

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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21/1/08

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

Dear David,

RE: BREACHES OF EDEN REGION IFOA-TSL CPT 729-4

An audit was conducted on the 12th-13th and 19th-20th of January in Gnupa State Forest Cpt 729-4 and the following breaches of the Eden IFOA-TSL were found.

5.6. Tree Retention

f) Non-regrowth Zone Hollow-bearing Tree Retention

iii. In Low Quality Habitat a minimum of four hollow-bearing trees must be retained in every two hectares of net logging area. Where this density is not available, the existing hollow-bearing trees must be retained plus additional trees must be retained to meet the requirement of four in every two hectares. The additional trees retained must be those with the largest dbhob.

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.

vii. Hollow-bearing trees must be scattered throughout the net logging area, except where compliance with condition 5.6 f) iv. above prevents such retention.

g) Non-regrowth Zone Recruitment Tree Retention

iii. In Low Quality Habitat a minimum of four recruitment trees must be retained in every two hectares of net logging area.

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.

vii. Recruitment trees must be scattered throughout the net logging area.

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.

5.17. Ground Habitat Protection

a) SFNSW must, to the greatest extent practicable, protect ground habitat from specified forestry activities. Ground habitat includes, but is not limited to, understorey vegetation, ground cover vegetation, thick leaf litter and fallen timber.

An area of the coup (Plot 1) was surveyed for Hollow Bearing Tree and Recruitment tree retention. Plot 1 is bounded by 729-7 rd, the 1st order stream/cpt boundary, Burrowing Frog exclusion and a line from dump G North west to 0741192, 5907875. It is approximately 3ha in area.

All trees over 30cm DBHOB were mapped. Trees that were marked for retention were given an identifier M1,M2,....., unmarked trees that were retained are labelled U1,U2....., stags are identified as S1,S2..... The following table details the results of the survey.

Tree	Species	Hollows	Logging Damage	Description	H/R
M1	Stringy	N	Y	1 sided crown due to logging, butt damage	
M2	Stringy	N	Total	Crown totally taken out	
M3	STA	Y	N	On roadside, poor crown, big lean	
M4	STA	Y	N	Good crown, good form	H
M5	STA	Y	Y	2 nd major limb torn off	
M6	STA	Y	N	Poor crown, dead trunk section at top	
M7	Stringy	N	N	Reasonable tree, poss R tree	R
M8	STA	N	Y	Reasonable crown but limb torn off	
M9	Stringy	N	N	Good crown, basal hollow fire damage, poss. R	R?
M10	?	Y	N	Crown torn out due wind, now a stag, poor before	
M11	Stringy	N	Y	2 limbs torn out, poor crown	
M12	STA	N	Y	Major limb torn off but alright crown	R?
M13	STA	Y	Y	One major limb, poor crown, marked H	
M14	STA	Y	N	Crown reasonable, lean, basal hollow 2m high	
M15	Stringy	Y	Y	Small amount of crown torn off, crown mostly epicormic, parts of trunk fire damaged, basal hollow 2m high, major fire damage, marked R	
M16	STA	N	Y	Most of crown/major limb torn off, very poor crown, basal hollow 2m high	
U1	STA	N	N	Mature, good crown but in road batter	
U2	STA	N	N	Young tree	
U3	STA	N	N	As above, slightly bigger	
U4	STA	N	N	“ “ , “ “	
U5	STA	N	N	Sapling	
U6	STA	Y	N	Biggest of preceding 4, fire damaged butt, possibly in exclusion zone	
U7	STA	P	N	Maybe very small hollow, poss R tree	R
U8	CYP	N	N	Young tree, good form, grower	
U9	Stringy	Y	N	Very poor crown, senescent, small, fire damaged trunk sections	
U10	STA	N	Y	Lean, 2 nd major limb torn off	
U11	CYP	N	N	Young tree, exclusion/plot boundary	
U12	Stringy	Y	N	Poor crown	
U13	STA	N	Y	3 major limbs torn off, epicormic	
U14	Stringy	P	N	Very poor crown	
U15	STA	N	N	Lean, basal hollow, snig spoil pushed against base 1m high	
U16	STA	Y	N	Poor crown, senescent, fire damaged	
U17	STA	N	N	Good crown	R
S1				Stag	
S2				Stag	

STA- *E. sieberi*, CYP-*E. cypellocarpa*, Stringy- *E. globoidea* or *E. agglomerata*, Y=yes, N=no, P-possible/probable

5.6 f) iii, iv and 5.6 g) iii, iv

There is a large proportion of *E. sieberi* present in the coup and so the plot will be assessed on the basis of low quality habitat tree retention requirements, as this is the least restrictive for Forests NSW. In the plot there were 16 marked trees, enough for the required amount of 6 H and 6 R trees. Of these 1 was largely destroyed and another 7 have varying degrees of damage. Of major concern is that 7 of the 16 should not have been marked for retention as they do not meet the standards required (for example M15). The SFO responsible for the marking up of the coup seems to have a strange interpretation of the standards for H and R trees. Unmarked retained trees have the same problems as marked trees in that

many are damaged and few meet H or R standards. Even with the few unmarked trees that meet the standards for H or R trees, adequate tree retention rates have not been met. The last column in the above table is what we assessed as being an adequate H or R tree. We feel that there is only 1 H tree and 4-5 R trees in this whole plot, well below the minimum required.

5.6 f) vii and 5.6 g) vii

In the south eastern part of the plot all the marked trees are near road or the log dump. There are no marked trees in the mid slope area. Even including the unmarked trees in this part of the plot most of the area between the marked trees on the edge of the road and the gully has no standing trees. The shortest distance being approximately 40m with most distances being 60m or more. The impact of this on resident arboreal mammals is devastating.

5.6 k) i

Of the 35 standing trees in the plot, 11 were damaged, apparently during harvesting. Visual inspection of the rest of the coup seemed to confirm this level of damage to retained/standing trees. There seems to be no effort to mark any additional H or R trees in place of those trees damaged. This coup was logged with a mechanical harvester which is meant to enable better directional control when felling. This is obviously not the case.

5.17 a)

In the surveyed area the ground disturbance is close to 100%. At least 10% of the plot was completely bare earth from snig tracks with the remaining area being driven over by snig or harvester. Again a visual inspection confirmed these findings as indicative of the whole coup.

General observations

An inspection of the stumps in the plot showed that most of the retained trees were not in the largest DBHOB bracket. Stumps in this cohort greatly outnumber retained trees. This indicates the marking up by Forests NSW is an even greater breach of the IFOA conditions as there was obviously plenty of choice for trees to be retained.

Along the 1st order exclusion boundary there were at least 11 trees that seem to have been subject to windthrow since the area was logged. None of these trees were marked for retention and if they were it shows the inadequacy of the licence conditions to ensure proper retention of H and R trees.

From this coup many other logged coups can be seen throughout the adjoining valley. The logging practices employed in this coup seem to be the same in the others. We feel this whole area needs to be inspected by DEC.

If you require any additional information please contact us. We await your reply.

Regards,

Scott Daines
South East Forest Rescue