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Chair

West Victoria RFA Independent Panel

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**Submission on  
West Victoria RFA agreement consultation paper (January 2000)**

**PART 1. GENERAL COMMENTS****Quality of information supplied**

The ridiculously short time-frame for the production and evaluation of this report have obviously caused many problems. Not the least of these are the many errors that have arisen in the documents – *e.g.* the EVC tables (Table 3.2b) were incorrect. There are also errors in the maps *e.g.* Johnson Reserve SW of Woolsthorpe is a Flora and Fauna Reserve but not shown as such on the map. We suggest later that there may be some errors in the EVC mapping, too. Were there also errors in calculating the percentage representation in Reserves? The difficulty in fully comprehending the meaning of all the data supplied (errors included), and then responding to it, are further problems that all have had to grapple with.

The inability of NRE Forests Service to produce accurate (or any) information on resources for the DRAFT is another major problem. To put the matter bluntly, the material provided is biased and misleading. There are serious omissions with respect to woodchips and private forestry on farm land (see later), and probably inaccurate estimates of sustainable yield of timber from the forests. What a pity the appraisal and analysis of DRAFT “4. FOREST INDUSTRIES” was not independent.

Further, there are deficiencies in “threatened fauna” listings in the DRAFT, APPENDIX 3. These include no mention of Powerful Owl in the Dergholm area, Masked Owl in Casterton area or Swamp Antechinus in Cobobboonee area. Heath Mouse and probably Swamp Antechinus also occur in the Dergholm area.

**Public participation**

More serious, though, has been the fact that the RFA DRAFT has apparently been produced with little or no notice being paid to any of the feedback from the public meetings. This RFA process has obviously been driven by the wants of the woodchip industry. This is made clear on p. 85 of the Draft (“*The current Commonwealth export arrangements provide that, after 31 December 1999, exports of hardwood woodchips from native forests will only be permitted from areas covered by an RFA agreement*”). We conclude that the RFA process is locking in export woodchipping of native forests.

NRE Forest Services has been able to promote its interests to the exclusion of others – they have obviously been partners with the Commonwealth in writing the DRAFT – and therefore very little of the public’s interests has found its way onto the DRAFT map. Now we have the ridiculous situation where, for example, a Minister will not halt logging in the disputed Riley Ridge area of Otways because it “*was not indicated in the DRAFT*”! Pardon us for believing that the RFA plan was yet to be produced! It is this sort of behaviour that has undermined the process. Our suspicions over NRE actions in Portland FMA also appear to have been confirmed – that NRE Forest Service wants to destroy any area of contested biodiversity resource so that no serious case can be made for its inclusion as a Reserve in the final plan.

**The JANIS criteria and the process of defining conservation and timber “reserves”**

The maps & tables appear to have been drawn up NOT on the basis of EVCs but on a more expedient basis, in contradiction to principles of JANIS Reserve Criteria for establishing the CAR (“*Comprehensive, adequate and representative*”) Reserve System. Thus, apparently:

- \* Those with timber interests have been consulted and “their” preferred areas have first been preserved, after removal of a few minor strips or marginal blocks
- \* Areas remaining have then been analysed to see what the EVC distribution looks like.

How else can one account, for example, for the shabby treatment suggested for the *Cobobboonee area*, where there is no adequate reserve for several species that are endangered or at the limits of distribution? We believe that there has been a sad lack of attention to these factors when considering Cobobboonee .

Incredibly, this apparently cynical abuse of process is excelled in the treatment of **Plains Grassy Woodland areas** (Yellow Box-Yellow Gum -Red Gum grassy woodlands of the Black Range-Grampians-Rocklands). We remind the panel that only 3% of the pre-settlement distribution exists and only 1.03% is in existing and suggested reserves, whereas 15% is required [see **PART 2.2** of report, plus **Appendix 1**].

Other aspects are raised for **Dergholm area** (see **PART 2.3 & Appendix 2**) and other areas at **Glendinning** (Rocklands) and **Weecurra** (west of Digby).

Aspects of the *JANIS reserve recommendations* (p. 97 of DRAFT) have been ignored in some cases:

- Boundaries should be set in a landscape context with strong ecological integrity
- The reserves should not consist of fragmented strips - the boundary-area ratio should be minimised.
- Large areas are preferable to small areas.
- Reserve design should aim to minimise impact of threatening processes.

Thus, we reject the claim made in the Executive Summary, that the Draft has properly addressed the JANIS criteria in defining a CAR reserve system. It clearly has not done so, as we will detail later.

JANIS criteria should be fully implemented with regard to the EVC's identified as endangered, vulnerable or rare. The conservation value of such EVC's should be the primary consideration in deciding their future status and management. Any body wishing to impose a competing land use should be obliged to demonstrate to an independent tribunal why the conservation value should not prevail. Plainly, that process has not happened here.

### **Sawlog pricing, future demand and allocation**

#### \* **Sawlog pricing and returns**

NRE currently supplies logs from native forests to the timber industry at subsidised prices. This is clear from the KPMG (1999) report, and from the Auditor General's (1993) report. Indeed, NRE admitted (p. 10 in the response to KPMG report) "*Log prices have not matched the costs of production*". The effect of this will be to discourage investment in forestry for sawlogs on cleared agricultural land. What the industry (and NRE Forest Service) is expecting is a continued subsidy to log native forests, regardless of conservation significance. NRE failed to mention this in the Draft (Section 4). They also failed to acknowledge that, as a consequence of the 22% of sawn timber being kiln-dried for higher value products and therefore making 40% of the gross value of sawn timber sales, increased value-adding by the industry in the future will actually reduce the need for timber volume from the native forest. NRE's argument that value-adding and increased processing of "*residual logs*" requires an increased allocation of timber from public lands is spurious. Any requirement for increased volume in the future could – and should – come from plantations on cleared farmland. For that to happen there is a need for Victoria to review its royalty structure, to allow such development to be profitable.

#### \* **Woodchip production**

NRE admits that sawlog quality from the forests (particularly SW Vic) is very poor, but it does not emphasise the fact that woodchip extraction is driving the present industry in the forests. NRE does not provide the information that there will be over 60, 000 ha of blue gum plantations in the SW by late 2000. About 20,000 ha were planted in 1999 and 10,000 ha in 1998, when the industry began here. Clearly, the future market for woodchips from the forest is not rosy.

NRE Forest Service does not reveal that a major reason for wanting woodchip from the native forests to continue is to fill the 5-year gap before blue gum woodchip hits the export market! Are they happy to lock all of our forests up for the next 20 years and beyond just to achieve that short-term objective? We find this an appalling situation. How can it be justified when biodiversity and other factors have also to be considered? NRE appears to be wanting the native forests to compete with forestry on cleared agricultural land, where the risks are borne by private industry!

#### \* **Allocations for the Portland/Horsham FMA**

The current 15-year licence arrangements were introduced in 1987. Some will run out soon, even with the present policy of rolling these over every 5 years. That provides the opportunity to rationalise the industry, something that NRE has never sought to do. It is feasible to reduce the allocation in order to produce a sensible biodiversity outcome. The impression created in the Draft is that allocations are sacrosanct. This is not so. Apart from the fact that NRE has badly overestimated sustainable yields in

some areas (and has no reliable figures for the Portland or Wimmera areas), there are funds available for restructuring to allow a great many licences to be bought out. This is an obvious need in the Horsham FMA, where no reduction in the present log allocations were suggested, despite the serious shortage of permanent reservation of Plains Grassy Woodlands.

## Employment

If we are to believe the figures quoted in the consultative papers then the maximum number of jobs likely to be lost in timber mills throughout the West Region is 67 from a workforce of 315. This represents the worst-case scenario. That is, if all the DRAFT Reserves are adopted and there is no value-adding. The latter is unlikely. Further, it is clear that 48 of these estimated job losses are due to NRE's revised estimates of timber resource availability and have nothing to do with biodiversity considerations. NRE has simply been incompetent in the past and wishes to put the blame elsewhere.

How are these figures supposed to indicate a huge socio-economic impact for the region? Do these presumptive figures compare with the actual closing in recent years of the abattoir at Portland, or the Regional Veterinary Laboratory at Hamilton? No, they do not; combined, hundreds of jobs were lost there. And not a murmur from Shires, politicians and companies now so vehemently pushing the presumptive case of the logging industry. Valid alternatives, controlled tourism and employment in the burgeoning blue gum industry, is not even acknowledged by these people.

Obviously there will be some flow on multiplier effect with a decline in logging but the present remarkable growth of the plantation industry in SW Victoria, and the growth of tourism, will absorb that impact. We feel compassion for any person who losses employment through no fault of their own – some of us have suffered in that regard – but the existence of the *Timber Industry Re-adjustment plan* should provide some compensation to those affected while alternative long-term solutions are worked out.

## Security of management for biodiversity

Professor Ferguson indicates that elements are in place for ecologically sustainable management of forests. Some elements may be “in place” but not active in some forest areas we are familiar with. Ferguson concedes there is room for a lot of improvement. Clear-felling systems which strive for maximum yield from even-aged single-species stands are incompatible with biodiversity. It is possible to make a case for single-tree selection harvesting, provided that the practice of culling habitat trees is dispensed with. NRE has been unwilling to consider the option that previously operated in this area, and which did not result in such disastrous consequences to the wildlife. The shambles in ecological management of the Cobobboonee, or of the woodlands around the Black Range, indicates that the NRE Forest Service has no interest in biodiversity. We submit that any suggestion that NRE will put biodiversity considerations above forestry aims is laughable. Is there one instance concerning the *Fauna and Flora Guarantee Act* that has been acted on in good faith in respect to Cobobboonee?

Sorry, but we have been given no evidence of NRE Forest Service's commitment to biodiversity in forests, or it's willingness to suspend operations that clearly breach the Act. In short, the litany of acts of bastardry by managers of the Portland FMA are ample testament to future intentions. On the evidence available over the last 3 years (see **Appendix 3**) every effort has been made to reduce the ecological value of the Cobobboonee area before the RFA assessment process began, and during the course of the study. Either through incompetence, or by design, NRE has had no Portland FMA management plan in place, so no management guidelines could be broken!

According to the DRAFT, no FMA management plan will be forthcoming for the Portland FMA until after the RFA process is secured. How gullible does NRE Forest Service think the public are? Our information is that NRE intends to continue by stealth the present destructive process, to turn the forest into a single-species plantation of Messmate – and finally rid the forest of the Powerful Owl, Masked Owl, Barking Owl, Yellow-bellied Glider and other species there. Any plan drawn up after the RFA agreement is signed will certainly entrench present NRE Forest Service prescriptions and generate massive discontent.

The Forest Management Plan must be AGREED by all parties BEFORE the signing of the RFA Agreement. We will not agree to having clear-felling practices entrenched in this forest by this desperate delaying tactic. At the very least we expect to see a return to single-tree selection for harvesting, no woodchipping, no culling of habitat or feed trees, and a return to the type of sustainable logging methods used by the small mill operators in the area.

NRE Forest Service has not given us any confidence that they can manage any critical area for multiple use. If it is important for biodiversity then it must be reserved now. The so-called “*Special Management Zones*” will not be effective. They are a transparent ruse by NRE Forest Service to continue present logging unhindered. On its record, NRE Forest Service simply cannot be trusted to adhere to the letter or spirit of an agreement. Perceived timber interests always take precedence (see **APPENDIX 3**).

We expect a much greater area of Cobobboonee reserved for biodiversity. Failure to do that will negate the whole basis of the RFA process (to create a *Comprehensive, Adequate and Representative Reserve* system), and indicate that Victoria is in contempt of the principles behind the RFA process.

## **PART 2. SPECIFIC AREAS**

### **2.1 Black Range-Grampians – Plains Grassy Woodland (EVC 55)**

As outlined in the General Comments, the treatment given to this area in the DRAFT is disgraceful. As may be seen by reading **Appendix 1**, the significance of this EVC, and its shameful neglect, has long been known (or ought to have been known) by NRE. This is classified as a “vulnerable and rare” EVC, whose severe depletion requires that 100% of its present distribution should be reserved.

Representation in Reserves – only 1.03% of the pre-1750 extent will have been included in Reserves if the DRAFT is adopted. This is clearly in breach of the JANIS principles. It is “possible and practical” to increase the amount to at least double that presently suggested. Even that will only bring the total in reserves to 2% of the historical presence. The RFA process has failed to adequately deal with this ECV.

All areas of *Yellow Box-Yellow Gum-Grey Box* whether currently being grazed or not must be included in the Reserve system. There is no need for any “*review of grazing activities*” – these are well known and positively deleterious (see **APPENDIX 1**). Action is urgently required to link the Grampians and Black Range Parks through two strips running east-west below Cherrypool, to give permanent reservation to a unique and severely under-represented vegetation alliance. These areas are shown on the attached MAP.

These areas should have been included years ago, were it not for the intransigence or ignorance of the then Forests Commission. It will be a travesty of biodiversity justice – a monument to ignorance or prejudice – if things do not change. It should be noted that these areas are basically not sought by the timber industry and the failure to include them in a Reserve would be a demonstration of incompetence.

Argument has been made (DRAFT, p.14) of the need to preserve the local red gum industry. No reductions in timber availability for posts, poles and firewood were suggested in the DRAFT. Clearly, as outlined in our General Comments, it is possible and feasible to make reductions. Some firewood and poles could be produced for sale on farms, given a shortage of cheap material from Crown Lands.

The DRAFT has suggested that the objectives of conservation can be pursued in the presence of logging, firewood gathering activities and grazing. One weakness of that argument is that preservation of hollow trees, prescriptions for maintaining a suite of grassland species, and supervision of logging activities is dependent on management by NRE. This is not available; there are too few staff now to exert any substantial moderating influence.

The RFA has obviously pandered to the interests of the local industry to the exclusion of biodiversity considerations. However, we concede that selective logging and firewood gathering in at least half of the **Woolpooer Red Gum forest** should be allowed to continue. We believe that a compromise is to reserve the block which runs from the fork of the Henty Highway and the Old Horsham Rd, west to meet the block containing the Reference Area (see MAP) and north to the reservoir. This will allow connectivity of Reserves and conserve a reasonable area of almost pure River Red gum woodland. The area near Woolpooer itself is virtually a plantation, having been allowed to regenerate from the 1920s. It has been ruthlessly grazed until recent times. We believe that the current relief from grazing by sheep mentioned in the RFA DOCUMENTS is only short-term, to allow some Red Gum regeneration.

If timber getting is permitted to continue in the Woolpooer block – and only there – we would expect that all of the Yellow Box-Yellow Gum-Grey Box-Red Gum alliance identified above will be included in the Reserve system.

The DRAFT suggests that phasing out firewood collection from the forest areas will be difficult, however once the community knows that firewood can be obtained from the one area there will be little problem.

## **2.2 Cobbobboonee Forest – Heathy Woodland (EVC 48)/Wet Heathland (EVC 8) & Lowland Forest (EVC 16)/Lowland Forest-Heathy Dry Forest (EVC 20)**

We have discussed this in “General Comments”. In summary, we believe that the DRAFT plan is totally inadequate and that a serious attempt must be made to include a substantial (if not total) part of the Cobbobboonee forest in the Reserve. The biodiversity implications of the DRAFT plan are such that there is no secure future for the threatened listed species. This area is also important for the conservation of an example of old growth forest dominated by *E. obliqua*, which has no reserve status in this area.

The *Cobbobboonee Block* is a critical area. All of the area inside the present DRAFT “fringe” must be incorporated into the Reserve, effectively the lower half of the whole block (see our MAP).

1. This area contains several Powerful Owls, together with Masked Owl, Yellow-bellied Gliders and probably the Spot-tailed Quoll. It is unthinkable that any serious plan would disregard this factor, especially in the light of the current mismanagement of the area by NRE.
2. The area has a significant amount of Old Growth forest and *E.obliqua* not found in Reserves here.

## **2.3 Other areas of Portland FMA that should be included in the RESERVE.**

- *Block east of North-South Rd, Nth of Annya Rd to Top Rd, plus the margin Nth of Top Rd extending east to Savins Rd area. That, plus the Sandy creek area*, would complete the entire block in the eastern half of Annya. There are four major reasons for this reservation:
  1. Yellow-bellied Gliders and Powerful Owls are located in the forest east of North-South Rd
  2. This is one area that NRE has yet to vandalise.
  3. The area Nth of Top Rd is mainly *Damp Sands Herb-rich Woodland* (EVC 3) and this is under-represented (10% only of previous area has been suggested for Reserves)
  4. The unit is then large enough to be viable according to JANIS criteria, and to offer continuity for other species.
- *Jens Rd Block* – this block must be included for the following reasons:
  1. It has the under-represented *Herb-rich Foothill Forest* (EVC 23), for which only 8% are currently suggested to be in recognised Reserves.
  2. It is the known residence of Powerful Owls
- *Dunmore Rd Block* – this entire block should be reserved for following reasons:
  1. It contains the under-represented *Herb-rich Foothill Forest* (EVC 23),
  2. It extends the boundary of Mt Eccles NP, including a more diverse flora.
- *Woolwash Rd Block at Mt Clay* – this block must be included in the Reserve. It has plainly been excluded because it grows some good timber. Allowing that narrow intrusion into the suggested Reserve is not compatible with JANIS principles.

**The Portland Field Naturalists Club has made detailed representations on this Portland FMA and we support the general arguments of the group’s submission.**

## **2.4 Dergholm-Brimboal Area – Heathy Woodland (EVC 48); Heathy Herb-rich Woodland (EVC 179); Damp Heathland (EVC 710)/Damp Heathy Woodland (EVC 793); Damp Sands Herb-rich Woodland (EVC 3); Sedge Wetland (EVC 136); Riparian Scrub (EVC 191); Seasonally Inundated Shrubby Woodland (EVC 195)/Plains Sedgy Woodland (EVC 283).**

A significant block to the West of Nolans Creek, which is SW of Brimboal State Forest (Block 3002 on the DRAFT map) must be included in the CAR Reserve System

- This block is the home range of **Powerful Owls**. They have been seen and heard twice by our group, once 18 months ago and last in January of this year, in the Nolans Creek area named above. Those records have been made in the DNRE Atlas in January 2000. This species has also been recorded in the State Park several kilometres further north, as indicated in the “DNRE Working Map Draft for the West

Region, Comprehensive Regional Assessment Volume 1 - Land tenure with threatened fauna records” (1999). This is a pressing need for reservation against activities.

- The block contains some very large old River Red Gums, Manna Gums, Yellow Gums, Swamp Gums and Stringybark trees. These are in short supply in other areas of the Park. It is difficult to understand how the block could have been overlooked as it is also important for nesting **Red-tailed Black Cockatoos**. These live in the area, and have been observed seeking nest sites and feeding in the Stringbarks. For further information see **APPENDIX 2**.
- This block has a substantial component of EVC 3 (**Damp Sands Herb-rich Woodland**), of which only 8% of pre-settlement extent is contained within Reserves, but the DRAFT suggests that only 2% be included in Reserves. Why was this component of forest excluded from the Reserve? More is required to approach the CAR Reserve criteria.
- This block contains a stand of *E. leucoxyton*, which does not appear to occur elsewhere in the *Youpayang* area of the State Park, or the areas suggested for inclusion in the Reserve.
- This block is mainly EVC 179 (Heathy Herb-rich Woodland) which has one of the smallest representations in Dergholm Youpayang Block, and the DRAFT has suggested only a small reservation of this EVC in this part of the region. Overall, this EVC has only 12% of pre-settlement extent in current Reserves across the whole Western region, with a further 11% suggested for inclusion in the DRAFT.

Another block is also required, to link the Dergholm State Park and the eastern strip nominated in the DRAFT plan. This would connect with the Casterton-Chetwynd Rd (**see our MAP**). This extra area consolidates the southern area, leaving the northern part for forestry. The addition is required to ensure long-term protection of the *Red-tailed Black Cockatoo* and *Powerful Owl* habitat. Woodcutting and uncontrolled fire has removed most of the large old trees from the forest and provision must be made now for the restitution of the biodiversity potential.

**2.5 Mooralla West Area** – we agree with the suggestions in the DRAFT for this southern extension of the Black Range – but not for the apparent reason suggested by the RFA map. We are puzzled by the EVC mapping classification used. It appears to be classed largely as EVC 792 (Stony rise Woodland/Stony Knoll Shrubland). This area is not basaltic, although it does contain areas of rhyolite, and is most infertile. This looks very odd. Since the same type of rhyolite outcrops are present NE and NW, yet have not been marked as such, we can only conclude that an error has been made on the map. The area contains parts of *Plains Grassy Woodlands flora*, including some lovely stands of Yellow Gum and Yellow Box woodland. It also contains an area of Brown Stringbark (which is identified on the DRAFT map) which has not been burned for over 40 years.

Altogether, this area has a most varied and interesting mosaic of vegetation. In the interests of accuracy, we believe the EVC mapping description should be re-assessed.

**2.6 Glendinning Area** – we do not agree entirely with the suggestions in the DRAFT. We are not able to follow the reason for not including the Rocklands frontage area with the Claude Austen area (to the west) as a new Reserve. This country includes a varied range of habitat, including a large area of Yellow Box-River Red gum woodland. These areas are not shown on the DRAFT MAP. Neither are they shown as being present in the SW part of the Claude Austen Reserve. We suggest that the accuracy of mapping of this area should be reviewed before the final RFA plan is produced. We believe that an additional area to the east, fronting the Reservoir, should be included in the RESERVE (**see our MAP**).

**2.7 Weecurra Area** – we believe that a greater area should have been included here for long-term security of Red-tailed Black Cockatoos. A serious attempt must be made to increase their resource base. There is ample opportunity to do this at Weecurra, leaving a larger tract of Stringbark country that can provide seed for food and, ultimately, produce hollows for nesting. We have marked areas that we believe should be added to the Reserve (**see our MAP**)

## **2.8 Other areas –**

- *Deep Lead* – we applaud reservation of the Deep Lead Ironbark-Yellow Box-Yellow Gum woodland.
- *Lake Fyans* – this is another deserved area for reservation.

There are many small woodland areas and larger patches of bush that we are not familiar with. We particularly rely on other groups to comment on the NW and extreme western areas.

## APPENDIX 1. HFNC submission to Parks Victoria on Black Range State Park Draft Management Plan (April 1998)

[Following are excerpts from this document that relate to RFA outcomes]

Hamilton Field Naturalists are well acquainted with this area - for instance our members found the aboriginal art sites in the 1960's and we made detailed submissions on this area in 1976 to the then Forests Commission Victoria (Draft Management Policies) and in 1981 to the LCC. We have visited the area frequently, as it is an exceptional place for the winter display of many heath species, acacias including Varnish Wattle (*A. verniciflua*), and in other parts of the Park, for experiencing the unique *open Box-Gum woodland environment*.

It is with some concern that we note, in reading the present Draft Management Plan and relating that to our submissions in 1981, how little progress has been made in those 20-odd years towards better nature conservation management practice and in improving the representation of vegetation units in the Park. We will allude to specific points in our submission.

We believe that the Plan should indicate a plan for the incorporation of the entire Black Range State Park area - and much of the surrounding State Forest - into the Grampians National Park. There are many reasons for this, as discussed below.

### **Plains grassy woodlands.**

The Black Range SP - supplemented by the adjacent "State Forest" area - contains the most extensive area of Yellow Box woodland/grassland in the State. The Grampians also contains some Yellow Box grassland but the major areas are River Red Gum. This is poorly represented in other National Parks or conservation reserves. This fact is not acknowledged in the Draft Plan and is a serious omission. Our club stressed this in 1981 and others (*e.g.* Lunt 1995) have noted the importance of these grassy woodland areas, but management still appears ignorant of the fact. Lunt makes the point that these areas are managed as "grazing ecosystems" with no burning. Most of these areas have been converted to agriculture. The fragments that remain have undergone "ecological segregation", with some species depleted or eliminated. Lunt states that "all remnant grassy forests and woodlands have been grazed by stock, so that at best the policy can only maintain the impoverished remnants of 150 years of stock grazing". This is, of course, true of the Black Range woodland which has been unmercifully flogged by sheep up to the present day. The Plan should make a major feature of the Yellow Box (*E. melliodora*) and River Red Gum woodlands. This can hardly be done whilst some of these areas continue to be treated as sheep grazing runs. The Draft Plan needs to address this vital issue - nowhere has the Draft indicated an awareness of the conservation significance of this issue.

Over 99% of the indigenous vegetation in the grassy forest and woodlands in SE Australia has been destroyed, primarily as a result of management practices that are detrimental to the species. Lunt contends that a program of regular burning and grazing by kangaroos (not stock) on parts of the grassy woodlands should be the long-term aim to restore the species diversity of these important relics. Archer (1997) reminds us that the way this is done is important to the result: the traditional aboriginal fire-stick methods created a mosaic of different aged vegetation which had great diversity.

The *existing boundaries* specifically exclude the Box-Gum woodlands from most of the Park, thereby diminishing their status! A glance at the Plan map, in association with a vegetation map, shows that the significant area south of the road from Cherry Pool to HGH Corner is not in the Park. Nor are the very substantial areas north of Rees Road and the Black Range Road. This is a major conservation concern that should be addressed in any future plan for this area. Fire control was once given as a reason for excluding these areas. That has never been a reasonable excuse because there are a multitude of kangaroos and wallabies in the area and sheep grazing is not required for vegetation control in such an infertile area.

The State Forest areas north of Rees Road and the Black Range Road should now be incorporated into the Park. It may have been politically expedient to exclude them in 1981 but those times are gone (see HFNC 1981). Action is required to plan the conservation of species that are important to the State. There are also important areas of Desert Banksia in part of this zone that require protection from fire - as noted in the Draft Plan for the Park.

It is interesting to re-visit the HFNC submission to the LCC (1981), to see that no action has been taken to redress obvious deficiencies in the vegetation units represented in the Park ..."omission of the Yellow

gum/Yellow Box woodland from the proposed park seriously diminishes the variety of habitats and plant communities available for conservation of fauna, and also seriously diminishes the proposed park's scenic values. There is more to a National Park than rocks and scrub".

The area between the present Grampians NP and the Black Range SP should also be combined together to link the area into a single management zone - a corridor to preserve future biodiversity. This action was also proposed and justified by HFNC in 1981. It is time that some active and sensible planning was done to rectify the mistakes that were made in 1981 when this corridor was simply listed as State Forest and treated as a grazing run. This area contains a stand of Grey Box (*E. microcarpa*), a few Buloke (*Allocasuarina luehmanni*) and many Yellow Gum (*E. leucoxylon*). *The first 2 species* are notable for their rarity in the area and Yellow Gum is also poorly represented in the Park. The area south of Cherrypool (Djarabul) is particularly important.

The Black Range State Park is presently under the same management as the Grampians NP, and has the same fire plan, so there do not appear to be any obstacles from a management point of view.

### **References**

- Archer, W.R. (1997) "A variation on the view expressed in a manuscript published in the Victorian naturalist relating to fire and indigenous land management". *The Victorian Naturalist* **114**, 192-195.
- Lunt, I.D. (1995) "European management of remnant grassy forests and woodlands in south eastern Australia". *The Victorian Naturalist* **112**, 239-249.
- HFNC (1981) Second submission to the Land Conservation Council on the Grampians Area: October 1981 (Hamilton Field Naturalists Club).



## APPENDIX 2. HFNC submission to Parks Victoria on Dergholm State Park Draft Management Plan (April 1998)

[Following are excerpts from this document that relate to RFA outcomes]

- (1) **Natural values** - Dergholm State Park (p.4) - yellow gum (*E. leucoxylon*) and pink gum (*E. fasciculosa*) woodlands should have been mentioned as major features. These are not well represented in any other Park, yet are one of the major features of the *Bogalara Block* (*a small patch of yellow gum also occurs in State Forest on the SE edge of the Youpayang Block, near the south end of Farley's track*).
  
- (6) **Conservation of red-tailed black cockatoo**  
 Our observations in the area since 1996 indicate that the Youpayang Block and adjacent State Forest is used extensively by these birds. For example, on 6 April 98 approximately 140 birds were seen in the Brimboal State Forest. Part of that flock stayed in the general vicinity for at least a week, being seen or heard daily from 11-13 April while venturing west near the State Park and then returning in the evening. We first noted the birds in that area in 16 Nov 96, 1 Jan 97, 2 Feb 97, 16 Feb 97, 12 Jul 97, 13 Sep 97, 7 Oct 97 and 30 Nov 97.
  - (a) Adequacy of the Youpayang Block for conservation - the birds may prefer larger trees, which appear to be in the *Brimboal State Forest* section. [**Update note** - there are many very large old river red gums in the State Forest east of Farley's Rd (*i.e.* west of Nolans Creek and Brimboal State Forest block) which have no protection - timber cutters were active in the area in 1999, cutting down dead trees for firewood. Note also that this is in the centre of range of a pair of *Powerful Owls*, an endangered species in Victoria].
  - (b) Harvesting of stringbark - years of harvesting appears to have left few large trees and very few with hollows for nesting. We have seen a stringybark in the Wilkin area that is used as a nest tree - they do not only depend on river red gums or yellow gums. Yellow gums are now being cleared from the Edenhope-Dergholm-Casterton-Dartmoor area to plant blue gum and pine. Some of this clearing on farmland appears to have been without permit. However, there is little to prevent such clearing - and nothing to prevent clearing of dead trees. A shortage of nest sites will be critical for future survival of the birds.
  - (c) Timber cutting activities - this may also disrupt the birds' feeding/breeding activity. The boundaries of this block should be reviewed to include areas which would improve the long-term survival prospects of the birds. The Park should, in any case, include the **river red gum woodland near the Chetwynd-Casterton road and to the SE of the Farley's Rd**. We fear that on-going timber harvesting, including mature river red gums, will compromise the future of the red-tailed black cockatoo.
  
- (7) **Park boundaries**  
 The Plan should indicate a review of the present Park boundaries, to see if they are satisfactory for long-term conservation needs. The case of the *red-tailed black cockatoo* was given above. Present boundaries of Youpayang block are very arbitrary and should be widened to include part or all of the State Forest which is contiguous. The Youpayang Block needs a public frontage.
  
- (8) **State Forest management**  
 Activities on the State Forest should, in any case, be examined to see whether actions there (fire plan and harvesting) are detrimental to conservation of rare species. The management of State Forest areas should ensure the retention of large old trees for the red-tailed black cockatoos.

### APPENDIX 3. Some recent actions by NRE Forest Service with respect to management of threatened fauna habitat in Cobobboonee

- **1997/98** – The block near the corner of *T&W Rd and Mt Deception Rd* was burned in 1991 and one block bulldozed and re-seeded with Messmate. Around 1997 the adjacent block was treated to leave trees left in a buffer strip but only about one per hectare in the forest block. At *Holmes Rd forest*, hollow-bearing trees were ring-culled and a few trees were left that were supposedly going to form hollows at some distant date. Around this period (6 January 1998), the Portland Manager NRE received information regarding nest hollows “all feed trees should be retained in a coupe, additional to habitat trees containing nesting hollows”. The information also stated that roads that should have a 20 m wide SPZ included Jacky Swamp Rd, Boiler Swamp Rd, Cobbobboonee Rd, Fish Holes Rd, Coffee’s Lane, Mt Deception Rd, Sunday Creek Rd.
- **1997**- NRE furtively introduced clearfelling, with large coupes in critical habitat areas. This area had never before been subjected to that process. It was a new management practice, coupled with intensified ring-culling. Claims were made later (Portland Observer 31 May 1999) that it was only to improve the sawlog capacity of the forest, or that it was actually improving biodiversity by creating better trees! (NRE Officer at RFA Public Meeting at Heywood in 1999). However, this was clearly intended to pre-empt consideration of these critical areas for inclusion in a conservation Reserve when the RFA process visited Victoria.
- **Winter 1998** – Woodchipping began, despite protests from the public, and despite the absence of a management plan. Trees that were removed “were primarily less than 30 cm in diameter”. A contractor from Colac did the work for Midway Wood Products for export out of Geelong and obtained the timber for an undisclosed (presumably paltry) sum. This area had never before been subjected to that process.

This process was also seen as an effort to pre-empt consideration of these critical areas for inclusion in a conservation Reserve when the RFA examined the area in March 1999. Morrow claimed (Portland Observer, 21 August 1998) that they “retained habitat trees”. According to Morrow, they aimed to thin 250 ha of Annys, Gorae and Cobbobboonee by a woodchip operation, to maximise future sawlog objectives. Manager of SW Forestry Peter Keppel stated (Portland Observer 24 February 1999) that the average coupe size was 70 ha and that 500 ha was logged each year. He further stated that woodchipping had “moved away from the Portland area and would not return for two or three years”. We believe that such a large coupe size is completely unacceptable for wildlife conservation. Indeed, that any clear-felling practice is detrimental to wildlife because it diminishes the diversity of other species in the forest and removes hollows for predators and prey.

Koori and conservation groups took their protest over logging to the Portland streets (Portland Observer 22 February 1999), asking for a cessation of logging until the RFA process was completed.

- **18 March 1999** – 20 m buffer zone burned along Coffee’s lane. This was a very hot burn, Habitat trees were burnt to charcoal shells. This was a Powerful Owl area. In January 1999 an adult was sighted and the next night 2 juveniles were photographed (ATLAS report)..This is also a Yellow-belly Glider area
- **April/May 1999** – Cut Out Dam Rd, within 2 km of Surrey Ridge Picnic Ground. Area logged in 1998. Woodchipped in 1999. Habitat trees cut off at ground level. Little more than Messmate saplings left standing. Yellow-bellied Gliders, Powerful owls and Barking Owls heard calling at Surrey Ridge in February 1998.
- **Early September 1999** – Surrey Ridge Picnic Ground – fires set under dead stags in the area. yellow-bellied Gliders excluded from 6 trees in the grounds. Powerful Owls and Barking Owls heard calling.
- **December 1999** - T&W Rd logging coupes stopped about 100 m from the Surrey River, where a Masked Owl had been sighted (ATLAS report). Habitat trees were cut off at ground level. Similar treatment was given on the unlogged side of the road. A deliberate attempt to destroy the habitat. A very large coupe of clear-fell harvesting in this area, near Cut Out Dam Rd to Boiler Swamp Rd.

This destruction occurred despite a Public meeting at Heywood (16 Aug 99) to discuss RFA Vol 1 Report, where a call as made by those present in the audience to halt removal of any more mature, hollow-bearing habitat trees. It was understood by all that NRE would not do so. Indeed, following the RFA Public Meeting at Heywood on 10 March 99, Field Naturalists had called for a stop to ring-culling of all hollow-bearing habitat trees in Cobbobboonee area, as less than one third of mature trees remain since logging began. The Portland Field Naturalists met Minister Tehan and she agreed to act on the situation in the Portland area. **“..no ring-culling operations will be scheduled in the Portland forests until the West RFA is signed.”** (Media Release, 9 April 1999)

Cull-felling continued, despite further calls from Portland groups, including the Public Meeting at Portland on 9 Nov 99 to discuss the West Victoria RFA Report Vol 2, urging NRE to stop ring-culling and cull-felling of all habitat in the area.

**This culling, NRE claimed, was acceptable because they had only agreed not to “ring-cull” the trees.** A representative of NRE at Portland had responded on 23 April 99 to the Minister’s statement by saying that **NRE would not schedule any cull treatment operations until after the West RFA was finalised.** Duplicity personified. Is there any wonder that NRE has lost the trust of the public?

Portland FNC had made a detailed submission to Portland NRE concerning the Portland FMA 1999-2001 Wood Utilisation Plan but had basically been ignored (Portland Observer, 26 May 1999) and fobbed off with bland assurances that NRE flora and fauna staff would be involved in the forestry operations (Portland Observer, 31 May 1999).

- **Mid December 1999** - NRE Forest Service began bulldozing and widening tracks in the Beagleholes Rd area of the Cobbobboonee. This had been clearly marked as an area not to be logged, and agreed by NRE. After a public outcry and appeal to the Minister, Ian Miles (Acting Manager, Forest Management Branch) NRE responded by saying “ the harvesting of the Beaglehole’s coupe has been postponed, pending finalisation of the RFA for the west region. Due to an unfortunate oversight, the annual track clearing program in the general area has not been amended to reflect the coupe’s postponement and some brushing up of old existing tracks has resulted...” (Portland Observer, 17 January 00). Taking the charitable view that the “brushing up” (bulldozing) was a mistake, that shows incompetence on the part of NRE. Clearly there was no satisfactory checking process in place to prevent such “oversights”.

This area contains many hollow-bearing trees, with Yellow-bellied Gliders present. A bat roost tree is on the edge of the road. A Powerful Owl was sighted there on 27 Dec 99 (ATLAS report).

- **January 2000** – New logging coupe on corner Fish Holes Rd and Boiler Swamp Rd. This is a known Yellow-bellied Glider area. This coupe is opposite 2 glider feed trees on the other side of the road. Glider feed trees and habitat trees were removed along Boiler Swamp Rd. GPS readings of the position of these trees had been given to NRE a year earlier. Instead of being protected these trees appear to have been targeted by NRE.