



Submission to Timber Release Plan, November 2016 by Rubicon Forest Protection Group Inc.

The five coupes proposed for addition to the TRP in the Alexandra area are all in significant environments:

286-503-0003 – adjoins **Special Protection Zone** and waterways. It also borders the plateau ridge that would allow one boundary of the coupe to be seen from key tourist roads, the Goulburn Valley and Maroondah Highways.

286-510-0010 – partially within the **Historic Reserve** and also has an **extensive creek boundary**, a **recorded Barred Galaxias (threatened species) habitat**.

286-513-0012 – adjoins a creek with recorded **Barred Galaxias (threatened species) habitat**.

289-520-0003 and **290-524-0004** - these two adjoining coupes have extensive common boundaries with a large **Special Protection Zone (*Bills Head Leadbeater's Possum Reserve*)** and are also in the headwaters of several creeks. When all the TRP coupes have been harvested, this SPZ will be virtually entirely surrounded by logged forest and **will result in the 120 ha maximum contiguous logged area being breached, once again**.

Despite numerous requests for information about details of flora and fauna field assessments in the Rubicon area and advice from VicForests that results of any surveys undertaken would be included on the VicForests website, this information has still not been provided or made publicly available on the website as advised.

Importantly also, according to the TRP website:

“Each new area considered to be included on a TRP is subject to desktop and field assessments that aim to highlight potential forest biodiversity, social, historical, cultural, soil and water issues that may require management prior to and during the proposed operation.”

However, no information on any of the required assessments has been provided as part of the TRP process.

To allow for genuine community consultation on the TRP process, it is critical that VicForests:

1. Provides justification for the selection of the proposed coupes on the TRP and the current proposal for additional coupes, including an analysis of total areas of contiguous logging within the current 5 year period.
2. Shows, on the interactive map, proposed coupes in the context of the existing TRP and previously logged coupes over the past 5 years.
3. Provides justification for clear-felling rather than retention harvesting as previously instigated and promoted.

4. Provides details of flora and fauna assessments and surveys (dates, duration, methodology, detailed results), and assessments of historic and indigenous cultural values, scenic and other forest values in accordance with the Code.
5. Provides details of environmental, scenic and cultural heritage protection measures to be implemented, given the major and compounding impacts of the proposed extensive clear-felling process in the significant environments of Rubicon State Forest.

RFPG urgently requests details as per 1. to 5. above, especially flora and fauna assessments and surveys (dates, duration, methodology, detailed results, protection measures), and also, assessments of and protection measures for historic and indigenous cultural values, scenic and other forest values in accordance with the Code.

Accordingly, RFPG objects to the current TRP, in particular **289-520-0003** and **290-524-0004**, and any further coupe approvals and logging in the Rubicon State Forest.

Yours sincerely,



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