



Feedback on Timber Release Plan, August 2016 by Rubicon Forest Protection Group (RFPG)

Significantly, Leadbeater's Possums have been recorded by citizen scientists in the Rubicon State Forest during August 2016. These records are currently being verified by DEWLP and will then be included in the Biodiversity Information database. This information needs to be addressed as part of the TRP.

Accordingly, prior to any further logging in the Rubicon State Forest, RFPG requests details of flora and fauna assessments and surveys (dates, duration, methodology, detailed results), assessments of historic and indigenous cultural values and other forest values in accordance with the Code.

In addition:

RFPG supports the removal of **Holeproof (287-508-0010)** and **Golden Goose (286-514-0004)** from the TRP of August 2016.

RFPG strongly opposes the proposed addition to the TRP of additional and amended coupes, in particular:

Bonds (287-508-0002)
Berlei (287-508-0014)
Commando (287-508-0013)
Low Flow (286-512-0022) + new driveway
Bullfight Road East RDC (288-520-0010)
288-509-0001 (Amended coupe)

Critically also, the proposed new coupes on the TRP need to be considered within the context of existing proposed coupes and already logged coupes, together with biodiversity, scenic, cultural, water catchment and recreational values.

Accordingly, RFPG strongly opposes logging in the following coupes already on the TRP but as yet unlogged and the associated road network:

- **Calvin (287-508-0012)**
- **Rio (287-508-0009)**
- **Roger Ramjet (287-508-0008)**
- **Robotsky (287-510-0009)**
- **Bananaman (287-508-0011)**
- **Snifter (286-504-000)**
- **Bison (287-515-0007)**
- **Gnu (288-520-0007)**
- **Leopard (287-515-0006)**
- **Pamplona (287-516-0004)**
- **Panther (288-520-0004)**
- **Tijuana (287-516-0005)**
- **Peter Pan (287-519-0010)**
- **Gadget (287-519-0011)**
- **Vacation Roadline (287-519-0012)**
- **Machine Roadline (287-519-0013)**
- **Machine (287-519-0014)**
- **Gizmo (287-519-0015)**
- **Mogwai (287-519-0016)**
- **Pooh Bear (288-520-0005)**
- **Marmalade (290-523-0001)**
- **Piglet (290-523-0003)**
- **Yogi (290-523-0006)**

Basis of objections to the TRP

1. The timing of harvesting operations

Logging now occurs throughout the year, even in winter during ongoing wet weather that greatly exacerbates environmental impacts with extensive soil erosion evident on the numerous recent road works, creek crossings and steep sections of logging coupes.

2. The use of particular haulage routes

VicForests needs to brief haulage operators to ensure respect for the amenity of local communities, recreational users and native wildlife by minimising speed and dusk, dawn and night time operations on all logging and public roads.

3. The proximity of proposed harvesting to public use areas

It is critical to protect biodiversity/threatened species, water catchment, landscape and cultural values, in addition to tourism routes, camping areas and recreational opportunities, by giving long term protection to proposed coupes in the Rubicon State Forest.

This is especially important for proposed coupes impacting on the escarpment overlooking the Rubicon Valley, the Rubicon Valley Historic Area and the camping areas along the Rubicon River (Kendalls, The boys and Tin Hut), consistent with the objectives of these areas, for example, “*the Rubicon Valley Historic Area has been set aside for the protection of the area’s historic sites and values*”. Coupe visual offsets of a minimum of 20m from the main scenic access roads also need to be strictly adhered to.

4. The identification and protection of forest values within specific harvesting sites.

Protection of biodiversity, water catchment, landscape and cultural values are key requirements in accordance with the *2014 Code of Forest Practice for Timber Production* (the Code) in addition to State and Commonwealth threatened species legislation.

When considered in the context of recently harvested coupes and already proposed logging coupes, the proposed changes are contrary to the **Code** which requires that *long-term forest management planning must, among other things, provide for the perpetuation of native biodiversity, minimise adverse visual impact in landscape sensitivity areas and facilitate effective regeneration of harvested forest*. Such a piecemeal approach as this TRP is, whereby each proposal is expected to be examined in isolation of approved coupes, rather than in the context of what has already happened and is planned to occur, cannot meet this requirements of the **Code**.

Importantly, the proposed changes to the TRP in the Rubicon State Forest increase the net area available for harvesting by a further 175 ha (excluding amended coupes), mostly in the northern part of the forest where RFPG, the local community and tourism/recreational/educational businesses have sought a moratorium. The proposed additional areas to be logged will have significant impacts on the biodiversity, landscape, cultural, water catchment, educational and recreational values of the area.

The group of coupes proposed for addition to the TRP impact significantly on the large special protection zone (SPZ) which occupies most of the area to the west and south of the Mt Bullfight Nature Conservation Reserve. This area is still relatively lightly affected by logging and associated logging roads, and all of these coupes intrude in some way into the Special Protection Zone which protects the myrtle beech rainforest and the threatened *Galaxias fuscus* habitat in the headwaters of the Rubicon and Royston Rivers. This area, located between the Lake Mountain extension of the Yarra Ranges National Park and Mt Bullfight, should also be a very high priority to be included in an expanded conservation reserve system.

Two specific coupes that RFPG has strenuously objected to being logged (**Calvin** and **Snifter**) remain on the TRP. Plaudits that may otherwise have accompanied the removal of two other coupes, one presumably on biodiversity protection grounds, since it is in the midst of a Barred Galaxias catchment, from the current approved TRP, are wholly outweighed by the addition of further coupes that are adjacent or nearby.

For example the most northerly coupe on the western flank of the Royston Range alongside the Royston River, **Holeproof** (which is adjacent to **Calvin**) is to be removed, presumably because of the devastating impacts harvesting would have on scenic values. However, **Holeproof** is to be replaced by a pair of coupes and a new extensive logging road a few kilometres to the south, also alongside the Royston River and adjacent to the Rubicon Valley Historic Area, which itself has just been logged nearby. Essentially, the scenic impacts from the Royston River Road have just been shifted a bit further south.

Therefore, **RFPG supports the removal of Holeproof** (287-508-0010) but RFPG **opposes the addition of Bonds** (287-508-0002), **Berlei** (287-508-0014) and **Commando RDC** (287-508-0013). When these three proposed new coupes are added to the many coupes already on the TRP in this local area, the looming scenic impact will be disastrous. Past experience shows that VicForests does not protect scenic roads with a minimum 20 metre buffer, but in this area no buffer will suffice to overcome the significant tourism and biodiversity impacts given the proximity of these coupes to the Rubicon Valley Historic Area and the Royston River Road which is a scenic tourist road.

Across the Rubicon State Forest and adjacent areas in the Marysville State Forest to the south, this is the last broadly intact area of 1939 mountain ash regrowth unscathed by the 2009 fire. Failure to allow a substantial area of ash forest such as this to reach maturity carries a huge biodiversity risk since many of the iconic arboreal mammal and bird species, including the critically endangered Leadbeater's Possum and the threatened Greater Glider and Powerful Owl, that were once widespread in this area but have been drastically reduced by the 2009 fires and subsequent logging. VicForests is obliged to perpetuate native biodiversity and the addition of these coupes is in stark contrast its obligations under the **Code**.

RFPG therefore seeks the removal of all the remaining unlogged coupes in this local area from the TRP namely **Calvin** (287-508-0012), **Rio** (287-508-0009), **Roger Ramjet** (287-508-0008), **Robotsky** (287-510-0009) and **Bananaman** (287-508-0011). The scenic, biodiversity and water catchment impacts of logging these coupes is totally unacceptable.

RFPG also seeks the removal of **Snifter** (286-504-000) from the TRP. This coupe contains a magnificent area of 1939 alpine ash regrowth with an open undestorey, and a large number of hollow bearing trees, many of which are within the site of the proposed log landing and so will be harvested.

RFPG opposes the addition of **Low Flow** (286-512-0022) and the associated new driveway in an area just south of the Rubicon Power Station. The area surrounding the south end of the historic area, including encroachments such as this into the Historic Area itself, have been heavily logged by VicForests and the value of the Historic Area will be further degraded by the addition of this coupe.

RFPG opposes the addition of **288-509-0001 (Amended coupe)** because of its significant impacts on threatened species habitats (Leadbeater's Possum, Greater Glider and Barred Galaxias), the Conservation Reserve and Special Protection Zone including the associated river environment.

RFPG supports the removal of **Golden Goose** (286-514-0004) from the TRP bounded as it is by prime Barred Galaxias habitat. It should never have been included.

RFPG opposes the inclusion of **Bullfight Road East RDC** (288-520-0010). This coupe would see a moderately graded very scenic and windy 4WD track that leads up to Mt Bullfight and over to join the Royston River Road converted to a wide and ugly gravel road that would compromise the intrinsic values of the Mt Bullfight Nature Conservation Reserve.

Significantly, this proposed coupe would also open up the five remaining unlogged coupes on the northern slopes of Mt Bullfight, encompassing some magnificent areas of 1939 regrowth Alpine Ash that survived the 2009 fire. The forest here has characteristics suggesting good habitat for threatened arboreal animals, such as the Powerful Owl, Leadbeater's Possum and Greater Glider.

In addition, logging these coupes would lead to a vast expanse of highly visible contiguous logged forest in this area which RFPG considers also has considerable untapped future tourist potential. Accordingly, **RFPG seeks the removal** of all the unlogged coupes in this area from the TRP, namely **Bison** (287-515-0007), **Gnu** (288-520-0007), **Leopard** (287-515-0006), **Pamplona** (287-516-0004) and **Panther** (288-520-0004).

Further south, in an area between the Lake Mountain section of the Yarra ranges National Park and the Mt Bullfight reserve, several coupes including two new roads sit amidst an extensive Special Protection Zone (SPZ) designed to protect myrtle beech rainforest. Logging these coupes would significantly impact the particular values of this local area, including the Mt Bullfight reserve and the National Park.

RFPG therefore **seeks the removal** of these coupes from the TRP, namely **Tijuana** (287-516-0005), **Peter Pan** (287-519-0010), **Gadget** (287-519-0011), **Vacation Roadline** (287-519-0012), **Machine Roadline** (287-519-0013), **Machine** (287-519-0014), **Gizmo** (287-519-0015) and **Mogwai** (287-519-0016).

On the eastern slopes of Mt Bullfight there are a further four coupes that RFPG considers must remain unlogged in order to protect the values of the Mt Bullfight reserve. We therefore also **seek the removal** of **Pooh Bear** (288-520-0005), **Marmalade** (290-523-0001), Piglet (290-523-0003) and **Yogi** (290-523-0006) from the current TRP.

At the same time RFPG continues to urge VicForests to put in place a **moratorium on all logging** at the north end of the Rubicon/Royston range, as set out in our submission **Unsustainable!**, pending a full and detailed evaluation of the outstanding biodiversity, landscape, cultural, water catchment, educational and recreational values of the area.

Yours sincerely,



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