



**Respondent No:** 457

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Q1. <b>First name</b>	Les
Q2. <b>Last name</b>	Mitchell
Q3. <b>Phone</b>	not answered
Q4. <b>Mobile</b>	██████████
Q5. <b>Email</b>	████████████████████
Q6. <b>Postcode</b>	████
Q7. <b>Country</b>	not answered
Q8. <b>Stakeholder type</b>	Individual
Q9. <b>Stakeholder type - Other</b>	not answered
Q10. <b>Stakeholder type - Staff</b>	not answered
Q11. <b>Organisation name</b>	not answered
Q12. <b>What is your preferred method of contact?</b>	Email
Q13. <b>Would you like to receive further information and updates on IFOA and forestry matters?</b>	Yes
Q14. <b>Can the EPA make your submission public?</b>	Yes
Q15. <b>Have you previously engaged with the EPA on forestry issues?</b>	No

**Q16. What parts of the draft Coastal IFOA are most important to you? Why?**

Proposed harvesting practices and retention of habitat. I am concerned that the proposed harvesting practices and the inadequate protection of key features such as large trees will see the further loss of environmental values of NSW coastal forests.

**Q17. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?**

The proposal for aggregated retention or clumping of protected features is the only positive outcome for the management of environmental values as they will provide more secure habitat for a range of native species. However they need to be focused around existing large trees and connected by strips of protected forest to be viable.

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**Q18. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?**

Most aspects of the draft Coastal IFOA will have a negative outcome on the management of environmental values. Proposed coupe sizes are far too large, intervals between logging cycles are too small, the basal area retention in selectively logged coupes is far too low and large trees will now be subject to removal. All trees with a dbh of 100cm or more should be retained if mature hollow bearing trees are to form in the near future.

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**Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?**

Many of these coastal forests are in such a poor state that the ecological outcome required is rehabilitation and recovery not further intense pressure as proposed in the Coastal IFOA. Therefore at all levels I do not consider that the multi scale protection proposed will lead to more sustainable forestry operations.

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**Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?**

As someone who was involved in the Comprehensive Regional Assessments and the Regional Forest Agreements in the late 1990's, I do not believe that the proposed intensive logging regime was ever envisaged during the development of a comprehensive, adequate and representative reserve system that underpinned the NSW Regional Forest Agreements. In my view, if these proposed changes to logging intensity are to be formally adopted, they need to be met with a concomitant change in the network of protected areas, particularly in the predominantly coastal foothills where the reserve system is inadequate in size and connectivity. This is needed because of the reduced capacity of the very young forests in the harvest area to provide the critical habitat resources required by fauna species. The protected component of the forest must therefore bear a greater conservation load, especially for threatened species with specific habitat requirements that are not found in young forests.

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**Q21. General comments**

I do not consider that the Coastal IFOA as it currently stands strikes a balance between environmental values and timber supply. In the words of one member of the expert panel reviewing the protocols:- "Sustainable forest management requires maintenance of forest stand structure complexity and heterogeneity to allow for biodiversity conservation. This key point seems to have been given up on in this review process with harvesting practices proposed that will severely degrade these forests to an artificial and simplified arrangement with severely reduced and limited biodiversity values."

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**Q22. Attach your supporting documents (Document 1)** not answered

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**Q23. Attach your supporting documents (Document 2)** not answered

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**Q24. Attach your supporting documents (Document 3)** not answered

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