



# ***SOUTH EAST FOREST RESCUE***

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Mr Steve Hartley,  
Manager, Crown Forestry Policy and Regulation,  
Dept. Environment, Climate Change and Water.

4/11/10

## **RE: BREACHES OF EDEN IFOA-TSL, YAMBULLA SF, CPT 450- COUP 1, CPT 446- COUP 4**

Dear Steve,

On Wednesday 3/11/10 SEFR conducted a limited audit of Yambulla SF compartments 450 coup 1 and 446 coup 4 and found the following breaches of the Eden region IFOA-TSL. All coordinates are AGD 66 datum.

### ***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.*
- c) Exclusion zones of at least 40 metres wide must be implemented around all rocky outcrops more than 0.5 hectare.*

*(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 1: 5.11. (b)**

At RO1 0723863, 5880190, an unmarked rocky outcrop greater than 0.1ha was located. The approximate size is 0.25ha. Logging disturbance was found in what should have been the 20m exclusion zone. The south western side of the outcrop is along Poole Gap Trail which has cut through what was once a larger outcrop. Photo 1

Several of the marked retained trees near the outcrop were also very poor selections. Further many of them had debris around their base higher than a meter. Photo 2

### **BREACH 2: 5.11. (a), (b)**

At RO2 0724064, 5879683, cpt 446-4 dump A, an unmarked rocky outcrop greater than 0.1ha was located. Machinery has been driven onto the outcrop and it has been logged along with the associated 20m exclusion zone. Photo 3.

Cpt 446 is currently active and partly logged. In a yet to be logged area of cpt 446-1 an unmarked rocky outcrop was located at RO3 0724965, 5878951, photo 4. H and R trees (also some very poor selections) have been marked to the edge of the outcrop in what should be a 20m exclusion. This clearly shows that the SFO has failed to identify the outcrop and is a breach waiting to happen.

While driving along Goldmine Road numerous unmapped outcrops were observed in cpt 444 which is to be logged next. The harvest plan for cpt 445, which is also active, shows mapped outcrops and large areas of rocky terrain. There is a high probability of future breaches in all of these compartments and urgent action needs to be taken to restrain the activities of FNSW in these areas.

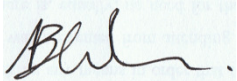
Due to the many rocky outcrop breaches in recent weeks and the high potential for future breaches, SEFR requests that an immediate investigation be undertaken by DECCW of these breaches. FNSW seem totally incapable in identifying outcrops that meet the prescription.

SEFR requests that this breach report be investigated by DECC and not handed to FNSW to self audit. SEFR also requests that after DECC's audit a meeting in the field with SEFR occurs.

Thank you for investigating these breaches in the context of your ongoing regulatory activities and we await your response.

Kind Regards,

*L Stone*

A handwritten signature in blue ink, appearing to read "O.S. Daines", is placed over a light blue rectangular background.

*O.S. Daines*