



Submission by Rubicon Forest Protection Group on proposed TRP changes, July 2021

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Forest Block 281 – Ginters

The two existing coupes Pond Hawk (281-512-0006) and Guanaco (281-512-0012), added to the TRP in 2019, sit amidst what is, or soon will be, a substantial area of newly logged forest.

Both these coupes have an extremely high number of greater glider detections, and so provide a refuge and staging point for recolonisation of the regenerating forest from which they will have been displaced by logging in the surrounding area.

Moreover the location of these coupes on Northeastern Rd, close to the Ault Beeac Falls, not far from the popular Ginters camping area and adjacent to a wildlife corridor (SPZ) along Ault Beeac Creek (including many old King Ferns) should assure their protection from logging.

Leaving Pond Hawk and Guanaco on the TRP will breach the 'proper consideration' requirement of S. 4B(c) of the FFG Act, while the logging of them will breach Code Cl. 2.2.2.2 (the Precautionary Principle).

Forest Block 282 – Glendale

The area of State Forest in this block, excluding the non-commercial forest in the two scenic protection SPZs is around 4,000 ha.

Under the existing TRP, the gross area of coupes to be logged in the next 5 years is already 643 ha with the indicative net area approaching 500 ha. No indicative net areas are disclosed in the publicly-available proposed TRP information but it would add another 110 ha gross. With approximately 450 ha (net) logged since 1980, the total area of juvenile or soon-to-be juvenile forest will be around a quarter of the whole harvestable area. Given the extensive logging that has already occurred in adjacent blocks on the Black Range plateau, under these circumstances, and given the impact of the 2009 fires in forest areas further south, it is hard to see how Code Cl. 2.1.1.1.iii (maintain a range of forest age classes and structures) will be adequately complied with.

Apart from a few small patches, the entire Cameron Road/Billy Creek Rd area has not been logged since Black Friday, and contains magnificent peppermint, messmate and gum forest. With so much logging of the area to the west, pine plantations and extensive logging to the south and farmland to the north and east, logging this area presents a major biodiversity loss risk and it is hard to see how even proposing their inclusion complies with the 'proper consideration' requirement of S. 4B(c) of the FFG Act. Under these circumstances Code Cl. 2.2.2.2 may well be breached unless the proposed logging is abandoned or substantially curtailed.

The logging of most of the coupes in the area enclosed by the Ausnet transmission lines will also be highly visible from the Maroondah Hwy. Based on the net area figures in the 2019 TRP information package, logging the area will be in conflict with the Code Cl. 2.1.1.1.vi (scenic landscape protection).

Cameron Rd is also the main access route to the north end of the Black Range from the Maroondah Hwy (via Glendale Lane) and being so close to the Cathedral Ranges State Park already represents a nature-tourism opportunity that should be protected, at least by 40m retained forest buffers along Cameron Rd. Finally, all these coupes all lie in a Bushfire Moderation Zone and logging them as planned will breach MSPs Cl. 5.8.1.5(a)

Given the multiple adverse impacts cited above, the proper course is to remove all the coupes in this area from the TRP and add no new more.

Forest Block 283 – Mohican West

While the TRP adds no new coupes in this block, the reality is that there is very little left in the surrounding that survived the 2009 fires, with much of the area being severely .As local VicForests staff would well know, the Murrindindi Scenic reserve is an extremely popular camping area. For so much of the nearby forest to be so heavily logged given the landscape impact of the Black Saturday fire, will significant degrade the wider value of the reserve.

We urge VicForests to remove the remaining unlogged coupes in this block from the TRP.

Forest Block 284 – Mohican East

The proposed addition of 7 new coupes in the block totalling 200 ha (gross) is opposed. Most of the coupes will be highly visible from the Maroondah Hwy and lie in an area that should – if the recommendations of the LCC and the Central Highlands FMP were properly implemented – have been designated as an SMZ, as per the eastern flank of the escarpment further south.

Views to the escarpment are already compromised by logging on the south side of Black Range Rd, although in that case we can only assume that VicForests regards areas more than 6.5 km from the Maroondah Hwy – an entirely arbitrary distance – need no scenic protection. In the absence of net area estimates it is impossible to accurately gauge the seriousness of the scenic impact of the proposed new coupes but it will be profound.

Most of the escarpment in this block was only lightly affected by the Black Saturday fire, in contrast to the adjacent forest on the plateau. Like Glendale block, so much logging of the area to the west, pine plantations and farmland to the east, and serious fire impacts to the south, logging this area presents a major biodiversity loss risk. Similarly, it is hard to see how even proposing their inclusion complies with the ‘proper consideration’ requirement of S. 4B© of the FFG Act. Under these circumstances Code Cl. 2.2.2.2 may well be breached unless the proposed logging is dramatically curtailed.

Most of the new coupes also sit within two Bushfire Moderation Zones and such extensive logging as is proposed (on top of what has already occurred in the northern part of this block) will doubtless breach MSPs Cl. 5.8.1.5(a).

No coupes should be added in the block and existing unlogged coupes should be removed.

Forest Block 285 – Cathedral

In line with both previous TRP submissions from RFPG’ we ask that Chitty Chitty Bang Bang be removed for the reasons which we again set out below.

Any logging of it will compromise the views from the Cathedral Range State Park, especially from Little Cathedral Peak, but also from the Maroondah Highway which is listed in Table 9, Appendix 5 the Planning Standards. In this case its ‘landscape sensitivity’ qualities defined by the Code also encompass the Blue Range Road, the major tourist road for people accessing the Blue Range. The unequivocal requirement of MSP Clause 5.3.1.5 is for a minimum buffer of 20m on Blue Range Road. Given that the log landing would also inevitably be placed on this road, logging this coupe is totally precluded.

And the biodiversity values of this coupe are also obvious, with both greater and yellow-bellied gliders recorded in it, as well as a koala with koala populations in the area decimated on Black Saturday.

Coupe 285-502-0001 must be removed from the TRP or else the biodiversity and landscape provisions of the Code and section 37(3)(b) of the *Sustainable Forest (Timber) Act 2004* will most likely be breached.

Forest Block 286 – Rubicon

In line with RFPG’s previous TRP submissions and with our report [*Fire and logging as a biodiversity threat with serious and potentially irreversible ecological consequences for the Rubicon State Forest*](#) we ask that no further logging occur in this block and are most disappointed

that VicForests should be attempting to add yet more coupes to an area whose biodiversity has been so grievously harmed by excessive logging when so much further south was killed by the Black Saturday fire.

Our arguments for protecting this area, which we have been making for the past 6 years are more relevant than ever following the Black Summer fires. The excess logging in the Rubicon State Forest, particularly in the Rubicon and Royston Blocks, and particularly since 2009, contravenes the principles of the Code, several mandatory long-term planning clauses, clause 2.2.2.2 (the precautionary principle), while the proposed additional coupes and proposed retention of existing unlogged coupes runs counter to S. 4B(c) of the FFG Act.

With the amendments to the FFG Act having now been in force for over a year, any further logging in the Rubicon block will signal that VicForests has not properly heeded its obligations under S. 4B(c) of the FFG Act.

Blue Range coupes (Snifter, Goblet, Haywire and 286-503-0004)

The southerly extent of the Blue Range was massively impacted by the 2009 fire, with most of the ash forest area completely killed. The remaining forest in the Rubicon Valley and most of the eastern side of the Blue Range is now completely logged out. Apart from the Rubicon Historic Area, the Blue Range ridge along its extent from just north of the Cathedral Range State Park in the south is the only remaining significant area of largely intact 1939 alpine ash regrowth forest in Block 286. Its extensive branching and open acacia understorey that makes it ideal sooty owl, leadbeaters possum and greater glider habitat.

The proximity of the Blue Range to the Cathedral Range State and its accessibility via Parks Rd make it particularly important that this area be spared to allow the establishment of a viable forest tourism sector once logging ends before the Rubicon State Forest is completely ecologically devastated. Further north, Haywire and the adjoining coupe added last December are very steep and that alone should rule them out. These 2 coupes are also close both to the Camp Jungai and the Rubicon River camping areas and readily visible from the Rubicon River Road –popular with walkers - and within the RVHCFR. Pursuant to MSP Clause 5.3.1.6 and Code Clause 2.1.1.1.vi they should be left unlogged.

Citrine amended (286-504-0011)

As outlined in RFPG's previous submission, the amended boundary of this coupe seems designed to allow a far greater area to be logged than the 1.9 ha claimed. We thought then it may be a mistake, but there has been no rectification of what could have been an error. To return to log this tiny patch of remaining ash in a sea of despoliation is utterly unacceptable.

Low Flow (286-512-0022) and Huckelberry Finn (286-507-0015)

The proposed retention of these two coupes which abut the Rubicon Historic Area suggests that VicForests has little regard for the wider values of this area that visitors to the area might appreciate. In the past decade, VicForests has already logged the following coupes which are within or abut this remarkable, and popular, historic area: Calvin, Rio, Berlei, Ralf, Cortez, Little Jacqui, Archibald, High Voltage, Sutcliffe, Alexander, Lubra Dam, Julius Caesar, etc. And beyond these coupes are yet more coupes – most only one or two decades old - creating a devastated landscape with its former majesty and biodiversity gone. The current information package gives the total estimated net area of these two coupes as only 21 ha. Surely they can be spared for the sake of the significant benefits brought by leaving them unlogged?

Proposed new coupes 286-519-0008 and 286-505-0033

The proposed addition of both these coupes given the fire and logging history of their surrounding areas is unsupportable, breaching multiple long term planning clauses of Code Cl. 2.1.1.1. Surrounded by relatively recent (post 1990) logging and vast fire-killed areas to the south, both these patches of forest must be spared.

Removal of Straight Line (286-505-0013)

Finally, we note that you are finally proposing to remove Straight Line (286-505-0013) from the TRP, and would appreciate why VicForests took a decade to satisfactorily regenerate it.

All remaining unlogged coupes in block 286 must be removed from the TRP or it will breach multiple landscape and biodiversity provisions of the Code and section 4B(c) of the *Flora and Fauna Guarantee Act 2004*.

Forest Block 287 – Royston

In line with our comments above on the Rubicon block proposals and for the same reasons set out there we ask that no further logging occur in this block. We are particularly dismayed that VicForests should be proposing to add two gigantic coupes to the between the Mt Bullfight and Lake Mountain reserves and just north of the proposed Immediate Protection Area (IPA) announced in 2019, plus a road to access Bag of Bones (287-518-0007). What we said in our submission a year ago in relation to the 2020 proposed TRP changes remains relevant here.

Bag of Bones (287-518-0007), Tijuana (287-516-0005), Santa Cruz (287-516-0006), and proposed new coupes 287-516-0001 and 287-516-0007

Bag of Bones, Tijuana and Santa Cruz are all candidates for incorporation in the adjoining IPA once the promised public consultation on the IPA boundaries commences. RFPG will be arguing strongly that the IPA should certainly include these three coupes and extend northwards to the Mt Bullfight West road, as part of the linking of the Mt Bullfight Reserve with the Yarra Ranges National Park and in the meantime should be removed from the TRP.

Proposed removal of Little Jacqui (287-509- 0003)

Finally, we are surprised at the intention to remove Little Jacqui from the TRP on the basis that it is fully regenerated when it clearly is not, as the image on the following page taken only last month shows.

We would appreciate being given a copy of the regeneration assessment report for this coupe.

All remaining unlogged coupes in block 287 should be removed from the TRP or else multiple landscape and biodiversity provisions of the Code will be breached as well as section 4B(c) of the *Flora and Fauna Guarantee Act 2004*.



Forest Block 288 – Snobs

We strongly oppose the proposed addition of 3 new coupes at the north end of the Snobs Creek Valley, as well the small new coupe further south, as well as the failure to remove any of the coupes on the north end of the Torbreck Range.

Proposed new coupes 288-509-0003, 288-509-0005 and 288-509-0006

VicForests is aware of RFPG's longstanding opposition to the accelerated logging in the Snobs Creek Valley, especially given what has transpired elsewhere in the Rubicon State Forest, and the proposed inclusion of these 3 coupes only heightens our concerns. We add here that this area may be part of the home range of what could be a breeding pair of sooty owls and until a full assessment has been conducted of the status of the sooty owl management areas in the Central Highlands, logging in this area should cease. Certainly their presence, as well as the high density of greater gliders, of which VicForests is well aware, makes it particularly important that VicForests heed the requirements of S. 4B(c) of the FFG Act.

Unlogged coupes at the north end of the valley should be removed

The exclusion of these coupes from the nearby IPA ahead of the promised public consultation on the IPA boundaries and their eventual formal protection is, like those in the Royston block, quite wrong. RFPG will be arguing strongly that the IPA should certainly include these coupes and until final decisions are made about the boundaries of this IPA these 8 coupes should be removed from the TRP.

Proposed coupe 288-517-0010

The proposed inclusion of this coupe situated near the junction of No.5 Track and Snobs Creek Road is opposed. Apart from the scenic damage to Snobs Creek Rd that logging it would entail, approximately half its 12 ha area lies within 200m of Snobs Creek and therefore forms part of the proposed extension to the Snobs Creek River Zone which the Government has promised to implement.

Other unlogged coupes on the TRP

For reasons set out in our 2020 TRP submission, and for much the same reasons as apply to our arguments relating to Blocks 286 and 287, we say that:

all remaining unlogged coupes in block 288 should be removed, and no coupes added if the landscape and biodiversity provisions of the Code and section 4B(c) of the *Flora and Fauna Guarantee Act 2004* are to be followed.

Forest Block 289 – Torbreck

Proposed new coupes 289-520-0006, 289-520-0007 and 289-520-0008

It is deeply disappointing that VicForests is contemplating further harm to the scenic qualities and rideability of the National Bicentennial Trail (NBT) by the creation of these three coupes to the east of Bill Head. Within the Rubicon State Forest, the NBT is already compromised by making parts of Conn Gap Rd, Bullfight Rd and Quartz Creek Rd readily navigable by log trucks, with the situation along Quartz Creek Road is particularly galling. Now 3km of Hughes Rd is to suffer the same fate in order to access just two coupes! There is no doubt that the proposed access to these coupes via Hughes Rd breaches Code Clause 2.1.1.1.vi.

Proposed new coupes 289-512-0006 and 289-512-0004

These two coupes lie on the Eildon-Warburton Rd and VicForests' idiosyncratic approach to those bits of the Code it wants to follow is well-illustrated by another coupe on this road - Camberwell Junction (290-527-0004). In that case, despite the Code requiring a 50m buffer alongside the road, Camberwell Junction was logged right up to the road. It is to be hoped that this breach of the Code is not repeated with these coupes

Proposed new coupe 289-504-0018

This coupe will be starkly visible from the extremely popular Mt Pinniger lookout next to Lake Eildon and should not be added to the TRP since its inclusion will clearly breach Code Clause 2.1.1.1.vi.

All remaining ash forest coupes in block 289 must be removed, and no new coupes added or the TRP will breach multiple landscape and biodiversity provisions of the Code and section 4B(c) of the *Flora and Fauna Guarantee Act 2004*.

Forest Block 290 – Taponga

Proposed new coupe 290-526-0002

This coupe, as with the two proposed new coupes in Block 289 discussed above, lies on the Eildon-Warburton Rd and our comments regarding the requirement for a 50m buffer alongside the road applies here as well. In this case also, we hope that there is no breach of this critical buffer requirement in this case, or anywhere else along the Eildon-Warburton Rd

Forest Block 309 – Acheron and Block 310 – Steavenson

Our objections to the inclusion of so many new coupes in the Fisher Creek Rd/ Hermitage Walking Track area in Block 309 was fully set argued in RFPG's TRP submission last year and those arguments remain, however the inclusion of 4 new coupes between Granton and Marysville near the Marysville Rd is also strenuously opposed.

Proposed new coupes 309-503-0005, 309-504-0009, 309-404-10010, 310-501-0002 and 310-503-0015

As with all the proposed changes attached to this latest TRP change proposal, the absence of net area estimates, which VicForests has refused to provide notwithstanding its obligation to comply with Government data transparency policy for forests, makes it impossible to fully assess the biodiversity and scenic landscape impacts of its proposals. However in light of the high severity of the Black Saturday fire in the immediate and wider area around these coupes, and the death of a huge number of arboreal animals, the inclusion of these coupes is very likely to breach the biodiversity provisions of the Code as well as S. 4B(c) of the FFG Act.

Under these circumstances, we request that

All remaining coupes in blocks 309 and 310 be removed from the TRP, and no new coupes added, ahead of landscape scale biodiversity and scenic assessments being conducted across the Narbethong/Marysville area.

Forest Block 311 – Upper Taggerty

The two existing coupes Diana (311-503-0014) and Fergie (311-506-0008), added to the TRP in 2017, sit amidst a vast area of ash forest killed in 2009 and now regenerating. Despite spanning the AO boundary between ash and mixed species, they are designated as mixed species, since this is all that is left on these coupes to log.

As a small patch of living mature forest surrounded by such a vast areas of fire-killed young forest of limited habitat value for birds and arboreal mammals, these coupes provide a critical staging point for recolonisation of the regenerating forest by birds and arboreal animals, whether threatened or not, as well as long-lived understorey plant species.

They also sit less than 6.5 km from several vantage points along the Buxton Marysville Road, this being in the Planning Standards requiring protection of views from it.

We suggest that the original inclusion of these coupes on the TRP breaches Code Cl. 2.1.1.1.iii and 2.1.1.1.vi, retaining them on the TRP may breach S. 4B(c) of the FFG Act, while the logging of them is likely to breach Code Cl. 2.2.2.2 (Precautionary Principle), Code Cl. 2.2.2.9 and MSPs Cl. 5.3.1.6.

Retaining Diana and Fergie on the TRP will breach the 'proper consideration' requirement of S. 4B(c) of the FFG Act, while the logging of them will breach Code Cl. 2.2.2.2 (the Precautionary Principle).

Forest Block 312 – Torbreck River

The removal of 312-509-0001 is welcomed noting that the original net area estimate suggested only 4 ha was to be logged.

Proposed new coupe 312-504-0004 and amended coupe 312-504-0003

We oppose the inclusion of these coupes in part due to their location on Federation Road (which RFPG has always seen as forming part of a scenic drive from Marysville to Eildon via Cambarville and Snobs Creek) and in part due to the significant population on Mt Bullfight of the threatened Baw Baw berry (*Wittsteinia vaccinea*) that was found in 312-504-0003 last year (Ref FPSP) and potentially also in 312-504-0004. This species spreads only slowly from rhizomes and so is particularly susceptible to disturbance caused by logging machinery and regeneration burning.

If these coupes remain a 50m buffer should be retained along Federation Road and both coupes should be comprehensively surveyed for Baw Baw Berry in order that occurrences can be excluded from the net harvest area. Ideally, however

these two coupes should be removed from the TRP under the 'proper consideration' requirement of S. 4B(c) of the FFG Act and under the long-term biodiversity protection provision (cl. 2.1.1.1.ii) of the Code

Forest Block 313 – Stockmans

The removal of 313-503-0011 is welcomed but we oppose the proposed addition of a new coupe at the junction of the Eildon Warburton Rd and the Warburton-Woods Point Rd (313-503-0008), meaning that a total of 7 contiguous coupes remains in this area, with Barcelona now logged.

The arguments for removing these coupes, are set out in RFPG's two previous TRP submissions.

In RFPG's 2019 TRP submission we argued that for two roads so significant for forest tourism, including access to the Big River Valley and its many camping areas, this would be unacceptable. However our request went unheeded and it took legal action to oblige VicForests to abide by the Code in relation to roadside buffers. In fact, by virtue of being on the Eildon-Warburton Road a 50m buffer was required according to the Planning Standards.

Biodiversity issues are at stake as well with the area being another biodiversity hotspot. Collectively, within the seven coupes surveyed in this block there are 18 lyrebird detections, representing more than a quarter of all lyrebird detections by the FPSP in the Central Highlands. The area is clearly a biodiversity hotspot as the full list of detections on the following page shows.

Southern Greater Glider	79	Pygmy possums	3
Agile Antechinus	58	Brown Treecreeper	2
Bush Rat	36	Eastern Spinebill	2
Mountain Brush-tailed Possum	33	Feathertail Glider	2
Mainland Dusky Antechinus	27	Golden Whistler	2
Antechinus	23	Sooty Owl	2
Superb Lyrebird	18	Tawny Frogmouth	2
White-browed Scrubwren	18	White-footed Dunnart	2
Lewin's Honeyeater	14	Yellow-tailed Black-Cockatoo	2
Eastern Whipbird	10	Yellow-tufted Honeyeater	2
Southern Boobook	10	Australian Owlet-nightjar	1
Sugar Glider	10	Bassian Thrush	1
Eastern Ring-tailed Possum	8	Brown Thornbill	1
Pied Currawong	8	Common Blackbird	1
Eastern Yellow Robin	7	Olive Whistler	1
Grey Shrike-thrush	7	Powerful Owl	1
Leadbeater's Possum	7	Rose Robin	1
Crimson Rosella	6	Sambar Deer	1
Satin Bowerbird	5	Silvereye	1
White-throated Treecreeper	5	Striated Thornbill	1
Eastern Pygmy-possum	4	Superb Fairy-wren	1
Bare-nosed Wombat	3	Swamp Rat	1
Black-tailed Wallaby	3	White-plumed Honeyeater	1
Crescent Honeyeater	3	Wonga Pigeon	1
feather-tailed glider species	3	Yellow-bellied Glider	1

All coupes in compartment 503 in block 313 should be removed from the TRP in line with the landscape and biodiversity provisions of the Code and section 4B(c) of the FFG Act.