



SOUTH EAST FOREST RESCUE

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Enviroline 131 555
Office of Environment and Heritage
EPRG

Attn: Steve Hartley or Ric Noble

info@environment.nsw.gov.au

Dear EPRG,

South East Forest Rescue has recently inspected compartment 2084 of Badja State Forest uncovering several breaches of the South Coast TSL and EPL.

The area surveyed in this inspection encompasses the zone around 2084/3 Road. All following GPS coordinates are in WGS84 format.

Breach 1: EPL Schedule 4 81(b)

Significant rutting was observed at the following locations, among others:

- 0726904/5999212
- 0726959/5999130
- 0727102/5999449

WET WEATHER RESTRICTIONS

81. Tracks must not be used where:

- a) there is run off from the snig track surface; or*
- b) there is a likelihood of significant rutting leading to turbid runoff from the track surface.*

Appendix A of the Southern Region Environment Protection Licence at page 25 states:

"saturated soil" means the physical condition of a soil in which no more moisture can be absorbed or accepted. Saturated soils are subjected to compaction, rutting or displacement by machinery and vehicles;

Breach 2: TSL Condition 5.6.g.ii Debris Around H & Rs

Judging by the amount of burnt debris and the scorch marks and damage of retained trees we would state that there was, prior to burning, logging debris within 5 metres of retained Habitat tree and greater than one metre in height. This was observed at the following location, among others:

- 0726913/5999168
- 0726934/5999110
- 0727076/5999504
- 0727078/5999463

ii. In the course of conducting specified forestry activities, logging debris must not, to the

greatest extent practicable, be allowed to accumulate within five metres of a retained hollowbearing tree, recruitment tree, stag, Allocasuarina with more than 30 crushed cones beneath, eucalypt food tree, or Yellow-bellied Glider or Squirrel Glider sap feed tree. Logging debris within a five metre radius of a retained tree must be removed or flattened to a height of less than one metre. Disturbance to ground and understorey must be minimised to the greatest extent practicable within this five metre radius. Habitat and recruitment trees must not be used as bumper trees during harvesting operations.

Breach 3: Condition 5.6 Tree Retention

We would state that as there were an inadequate amount of suitable trees with good crown development retained in the area surveyed, suggesting that this would be the case for the entire compartment.

The following condition must be applied within the non-regrowth zone:

b) Non-regrowth Zone Recruitment Tree Retention

ii. 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.

Breach 4: Condition 5.6(i) Stag Retention

There were two felled stags on the walk down 84/2 Rd as per photographs attached.

i. Where more than ten stags per two hectares occur in the net logging area, a minimum of ten stags must be retained per two hectares of net logging area where it is safe to do so. If there are less than ten stags per two hectares, then all stags should be retained where it is safe to do so.

ii. Stags must not be counted as hollow-bearing trees or recruitment trees.

Breach 5: Condition 5.11 Rocky Outcrops and Cliffs

A large unmarked rocky outcrop was observed in this compartment. It had no exclusion zone. It had been logged. We traversed the perimeter down the snig track 84/2 Rd. This was beginning at the following location and extending down south westerly and encompassing the knoll:

- 0727094/5999388

There is another small rocky outcrop which possibly did join the larger one, however a snig track has been driven through, at the following circumference transect:

0727126	5999421
0727138	5999411
0727155	5999402
0727159	5999387
0727158	5999382
0727151	5999379
0727133	5999396
0727124	5999401
0727120	5999408
0727123	5999416

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.

(Note: it is not intended to exclude SFNSW from all areas that have a scattered or stony or rocky ground cover, only those areas where rocks and exposed boulders cover greater than 70% of at least a 0.1 hectare area. Those areas that fall within the definition of Rocky Outcrops and Cliffs are considered to contain likely habitat for threatened flora and fauna.)

Breach 6: Tree Retention

Trees with butt damage were observed at the following locations:

- 0727060/5999494
- 0727072/5999501

The following condition must be applied within the non-regrowth zone:

a) Non-regrowth Zone Hollow-bearing Tree Retention

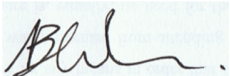
i. A minimum of ten hollow-bearing trees must be retained per two hectares of net logging area. Where this density is not available, the existing hollow-bearing trees must be retained plus additional trees must be retained to meet the requirement of ten per two hectares. The additional trees retained must be selected from those with the largest dbhob.

ii. Retained hollow-bearing trees must be selected from the trees with the largest dbhob and must be live trees and should have good crown development and minimal butt damage.

SEFR requests that an immediate investigation be undertaken by DECCW of these breaches.

Kind Regards,

L Stone



S. Daines