



# ***SOUTH EAST FOREST RESCUE***

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14 July 2011

OEH  
EPRG Forestry

Forestry Unit,

## **Re: Southern IFOA and TSL BREACHES BODALLA STATE FOREST Cpts 3061, 3062 and 3063**

Koala records appear relevantly in Compartments 3061 and 3065. In the Southern region where a koala record appears in, or within, two kilometres of compartments that will have 'specified forestry activities' undertaken triggers r.6.11 and 8.10 of the Southern IFOA Appendix B Threatened Species Licence.

'Hazard reduction burning' is defined as a 'specified forestry activity' as defined in the Sthn TSL Appendix B, page 8:

*"Specified forestry activities" means:*

- i. Tree felling or killing (excluding miscellaneous forestry operations);*
- ii. Construction and operation of log dumps;*
- iii. Construction and operation of snig tracks;*
- iv. Road construction (NB. routine road maintenance is not a specified forestry activity);*
- v. Road re-opening;*
- vi. Commercial collection of firewood;*
- vii. **Bush fire hazard reduction work;***

Perhaps your department has a different IFOA or TSL to us. If so could you forward the clause which exempts Forests NSW from complying with r.8.8.10 and r.6.11.

6.11 Koala *Phascolarctos cinereus*

### **For all specified forestry activities:**

As stated burning triggers 8.8.10. Forests NSW have not undertaken adequate koala surveys for this area. This habitat is defined as 'core habitat':

#### ***Sthn IFOA TSL 8.8.10***

*Where there is a Koala record within two kilometres of a compartment boundary, or local knowledge indicates that koalas are likely to be present, the following surveys must be implemented:*

##### ***a) Survey Method***

- i. Where habitat within the compartment has been identified as core Koala habitat by the Modelled Areas of Habitat Significance for Vertebrate Fauna in the Southern CRA, Condition 8.8.10 b) **Transect Survey with Quadrats** must be carried out in the modelled*

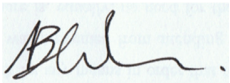
*habitat.*

Further we state again Forests NSW was also required, denoted by the word 'must', to carry out a comparative assessment of the potential impacts on the environment and threatened species from this burning.

Unfortunately yet again it is too late for protection. We state again this burning was unlawful.

Regards,

*L Stone*

A handwritten signature in black ink, appearing to read 'S. Daines', is shown on a light blue rectangular background.

*S. Daines*