



Submission from RFPG on Timber Release Plan (TRP) Proposed Changes, July 2016.

The Timber Release Plan is the official document that VicForests develops and approves before it can open up specific areas (coupes) for logging. Prior to adopting or amending a TRP VicForests is obliged to consult upon its proposals, but the current invitation to consult only relates to minor amendments not to the full Plan (which was adopted last year).

The proposed changes to the TRP in the Rubicon State Forest increase the net area available for harvesting by a further 100 ha, mostly in the northern part of the forest where RFPG had sought a moratorium. So the RFPG considers that the additional areas to be logged amount to “one more nail in the coffin” for the Rubicon State Forest.

The invitation to comment only invites comment on each individual coupe proposed to be added modified or removed, not the overall TRP. This is regrettable but is in line with the Act and means that consulting on the proposed changes can't have much impact.

However an argument could be mounted that the proposed changes are contrary to the *2014 Code of Forest Practice for Timber Production* (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 is, whereby each proposal is expected to be examined in isolation, rather than in the context of what has already happened and is planned to occur, cannot meet this requirement of the Code.

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, often 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 scenic impact harvesting would have. But it is to be replaced by a pair of coupes and a long driveway a few kilometres to the south, also alongside the Royston River and adjacent to the Rubicon Historic Area reserve, which itself has just been logged nearby. So the scenic impact from the Royston River Road has just been shifted a bit further south.

Therefore, **RFPG support the removal** of Holeproof (287-508-0010) but we **oppose 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. Bitter past experience shows that VicForests does not protect scenic roads with a minimum 20metre buffer, but in this area no buffer will suffice to overcome the damage to tourism and

biodiversity given the proximity of these coupes to the Rubicon Historic Area and the Royston River Road which is a tourist road in all but name.

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 that once widespread in this area 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 seek 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 and biodiversity impact of logging these coupes is totally unacceptable.

RFPG also seek 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.

At the same time RFPG continues to urge VicForests to put in place a **moratorium on all logging** at the north end of the range, as set out in our submission *Unsustainable!*, pending a full and detailed evaluation of the outstanding scenic and biodiversity values and future tourist potential of this area.

RFPG oppose the addition of Low Flow (286-512-0022) 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 support 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 oppose 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.

It 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. Given this, and the recent logging close by we would like to be provided with the results of fauna surveys that have been conducted in these coupes.

Logging these coupes would lead to a wide expanse of highly visible contiguous logged forest in this area which RFPG considers also has considerable untapped future tourist potential. Accordingly, **RFPG seek 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 should 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.

For further information contact info@rubiconforest.org