

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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5/9/05

David Nicholson
Forest Policy and Regulation Section
Department of Environment and Conservation

**RE: BREACH OF THE IFOA – TSL IN WANDELLA 3283, 3284, BODALLA 3013, 3014,
3021, 3036**

Dear David,

A desktop audit of the above mentioned harvest plans has revealed a breach of the IFOA – TSL for these compartments regarding the owl landscape prescription.

6.4.2 Large Forest Owls: Landscape Approach

e) Of the areas to be retained in SFNSW estate outside of statutory reserves, referred to condition 6.4.2 d) above, a minimum of 30% must be retained in patches at least 50 hectares in size. The shape of exclusion zones should minimise the boundary to area ratio. Long, linear strips must not be counted towards meeting the requirement to retain these patches.

All of the above harvest plan maps show the use of stream exclusion zones as doubling up as owl reserves to meet the requirements of 6.4.2. This is a breach of this prescription as it states “long, linear strips **must not** be counted...”.

In several of these compartments Forests NSW have used 1st order streams as owl reserves. How can a 20m wide exclusion be allowed to be used to meet this prescription? This is another attempt by Forests NSW to rort the IFOA and gain extra loggable area. Once again they are not following the spirit of the IFOA.

These breaches were found by scrutinising the harvest plan maps for a few minutes. Is there anyone doing a similar job in your department, and if not maybe in future all new harvest plans automatically get a brief desktop audit.

Forests NSW must be made to stop using stream exclusions as owl reserve and hand over compensatory habitat for those areas that have been already logged with these reserves in place. A full investigation into how this situation occurred is also needed.

We look forward to your speedy reply to these matters.

Regards,

Scott Daines