PO Box 162, Kyneton VIC 3444
info@biolinksalliance.org.au
www.biolinksalliance.org.au
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Chair,
Victorian Environmental Assessment Council,
PO Box 500
EAST MELBOURNE VIC 3002

Submission to the VEAC Central West Investigation Draft Proposals Paper August 2018

We welcome the draft proposals and commend VEAC for their thorough investigation and well-developed recommendations.

We recognise competing values and uses of the central west forests, but consider that the wider-reaching and longer-term biodiversity and catchment values should be pre-eminent in decisions about public land use and management. These values are fundamental and have a big impact on the regional and local environment, communities and economies. They will be even more important in providing resilience in a time of climate change. Protection of natural vegetation across central Victoria will also add significant carbon sinks in our efforts to control CO_2 in the atmosphere. So we fully support the recommendations to increase protection of the natural values in the forests of central Victoria.

We are concerned about the proposals which inadequately protect the Mount Cole area and some other areas, and have provided feedback and suggestions below. We have also provided feedback on several of the general issues raised in the Paper.

This investigation focusses on discrete areas within central western parts of Victoria. Biolinks Alliance is involved in community networks and in projects that extend across the whole area between the Grampians and the eastern forests, including public and private land. So our feedback on this proposal is in the context of our interests over a wider geographical area and across land tenures.

2. Overview of the investigation area

2.1.2 Biodiversity

Biogeography and genetics: An additional consideration not explicitly covered under the distribution of species is the dis-continuities between populations of forest species. There are large habitat gaps between the larger populations in eastern Victoria and the central west forests and the Otway forests, and even between the different forest blocks in the central west. It is likely that some of these gaps have been barriers for movement for millenia rather than just the past 200 years. So it is also likely that the genotypes of species vary greatly between these populations (if it is not already known). Biodiversity conservation should recognise genetic differences between populations. Likely cases are the Greater Glider and Mountain Brushtail Possum that are limited to islands of wetter (higher) forests.

2.1.5 Public Land (also 2.1.2, 2.4.2, p45, and R9)

The poor representation of many ecosystems in protected lands across the region is a deep concern. We recognise that most are on private land and outside the scope of this investigation. This investigation, and the Remnant Native Vegetation Investigation, do have good proposals to protect what little remains on public land (unused roads and stream frontages in particular) but we are concerned that the RNVI recommendations have received little government attention. We will continue to identify remnants and recommend permanent protection on private land.

2.3.2 Recreation

Demographics: The term "tree change" covers a very wide range of aspirations from people who want to conserve natural values to those who want to farm (even on small areas and so have "no room for trees") to people who want a place for the family to ride horses or motor bikes. Some areas have more of one type of tree-changer than others.

A high proportion of the rural properties in the study area are small to medium-sized, with owners who are time and money poor and usually work elsewhere (effectively if not actually weekenders). There is a short turn-over time for these properties (statistics not covered in the table). Any conservation work by one landholder is likely to be lost within a few years unless that land is covenanted.

4.1 Draft policy and management recommendations

R9 Landscape Connectivity.

While we strongly support this recommendation, it does not provide a clear blueprint for implementation. Many small areas remain largely unknown. With the loss of the on-line biodiversity maps that had useful descriptions of the status of small public reserves (including managing agency and LCC/ECC/VEAC recommendations), local communities and agencies will find it difficult to identify and follow-up on their protection.

Additional recommendation: that maps of public land be updated and made available to the community online.

R10 Maintaining catchment condition and services.

In addition to the issues identified in the document (2.1.6 and p59-60, and in sections on particular forest blocks), we would add the following:

Improving the ecological health and catchment condition in disturbed forests

Streams across central Victoria rely for continued flow on groundwater systems. While the re-charge areas for these streams may be in forests, these forests have been logged and mined, resulting in loss of topsoils and dense regrowth of trees that are competing for resources and fail to develop into the large productive trees needed for wildlife. And the ground beneath the trees is bare or covered in loose litter, and lacks the understorey and ground cover needed to slow runoff. As a consequence of rapid runoff, less water is entering the local groundwater aquifers, and many gullies and steams are deeply incised by fast-flowing water. These incisions drain water from the local aquifers, lowering the water table and drying the land. The streams are more intermittent, with no flows for longer periods of each year and faster runoff after storms that removes litter and soils and carries big sediment loads downstream. This is, of course, exacerbated by roading and other uses that disturb the land, and by climate change.

Where forests are in this disturbed condition, they and their downstream catchments are very vulnerable to climate change. So forest restoration is an urgent matter

In order to bring back more functional ecosystems, a change in use and management is required in these disturbed forests. Management should enhance the ability of soils and native vegetation to retain and absorb moisture. A landscape scale approach would use methods including removal of regrowth (retaining larger trees with a diversity of species and room to develop a spreading canopy) and retention on site (no removal for firewood or logs, etc) to help control water flows and provide habitat for a wider spectrum of biodiversity. These actions would be amongst a range of technologies such as direct seeding, contour ripping, brush banding, (eroded) gully stabilisation, etc. – all depending on site and nuanced condition assessment.

Several trials have already been carried out in Rushworth Forest, near Bendigo (see here), Shelbourne Nature Conservation Reserve by Mid-Loddon Landcare Netowrk - see here and here), and on private land (eg. at Muckleford – see here), and similar work is beginning in the Wedderburn area (see here). "Ecological thinning" was recommended and defined in the ECC Box Ironbark Forests and Woodlands Investigation Final Report 2001 (see section 19.4 in particular) and the principles and rationale were covered in *Ecological impacts of firewood collection - a literature review to inform firewood management on public land in Victoria* (see here). It is our view that "ecological thinning" should only be done in the context of wider forest restoration to enhance the health of the environment – it is not the same as selective harvesting and should be just one of a suite of actions needed for forest restoration.

Restoration of these disturbed forests has been carried out by government agencies, community groups and private landholders. However, this valuable conservation work is impeded by the rules for clearing native vegetation. Under the *Guidelines for the removal, destruction or lopping of native vegetation*, any removal of native vegetation requires offsets even if it is being done to enhance the environment. Removal of older regrowth for environmental purposes should be exempt from requiring offsets where there is a medium and long term net benefit for the native vegetation at that site. Any works that include removal of trees should still require a Native Vegetation Precinct Plan so that this exemption is legitimately used for environmental benefits only.

We propose that the agencies, groups and individuals be supported to prepare and implement suitable Native Vegetation Precinct Plans. To make it easier, it would be useful to have a template that helps to spell out both the procedures (including removal of trees) and ecological gains from any forest restoration projects. The many trials of restoration involving removal of regrowth across central Victoria could provide the basis for this template. It would also be useful to have the full range of techniques for improving the ecological health of forests widely recognised as legitimate on-ground actions among the approved actions in the guidelines for grants.

Additional recommendations:

Removal of older regrowth for environmental purposes should be exempt from requiring offsets where there is an approved plan addressing the medium and long term net benefits for the native vegetation and catchment values at that site.

Agencies and community groups be supported to develop and implement plans for the management of disturbed forests on public and private land for the benefit of biodiversity and catchment, including removal of regrowth where appropriate.

R11 Domestic firewood collection

We strongly support more rigorous processes to control the removal of firewood. The issue extends from forests to local roadsides. Many utes and trailers arrive in central Victoria in Autumn to take timber from roadsides. There is confusion at best about the laws between DELWP and local Councils, and a lack of on-ground enforcement. Logs on the ground are valuable part of the habitat for biodiversity. And there is a public safety issue with people parking half-off roads and even felling dead trees. Roadside firewood collection should be left to accredited commercial operators, and forest firewood collection should be controlled by licencing rules.

4.2 General recommendations for public land use categories

Implementation

The recommendations address most of the issues we are concerned about. However, we are concerned that there are few resources to manage or enforce these recommendations. As these draft proposals include some significant changes in management from what people have been used to, investment is required to:

- publicise and explain and ultimately enforce the recommendations, and
- provide the infrastructure including tracks and trails suitable for a new range of uses.

Other comments:

Regional Parks: uses include "protect natural biodiversity to the extent consistent with…informal recreation for large numbers of people". While generally there will be little conflict, there may be some localities that are valuable remnants of intact ecosystems, habitat for significant species or environmentally sensitive areas such as gullies and streams. Regional Parks are significant parts of the matrix of natural areas in the central west and we think the protection of natural biodiversity should be a primary consideration, with use of the Park for informal recreation for large numbers of people compatible with the protection of biodiversity.

Water frontage, beds and banks reserves: these are important for all the reasons given, and grazing by domestic animals is the main threat. Many frontages are grazed under Grazing Licences but many new landholders are unaware of any licences and some grazing probably occurs without a licence. We recognise that it is difficult for DELWP staff to keep track of the use of all frontages. But in your recommendations, you do not specifically mention the requirement for licences other than Riparian Conservation Licence. The VEAC Remnant Native Vegetation Investigation in 2011 referred to improving the management of stream frontages (Recommendation R9) as a high priority in the Central Victorian Uplands, with incentives for biodiversity actions on the public/private land interface (R2 and 3). Has the situation actually changed as a result of the 2011 Investigation or is there a need to re-iterate the recommendations in this Investigation?

Utilities and government service reserves: It is not clear where unused road or rail reserves fit, but they often include avenues of large old trees and some have rich understorey and ground cover with high biodiversity values. Some are under Grazing Licences and many are deteriorating as a result of grazing and camping by domestic animals. Notes for water frontages also apply to these.

Uncategorized public land: in the past, public utility land not in use has been sold off, with losses to biodiversity, public amenity (such as walking and bicycle trails) and potential for

future use. So we are wary of the vague term “public land values” and would like to see a more complete listing of current and possible future values that should be considered.

Plantations: Some of the plantations in central Victoria lie between areas of native bushland and are potentially a barrier to movement of biodiversity. While plantations may have lines of native vegetation along waterways, has the Investigation looked at the overall impact of plantations on connectivity? Connectivity is mentioned for the area between Mount Cole and Mount Lonarch state forests (p97 and discussed below).

5. Mount Cole - Pyrenees Block

We welcome the changes in land use proposed for this block apart from the proposals for Mount Cole and Mount Lonarch State Foresst. Our concerns in relation to this forest are:

1. Site condition and significant sites. In the statewide analysis of biodiversity habitat values (p95), high rankings occurred “in parts of Mount Cole State Forest”. But the Proposals Paper also notes (p96) that “the condition of Mount Cole’s forests has been degraded as a result of the extensive logging history, which has produced dense young regrowth with little understorey over much of the area”. Furthermore “there are few large old trees remaining in the Mount Cole State Forest due to the heavy logging of this forest since European settlement.” All this “disadvantages species that require the original open forest structure, or rely on habitat features such as dense or diverse understorey, mature trees for hollows or food resources, or a sparse ground layer with leaf litter and fallen wood.” In other words, the habitat for many species has been compromised by past logging and continues to be impacted by current clear-fell timber harvesting which resumed almost five years ago as a ‘trial’ after being stopped for a decade. This affects the ability of these large forest areas to provide habitat for healthy breeding populations, including several of the significant species referred to on p95. The same conditions described above were identified for Mount Lonarch State Forest (p97).
2. The condition of the forests affects the ecological health and catchment condition referred to above under ***R10 Maintaining catchment condition and services*** as needing a suite of remedial actions. Further timber harvesting in Mount Cole forest is not consistent with this need to improve the condition of the forests.
3. Further, ongoing intensive logging adds significantly to the degradation of the catchment, by initially disturbing the ground for erosion, and then by increasing absorption of water into the regrowth forests and reducing down-stream flows. Reduced water yields begins 2-3 years after logging (or fire) and can continue for decades in some forests. This is an issue that needs further investigation in the relatively drier forests of Victoria and in the light of climate change predictions.
4. Roads in forests are un-sealed hard surfaces that speed the movement of water and sediments into local creeks. Roads and tracks opened up for logging are initially used by vehicles associated with timber harvesting. Large numbers of recreational vehicles are using Mount Col, and these logging roads and tracks continue to be used after logging has ended. They are often in hillier (less resilient) terrain, they are not usually maintained, and they are sometimes used by recreational vehicles at times when tracks are wet and vulnerable to erosion. With continuing use, the tracks cannot naturally revegetate and recover. These tracks also allow access for illegal firewood collection and dumping of rubbish. Tight control is required (as mentioned by the community, p102).
5. The Mount Cole and Mount Lonarch forests are at the headwaters of the Wimmera River. This river is in very poor condition with reduced and irregular flows and loss of

iconic species such as the Platypus. Mount Lonarch is also in the headwaters of the Avoca River. These forests in the headwaters are critical for moderating and maintaining surface and groundwater flows in this catchment.

6. Threatened species and isolated populations: we note that records of the Brush-trailed Phascogales, Mountain Brushtail Possums and Powerful Owls in the Mount Cole area are predominantly in areas recommended as state forest and containing degraded habitat.
7. Connectivity: the Paper identifies the gap between these two forests as important areas for ecological connectivity and resilience. Both are between areas proposed as State Forest with degraded habitat, and this will have an impact on both the source populations that might be able to expand into the surrounding country and the migratory species moving along links and seeking seasonally abundant resources. Added to this is the wide area of plantation between the two forest blocks, so that the best potential links between these two large forest areas are across private land to the north, on Grassy Dry Forest and open farmland rather than the Herb-rich Foothill Forests of the forest areas.

We recognise competing values and uses of these forests (5.9) but, as stated earlier, we feel the wider and longer-term biodiversity and catchment values should be pre-eminent in decisions about land use and management. Reduction of these values will have a big impact on the local environment and communities, and this impact will be even worse with climate change. Most of the current recreation uses could continue if the forests were protected in parks; in fact recreation opportunities and values could be enhanced.

***Recommendations*: that recommendations relating to Mount Cole State Forest (G5) and Mount Lonarch State Forest (G1) be reviewed to protect catchment, biodiversity and recreation values, with both areas being added to Mount Buangor National Park.**

Other areas that should be considered for a higher conservation status are Musical Gully, Camp Hill, Trawalla and Glenmora. In the statewide analysis of biodiversity habitat values (p95), "high rankings occurred in extensive areas of the Mount Cole–Pyrenees block including …. Musical Gully and Trawalla state forests. This reflects their importance in providing habitat for many species in a heavily cleared landscape". Musical Gully and Camp Hill are home to the threatened Ben Major Grevillea. Camp Hill and Trawalla contain Brush-tailed Phascogales and Musical Gully has suitable habits where the species could expand its range. Glenmona is noted for its threatened spcies and communities (p96). Further, "important areas for maintaining ecological connectivity and resilience lie between the smaller forest blocks of Trawalla-Andrews and Musical Gully-Camp Hill" (p97). Despite their values, all or a large part of these forests are recommended to remain as state foreststhat "would continue to allow for commercial timber harvesting and a wide range of recreational activities".

***Recommendations*: that recommendations relating to Musical Gully, Camp Hill, Trawalla and Glenmora forests be reviewed to protect catchment and biodiversity values by changing their status to Bushland Reserves.**

6. Wellsford Block

We note that, although the forest has been highly modified by heavy logging since European settlement, it is in exceptionally good condition relative to other Box Ironbark forests in central Victoria and provides habitat for a wide range of species including threatened migratory species. Some work is needed to open the forest to allow large trees and understorey to develop. But firewood collection as a way to "thin" without any of the other

management actions (including retaining of fallen timber) and loose controls is not consistent with best management for these forests. The recommendations for a Wellsford Nature Reserve are welcome, but we feel the many biodiversity values of the whole forest warrant the much higher conservation status that was strongly supported in submissions.

***Recommendations*: that recommendations relating to Wellsford Forest be reviewed to protect biodiversity values by changing its status to National Park.**

7. Wombat Macedon Block

We note that, although most of the forests in this block have been affected by timber harvesting and regeneration and hot fuel-reduction burns, their size, location and site conditions are sufficient to support populations of most species of wildlife. Obviously, these forests will need resources to manage the impacts of use and, in many areas, to restore the ecological health and catchment condition of forests affected by past practices.

It is also good that the recommendations recognise the importance of connectivity between the smaller and more fragmented remnants of public land across the region. This is a target area for projects by Biolinks Alliance, Landcare groups and Macedon Ranges Shire Council in particular.

So we welcome the recommendations on land use in this area. The Wombat Lerderderg National Park will be a wonderful addition to the protected areas of the central west. The two conservation parks are also very significant additions; both are more isolated from other large conservation areas by private land, and will provide important refuges and source populations for species moving through the landscape. The matrix of bushland reserves, waterfrontage reserves and other land are essential components of these landscapes.

However, we cannot see why the iconic Macedon Ranges should not also be a National Park with a relatively small although prominent area zoned for the more intensive visitor activities. We support the Macedon Ranges Shire Council in calling for a Macedon National Park.

***Recommendations*: that recommendations relating to Macedon Ranges be reviewed to protect landscape and biodiversity values by changing its status to National Park.**

Yours Sincerely

Peter Mitchell

Secretary

Biolinks Alliance

0468 795 954