

Internal Review of Issues Raised by Community Members regarding Coupe FD053A

Issue:	Forest Practices Plan – notification and consultation process
FT Action:	<p>The proposed harvesting of this regrowth coupe within the designated Permanent Timber Production Zone has been included in Forestry Tasmania’s Three Year Wood Production Plan for two years. Prior to any harvesting operation, Forestry Tasmania undertakes a process which includes on ground coupe reconnaissance, gathering and analysis of data from various biodiversity and other special values databases and commences the preparation of a draft Forest Practices Plan (FPP). These plans stipulate where and how harvesting operations are to be undertaken, including prescriptions to manage and protect identified natural and cultural values.</p> <p>Initial engagement with community members commenced in August 2014. A series of meetings was held with community members to advise them of and discuss FT’s intended operations, and a number of submissions were subsequently provided to FT and considered during the iterative process of developing the draft FPP for this proposed operation.</p> <p>Consistent with standard planning procedures, a Notice of Intent was sent to community members on 1 October 2014, which included a projected commencement date for roading of 12 January 2015.</p> <p>In response to community requests, the projected commencement date for operations was delayed (in Dec 2014) to at least 1 February 2015 to allow further time for community members to gather and provide any additional evidence of special values that should be taken into account in the planning process. This timing aligned with the community’s advice regarding when their planned surveys would be undertaken (that is in late December and early January).</p> <p>Given the strong community interest and the range of issues that had been raised, the local Forest Manager also advised the community that he had requested an internal review by Forestry Tasmania’s Head Office of all of the issues and information that had been provided, and of the proposed mitigation measures.</p> <p>In response to a further request from the community, FT committed that it would not be making a final decision on harvesting until the end of February 2015. This extension was for the explicit purpose of providing additional time for the community to forward any further results of fieldwork and surveys, and for this information to be properly considered by the internal review.</p> <p>As part of this internal review process, the review team met with community members on site on 13 February 2015, and confirmed that no decision would be made regarding harvesting until the review was completed. Given the large volume of emails and other correspondence received, the review has taken longer than initially anticipated, however this time was necessary to ensure that the range of issues were carefully considered.</p> <p>The primary purpose of this review was to determine whether the proposed operation would meet all required standards and legislation. In particular, this includes determining whether or not the proposed operations would meet all relevant requirements under the <i>Environment Protection and Biodiversity Conservation (EPBC) Act 1999</i>, the <i>Forest Practices Act 1985</i> and the Forest Practices Code. The <i>Forest Practices Act</i> and Code set out the requirements for protection of environmental and cultural values, including threatened species such as the giant freshwater crayfish, Tasmanian devil, spotted-tail quoll and wedge-tailed eagle.</p>

	<p>The review will also consider the potential financial and economic returns from the proposed operations.</p> <p>The internal review team concluded its review on 9 April 2015.</p>
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Threatened species and communities

Issue:	Giant Freshwater Crayfish management prescriptions and EPBC Guidelines
FT Action:	<p>Both the initial and subsequent draft of the FPP for this coupe have included specific management prescriptions to protect potential habitat for Giant Freshwater Crayfish. These prescriptions meet or exceed all relevant requirements under the Forest Practices Code.</p> <p>There have been some suggestions that there was a connection between Forestry Tasmania's commitment to make a decision by the end of February on proposed harvesting of the Lapoinya coupe (FD053A), and the closing date for comments on the Federal Department of Environment's Draft EPBC Act referral guidelines for the Tasmanian giant freshwater lobster (<i>Astacopsis gouldi</i>). There is no connection between these two processes.</p> <p>The Tasmanian Regional Forest Agreement (RFA) 1997 includes a number of provisions related to the protection of giant freshwater crayfish (<i>Astacopsis gouldi</i>):</p> <ul style="list-style-type: none"> • <i>A. gouldi</i> is listed as a 'priority species requiring consideration' (RFA Attachment 2); • <i>A. gouldi</i> is to be protected through the Comprehensive Adequate and Representative (CAR) reserve system or by applying relevant management prescriptions (RFA Clause 68); and • management prescriptions or actions identified in jointly (National and State) prepared and agreed Recovery Plans or Threat Abatement Plans are to be implemented as a matter of priority (RFA Clause 70). <p>For the purposes of the Tasmanian RFA, the endorsed management prescriptions are those set out in the Threatened Fauna Advisor managed by the Forest Practices Authority. These management prescriptions are endorsed by the Tasmanian Scientific Advisory Committee that is established under the <i>Threatened Species Protection Act 1995</i>.</p> <p>The Threatened Fauna Advisor is a decision support tool that provides the endorsed management prescriptions for threatened species to be included in Forest Practices Plans developed under the <i>Forest Practices Act 1985</i>. In addition, the current giant freshwater crayfish Recovery Plan also includes specific prescriptions for streamside reserves for class 2 to 4 streams in areas classed as 'high' or 'moderate' suitability habitat for <i>A. gouldi</i>. These prescriptions are included in the current Threatened Fauna Advisor prescriptions.</p> <p>In accordance with the Threatened Fauna Advisor, the stream habitat suitability for <i>A. gouldi</i> for some class 2 and 3 streams within the coupe have been assessed as at 'high' suitability. In accordance with <i>Fauna Technical Note No. 16: Assessing juvenile giant freshwater crayfish habitat in class 4 streams</i>, which is available from the FPA website, class 4 streams in the coupe have been assessed as 'low' suitability habitat.</p> <p>For class 2, 3 and 4 streams the Threatened Fauna Advisor recommendation is to "Apply streamside management provisions as per the Forest Practices Code". The requirements in the Forest Practices Code are for:</p> <ul style="list-style-type: none"> • a streamside reserve of 30 m on both sides of class 2 streams

	<ul style="list-style-type: none"> • a streamside reserve of 20 m on both sides of class 3 streams • a machinery exclusion zone of 10 m on both side of class 4 streams <p>The internal review notes that the management prescriptions included in the draft Forest Practices Plan for this coupe meet or exceed all of these requirements. Specifically the prescriptions provide for:</p> <ul style="list-style-type: none"> • streamside reserves of a minimum 30 m on both sides of class 2 streams • streamside reserves of a minimum 30 m on both sides of class 3 streams • streamside reserves of a minimum 10 m on both sides of class 4 streams <p>Section 38 (1) of the <i>Environment Protection and Biodiversity Conservation (EPBC) Act 1999</i> is clear that the Act's requirements relating to environmental approvals do "not apply to an Regional Forest Agreement forestry operation that is undertaken in accordance with an RFA." This fact is also explicitly reflected on page 4 of the draft EPBC Act referral guidelines. As the proposed operation would be undertaken in accordance with all relevant requirements of the 1997 Tasmanian RFA, the draft EPBC Act referral guidelines do not apply to this proposed operation.</p> <p>There have been some suggestions that the 1997 Tasmanian RFA included specific requirements relating to the Flowerdale River catchment. This is not the case and confuses some recommendations that were generated during the RFA process, with what was actually agreed to in the final RFA.</p> <p>There have also been some concerns raised by community members that improved access due to the area as a result of roading for the harvesting operation could increase illegal poaching of the Giant Freshwater Crayfish. This review suggests that appropriate measure be put in place to limit use of the upgraded road when it is not required for operational purposes.</p>
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Issue:	Tasmanian Devil and Spotted Tail Quoll management prescriptions
FT Action:	<p>The Forest Practices Code requires the protection of known den sites and the retention of suitable habitat within and around the coupe for these species.</p> <p>While the biodiversity evaluation conducted by the Forest Practices Officer identified that the coupe includes potential habitat for the Tasmanian Devil and Spotted Tail Quoll, no explicit management prescriptions were included in the draft FPP. This is because no den sites have to date been discovered within the coupe, and the design of the harvesting boundary satisfied all relevant Forest Practices Code requirements as set out in the Threatened Fauna Advisor relating to retention of suitable habitat within and around the coupe.</p> <p>In addition to FT's on ground reconnaissance of the coupe, subsequent survey of the coupe by consultant wildlife biologist Nick Mooney and community members (which were explicitly aimed at identifying den sites), have not found any den sites.</p> <p>As this non-inclusion of specific references to protection of Tasmanian Devil and Spotted Tail Quoll habitat has raised unnecessary concerns that the forest practices planning has not taken this threatened species into account, the internal review recommends that any final FPP should include explicit references to the habitat protection measures that have been included. These should also include the standard requirements that operations should immediately cease in the area if a den site is discovered, and management prescriptions be developed and implemented including seeking FPA advice if required.</p>

Issue:	Grey Goshawk, Masked owl, Wedged-tailed eagle, White-bellied sea eagle management prescriptions
FT Action:	<p>The Forest Practices Code requires the protection of known nesting sites for these species.</p> <p>While the biodiversity evaluation conducted by the Forest Practices Officer identified that the coupe was within the range of, and/or included potential habitat for these species, no nesting sites have been identified in surveys by FT staff during coupe assessments and planning. This included searching for eagle nests using a helicopter.</p> <p>As part of its consultation with the community, FT has requested that community members provide any information they may have on the location of any nesting sites. No locations have been identified or provided.</p> <p>As with other threatened species, if any nesting sites are identified during harvesting operations, these operations should cease within the radius specified for the species in the draft FPP, and management prescriptions would be developed and implemented including seeking FPA advice if required.</p> <p>The internal review notes that these requirements are reflected in the draft of the FPP.</p>

Issue:	Burrowing Crayfish management prescriptions
FT Action:	<p>While there are burrowing crayfish evident within the coupe, the FPA's Biodiversity Values Database indicates that the coupe is not within the range of any of the threatened species of burrowing crayfish. As a result, the FPP does not contain any specific management prescriptions relating to burrowing crayfish. However, the internal review notes that the streamside reserves that have been included in the FPP would meet or exceed the Forest Practices Code requirements for any threatened burrowing crayfish in the event they were to be present outside their known range.</p> <p>Specifically the prescriptions included in the draft FPP for this coupe provide for:</p> <ul style="list-style-type: none"> • streamside reserves of a minimum 30 m on both sides of class 2 streams • streamside reserves of a minimum 30 m on both sides of class 3 streams • streamside reserves of a minimum 10 m on both sides of class 4 streams

Issue:	Suggested presence of <i>Cyathea cunninghamii</i> tree fern
FT Action:	<p>As part of the standard on ground coupe assessment for this coupe, a tree fern survey was conducted and a number of tree fern species were identified. This included <i>Cyathea australis</i> which looks somewhat similar to the threatened species <i>Cyathea cunninghamii</i>.</p> <p>In response to community suggestions that the threatened <i>Cyathea australis</i> was present in the coupe, the Forest Practices Authority's botanist and ecologist undertook a further assessment of the coupe. This expert assessment confirmed the identification of <i>Cyathea australis</i>. In addition, it is noted that subsequent survey work by community members has not identified any <i>Cyathea cunninghamii</i> within the harvest area.</p> <p>However, if it was to be subsequently discovered during harvesting operations, the operations would immediately cease in the area and management prescriptions would be developed and implemented including seeking FPA advice if required. The internal review recommends that this general requirement relating to the discovery of new sites for threatened fauna and flora should be included in any final FPP.</p>

Issue:	Suggested presence of <i>Caladenia pusilla</i> orchid
FT Action:	<p>As part of the standard on ground coupe assessment for this coupe, an orchid survey was conducted and a number of orchid species were identified. This included <i>Caladenia alata</i> which is easily confused with the threatened species <i>Caladenia pusilla</i>. <i>Caladenia pusilla</i> has a known location approximately 1.5 km from the coupe. This was identified on the Biodiversity Values Database and triggered the Forest Practices Officer to notify FPA and seek advice for management.</p> <p>In response to this notification and the community suggestions that the threatened <i>Caladenia pusilla</i> was present in the coupe, the Forest Practices Authority's botanist and ecologist undertook a further assessment of the coupe during the peak flowering season for the orchid. This expert assessment confirmed the identification of <i>Caladenia alata</i> orchid. In addition, it is noted that subsequent survey work by community members has not identified any <i>Caladenia pusilla</i> within the harvest area.</p> <p>However, if it was to be subsequently discovered during harvesting operations, the operations would immediately cease in the area and management prescriptions would be developed and implemented including seeking FPA advice if required. The internal review recommends that this general requirement relating to the discovery of new sites for threatened fauna and flora should be included in any final FPP.</p>

Issue:	<i>Eucalyptus brookeriana</i> (Brookers Gum) community management prescriptions
FT Action:	<p><i>E. brookeriana</i> is listed under the Forest Practices Code as a vulnerable vegetation community requiring protection. While patches of <i>E. brookeriana</i> were noted in initial field surveys by FT, the size of these patches were below the standard Forest Practices Code threshold for identification of vegetation communities (which is a minimum of 1 ha). As a result, the initial draft FPP did not include management prescriptions for this vegetation community. However, as a result of consultation with the community, FT decided to exclude the two significant patches of <i>E. brookeriana</i> community from harvesting. To ensure these patches were sufficiently protected, larger areas than the strict patch size have been excluded.</p> <p>This exclusion is explicitly reflected in the updated draft FPP map provided to the community on 13 February 2015, and the internal review recommends that this exclusion should be retained in any final FPP.</p> <p>Note: The Forest Practices Code does not require the protection of individual, isolated trees as the tree species (rather than communities of these trees) is not a listed threatened species and therefore individual <i>E. brookeriana</i> trees beyond these patches have not been excluded from harvest. <i>E. brookeriana</i> seed has been included in the proposed seed mix of the draft FPP for regenerating the harvested forest.</p>

Other issues

Issue:	Cultural heritage – management prescriptions
FT Action:	The draft FPP notes that there are no recorded Aboriginal archaeological sites within the harvested area. However, the cultural heritage evaluation did note that two isolated artefacts have previously been found 110m and 600m from the harvest area.

	<p>The draft FPP also notes that it is virtually impossible to identify artefacts in wet sclerophyll forest until vegetation clearance and soil disturbance has occurred and therefore includes a requirement for a post roading archaeology assessment to be conducted.</p> <p>The internal review notes that this is consistent with the requirements set out in the Forest Practices Code for areas identified as of moderate Aboriginal archaeological sensitivity.</p> <p>In the event that any Aboriginal archaeological artefacts or sites are discovered during roading or harvesting operations, the operation in that location should cease and Forest Practices Authority (FPA) advice sought. This requirement should be included explicitly in any final FPP.</p> <p>During consultations some members of the community identified a particular stump remaining from previous harvesting operations as being significant to them. The internal review recommends that any final FPP should be modified to avoid disturbance to this identified stump during roading and harvesting operations.</p>
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Issue:	Potential windthrow on adjacent private property
FT Action:	<p>A concern was raised by one adjacent property owner that the proposed harvesting operation could expose trees on their property to stronger winds. This resident requested consideration of the inclusion of a buffer zone along their property boundary.</p> <p>Planning staff subsequently met with the property owner to investigate possible options to manage the risk of windthrow.</p> <p>As a result of this consultation, FT planners proposed to remove a section of the proposed harvesting area adjacent to the property boundary from the harvest area so that there would be very little harvesting planned adjacent to the boundary.</p> <p>The internal review notes that this change should significantly reduce the risk of windthrow damage, and should therefore be included in any final FPP.</p>

Issue:	Habitat connectivity
FT Action:	<p>Some concerns were expressed about the potential for habitat connectivity within and adjacent to the coupe.</p> <p>As a result of streamside reserves and other measures included to protect a range of identified values, there is significant habitat connectivity built into the draft FPP. The review notes that more than 40% of the coupe area has been excluded from harvesting which exceeds the Forest Practices Code requirements. It is also noted that the coupe is adjacent to the 290 ha Flowerdale River Forest Reserve that provides connectivity into the broader forested landscape.</p>

Issue:	Stream protection and management
FT Action:	<p>As mentioned above, the internal review notes that the draft FPP includes the following streamside reserves that meet or exceed all Forest Practices Code requirements:</p> <ul style="list-style-type: none"> • streamside reserves of a minimum 30 m on both sides of class 2 streams • streamside reserves of a minimum 30 m on both sides of class 3 streams • streamside reserves of a minimum 10 m on both sides of class 4 streams

	The internal review also notes that further consideration has been given to possible additional technical/engineering measures that could be used to assist in minimising sediment input that could otherwise arise during construction of road/stream crossings. The review recommends that these additional measures should be included in any final FPP.
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Issue:	Visual landscape
FT Action:	<p>Some concerns have been raised about the potential visual impact of the proposed harvesting operation. A landscape evaluation was initially undertaken using a viewpoint from Lapoinya Road. Following consultation with community members the visual impact from two Nelson Rd viewpoints (including a tourist accommodation facility) has also been evaluated. This evaluation indicates that the visual impact from all these viewpoints will be limited due to the ongoing presence of surrounding vegetation on private property and retained within the coupe.</p> <p>The visual impact from Myalla Rd and Preolenna Rd (both of which are further away than Nelsons Rd from the coupe) has been considered and further computer analysis undertaken. This analysis indicates that the visual impact will be limited due to the ongoing presence of surrounding vegetation on private property and retained within the coupe.</p>

Issue:	Loss of amenity
FT Action:	<p>The internal review recognises that local community members care passionately about this area of regrowth forest, and that they have enjoyed access to this area of forest for recreation for many years. However it is also recognised that this coupe is part of the designated Permanent Timber Production Zone and is therefore part of the limited wood resource available to sawmillers and wood processors. In addition, it is noted that the 290 hectare Flowerdale River Forest Reserve is immediately adjacent to this coupe and is permanently protected from any harvesting and is available for ongoing recreational use.</p> <p>The internal review also notes that while there would need to be some short term restriction of access to Broxhams track for safety reasons during any harvesting operation, this would be re-opened as soon as possible after any harvest was completed.</p>

Issue:	Harvesting and regeneration method
FT Action:	<p>There have been some suggestions that this coupe should only be selectively harvested for single trees. While it is recognised that selective harvesting produces less visual impact, the internal review notes that this is not an economically viable option in forests of this type and also presents considerable safety concerns. In addition, the internal review notes that selective harvesting leads to poorer regeneration of the forest following harvesting operations and potential ongoing safety issues for forest users.</p> <p>The internal review also notes that clearfelling, burning and sowing seed was chosen by planners as the most appropriate harvest method based upon the forest type and its requirements for successful regeneration. These requirements reflect the fact that, in nature, wet eucalypt forests generally rely on a large bushfire to regenerate. These bushfires remove the canopy, enable sunlight to reach the forest floor, reveal a mineral earth seedbed, start natural seedfall and allow the seedlings to grow with reduced competition and predation from other species.</p> <p>There have also been questions about the planning for the proposed regeneration burning of the coupe following harvesting. The planning for these regeneration burns normally commences after</p>

	<p>harvesting operations have been completed so as to be certain of final harvest boundaries, fuel load, fuel conditions etc.</p> <p>Given the strong community interest, the internal review recommends that FT should include community members in any burn planning for this coupe to ensure the appropriate protection of assets surrounding the burn boundary including the Flowerdale River Forest Reserve, streamside reserves and private property. Forestry Tasmania fire management staff are confident that this can be achieved.</p> <p>The review notes that prescriptions included in the draft FPP for re-establishment operations include the aim of using 100% on-site seed for all present eucalypt species.</p>
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Issue:	Safety
FT Action:	Some concerns were raised about the potential for log truck operations to coincide with school bus times and routes. As has occurred in other similar situations, the internal review recommends that FT should restrict the haulage of forest products to outside school bus hours. Contact should also be made with bus operators closer to haulage operations occurring. This requirement should be included in written advice to the contractor.

Issue:	Harvest profitability
FT Action:	There have been suggestions that the proposed harvesting of this coupe would not be profitable, and would actually lose money. This is not the case. The analysis that suggested this was based upon statewide average figures rather than actual figures for wood volumes, harvest, transport and roading costs relating to this coupe.

Conclusion

Having carefully considered all issues raised, the review concludes that the proposed harvesting operation is able to meet or exceed all required standards and legislation, including in particular all relevant requirements under the *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*, the *Forest Practices Act 1985* and the Forest Practices Code.

The review also recommends that the following additions/changes be included in any certified Forest Practices Plan for this coupe to ensure there is clarity regarding the management prescriptions relating to protection of some important values. (Note: the first three prescriptions below reflect standard procedures, but it is considered useful to explicitly reference these procedures in this Forest Practices Plan):

- A general prescription that if any threatened or endangered species is discovered during operations (such as a den, nesting site, threatened flora species, etc) then the operation will be suspended in the area and management prescriptions will be developed and implemented, including seeking advice from the Forest Practices Authority where required.
- Explicit references to the management prescriptions in place to protect habitat for the Tasmanian Devil and Spotted Tail Quoll.
- In the event of the discovery of any Aboriginal artefact or site during operations, the operation will be suspended in the area and management prescriptions will be developed and implemented, including seeking the Forest Practices Authority advice if required.
- Remove from the harvest area the small sections neighbouring private property to reduce the potential impact of wind exposure.
- Additional engineering measures to minimise potential sediment input from road/stream crossings during construction.
- Rooding should be located to avoid disturbance and damage during rooding and harvesting operations to the community identified stump remaining from previous harvesting operations.

Subject to inclusion of these recommended additional changes, and subsequent certification of the Forest Practices Plan, the review concludes that the proposed harvesting operation would meet or exceed all required standards and legislation and therefore could be undertaken.

The review recommends that a copy of the certified Forest Practices Plan is provided to the community as soon as possible following certification, and prior to commencement of any harvesting or rooding operations.

Forestry Tasmania
9 April 2015