into hollow-bearing trees. Retained recruitment trees must have good crown development and should have minimal butt damage and should not be suppressed. Mature and late mature trees must be retained as recruitment trees where they are available.*

R3 has major butt damage from fire resulting in less than 50% holding wood left at the base. It has also suffered minor logging damage with only an average crown. R5 is a very poor specimen with the crown already dead, major logging damage and a small DBHOB, it is not mature or late mature.

Breach 4

5.6. Tree Retention

k) Protection of retained trees

i. When conducting specified forestry activities and post-logging burning, damage to trees retained under Conditions 5.6 f), g) and h), of this licence must be minimised to the greatest extent practicable. During harvesting operations, the potential for damage to these trees must be minimised by utilising techniques of directional felling.

Trees R2,R3 and R5 have varying degrees of logging damage. R2 also has a snig track cut ½ m away on one side with fill pushed against another side of the trunk.

R1 and R4 have both suffered major wind damage since logging. There are other marked trees in the coup also with wind damage. This shows the inadequacy of the tree retention prescriptions due to mortality after the logging event. If they don't blow down they get torched in the post logging burn. These prescriptions need a major overhaul in the 5 year (nearly 10 year) review.

The ball is definitely in DECC's court over what action is to be taken regarding these breaches. This is now the fourth compartment in this area with the same reoccurring breaches. It is time for serious enforcement of these prescriptions of the TSL.

We would also ask to meet in the field to discuss these breaches. Thank you for investigating these breaches and we await your reply.

Yours sincerely,

Scott Daines