



SOUTH EAST FOREST RESCUE

<http://www.myspace.com/southeastforestrescue>
PO BOX 899 Moruya, NSW, 2537
sefr@fastmail.fm

22 October 2010

Attn: DECCW Envioline
Mr Steve Hartley,
Manager, Crown Forestry Policy and Regulation, EPRG
Dept. Environment, Climate Change and Water.

RE: BREACHES OF SOUTHERN IFOA-TSL MOGO SF, CPT 160

Dear EPRG,

On Thursday 21/10/10 SEFR conducted an audit of Mogo State Forest compartment 160 and found the following breaches of the South Coast region IFOA-TSL.

Please note that all GPS coordinates are produced from a Garmin E-trex 12 channel GPS unit with settings at:

position format:	UTM/UPS
map datum:	WGS84
units	metric
North ref:	grid
variance:	002°E

From Mogo village we travelled west along Buckenbowra Road, then entered the compartment on 160/2 road and travelled up and along to 0235947/6036530. Within 20 metres of this point we discovered three felled hollow-bearing trees (HBTs).

Also nearby, at point 0235835/6036508 was found an unmarked HBT that had debris at its base, but due to the intensity of the post-harvest hazard reduction burn the tree had collapsed.



Traverses around the harvest area identified two marked H trees at 0236506/6035921, with one accompanying R tree discovered, although this R tree had, by causes unknown, somehow fallen down.

We note that this compartment is in the 'Regrowth zone', but due to the amount of HBTs felled and the paucity of marked H & R trees retained throughout the net harvest area, we contend that the operation did not comply with the relevant licence conditions of the IFOA and TSL.

This logging event is one of the most graphic in its tree removal and burning treatment we have seen in the South Coast RFA region - STS heavy had seemingly become STS extreme on this occasion. We contend that the minimum basal area of 10m² has not been adhered to. This logging operation has removed well over 50% of the canopy of the net harvest area.



IFOA/TSL breaches include:

1. Inadequate H & R trees retained in NHA - **TSL 5.6.c-g**
2. R trees and H trees damaged by logging
3. R trees and H trees damaged by burning
4. Felled hollow bearing trees
5. Greater than 50% canopy removal - **IFOA 5.11**
6. Minimum basal area not retained.

FNSW information gives that Mogo SF Cpt 160 commenced 08-Jul-08 and ended 17-Aug-10, and had EPL coverage from 03-Jun-10 to 17-Aug-10. We contend that this operation was not conducted in compliance with the IFOA and request regulatory action on this matter.

Kind Regards,

L Stone

Blu.