

HAMILTON FIELD NATURALISTS CLUB



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To:

27 Feb 2010

RFA Review – Submission
Department of Sustainability & Environment
PO Box 500
East Melbourne Vic 3002

Re. West RFA Victoria region Review

General comment

Why is this expensive and unsatisfactory RFA process continuing in this region? It has lost its purpose:

- The unsustainable logging of forests in the West RFA Region has led to its demise.
- The SPZs provide short-term protection for critical areas but they provide no long-term protection.
- The RFA process was developed at a time when climate change was given scant consideration.
- The implications for fauna were not adequately understood or canvassed in the RFA process.
- The implications of potential supply of firewood and farm timbers from the extensive Blue Gum plantations and smaller areas of other forestry woodlots was not adequately covered in the RFA process.
- The RFA approach does little to help link vegetation units across the landscape (e.g. Habitat 141).

Specific comments

Our submission relates primarily to the management of Plains Grassy Woodlands under the RFA. We refer to the following main areas:

1. Yellow Box-Yellow Gum-River Red Gum grassy woodlands of the Black Range-Rocklands State Forest
2. River Red Gum grassy woodland of Woohlpooer State Forest

We remind the panel that only 3% of the pre-settlement distribution of the vulnerable and rare *Plains Grassy Woodland* EVC exists and only 1.03% is in existing and “new” RFA reserves. JANIS criteria requires a 15% contribution in defining a CAR reserve system. It was clear that DSE foresters at Horsham lobbied hard for interests of timber gatherers and graziers, to the detriment of biodiversity. There was little evidence of balance. In contrast to other regions, suggestions made by HFNC or other environment groups appeared to have all been ignored.

While guidelines for the current review suggest that the original basis for a flawed decision to ignore JANIS requirements is not subject to review, for one significant case we dispute that contention. The current deficiencies in management certainly are worth discussing.

1. Black Range-Rocklands State Forest

The failure in 2002 to include the Yellow Gum-River Red Gum Grassy Woodlands of the Black Range-Rocklands-Cherry Pool State Forest areas in SPZs, linking with Grampians National Park, appears to have demonstrated how little notice the panel took of biodiversity issues.

- There is good reason to make a proper assessment of this area and change the GMZ to an SPZ (or at the very least a SMZ). It is noted that this area is not a commercial firewood area. The failure to give it the protection required by JANIS criteria is indeed a puzzle and example of how the system can fail.
- If any grazing leases are still current they should be cancelled – grazing pressure from native fauna in this period of low rainfall is alone enough reason to prevent overgrazing of native flora.

2. Woolhpoor State Forest

- This was classified as GMZ whereas much of it should have been classed as SPZ. According to JANIS criteria at least 60% should be protected when the classification is vulnerable. The current zoning confers no protection at from processes that would endanger the grassland flora.
- The DSE map *Woolhpoor Bioregional Conservation status of EVCs* indicates that most of the area is designated as “*endangered*” and most of the remaining area is “*vulnerable*” or “*depleted*”.
- Grazing by livestock should be removed from all areas, particularly since rainfall has declined markedly in recent years and the impact of grazing by native fauna (emus, kangaroos and wallabies) is very high, preventing high ground biomass levels (thus minimising fire danger). There is no good economic case for allowing grazing. It certainly impairs the spring wildflower display. The purple haze and gold blaze of Chocolate and Bulbine Lilies, along with a host of other native species in flower, is one of the great tourism features of the grassland that has been least disturbed (see photo below).
- There is no positive action to retain wood on the ground, in contravention of requirement.
- The management does not provide for the protection of trees that will provide hollows (i.e. these trees are identified and culled, as normal forestry plantation practice. This lack contravenes requirement.
- Apart from work on African Weed Orchid around the Rocklands area there is no effort to prevent spread of weeds into these grasslands, eg. *Sparaxis* is not controlled and the seed is brought in on the tyre treads of wood-gatherers vehicles in wet periods. An example of this was seen in the SW block in 2009. This is a serious weed that should be curtailed but is not.
- Ploughing is used to regenerate River Red Gums – extensive cultivation damages the groundflora, allows weeds to establish and is not essential for regeneration. A dense regeneration of tree seedlings results. One does not need 10,000 seedlings per ha to obtain a good stand of River Red Gum, contrary to perceived wisdom of some foresters.

The RFA Victoria document suggested that the objectives of conservation can be safely pursued in the presence of logging, firewood gathering activities and grazing. A major weakness of that argument is that intensive management by DSE would be needed to:

- supervise logging activities and monitor sustainable yield of timber from the forest
- preserve hollow trees
- ensure some solid wood is retained on the ground after harvesting
- supervise wood gathering (including restricting access during wet periods)
- maintain a suite of grassland species and provide weed prevention and control
- monitor grazing activities

There are too few staff, trained or otherwise, to exert any substantial moderating influence on most of these aspects. Since there will be no more staff provided, the only practical way of managing this important ecological resource is to limit the number of endangering processes that require managing.

Yours faithfully



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