



South East Forest Rescue

<http://www.myspace.com/southeastforestrescue>

PO BOX 899 Moruya, NSW, 2537

sefr@fastmail.com

8/9/101

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

RE: BREACHES OF EDEN IFOA-TSL 8.8.12, YURAMMIE SF CPT'S 963, 964, 965.

Dear Steve,

SEFR has audited the Koala transect surveys for Yurammie SF Cpt's 963, 964, 965 and found that the survey fails to comply with the prescriptions in the IFOA-TSL.

8.8.12. Koala survey

b) Transect Survey with Quadrats

- i. An intensive survey within the proposed logging area will occur prior to harvesting to determine whether koalas use the compartment.
- ii. The survey will involve traverses in areas to be logged. Areas where logging will not take place (such as wildlife corridors) need not be surveyed.
- iii. The traverses must uniformly cover the harvesting area with transects between 50 to 100 metres apart (subject to local conditions).
- iv. At approximately 25 to 50 metre intervals (depending on the distance between transects) quadrat searches are to be conducted. At each search site, four quadrats (quadrat size = 50 centimetres x 50 centimetres) are to be randomly placed within 10 metres of the transect, beneath tree crowns. The quadrats are to be searched for Koala scats

The following table summarises the data from the surveys.

Transect	Distance (m)	Quadrats required	Quadrats surveyed	Time (min)	Time per quadrat	Surveyor
T1	1315	53	43	190	4.41	A
T2	600	25	22	100	4.54	A
T3	175	8	7	30	4.28	A
T4	1090	44	36	180	5	B
T5	700	29	23	120	5.21	B
T6	130	6	7	60	8.57	B
T7	1240	50	50	180	3.6	C
T8	850	35	38	120	3.15	C
T9	300	13	20	60	3	C

Previous breach reports on Koala surveys have focused on the time taken per quadrat and therefore the adequacy of the surveys. In these breach reports we have used a minimum time per plot of 3.25mins,

which when applied to the above transects means T8 and T9 do not comply with the prescription and T7 only just complies. Although the surveyor names have been blacked out it seems these three transects were undertaken by the same person.

Of more concern with this survey is the number of transects with less than the required quadrats. The distance figure does not take slope into account and so the quadrats required figure is less than what is actually needed. This shows that T1, T2, T3, T4 and T5 do not comply with the number of quadrats required, and T1, T4 and T5 have only 80% of the required quadrats.

While we acknowledge that DECCW has undertaken RGB-SAT surveys of the area and found no evidence of Koalas, this does not enable FNSW to undertake sub-standard surveys of their own. It has been shown in Murrah 2051 that both RGB-SAT and transect surveys may not find all evidence of Koala's and therefore reinforces the need for all surveys to be undertaken to the highest standard.

This is the fifth compartment that SEFR has found with Koala surveys that do not comply with the prescriptions. It shows FNSW complete disregard for the spirit, intent and prescriptions of the TSL.

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

Yours sincerely,

Scott Daines