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29 August 2007

Submission to Draft Otway Wood Utilisation Plan 2007/2008

Thank you, for the opportunity to comment on the Draft Otway Wood Utilisation Plan (WUP).

In this submission the Otway Ranges Environment Network (OREN) requests DSE review issues raised in previous submissions from OREN to the Otway WUP process made on the 9th August 2004 and 30th September 2005. Some of the issues that were raised in these previous submissions have resurfaced again as discussed below.

Since the State government announced an end to logging in November 2002, OREN has accepted that logging will continue within the Forest Park component of the Otways until 2008 when log licenses expire.

However in the development of logging plans for the seasons 2002/2003 till 2006/2007 OREN has consistently objected to logging in some areas such as:

- Logging along scenic forest roads that will undermine the regions character for tourists in the short term.
- Logging within Tiger Quoll Special Management Zones.
- Logging near Cool Temperate rainforest
- Logging next to the boundary of the Great Otways National Park.
- Logging in Southern face of the Otways
- Habitat fragmentation issues

In response DSE have generally avoided these areas by either deferring, removing or modifying coupes on the logging schedule.

In the final Otway logging season OREN has objections with nine coupes out of the 46 coupes proposed to be logged in the 2007/2008 season. In summary they are:

Coupes on scenic drives:

07/233/505/0013 Colbendo – Old Colac Tree Road
07/234/504/0012 Rappa – Lavers Hill - Cobden Road
07/234/504/0007 Chapple Ck - Lavers Hill - Cobden Road
07/234/501/0001 Alker – Mt Mackenzie Road
07/253/715/0001 Roadknight - Roadknight Road

Coupes in Tiger Quoll Special management area:

07/237/507/0003 Charleys Creek South

*Coupes on the boundary of Great Otway National Park and Aire Heritage
River corridor:*

07/230/502/0017 Holywater South
07/230/502/0018 Water Point

Habitat Fragmentation issues Barongarook area:

07/253/505/0004 Amaki – Bridge Road

OREN believes logging of these areas can be avoided and sawlog licence commitments can be met as detailed below. Specific details regarding OREN objections to logging the above nine coupes are provided.

Forest Based Tourism issues near Lavers Hill

In the OREN 2005 WUP submission, OREN welcomed the removal of two coupes from the 05/07 WUP being the *Chapple creek* coupe located on the Lavers Hill Cobden road and the *Colbendo coupe* located on the Old Colac Tree Road.

Hence it was disappointing to see these two mixed species coupes reappear on the final 2007/2008 WUP.

Since previous submissions made by OREN to the WUP process, OREN has been made aware of the findings of a Otway tourism strategy report titled *Tourism Plan for Public Land in the Otway Hinterland 2005*. This report validates points that OREN has made in the past when arguing against logging of these coupes and other couple near Lavers Hill, as nominated above.

Specifically this 2005 report nominates the Cobden - Lavers Hill road as a part of a 4wd touring route (note is a 2WD dirt road) and nominates Lavers Hill as a designated "tourism node". (See figure 3.2 & 3.3 of *Tourism Plan for Public Land in the Otway Hinterland 2005*).

Hence this government report supports OREN's justification for not logging the four coupes on public roads near Lavers Hill. In summary:

- 07/233/505/0013 Colbendo. Old Colac Tree Road is an access to Skinners Creek Falls. Skinners Creek road and Old Colac Tree Road have had little history of logging and provide an excellent nature based 4WD experience. The Colac Tree road has extremely high scenic values, as it leaves the Great Ocean Road on the Otways ridge and travels through a diverse range of habitats including mountain forest and the extensive Devondale heathlands. The educational and visual values of this unique experience and diversity of environments should be preserved in the new Otway Parks reserve system. Most of the length (about 80 - 90%) of the Old Colac Tree road is now included within the Great Otway National Park.
- 07/234/504/0012 Rappa. Lavers Hill - Cobden Road (2km road frontage on designated tourism drive route) This 8 ha ash clearfell is almost entirely adjacent to one of the most scenic stretches of the Cobden – Lavers Hill road.
- 07/234/504/0007 Chapple Ck. Lavers Hill - Cobden Road is also on the same designated tourism drive route as the Rappa coupe and has the same visual values but is not an ash coupe. The combined effect of logging both these coupes would effectively devastate the unique forest based drive experience of the Lavers - Hill Cobden road.
- 07/234/501/0001 Alker – on the Mt Mackenzie Road provides the only 2WD Access to Glasgow Falls from Lavers Hill. Glasgow falls, which has

been included within the Great Otway National Park, is spectacular and surrounded by old growth mountain forest. Glasgow Falls has outstanding potential to add to the forest based tourism options for the Lavers Hill area. Logging the Alker coupe would wipe out a highlight in the drive to Glasgow Falls. Most of the logging would need to occur up against the Mt McKenzie road as most of the area the coupe occupies is over 25 degrees and cannot be logged.

The 2005 tourism strategy highlights how logging can be detrimental to values. For example assessment of Sabine Falls, and Wye river falls acknowledges that logging and regenerating forest undermines the arrival experience for tourists. (See page 49, Table 3.3 *Tourism Plan for Public Land in the Otway Hinterland 2005*)

OREN acknowledges that Glasgow Falls and Skinners Creek falls are not currently promoted for forest based tourism, however the future tourism potential of the site should not be compromised by logging in an area recognised as a “tourism node”.

Barangarook Area

There are four coupes to be logged in this area. Of particular concern are two coupes, the first being the Roadknight creek coupe which is on a scenic forest drive in relatively close proximity to Forrest and the second is Amaki coupe that will further fragment the Barangarook forest area.

Forrest has been nominated as a tourism node area and the Roadknight road is recommended as an “Extended Multiple use route” in *Tourism Plan for Public Land in the Otway Hinterland 2005*.

The Roadknight coupe has a 1km frontage to the Roadknight road and will have a significant negative visual impact on the driving experience. Additionally this coupe is a ‘group selection’ logging operation that will yield only 450 cubic metres of sawlog and 2250 tonnes of woodchip. Hence the coupe is of limited importance to making up sawlog volumes for the final logging season.

OREN is also concerned about logging in the vicinity of Bridge Track. The two coupes of concern are named Amaki and Parnevok.

Logging both of these coupes would further fragment the Barangarook component of the Great Otway National Park as there are only two small corridors of public land that connecting the Barangarook forest area to the rest of the public land in the Otways.

The corridor to the East of Barangarook which connects public land in the West Barwon has already been extensively clearfell logged within the last decade. The other corridor to the south at Bridge track has no current clearfell logging history. However clearfell logging planned in the Bridge track area will effectively isolate the entire biodiverse Baragarook native forest area from the rest of the public land in the Otways.

Hence OREN is of the view the Amiki coupe should not be logged and Parnevok coupe should be regarded as a last resort logging option.

The Amaki coupe is also in close proximity to the “Extended Multiple use route” that incorporates Bridge Track.

Seaview Coupe: Ash and Rainforest Issues

OREN welcomes the removal of the *Seaview coupe* from proposed 2007/2006 WUP. Seaview was scheduled to be logged in the 2006/2007 logging season but did not go ahead. OREN does not wish this coupe to be put up again as an alternative ash source to the Rappa or Alker coupes (See Otway Ash issues below). This small 8 ha nett coupe located in the southern fall of the Otways on the Seaview ridge road and is opposite the Great Otways National Park.

Unfortunately most of the forest opposite the Seaview coupe within the Great Otway National Park was clearfell logged in 1996/97 with no visual buffer on the road retained. The logging of Seaview would have in turn further undermine the whole scenic quality of the area for a very low sawlog output.

Logging Seaview will also put a very significant stand of Cool Temperate Rainforest at risk in the Head of the Aire Block.

Charleys Creek South coupe: Special Management Zone

OREN is totally opposed to the logging of the *Charleys Creek South coupe* (07/237/507/03) which is located within a Special Management Zone (SMZ).

Although this area is now a Forest Park, VEAC recommended that existing Special Protection Zones (SPZ) and SMZ zones as determined under the West Regional Forest Agreement (RFA) still be recognised when planning logging operations until 2008.

Charleys Creek South Coupe is within SMZ (No. 7013) under the West Regional Forest Agreement (West RFA) and is listed as Spot Tailed Quoll habitat. It is also a critical wildlife corridor to the 539 ha Charlies Creek Special Management Zone (No. 7014).

Charleys Creek South Coupe was first nominated for logging in the 1999/2000 logging season by ‘group selection’ where it was listed as a coupe that contains “over mature” forest. “Over mature” forest makes excellent habitat for Spot Tailed Quoll. No logging within any Otway SMZ’s has occurred since the West RFA was signed due to community concern.

Intensive logging of pine plantations in recent years has left the adjoining areas ecologically barren. Logging the *Charleys Creek South Coupe* would leave the 7014 Charlies Creek SPZ fragmented. Also of relevance is the listing of Habitat Fragmentation as a threatening process under the Flora and Fauna Guarantee Act (1988).

An SMZ plan was required under the West RFA process for SMZ 7013 before logging can commence, has this been completed?

The requirements of revised Action Statement No.15 for Spot-tailed Quoll should also be undertaken before any logging within this SMZ is considered.

Holywater Block Area

Since November 2002, only one coupe has been logged in the Holywater creek area as there has been a general understanding that no logging would occur in the southern fall of the Otways. There is strong community opposition to continued logging in this area.

Currently seven coupes are being proposed to be logged. OREN is strongly opposed to logging of two of these seven coupes as that are up against the Great Otway National Park and are in close proximity to the Aire River Heritage corridor.

These are:

07/230/502/0017 Holywater South
07/230/502/0018 Water Point

In general the Holywater area coupes are of low sawlog yield. One explanation for this is termite infestation of the trees. OREN members were made aware of termite problems with wood quality in this area back in 1997-1998 after discussion with logging contractors who were unhappy with the quality of the wood being felled. This may explain why all the coupes in the Holywater block in the southern fall of the Otways are all very low sawlog yielding coupes with a 5:1 woodchip to sawlog output.

Additionally there are issues with logging in the Holywater area being visible for the Great Ocean Road. In the past OREN heard complaints from the Boomerang Cottages holiday cabins about the visual impact from the cabins and along the Great Ocean Road caused by clearfell logging in the Holywater area.

Hence it is recommended that all logging in the Holywater be regarded as absolute last resort.

Impact on sawlog licence commitments

This proposed WUP provides about 27,000 cubic metres of sawlog and about 137,000 tonnes of woodchips for the final logging season. The remaining sawlog licence holder for the Otways has, for the past two logging seasons, taken about 12,000 cubic metres of sawlog and Midway about 65,000 tonnes of woodchips.

This will be the last logging season as it is now illegal for the government to issue any new sawlog or woodchip licences from within a National Park, Forest Park or Nature Conservation Reserve.

Hence for the sake of meeting one more year of sawlog licence commitments, it is an imperative that clearfell logging is kept out of areas that are of strategic importance for the on-going forest based tourism industry and strategic nature conservation values.

The nine contentious coupes nominated by OREN make up 17% of total sawlog licence commitments. Seven of these coupes are mixed species and two are predominately ash coupes. Given only 44% or 12,000 cubic metres out of the 27,000 cubic metres licence commitment has been taken for the last two years, it is reasonable to assume that logging can meet the final licence commitments without needing to log the six contentious mixed species coupes. However they may be a problem finding alternative ash coupes as discussed below.

Otway Ash issues

It has been clear for many years that there would be a short fall in Ash sawlog supply for the final Otway logging season.

As discussed above, the draft 2007/08 WUP proposes to take ash from two contentious ash coupe near Lavers Hill that come into conflict with the long term forest based tourism strategy/industry for the Otways overall. These are:

07/234/504/0012 Rappa Lavers Hill - Cobden Road
07/234/501/0001 Alker - Mt Mackenzie Road

The VEAC Investigation for the Otways that concluded in November 2004, recognised there may be an ash shortfall. Consultants engaged by VEAC (URS) have nominated several options for resolving the Ash shortfall issue for the Otways .

The following is an extract from Appendix 4 of the Angahook-Otway Investigation Final Report, November 2004, pages 144 & 145.

SOCIAL AND ECONOMIC STUDIES IN THE ANGAHOOK-OTWAY STUDY AREA
STAGE 3, By URS October 2004

One aspect of the VEAC recommendations relates to the possibility of immediate cessation of logging in the areas recommend for national park. One remaining sawlog licensee is affected by the recommendations – with entitlements amounting to approximately 20,000 cubic metres of sawlogs per year until 30 June 2008. The entitlements under the licence conditions include access to Mountain Ash and Mixed Species sawlogs.

Based on information provided by DSE, the potential to harvest sufficient quantities of Mountain Ash in the recommended forest park area is limited and may not be sufficient to meet fully the entitlements to 2008.

The outcome for Mixed Species harvesting as a consequence of the recommendations is such that commitments for these sawlogs could probably be met outside the new area of national park. However further field work would be necessary to confirm the availability of Mixed Species outside the national park area.

*In our view there are **at least** three and potentially many more options:*

- allow harvesting to continue for the next four years within the new national park areas in order to meet commitments (that is, delay implementation of the relevant areas of the national park). This option would represent a significant compromise to the integrity of the national park concept and the resultant controversy is likely to lead to associated added costs in terms of management, legal proceedings, enforcement and so on.*
- buy out the rights for the sawlog committed. Because it is likely that the Mixed Species can be sourced from the forest park areas, the buy out could be restricted to the remaining Mountain Ash component of the entitlement.*
- investigate the possibility of providing Mountain Ash logs from east of Melbourne, including the possibility of salvage logs from the areas damaged by the 2002/03 fires or from the Central Highlands. Transport costs may be a constraint. This option would need to be adopted soon in the case of fire salvage material, due to degradation of log quality over time.*

In the absence of detailed information on benefits and costs, we favour some combination of the second and third options.

We are assuming in all this that there would be no constraints on harvesting within the forest park areas for the next four years, other than those which

currently exist in state forest. However, we note that due to their 'park' status, there may be opposition to continued harvesting from these areas.

Ash Salvage logging in East Victoria

According to a VicForests fact sheet, the Government has decided that there will be 'salvage logging' of the areas affected by the recent wildfires of 2007 (bigger wildfire than in 2003), this equates to 1.2 million cubic meters of ash wood that will be logged over the next 12 months. Hence, taking the third option, nominated by URS and applying this to the current situation for 2007, the option of using Ash salvage logs from East Victoria to make up sawlog licence commitments in the Otways for 2007/2008 is a option that should be explored.

OREN acknowledges there are serious ecological issues and public criticism of salvage logging operations in East Victoria however we would suggest that using some of the salvage logs to "save" some non burnt ash forest for its aesthetic contribution to the Otway forest based tourism industry is a relatively positive outcome for all stakeholders.

Please contact me for further clarification on any of these issue

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