



Submission from RFPG on Timber Release Plan (TRP) Proposed Changes, Dec 2019

While the announced end logging in native forests by 2030 is great news for Victoria's forests, RFPG opposes the continued logging of the Rubicon State Forest for a further decade. We consider that most of the proposed TRP changes (and non-changes) that apply to the Rubicon State Forest and the adjacent areas of the Big River State Forest, including the failure to remove certain unharvested coupes, contravene the mandatory long-term planning requirements set by the *2014 Code of Practice for Timber Production*.

While our past submissions have led to few adjustments to VicForests' plans, we suggest that Minister Symes acknowledgement that current timber harvesting is unsustainable requires our criticisms of the latest proposals to be examined with particular care. In this vein, we hope that VicForests will ensure that relevant experts and relevant literature has been properly considered in line with Code Clause 2.2.2.3.

The five mandatory actions contravened are:

- A. 2.1.1.1 Long-term forest management planning must . . . (ii) . . . provide for the perpetuation of native biodiversity¹
- B. 2.1.1.1 Long-term forest management planning must . . . (v) . . . minimise impact on water quality and quantity within any particular catchment
- C. 2.1.1.1 Long-term forest management planning must . . . (vi) . . . minimise adverse visual impact in landscape sensitivity areas²
- D. 2.2.2.2 The precautionary principle must be applied to the conservation of biodiversity values. The application of the precautionary principle³ will be consistent with relevant monitoring and research that has improved the understanding of the effects of forest management on forest ecology and conservation values.
- E. 2.2.2.3 Long-term (strategic) forest management planning must incorporate wildlife corridors, comprising appropriate widths of retained forest, to facilitate animal movement between patches of forest of varying ages and stages of development, and contribute to a linked system of reserves.

General unsustainability

As outlined in our past submissions on previous VicForests' TRP change proposals, in our Code breach report sent to the timber harvesting compliance unit (THCU) in DELWP and copied to VicForests in August (Att 1), and in our earlier submission *Unsustainable!* to the VicForests Board in 2016, we consider that the TRP as it

¹ **'biodiversity'** is defined under the Code to mean the natural diversity of all life: the sum of all our native species of flora and fauna, the genetic variation within them, their habitats, and the ecosystems of which they are an integral part.

² **'landscape sensitivity area'** is defined under the Code to mean areas identified as having a high scenic quality and visual sensitivity. They are usually areas that are readily visible from high-usage recreational facilities such as look-outs, walking tracks, tourist roads, or campsites.

³ **'precautionary principle'** is defined under the Code to mean when contemplating decisions that will affect the environment, careful evaluation of management options be undertaken to wherever practical avoid serious or irreversible damage to the environment; and to properly assess the risk-weighted consequences of various options. When dealing with threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

now stands is wholly unsustainable. The vast area of forest impacted by the NSW and Qld fires, if repeated here as it surely will in the not-too-distant future, would have a calamitous impact on the remaining ash forests in Victoria given that 189,000 ha, or 35%, of Victoria's ash forests were killed or severely damaged by the major fires of the 2000s.

In addition to the inevitable loss in future fires, the fact that only 1% is old-growth - - way below pre-colonisation levels - - requires special consideration. It requires that particular attention be paid to all areas with remnant patches that survived the 1939 fire so that these can be consolidated and evolve, in the absence of fire, into larger old-growth areas with greater ecological integrity. If this approach were adopted coupes such as Magnum PI (288-511-0005) would be left unlogged and removed from the TRP.

In the Rubicon Forest the proposed changes double the net unlogged area on the current TRP from 994 ha to 1,920 ha⁴. The ash forest area to be logged would increase from around 650 ha to around 1,000 ha. We estimate that with the latest proposed changes and maintenance of current cutting rates until 2024, and allowing for the prospect of a further major fire before 2030 as is likely, the ash forest within blocks 285-290 could have an age-class distribution resembling that set out in Chart 6 of Attachment 1 putting it at grave risk of ecological collapse.

While we make particular points on particular coupes, we consider that if we are to have any hope of avoiding this scenario and if the requirements of Code clauses 2.1.1.1.ii and 2.2.2.2 are to be met, logging of ash forest areas within these blocks should cease.

Block 285

Chitty Chitty Bang Bang (285-502-0001)

In line with our Code breach report on this coupe, Case 2019-0053 (Att 2), which was copied to VicForests in August we request that this coupe be removed from the TRP.

Block 286

Blue Range coupes

			Gross	Net
286-503-0003	Ash	Haywire	53.2	15.5
286-503-0004	Ash	-- new --	55.9	20.7
286-503-0006	Mixed Species	-- new --	21.4	5.7
286-504-0007	Ash	Snifter	47.9	3.6
286-504-0008	Ash	Goblet	19.4	11
286-504-0009	Ash	-- new RDC --	17.2	6.7
286-504-0010	Ash	-- new RDC --	15.7	5.6
286-505-0029	Ash	Onyx	45.9	5.4

The southerly extent of the Blue Range was profoundly impacted by the 2009 fire, with most of the ash forest area completely killed, while the surviving forest in the Rubicon Valley and the eastern slopes of the Blue Range are now completely logged out. Apart from the Rubicon Historic Area, the northerly extent of the Blue Range ridge from just north of the Cathedral Range State Park is the only remaining area of largely intact 1939 ash regrowth forest in Block 286. Its biodiversity values include multiple detections of Leadbeaters possum and a sooty owl detection via the Forest Protection Survey Program, possible spot-tailed quoll habitat, patches of montane riparian thicket (EVC 41) and spectacular alpine ash stands with a

⁴ Including a net area of 160 ha proposed to be added adjacent to the Rubicon Forest near the Eildon-Warburton Rd

highly branched habit due to its exposed ridge-top location. It is this extensive branching and open acacia understorey that makes it ideal sooty owl and Leadbeaters possum habitat and also a critical candidate for a sooty owl management area (SOMA). It is imperative that this area remain unlogged.

The discovery by VicForests biodiversity experts of whitewash on a tree trunk in Snifter make it entirely possible that the single sooty owl detected was one of a pair. If so, according to the Central Highlands Forest management plan and depending on whether the target of 100 SOMAs was ever achieved and if so how each area fared after the 2009 fires, should require an area of 300ha to be set aside as habitat.

We understand that no proper evaluation has been conducted of the viability of previously designated SOMAs since 2009, and would expect that the fire means that most or even all of the 31 SOMAs in the Acheron and Marysville GRUs are no longer fit for purpose. Accordingly, RFPG requests that all the existing and proposed coupes on the Blue Range be removed from the TRP pending a complete re-evaluation of the SOMA regime as part of the RFA renewal process and accompanying forest management planning processes.

In addition, we consider that 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 proper establishment of a viable forest tourism and ecotourism industry once logging ends and before the Rubicon State Forest is completely ecologically devastated.

The proposal to log Snifter, as amended, just to access 3.6 ha of ash, requiring the construction of either a 1 km or 1.7 km access road with its concomitant ill-effects, including blackberry spread, is particularly ill-conceived.

We would also point out that Haywire and the two proposed new coupes in compartment 503 are exceptionally steep and along with their other values that should rule them out. The two proposed new coupes along the unmade section of Parks Road are very close both to the Camp Jungai and to the three Rubicon River camping areas and will be highly visible from Cicada Track, an integral and highly used part of the 3 camping grounds. For this reason alone, given that so much of the tourist appeal of the forest has already been lost, they should be left unlogged.

In relation to Camp Jungai we expect that VicForests will make a special effort to consult the Taungurung Lands and Waters Council given that the nearby forest areas, including those in Block 287, are a critical part of Camp Jungai's cultural educational values. With the recent loss of Calvin, Rio, Bonds, Berlei, Ralf, Archibald and Little Jacqui, it is crucial that the remaining unlogged areas remain so. We remind VicForests of the Government's commitment to partnership with Aboriginal people in modernizing the RFAs:

We value the unique ability of Victorian Traditional Owners to care for Country and their deep spiritual connection to it and are particularly aware of the opportunity we have now as we work to develop future forest management, to explore and provide for how we can work together.

Rubicon Valley Historic Area

We have examined the images of the eastern end of the RDC ash coupe 286-512-0023 and note that it appears to be located within the Rubicon Valley Historic and Cultural Features Reserve. The reserve is outside the Allocation Order boundary so including this coupe on the TRP would seem to be impermissible. This road access would also entail the destruction of vigorous alpine ash regeneration in the coupe Cortez. However these considerations would be irrelevant if the coupe Low Flow (286-512-0022), to which this RDC coupe gives access, were removed from the TRP. It and Huckleberry Finn (286-507-0015) should both be removed since their logging would further compromise the already depleted cultural and biodiversity values of the Rubicon Historic Area which will otherwise be surrounded by forest under 30 years of age.

Block 287

Top Cat (287-505-0002)

The proposed reinstatement of Top Cat (287-505-0002) following its removal in April and the resultant expectation that the remaining 17 ha (net) will be logged is completely unacceptable. In 2014 eight VicForests officials met local Rubicon residents concerned about the prospect of logging the Flea Creek catchment at the north end of the Royston Range - - a prelude to the shocking overlogging of the Range that continues to unfold - - and were promised that the ridgeline vista would be protected. As we know this did not occur and a scar has been created that greatly detracts from the tourist appeal of the entire area and is at odds with the 1994 LCC recommendation, accepted by Government, that views of the forested escarpments seen from the Maroondah and Goulburn Valley Highways must be protected.

A track has been bulldozed into the vicinity of Top Cat, resulting in the further uncontrolled spread of thistles and blackberries and we would like to know under what authority this occurred since the area seems not to be part of the current TRP.

The logging of the rest of Top Cat will make the existing sad situation far worse. This coupe must stay off the TRP.

Coupes between Mt Bullfight and Lake Mountain

		Gross	Net
287-516-0005	Tijuana	50.6	8
287-516-0006	Santa Cruz	18.6	3
287-518-0007	Bag of Bones	44.8	12

The Government's initial representation of the Immediate Protection Areas (IPAs) as part of its November forestry announcement indicated that these three coupes would fall within Bullfight IPA. The representation in the Greater Glider Action Statement indicates that these three coupes are outside the IPA, however the Vacation Roadline coupe which accesses to Tijuana and Santa Cruz does fall within the IPA as does the driveway for Bag of Bones and so both should be removed. Given that only 23 ha of these three coupes would be logged, and that accessing them would be extremely difficult, they should be removed from the TRP, as we sought in our 2018 TRP submission.

Compartment 515 coupes

		Gross	Net
287-515-0009	Red Rag	51.6	13
287-515-0011	-- new RDC --	17.6	6.9
287-515-0014	-- new --	15.7	5.9
287-515-0015	-- new RDC --	6.2	3.1

These four coupes were selectively logged in 1962-63 and so are likely to be mainly pulpwood coupes. Also, the extraordinary blackberry infestations along the bullfight west road (proposed RDC coupe 287-515-0015) means that the creation of this coupe is likely to see blackberry infestations greatly increase in Red Rag, since on past experience we consider it unlikely that VicForests will abide by its obligation to prevent existing infestations being exacerbated (Code Clause 2.2.2.14).

A further problem is that logging of these coupes, plus the coupes between Mt Bullfight and Lake Mountain discussed above, will further reduce medium term streamflow in the Royston River, contrary to Code Clause 2.1.1.1.v. This is the subject of a Code breach report (Case 2019-0058) copied to VicForests in August (Att 3) and was also comprehensively addressed in our TRP change submission of January 2018.

Block 288

Coupes close to or adjoining Snobs Creek

			Gross	Net
288-506-0003	Ash	Laundry	18.4	15
288-506-0004	Mixed Species	Hills Hoist	37.6	14
288-506-0005	Mixed Species	Washboard	51.9	37
288-509-0001	Ash	Shackle	41.8	11
288-509-0002	Ash	Turnbuckle	37.3	21
288-509-0004	Ash	Chainlink	50.6	15
288-512-0001	Ash	Snobs 13	33.1	20
288-512-0002	Ash	Snobs 14	25.2	15
288-514-0005	Ash	Superficial	33.4	19
288-514-0006	Ash	Conn Gap RdRDC	12.1	2
288-514-0007	Ash	Aristocrat	21.9	4
288-517-0005	Ash	Fruit Fly	42	8
288-517-0006	Ash	Dragonfly	43.8	18
288-517-0007	Ash	Firefly RDC	20.2	4
288-517-0008	Ash	Shadefly	21.7	13
288-517-0009	Ash	Damselfly RDC	33.3	1
288-519-0001	Ash	Toorak	59.1	12
288-519-0003	Ash	Mayfly	36.7	15
288-519-0004	Ash	Sawblade Saddle RDC	69.5	7
288-519-0005	Ash	Sawblade Saddle	50.3	10
288-519-0006	Ash	Ratso	19.6	3
288-519-0008	Ash	Fishfly	54.7	17
288-520-0009	Ash	Baker Street	22.5	3.7
			836.7	284.7

Compartment 509 coupes plus Snobs 13 & 14

Just as the streamflow impacts in the Royston River (see above) contravene Code Clause 2.1.1.1.v, so will the water quality impacts due to coupes up and down Snobs Creek, as is already likely from the logging of Snobs 14. This is the other subject of Code breach report (Case 2019-0058) copied to VicForests in August (Att 3) and likewise also comprehensively addressed in our TRP change submission of January 2018.

Particularly disturbing is the retention on the TRP of the five steepest coupes, Shackle, Turnbuckle and Chainlink (compartment 509) plus Snobs 13 and Snobs 14 in which logging has commenced. A large area of all these coupes is steeper than 30°, with the remainder mostly above 25°. Given the fragility of the soils – as evidenced by the major erosion in the coupe Rio – these five coupes should be removed from the TRP.

The LCC's 1994 Review of Melbourne Area 2 including a number of recommendations in relation to Snobs Creek and concludes by stating (p.207) that:

... management of the catchment should ensure that the quality of water used by the hatchery and other downstream users is not diminished.

This recommendation was accepted by Government and so remains Government policy. Given this and the risk to the viability of the Snobs Creek hatchery, we urge VicForests to treat Snobs Creek as if it were a special water supply catchment (SWSC) with slope and harvest level restrictions of the kind specified for Otways SWSC (refer Table 11, Appendix 3, MSPs) which would restrict harvesting to slopes less than 25° and limit the area that may be harvested each year.

Coupes along Snobs Creek Rd south of Snobs 14

A further reason for the removal of all the coupes south of where Snobs Creek Rd crosses Snobs Creek, including Snobs 13 and Snobs 14, relates to the alleged breach (Snobs 14) and expected breach of Code Clause 2.1.1.1.vi by virtue of the proposed logging along Snobs Creek Rd. This is the subject of a further Code breach report (Case 2019-0060) provided to VicForests in August (Att 4).

This imminent breach is a particular issue for the coupes Aristocrat, Superficial and Sawblade Saddle whose areas fall almost entirely within the zone that should have been SPZ if Government policy had been properly implemented. To a lesser, but still major extent it applies to many of the coupes further south, specifically Fruitfly, Shadefly, Fishfly, Sawblade Saddle and Toorak. In addition to the water quality issues and biodiversity issues this is a further reason for the removal of these coupes from the TRP.

Based on our experience with Snobs 14, the inclusion of these coupes suggests VicForests treats key tourist roads in the Rubicon State Forest as mere coupe access roads with no scenic values warranting protection. This is unacceptable.

Block 289

Torbreck coupes

		Gross	Net
289-502-0001	Kinabalu	24.3	15
289-502-0002	Gulmarg	27.6	16
289-504-0001	K2	45.4	25
289-505-0003	Everest	35.8	16
289-506-0001	Torbreck Plains	31.4	15
289-506-0002	Gremlin	23.8	11
289-505-0007	-- new --	41.0	9.1
289-505-0008	-- new --	56.9	16.5
289-505-0009	-- new --	47.7	8.8

Mt Torbreck and its surrounds have particular significance for the Taungurung⁵ that both the proposed new TRP and existing TRP clearly fails to recognise. Given the Government's strong emphasis on a partnership with the Aboriginal people in the RFA renewal process and that there is growing awareness of the value to the nation of our indigenous past, present and future, this is a particularly egregious shortcoming.

Also entirely overlooked are the scenic qualities of Mt Torbreck's environs, which should have been protected by a Special Management Zone had the Final Recommendations of the LCC, adopted by the Government, been properly accepted, namely the requirements that natural and scenic features reserves 'set aside land containing prominent peaks, scenic features, lookouts, geological formations or other natural features that warrant special protection. The maintenance of these features, their native vegetation and the character and quality of the landscape are the main aims of management'.

The impact on the area's scenic values caused by the harvesting of K2 and Everest is already the subject of a Code breach report, Case 2019-0052 (Att 5), with the same issues applying to Kinabalu and Gulmarg. Everest should never have been logged and K2, Gulmarg and Kinabalu should all be removed from the TRP.

⁵ See Taungurung Buk Dadbagi (Taungurung Country Plan) at www.gbcma.vic.gov.au

In addition, we consider the logging of Torbreck Plains and Gremlin, which span the walking track to the Avro Anson crash site memorial, would violate the commemoration for which the memorial was established.

The inclusion of three new coupes along Barnewall Plains Rd is opposed for biodiversity reasons generally, but if they were to substitute for K2, Gulmarg and Kinabalu, their inclusion would be more acceptable.

Blocks 289/293

Torbreck Station environs

		Gross	Net	% logged
289-504-0005	-- new --	56.8	25.3	45%
289-504-0010	-- new --	50.9	29.1	57%
289-504-0006	-- new --	18	10.8	60%
293-500-0001	-- new --	39.9	25.5	64%
293-500-0002	-- new --	52.8	30.8	58%
293-500-0003	-- new --	45.9	28.6	62%
293-500-0004	-- new --	45.9	23.3	51%
		310.2	173.4	56%

The proposed amendments are clearly at odds with section 5.3.1 of the Management Standards and procedures (MSPs). The general requirement under Code mandatory action 2.1.1.1.vi to minimise adverse visual impacts on landscape sensitivity areas is in addition to those landscape protection requirements in the Code that may be specified elsewhere, as in section 5.3.1 of the MSPs and clause 6.1.1.1 of the Planning Standards. The omission of the Royston River Road, the Snobs Creek Road, the summit of Mt Torbreck, the Eildon-Jamieson Rd, the Eildon-Warburton Rd and the Warburton-Woods Point Rd from Table 9 in Appendix 5 (the Planning Standards) does not mean that their importance as landscape vantage points can be ignored. For example, the summit of Mt Torbreck, and the walk to it, is featured in the DELWP brochure on the Rubicon State Forest.

They are all significant tourist routes with higher scenic value and tourist potential than many of the roads specified in Table 9, and certainly meet the definition of 'landscape sensitivity areas' specified in the Code.

By virtue of the net areas indicated, it appears that the proposed TRP envisages logging will occur along the edge of these key tourist roads treating them as if they were simply coupe access roads. The retention of these coupes on the TRP should only be permitted if the net areas are revised to ensure that the coupes comply with MSP clause 5.3.1.

Block 313

Stockmans

		Gross	Net	% logged
313-503-0001	-- new --	43	30	69%
313-503-0002	-- new --	41	32	78%
313-503-0003	-- new --	59	21	36%
313-503-0009	-- new --	43	27	62%
313-503-0011	-- new --	50	27	54%
313-503-0012	-- new --	47	31	66%
313-503-0013	-- new --	57	41	71%
		340	208	61%

On the east side of the junction of the Eildon Warburton and Warburton-Woods Point roads, in block 313 (Stockmans) is a group of seven proposed new coupes, which entail clearfelling a total of 208 ha. From the net areas proposed, it would appear that much of the forest bordering these two roads will be lost.

For two roads so significant for forest tourism, including access to the Big River Valley and its many camping areas, this is unacceptable. The retention of these coupes on the TRP should only be permitted if the net areas are revised to ensure that the coupes comply with MSP clause 5.3.1.

Block 312

Eildon-Warburton Rd near Big River Rd junction

		Gross	Net	% logged
312-510-0013	-- new --	44.4	21.1	48%
314-502-0009	-- new --	58.7	28.6	49%
312-507-0001	-- new --	39.5	28.3	72%
		143	78	55%

From the net areas proposed, it would appear that much of the forest bordering these two roads will be lost. For two roads so significant for forest tourism, including access to the Big River Valley and its many camping areas, and given their close proximity to two popular Big River camping areas, this is unacceptable. The retention of these coupes on the TRP should only be permitted if the net areas are revised to ensure that the coupes comply with MSP clause 5.3.1 and that the values of the camping areas are not sacrificed.

Keppel Ridge

		Gross	Net
312-510-0015	-- new --	33.8	4.8
312-510-0016	-- new --	41.3	17.9
312-510-0018	-- new --	25.6	6.3
312-510-0017	-- new --	38.8	13.6
312-510-0019	-- new RDC --	49.7	4.8

These coupes have never previously been logged and aerial imagery suggests they contain many big old trees. To log them they need a new access road which will entail two major creek crossings of Koala Creek. A large area of them is steeper than 30°, with much of the remainder over 25°. Given the fragility of the granitic-type soils, the damage that the creek crossings will entail and their obvious biodiversity values these five coupes should not be added to the TRP.

Hoodini, More Energy and proposed access roads

			Gross	Net
312-512-0001	Ash	Hoodini	53.2	11.9
312-512-0011	Ash	More Energy	55.6	4.5
312-512-0013	MS - RDC	-- new --	14	2.7
312-512-0014	MS - RDC	-- new --	6.5	1.5

Leadbeaters possum are present on Hoodini and More Energy and the proposed new access roads are presumably designed to avoid affecting proposed THEZs, as well as enabling downhill snigging. However the damage to the integrity of the forest by the development of the new access roads, both of which require logging recently logged forest is unacceptable and given the biodiversity values of the two object coupes, their steepness, the relatively small net areas involved and their importance for RPG's proposed tourist drives from Marysville to Eildon and to Rubicon via Cambarville Rd they should be removed from the TRP

Specific coupe removals, or for which substantial net area reductions are sought

In line with all the above arguments, RFPG seeks removal of, non-addition of, or substantial modification to:

- #1 All coupes on the Blue Range
- #2 All coupes adjacent to the RVHA
- #3 All coupes in the Royston headwaters west of the Mt Bullfight Nature Conservation Reserve
- #4 Red Rag and the proposed new coupe adjacent to it
- #5 All coupes in the Snobs Creek valley, particularly those along Snobs Creek Road
- #6 All coupes (existing and proposed) adjacent to Mt Torbreck and in its immediate environs
- #7 All proposed coupes close to Warburton-Woods Point Rd and Eildon-Warburton Rd intersection
- #8 All proposed coupes close to Big River Rd and Eildon-Warburton Rd intersection
- #9 All proposed coupes close to Eildon-Jamieson Rd and Eildon-Warburton Rd intersection
- #10 Hoodini and More Energy (and proposed RDC access coupes)
- #11 All proposed new coupes between Keppel Ridge and Koala Creek

RFPG requests that you meet with us to detail how you plan to address our concerns about the proposed TRP as part of the consultation process and before the TRP is finalised.

For further information contact info@rubiconforest.org

