

5.8 PROBLEMS ASSOCIATED WITH PLANTATION FORESTRY

All the detrimental effects that clearfelling silviculture can have are exacerbated by plantation forestry. When an area is labelled 'plantation', the other trees, shrubs and floral species lose their rights in the forest. The area may be clearfelled many times per century.

Short rotation plantations were developed in order to encourage agro-forestry on private land. A 20-30 year wait for a return on an investment is more attractive to a farmer than a 50-100 year wait. However, this intensive production is an unsuitable practice in the Strzelecki State Forest, where foresters must combat the native wildlife and vegetation, such as swamp wallabies, bush rats, wattle trees and ants and where soil and water conservation, tourism, recreation and habitat are high priorities.

It is interesting to note the conclusions of the Independent Panel, which rejected Amcor's applications to convert 2,000 ha. of native vegetation in the Strzelecki Ranges into eucalypt plantation. They stated that the removal of native vegetation would be contrary to the policy on the retention and re-establishment of native vegetation set out in Clause 3-8.1 of the State Planning Scheme. The plan to convert native vegetation into plantation was found to be not in accordance with the policy for timber production (Clause 3-10.1) as the proposed plantations were not on predominantly cleared land. The panel found that 'native vegetation has an inherent value fundamentally different to a plantation in terms of habitat and biodiversity' and that 'any reduction in size of vegetation reduces its value in terms of critical mass and increased edge effect.'⁹⁴ The Panel also acknowledged that there was other cleared land available for plantation purposes even if it had to be purchased.

Similarly, any moves to convert native vegetation in the Strzelecki State Forest into plantation or even harvesting eucalypt forest could be rejected on these grounds. The 2,000 ha. of eucalypt forest and the 2,000 ha. of understorey species referred to by Peter Ryan⁹⁵ have an inherent worth as native forest, wildlife habitat, scenic values etc. Coupled with the inability to use the 14,000 hectares of steep slopes and gullies for timber production and the need to abide by regulations set out by the Catchment Management Authority and Water Authorities, this land could become a liability for any licensees. Therefore the creation of this park will have little negative effect on the timber and plantation industries, while benefiting conservation, tourism and water production.

5.9 "USELESS SCRUB", "UNDERSTOREY SPECIES" OR "IMPORTANT FOREST"?

In the proposed National Park, there are acacia forests (blackwood, silver wattle, black wattle etc.) supporting abundant wildlife and a diverse understorey of ferns, epiphytes, and fungi and other species characteristic of the wet forest. Some of these areas have been earmarked for removal and the establishment of eucalypt plantations.⁹⁶ There is a tendency for foresters to continue the suppression of acacia regrowth with a regime of ringbarking and spraying. This is seen by many as a foolhardy move as:

1. Acacia forest is native bush and by rights must not be destroyed for plantation purposes on public land.
2. Acacia forests often tend to be the 'pioneer species' in areas too poor in nutrient to support eucalypt forest - such as previously eroded, cleared or degraded land. As legumes often with short life cycles, acacias restock degraded areas with new nutrient in a manner more efficient and cheaper than any man-made technique. In dry, nutrient-poor Australia, acacias are a blessing, not a curse.
3. Acacias, blackwoods in particular, make excellent timber and in this region grow at a mind boggling rate.
4. This type of forest prepares the way for the re-emergence of eucalypts once conditions become suitable.
5. Acacias provide food sources for several species of fauna

6. THE PROPOSED NATIONAL PARK AND THE CAR CRITERIA

The Comprehensive, Adequate and Representative (CAR) reserve system formulated by the

Commonwealth and the State Governments as part of the Regional Forest Agreements is governed by a set of criteria. 97 The proposed National Park in the Strzelecki State Forest meets CAR objectives and is further supported by guidelines in reserve design.

The objectives of biodiversity conservation in the Regional Forest Agreements are:

- to maintain ecological processes and the dynamics of forest ecosystems in their landscape context
- to maintain viable examples of forest ecosystems throughout their natural ranges
- to maintain viable populations of native forest species throughout their natural ranges
- to maintain the genetic diversity of native forest species.98

To achieve this, the RFA process seeks to preserve "15% of the pre-1750 distribution of each forest ecosystem" and states that 'the principle of comprehensiveness requires that the reserve system should sample each forest ecosystem within a region'.99

The original 'Great Forest of Gippsland' was at least 500,000 ha. '100 - 120 kilometres long by 50 -70 kilometres wide'. 100 Due mostly to land clearing for agriculture, and to a lesser extent, conversion of native vegetation to plantation, the original Great Gippsland Forest has been reduced to less than 15% of its former size. This phenomenal loss of forest cover for this region is well documented as one of the most radical and rapid land transformations in Australia, if not the world. However, the remaining forest covers a variety of forest types: wet sclerophyll dominated by mountain ash; blackwood forests; cool temperate rainforest; messmate, peppermint and stringy bark forest in accordance with the objective of comprehensiveness.

Viewing the Great Gippsland Forest as an entity unto itself, in order to even come halfway close to CAR criteria and the objectives of maintaining viable populations throughout their natural ranges, all remaining native vegetation in the Strzeleckis should be reserved. In preparation for the CAR reserve system, the Hardwood zone of the Strzelecki State Forest, approximately 25,000 ha. was made a deferred forest, exempting it from timber harvesting pending the outcomes of the RFA. However, because this 'hardwood zone' has been vested in the Victorian Plantations Corporation, it has supposedly been exempted from the CAR system. This is a travesty which needs to be reversed immediately. The Deferred Forest Areas were put in place to ensure that the CAR reserve system could be established. Under the heading 'Urgency and Practicability', the Report says, 'Where gaps have already been identified and current threatening processes may preclude future reservation options, immediate action should be taken to ensure that the CAR reserve system is established'.

In the discussion of adequacy, the report states that 'the general rule is that the chances of long term survival increase with increased proportions of populations or forest ecosystems reserved and appropriately managed.... Most estimates show that the risk of loss is highest where only a small percentage of the distribution of the community or species is reserved and adjoining unreserved forest is cleared or significantly modified.' They also stress the problems of threatening processes (e.g.. land clearing and disease) on surrounding land may affect the adequacy of the reserve system. This is relevant to the Strzelecki State Forest. The small, isolated reserves we have at present are under threat from the high rotation, plantation forestry which has recently been undertaken by the Victorian Plantations Corporation. The threatened cool, temperate rainforest community is especially vulnerable to 'edge effects' from timber harvesting, and the spread of myrtle wilt is a danger. High rotation timber harvesting also affects the age distribution of the Mountain ash in the forest. By keeping the forest young, biodiversity and ecological processes are modified.

Representativeness embodies the objective that 'sample areas of the forest that are selected for inclusion in reserves should reasonably reflect the biotic diversity of the communities.'101 Basically this argues that if forest species are distributed across the reserve and other measures of forest diversity are present then there is increased 'confidence that the reserve system does cover the full range of biodiversity'. By including different forest types and ages over a large area, the proposed National Park should meet this objective.

The proposed National Park meets many of the guidelines on reserve design in the report, in that it

incorporates catchments; is a 'large enough to sustain the viability, quality and integrity of populations'; covers many vegetation types and faunal species and successional stages and it links reserves across the landscape. 102 The nationally agreed criteria for the CAR reserve system also draw attention to areas which are 'natural refugia for flora and fauna and centres of endemism'¹⁰³ The Eastern Strzeleckis has become a refugium, an isolated sanctuary for some flora and fauna in an area where so much forest has been lost. For example, the Superb lyrebird once endemic across the Strzelecki Ranges is now largely restricted to the dense forest of the Eastern Strzeleckis and does not inhabit the more southerly Wilsons Promontory National Park.

The Report also says that 'priority attention should be given to rare, vulnerable and endangered ecosystems and species'.¹⁰⁴ Rare and endangered forest ecosystems, such as old growth mountain ash and cool temperate rainforest will have protection from threatening activities on contiguous land by being within the larger reserve system, and replication across the reserve of forest types will ensure against loss of forest types through stochastic events, such as fire. ¹⁰⁵ In the Strzeleckis, despite the persistence of mountain ash throughout the Ranges, old growth mountain ash is becoming rare and endangered due to forestry practices and the lack of reserves. The persistent clearfelling of ridges and slopes prevents the return of old growth. The presence of regrowth, which has escaped fire and clearing from the turn of the century (some of the oldest regrowth mountain ash in the State) and subsequent regrowth can provide a range of successional stages of Mountain Ash, which would be of State significance. The protection of these Mountain ash ranges will link the otherwise, small, vulnerable and isolated reserves, in which the old growth mountain ash may eventually suffer extinction. The inclusion of these areas to complement the old growth already present in reserves is in keeping with the Report's advice that, 'reservation of an appropriate mosaic of age-classes, which with ecological processes intact will have the potential to generate the old growth of the future'. ¹⁰⁶

7. CONCERNS ABOUT CONSERVATION VALUES IN AND SUPPORT FOR THE STRZELECKI STATE FOREST

Some local groups and residents are in the process of forming responses to and letters of support for this proposal. However, community concerns about the past and present management of the Strzelecki State Forest and the need to protect the environment are evident.

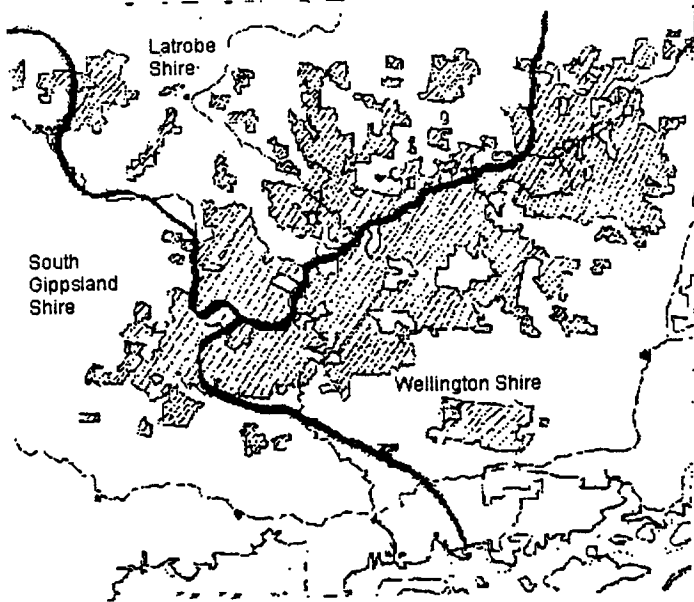
LOCAL SHIRES

The Strzelecki State Forest Shire falls within the boundaries of the Shires of Wellington, Latrobe and South Gippsland. All three Shire Councils have outlined environmental strategies in their Planning Schemes. The Shires of Wellington and Latrobe have said that native forest in the Strzeleckis, including areas of regrowth are worthy of conservation.¹⁰⁷ The Shire of South Gippsland in its Planning Scheme has recognised the environmental significance of public land in the Shire, the need to protect and conserve biodiversity, and to encourage the linkage of land areas into more environmentally viable parcels. It recognises the problems of small reserves, "some of which are the only known sites of original remnant vegetation"¹⁰⁸ and the problems of edge effects. Erosion is also of concern.

The South Gippsland Shire Council in 1997 expressed the need for the linking and upgrading of the Turtons Creek and Gunyah Gunyah Rainforest Reserve to the status of a state or national park. The tourism potential of the area was cited. In May 1998, the Council passed a motion to ask the State Government to delay implementation of the VPC privatisation bill until consultation has been held with the people of South Gippsland. Councillor Western stressed the importance of the Strzeleckis in terms of water, ecology and tourism and the need for a 'linked reserve' through the Eastern Strzeleckis.¹⁰⁹ Concerns have been expressed about lack of resources and expertise to monitor logging and plantation activities in this forest.

The proposed National Park should be appealing to the Shire Councils. It will provide a sound base for each Shire's commitments to the biodiversity and environment of the region and promote further tourism in the area, while relieving Shires of much of their forestry duties, such as monitoring and

policing the Forest Code of Practice and assessing applications for the clearing of native vegetation and the establishment of plantations.



WEST GIPPSLAND CATCHMENT MANAGEMENT AUTHORITY

The CMA has been charged with the care of catchments and a commitment to biodiversity. A draft version of this proposal was presented to the CMA after the Corner Inlet Management Group asked that the CMA consider the proposal. At a CMA board meeting held on 25/5/98 it was stated that the issue of the reserve 'has the potential to become a significant local issue and it is recommended that the CMA adopt an active role' and 'ensure that the RFA process include a detailed appreciation of the biological resources of the Eastern Strzelecki forests before the process determines the design of a CAR reserve system'. The motion 'that the CMA express the view that the native forest in VPC land become part of the RFA process' was carried.

LOCAL GROUPS/RESIDENTS

At a public meeting to discuss the South Gippsland Shire's draft planning strategy in July 1997, there was a general consensus that 'the natural environment be protected as a priority over and above any economic considerations'. 110

Local residents have been active in writing letters to newspapers, politicians, NRE and the RFA, voicing concerns about the treatment of the Strzelecki State Forest and the lack of public consultation in the vesting and privatisation process.

Demonstration: Seventy local residents attended a demonstration on the steps of Parliament House on April 28 1998 to protest against the inappropriate vesting of bushland in the Strzelecki State Forest with the Victorian Plantations Corporation and the continuation of the privatisation process, while local grievances had not been resolved. They also called for the creation of a 30,000 ha. National Park in the Strzelecki State Forest.

At the Yarram RFA meeting held on May 18 1998, over 70 local residents and representatives of community organisations demanded 'increased protection for remnant Strzelecki forests'.¹¹¹ There was an overwhelming sense of unfairness expressed in regard to the Strzelecki State Forest being written off as a plantation area and anger expressed at past and present management practices in this significant State Forest.¹¹² At the RFA forest heritage meeting at Foster on June 17 1998, the Eastern Strzeleckis were given a high rating from the majority of the 70 people in attendance. The South Gippsland Conservation Society has expressed concern about the privatisation of the Strzelecki State Forest and the threats to conservation and public access through its newsletters. The Society has provided financial assistance for the printing and distribution of this submission and offers its wholehearted endorsement for its objectives.

The Mt. Best Concerned Residents Group have expressed concerns about the corporatisation and

privatisation of the VPC and the management of the Strzelecki State Forest. They are worried by the inappropriate labelling of forest areas as plantation and threats to the scenic values and ecological values of the Strzelecki State Forest.

Susan Davies, local MP for Gippsland West, has voiced her concerns about the alienation of public land through corporatisation and privatisation in the local media and in Parliament. She has expressed her concerns about logging in sensitive catchments and stated her aims for lifting the status of the Gonyah Gonyah Rainforest Reserve and linking this reserve with the Tarra-Bulga National Park. 113

Franklin Landcare Group, President has expressed fears about the lack of information and public consultation about the privatisation of the Strzelecki State Forest and logging plans. 114

The Latrobe Valley Field Naturalist Club supports the proposal for a large National Park in the Strzelecki State Forest, which includes and links the Gonyah Reserve with the Tarra-Bulga National Park.

GUNAI/KURNAI NATIVE TITLE CLAIM

A claim was lodged on behalf of the Gunai/Kurnai community on April 4 1997 for all the unalienated Crown Land in an area bordered by the Tarwin River in the west to the Snowy River in east. This includes much of the Strzelecki State Forest. Until this claim is resolved, the Crown Land is supposed to remain intact and not be dramatically altered. Vesting the bulk of the Strzelecki State Forest in the Victorian Plantations Corporation and re-defining it as 'private' land, privatising the VPC and converting native forest into plantation is a dramatic alteration.

VICTORIAN COASTAL STRATEGY/TREATIES

The proposal for a large National Park in the headwaters and upper catchments of the Strzelecki State Forest will have a positive effect on the objectives of the Victorian Coastal Strategy and will benefit the marine reserves in and adjacent to Corner Inlet. The wetlands of Corner Inlet are one of Victoria's largest feeding grounds for international wading bird species. Headwater protection will contribute to the conservation of this important habitat and assist in the fulfilment of Australia's obligations under the international treaties - JAMBA, CAMBAR and RAMSAR.

VICTORIAN CONSERVATION GROUPS

Victorian conservation groups, Environment Victoria and Friends of the Earth have publicised their concerns for the privatisation of the Strzelecki State Forest and the lack of environmental safeguards in their newsletters and in the media. 115

Greening Australia has expressed a desire to enlarge the Tarra-Bulga Park.

MEMBERS OF PARLIAMENT

State Parliamentary debates from Hansard, 29/4/98 and 11/5/98 indicate that there is more than enough reason to doubt the wisdom of current management practices and trends in the Strzelecki State Forest. The State opposition since 1993 have raised various concerns, but have always voted in support of Government legislation regarding the Victorian Plantations Corporation until April 1998, when the opposition was concerned enough to speak at great length about a range of problems, referring on numerous occasions to concerns raised in regard to the Strzelecki State Forest and voted against the 1998 VPC Amendment Bill. On April 29, 1998 and May 11, 1998, a total of 10 Labor MP's voiced their protest as did Susan Davies, Independent MP. State National MP's also added some doubts and misgivings of their own.

The Shadow Environment Minister, Sherryl Garbutt highlighted problems regarding limitations to 'multiple use' of areas vested in the VPC in the State Parliament, e.g., road closures, loss of recreation and conservation areas, the loss of native forest. threats to tourism, effects on water and soil conservation. Ms. Garbutt also questioned the cost/benefits of this shift of public assets, and argued strongly against the haste with which the Government is pursuing these ends without adequate public consultation and information. 116 Many speeches supported calls to delay the Bill until community and environmental concerns had been resolved and inappropriate lands divested from the VPC.

Susan Davies, Gippsland West gave an account of the lack of Government interest in community concerns, the incomplete mapping of the Strzelecki State Forest, the inappropriate timing of the Bill (the RFA process for Gippsland was about to begin) and the environmental problems inherent in treating VPC land as 'private'.

The VPC Amendment Bill 1998 received 27 No votes in the Lower House and 9 No votes in the Upper House.

8. TOURISM

8.1 POTENTIAL

This beautiful place with its cool, ferny understoreys and towering mountain ash rising into the sky, a stunning array of intriguing mosses, fungi and ferns, habitat for rare and beautiful wildlife is only 2 - 3 hours drive from Melbourne. The mystique of the Superb Lyrebird has the potential to attract visitors from far and wide. Its prowess as a song bird and its remarkable plumage makes it one of the most famous of Australia's fauna. Koalas are also a big drawcard. The Strzeleckis are blessed with an abundance of both. Visiting this area leaves an indelible impression.

The enormous fame of the tiny Tarra-Bulga National Park¹⁷ is direct proof that as a natural forest destination, the Strzeleckis do not disappoint the visitor. South Gippsland has a rare and valuable treasure in the Strzelecki State Forest. The knowledge that an area is protected in a National Park somehow makes it more attractive to the potential visitor. Once an area is a National Park, it appears on maps, in guide books and tourist information literature and its fame continues to grow.

Reports from the U.S. state that by the year 2000, forest based recreation in the U.S. is expected to generate 30 times more income than revenue earned through timber sales. ¹¹⁸ Not only is tourism a less destructive land use alternative it has the potential to easily out-perform forestry on an economic level, provide more jobs, and maximise local revenue benefit.

8.2 GRAND RIDGE ROAD

Much of the proposed National Park is traversed by the Grand Ridge Road, a tourist route as soulful and historic as it is winding. Neither widened nor straightened, this authentic vintage mountain road has always had a great appeal. With a little promotion, the Grand Ridge Road could spark great public curiosity.

8.3 OTHER ROADS

Dozens of other wonderful, old roads are to be found in these Ranges:- the Toora-Gunyah Road, Turtons Creek Road, Tarra River Road, Morwell River Road, Christies-Albert River Road, McLeans Road etc all of which provide a unique experience for the motorist. Devil's Pinch Road and Dingo Creek Road and many forestry tracks may serve as marvellous hiking tracks.

8.4 VISITORS

National Park status for the area outlined would greatly enhance the tourism potential of the region and provide benefits for the towns in the Latrobe Valley and South Gippsland.

DCNR estimated that the Strzelecki Ranges received 150,000 visitors annually (mostly day visitors). ¹¹⁹ This is without facilities or signs except in Tarra Bulga National Park, which receives 80,000 visitor days per annum. Wilsons Promontory National Park receives, 128,000 day visits and 240,000 overnight visitors per year. ¹²⁰ Developments on Wilsons Promontory will inevitably increase visitor numbers to the region, both on-season and off-season.

A recent tourism survey¹²¹ calculated the average spending patterns of overnight visitors to this region at between \$86 and \$112 per day, depending on whether the visitors were from overseas, interstate or Victorian and whether they paid for accommodation or stayed with friends, etc. Day visitors on average spend \$40 per day. If the added attraction of the Strzeleckis could convince just a quarter of Wilsons Prom visitors to stay another day exploring the region to the immediate north, staying overnight in Foster, Balook, Toora, Mirboo North, Yarram, Fish Creek, Boolarra or Welshpool; refuelling their car, shopping, going out for dinner etc., the region could realistically see a direct injection of \$8.6 million to \$11.2 million into the local economy. 100,000 extra day visitors would inject an extra \$4 million. The towns of South Gippsland are strategically located halfway

between Wilsons Promontory and the Strzeleckis and may stand to reap much benefit from this proposal.

8.5 RECREATION

The proposed National Park would provide opportunities for the development of recreational activities such as picnicking, camping, bushwalking, swimming, bird watching, koala spotting and fishing. All these activities are low impact, yet bring revenue into the region.

9. SETTING UP COSTS FOR THE PROPOSED NATIONAL PARK

As the whole area is already State owned, a park could be formed without needing to purchase land. The establishment of a National Park in this area would not necessarily conflict with any local social, sporting or recreational interest. Off-road motor cycle riding and prospecting are uses which have the potential to conflict with the aims of a National Park, but with adequate consultation and agreement, there is no reason why these activities cannot continue. The proposed area is generally not used for firewood gathering. The extremely steep terrain makes much of the area unsuitable for logging and intensive timber production.

The area is serviced by reasonably adequate roads though rarely used as a thoroughfare. Traffic is light, mostly being tourists, logging trucks and the horses and wagons which are for hire. The forest within the proposed area has largely been spared the interference caused by the establishment of plantations and continues to display its remarkable vigour and resilience. Costly restoration efforts are largely unnecessary.

Whether it be promoted as a tourist destination or not, it would doubtlessly remain wild and tourist impact would be largely limited to roadsides, tracks and designated areas which already exist. As roadsides and tracks carry exquisite bush there is little need to 'go bush' to experience the place. The terrain, climate and the leeches serve as a natural deterrent to this activity. Simple paths and boardwalks could serve as an excellent way to view rainforest gullies and ensure that human impact in highly sensitive areas is kept within reasonable limits.

Creating a park in this vicinity would not only conserve the forest habitat and ensure the integrity of these important water catchments, it would also provide for future innovations in tourism and recreation and a renewed interest in the Strzelecki Ranges.

The township of Balook, close to the Tarra-Bulga National Park, is a natural base for the Park as it has already evolved into a hub with an information centre, Ranger quarters, various forms of accommodation and fuel and food for sale.

Mirboo North, Foster, Toora, Welshpool, Yarram and Boolarra could all serve as tourist 'stepping-off points'.

The development of major facilities within the newly formed park can evolve slowly as is needed. Beyond the upkeep of existing signage, picnic areas, toilets and camping areas and the provision of picnic area firewood and additional toilets no dramatic infrastructure expenditure would be necessary.

However, it is long overdue that these Mountain Ranges had an adequate staff of Rangers and works crew who are stationed in, and responsible for the Strzelecki State Forest for the multitude of tasks that any State Forest requires, whether it be a reserve or not.

10. CONCLUSION

- It is clear that the treatment of the Strzelecki Forest since white settlement has been heavy handed and the environment in the region has suffered. Management of the remaining forest indicates that a balance still has not been reached. The Eastern Strzelecki Ranges is a forest isolate surrounded by privately owned cleared land. The formation of a large National Park will ensure that the long term

future of much of the remaining forest is taken seriously.

- A large National Park in these Ranges is long overdue. A 30,000 ha. reserve would protect roughly half of the Strzelecki State Forest and allow for the future preservation of around 6 or 7% of the original Great Forest of Gippsland.
- The need for a large conservation reserve has become more pressing with the vesting of and plans to privatise a large area of native forest in the Strzelecki State Forest.
- The key areas identified for the establishment of a National Park include current reserves, LCC hardwood zones and RFA Deferred Forest Areas. The area amounts to 35,000 ha. of which 30,000 ha. should be selected for National Park status. Our own field trips, maps, research and consultation with other locals have consistently reassured us that the areas identified in this proposal are indeed amongst the most significant areas of bush in the Ranges.
- The natural significance of the Strzelecki State Forest has been downplayed and misrepresented. First hand experience over an extended period of time is necessary for a full appreciation of the quality of this forest and the tragedy of its continuing misuse since white settlement. Likewise, first hand experience bears witness to the forest's remarkable power to restore itself to its former state, once the misuse ceases.
- The entire Strzelecki State Forest is public land, whether it be vested, leased, reforested, regrowth, old growth, alienated or otherwise, and as such should be considered in its entirety. Only viable pine plantation areas could legitimately be excluded from consideration for reserves status.
 - Lease contracts held by Amcor or the VPC should in no way exempt any significant public land from reserve status.
 - Old land titles showing whether areas were alienated from the Crown and re-purchased or not bear little relationship with the current state of the forest and can no longer be used to exempt areas from reserve status.
 - Likewise, it is wrong to consider young forest as less worthy of reserve status. The level of human interference in the Strzelecki State Forest has left the majority of the land carrying forest 100 years old or younger. Old growth areas occur throughout, but no longer dominate as they did before white settlement. Areas of forest between 50 and 100 years have regrown from fires or land clearing. Areas younger than 50 years are generally regrowth after logging or areas which naturally regenerated or were re-forested with human assistance.
 - Likewise, it is equally irrelevant to consider areas which were at one stage cleared to be less significant than areas which were never cleared. Wilderness is not merely to be found in 'untouched' places. Wilderness returns. In the Strzeleckis wilderness returns with remarkable vigour.
 - Likewise, the presence of a proportion of 'planted' eucalypt forest cannot be used to exempt areas from reserve status. A viable reserve needs a large, continuous tract of land and a minimum of disturbance. 'Planted' ash forest bears much the same structure and understorey as naturally regenerated areas and are too scattered to be singled out.
- The proposed area would make an excellent National Park. It is spectacular, diverse and beautiful. The array of common, interesting, rare and downright endangered species present in the Strzelecki State Forest do not enjoy the protection which they deserve. The preservation of water catchments, flora and fauna and the integrity of the forest community are all important environmental, social and economic responsibilities, which need to be upheld.
- Presently, only 8% of public land in the Strzelecki Ranges has any degree of reserve status - 5,000 ha. in total. This amounts to about 1% of the original Great Forest of Gippsland. These reserves are small and scattered.

- The foremost value of the Strzelecki State Forest is that it is a wild place. As with most wild places

the most sensible and cost effective land management practice is to keep interference to a minimum.

- Although eucalypt and acacia are generally tough, rainforest is more vulnerable and prone to edge effects caused by activity on adjacent land and worsened by fragmentation and isolation. The Strzelecki State Forest is still among the four most significant sites in Victoria for cool, temperate rainforest, yet the proportion of rainforest has declined due to increased disturbance. Inclusion within a large reserve area will enhance the protection of these significant, yet vulnerable areas of rainforest.

- Present land use in the Eastern Strzeleckis is weighted too heavily towards the cutting of native timber, the cultivation of pine and short rotation hardwood plantations. Due to
 - the high proportion of the Eastern Strzelecki Ranges that is already privately owned by Amcor
 - the high level of intensive plantation forestry on public and private land
 - the removal of such a high proportion of native forest since white settlement
 the remaining public native forest deserves to be treated with great consideration.

- State policies and treaties all agree that generally:
 - public native bush should not be cleared, unless it is regenerated
 - plantations should be established on cleared private farmland
 - the current state of the environment could do with some improvement
 - biodiversity be maintained and improved
 - habitat depletion is the major threat to native flora and fauna

- Current forest management impinges on many aspects of the nature of the Ranges - soil disturbance, water quality, water yield, rainforest health, flora and fauna are all compromised as a result. Plantation forestry exacerbates these problems further as harvesting occurs more often leading to more frequent stress.

- Concerned parties, such as, Shires, CMA, conservation and interest groups, despite the best intentions, do not have the resources to carry out their responsibilities to the environment in the area. There is a serious lack of monitoring and policing of forestry activities and forestry planning is conducted with the minimum of consultation.

- Water quality, quantity and consistency of stream flow throughout the year are vital to the very quality of life for everything and everyone living in the region, and as such is seen by locals as an issue of vital importance. Improper use of the forests at our water's source cannot be tolerated.

- Forestry tracks, timber harvesting on steep slopes, heavy rain after timber harvesting all contribute to soil disturbance.

- Increased nutrient content, in waterways caused primarily by soil disturbance, and exacerbated by hot summers has a drastic effect on river health, water quality and aquatic life.

The formation of a National Park is an appropriate way to help secure soil and water conservation in the region's major headwaters and fulfil regional commitments to the environment and biodiversity.

- Vigorous efforts should be made to shift plantation forestry away from public land towards farm based agro-forestry as recommended in several reports.

- We are confident that any cost/benefit analysis that adequately assesses the region on social, economic and environmental grounds will show that in terms of tourism, water production and conservation there will be a direct economic benefit.

- The formation of this National Park will have minimal impact on forestry in the region.

- Amcor owns vast areas of private forest and plantation.

- The VPC will continue to manage the bulk of the softwood zone and some of the hardwood zone.

- NRE will continue forestry operations in some of the areas of the Strzelecki State Forest under its management.

- The proposal for a large National Park reflects the spirit of the CAR criteria in that it maintains

biodiversity and forest ecosystems across their natural range. It fits reserve design criteria by including various forest types and ages, by linking reserves and acting as a sanctuary for flora and fauna in the Strzelecki Ranges.

- Assuming the original Great Forest of Gippsland to be around 500,000 ha., this National Park would account for 6 or 7%. By CAR standards this is less than the desirable standard of 15% of pre-1750 forest cover. Nevertheless 6 or 7% would be six times better than the amount of reserves currently in place. 30,000 ha. must be seen as the minimum amount of reserve necessary at this present time. As this falls so far short of CAR targets, a reserve system smaller than 30,000 ha. is not a serious option.
- The treatment of the Strzelecki State Forest is a significant local issue and the government needs to re-assess the impact that recent restructuring and reclassification has had and is likely to have in the future. Numerous politicians as well as state and local interest groups have expressed concern over the vesting and privatisation of Victorian public land, in particular non-plantation forest and the current land management practices in the Strzelecki State Forest. Many groups support the proposal for a large National Park in the Strzelecki State Forest.
- The Strzelecki State Forest has two vital ingredients for successful tourism - it is worth visiting and it is less than 3 hours drive away from several million people. Even with a modest budget, the Strzelecki State Forest could be made far more tourist friendly than it currently is, with great potential benefits to the economy of the region. Tourism is capable of being a far more benign and lucrative alternative economic use.
- Human beings need protection also. The logging trucks that dominate the old, windy roads present a threat to road safety. A National Park can restrict and regulate logging truck access and in doing so increase safety.
- The Strzelecki State Forest deserves an adequate staff employed to care for the environment. The State Forest has continually suffered from a history of State miserliness. Major spending is unnecessary in order to establish this National Park beyond the provision of some basic facilities and an adequate staff.
- This area is capable of yielding a balance of economic, social and environmental values that could satisfy the local community and all concerned parties. The creation of this National Park will highlight the region's natural beauty, help to fulfil commitments to regional biodiversity and land care, preserve vital headwaters, protect habitat and heritage values and offer high protection for this large public remnant of the Great Forest of Gippsland.
The process of establishing a National Park must commence with a moratorium on forestry operations in the proposed area, an assessment of flora and fauna, the completion of Ecological Vegetation Class mapping, an accurate identification of plantations (according to agreeable, consistent definitions), and an evaluation of all recent forestry plans and operations. Following this there should be investigations of reserve boundaries, removal of areas deemed of low natural significance or best left available for timber harvesting, gazetting of the proposal and a comprehensive management plan for the National Park drafted. Throughout this process public input and scrutiny should be required and encouraged.
This proposal should be seen as a viable and realistic basis from which the State and Federal Governments can achieve a balance of values and responsibilities to the industry and the environment.

- 1 We calculate this on the basis of past records and NRE statistics regarding additional purchases. There is a possibility that the Amcor leased land has been counted twice. If so, the size of the Strzelecki State Forest is more like 54,400 ha.
- 2 Existing reserves are of course non-negotiable areas
- 3 These are of course gross areas which do not indicate net areas directly available for logging.
- 4 1980 figures. Possibly a larger area now. Some of these areas have voluntarily been made reserves by Amcor.
- 5 Amcor was leased 8617 ha. of the Strzelecki State Forest in the 1960s for 60 years.
- 6 VPC was vested with 40,000 ha. of the Strzelecki State Forest in 1993
- 7 See Land Conservation Council Map & RFA Deferred Forest Area Map
- 8 Those of us involved in the drafting of the boundaries of the 'main body' did so before becoming aware of either map by on the ground observation and study of topographic maps we arrived at an area almost identical to the LCC 'hardwood zone' and the RFA's 'deferred forest area'. However we had also identified extra land in the section leased to Amcor which unfortunately has been left out of the 'deferred forest area'.
- 9 LCC (1980) LCC South Gippsland Area District 2
- 10 Angus Pollock, Issues magazine
- 11 See Figure - Water Catchments
- 12 CAR stands for comprehensive, adequate and comprehensive
- 13 Regional Catchment Strategy 1996
- 14 Fires were deliberately lit as a form of land clearing, often on the hottest days leading to out of control situations.
- 15 See Appendix 2: Rare & Endangered Species in the SSF.
- 16 Neville Walsh, Royal Botanical Gardens, Herbarium, Personal correspondence. *Adiantum diaphanum* appears on the F&F Guarantee threatened list.
- 17 F & F Survey & Management Group. 1990, Table 1
- 18 C,F&L, Sites of Botanical Significance in Central Gippsland, 1984.
- 19 F & F Survey & Management Group. 1990, p. iv Mapping of rainforest is not complete. However, it is clear from maps that are available, that n extensive sections and smaller patches of rainforest have been vested in the Victorian Plantations Corporation.
- 20 After clearfelling this area of native forest, the ash was replaced with a non-endemic species, even though it is against State Policy to convert public bush into plantation.
- 21 Current flora and fauna survey work by naturalist Elaina Fraser.
- 22 A map of the original Gunyah reserve dating back to the 1890s is shown in McNaughton W, Gunyah 1894-1940 and also on parish maps.
- 23 Dargavel J 1995 Fashioning Australia's Forests p187
- 24 Regrowth area are 'part of the continuum of the ecosystem and should not be regarded as being unworthy of conservation' (Panel Report, 1996).
- 25 Brown and dusky antechinus and the long and short nosed bandicoot
- 26 The greater glider is absent from Wilsons Promontory
- 27 Recent chew balls from College Creek of yellow bellied glider identified by B Treggs
- 28 LCC South Gippsland Area District 2 (1980) p. 283-4
- 29 Report of Panel Hearing on Applications by Amcor Plantations September 1996 p. 46
- 30 Panel Report p. 40
- 31 The superb lyrebird is not endemic to Wilsons Promontory National Park. The LCC report says that it was introduced there but didn't survive.
- 32 Jackson 1988 Review of biological information, distribution & status of the Australian grayling p 15
- 33 The underlined species are rare or threatened. See Appendix 2 - Rare & Endangered Flora & Fauna
- 34 Moulds, E The Dynamic Forest p.106
- 35 Proposed Recommendations South Gippsland Area District 2, LCC 1982 Introduction
- 36 See section 5.5 which outlines differences between the public and private sections of the Code.
- 37 Areas set aside under interim protection and exempt from timber harvesting pending the

outcomes of the Regional Forest Agreement.

38 Some of the newspaper articles listed in the bibliography outline these concerns. Members of the public have received letters from Forestry, indicating that during the RFA process areas of public land may be considered for inclusion within the reserves system, while they hear that the Vic. Gov. is passing bills to ease the sale of the VPC and placing advertisements in newspapers asking for expressions of interest to buy it.

39 Purple indicates that the land is set aside for plantation purposes

40 Alan Stockdale said that he was unaware that native forest was involved in the VPC's holdings and that there was room for negotiation- Foster Mirror, May 27, p. 1

41 Foster Mirror, 10/6/98

42 A large area (from no name track, past Redhill Track and on to Stronachs Road and then north of the Gunyah reserve), part of the 2,500 ha. site of botanical significance, ie undisturbed wet sclerophyll forest, at Gunyah Gunyah has been clearfelled and replaced with a non-endemic species. See also Strzelecki Blues p.17f..

43 Indeed, not only has the Government vested pine plantations and eucalypt plantations in the VPC, they have also vested approx. 20,000 ha. of non-plantation land in the corporation. Areas of rainforest, acacia forests, eucalypt forest, some of which have been described as sites of botanical significance. Most of the vested area is in highly sensitive water catchments and headwaters.

44 Personal correspondence. These areas are not plantations, have an inherent worth as native forest and should not be part of the vested land. Coupled with the fact that approximately 12,000 ha. is unavailable for logging because of steep slopes, water ways etc, in the proposed reserve, the creation of this reserve will have a negligible effect on genuine plantation holdings.

45 The Panel Report on Applications by Amcor Plantations argued that while eucalypt plantations provide 'a better habitat for native fauna than pine plantations or cleared agricultural land, this habitat value cannot be compared with a naturally occurring forest with its diversity of species, range of maturity and fully developed understorey'. p. 42 They continued, 'when eucalypt plantations are first established they have no ecosystem. This is unlike selective logging in native forests where, although aspects of the ecosystem may be damaged, it will not be entirely destroyed and will recover.'

46 See section 5.4 Catchments & Water

47 Personal conversations, letters and minutes of the Mt. Best Concerned Residents Group, 24/5/98; RFA meetings held in Foster and Yarram.

48 In 1978 the entire hardwood harvest for Won Wron, Mullungdung, Alberton West and the Strzelecki State Forest was 47,000m³. (LCC, 1982) The VPC has promised to provide from its chunk of the Strzelecki State Forest alone, 100,000m³ to just one of its customers. (Latrobe Valley Express, 13/11/97)

49 Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia, ANZECC/MCFFA National Forest Policy Statement, p. 8

50 Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia, p.8

51 Mt. Best Concerned Residents ; Land care groups; South Gippsland Conservation Society etc.

52 e.g. Code of Forest Practices for Timber Production, p. 65

53 Clarke, J Australia's Plantations (1995) p. 109

54 See problems with estimating plantation hectares in 'Key Areas for Consideration..'

55 One of the myths perpetuated about the SSF is that it was all cleared farmland. In fact only half the SSF was bought farmland and that was also in various stages of natural regeneration.

56 Clarke J p. 108

57 National Forest Policy Statement p. 48

58 LCC 1982 Proposed Recommendations

59 This viewpoint is also expressed in 'Dangers in Privatisation' an article from The Weekly Times 20/5/98. The article points out that privatisation of the State's plantations will result in further job losses in the industry by the reduction in small-scale private forestry investment.

60 2% of public land in Victoria is plantation, but in the Strzeleckis 33% approx. is plantation.

61 Report of Panel Hearing on Applications by Amcor Plantations Sep.1996 P.48

- 62 Even without forestry activities soil loss is serious. For example, it was estimated that more than 8,000 tonnes of soil containing large quantities of nitrogen and phosphorous was washed down the Agnes River during one day of heavy flooding in November 1995. SG Regional Water Authority 1997 Catchment Management Activity Report.
- 63 Report of Panel Hearing on Applications by Amcor Plantations September 1996 p.52
- 64 Report of Panel Hearing on Applications by Amcor Plantations September 1996 p.45
- 65 Regional Catchment Strategy 1997 p.23
- 66 For example, this is supported by the WaterWatch initiatives being carried out in the region
- 67 Recent blue-green algae outbreaks in Lance Creek reservoir shows how quickly and easily water supplies can deteriorate.
- 68 South Gippsland Region Water Authority Submission to the Victorian Coastal and Bay Management Council on the Draft Victorian Coastal Strategy Feb 1997
- 69 Walbrink, p. 5 The Contribution of channel banks and gully walls to total Phosphorus loads in the Murrumbidgee River
- 70 W Gippsland Reg. Catchment & Land Protection Board 1997 Regional Catchment Strategy p.18
- 71 The cost of treating water in a closed catchment may be as little as \$10 per megalitre, while in a cleared treatment is significantly higher (perhaps \$100) South Gippsland Water Board figures. Recently \$25 million was allocated for the improvement of town water supplies & treatment of effluent within the region.
- 72 Regional Catchment Strategy 1996
- 73 Fisher, T (1997) National Competition Policy: Review of the Forests Act p.11-12
- 74 Personal correspondence
- 75 LCC Proposed Recommendations 1982, South Gippsland Area, District 2 p.24
- 76 Water Watch results from West and South Gippsland June 1997-May 1998
- 77 LCC Proposed Recommendations 1982, South Gippsland Area, District 2 p.24
- 78 SEPP Victorian Government Gazette, 26 Feb 1988
- 79 Code of Forest Practices for Timber Production, Chapter 1.2
- 80 Panel Report on Applications by Amcor pp. 32;34
- 81 Flora & Fauna Guarantee 1988
- 82 C,F&L (1987) Definition of Rainforest in Victoria's Rainforests-An Overview p.13
- 83 Personal correspondence
- 84 Packman J; Kile G 'A Survey of Myrtle Wilt in the Central Highlands & Strzelecki Ranges of Victoria'. in Victoria's Rainforests: Perspectives and Definition, Classification and Management
- 85 Packman J; Kile G *ibid* The authors state that out of two infection sites at least one was related to illegal cutting activities. Both the Agnes and Franklin catchments were affected.
- 86 Reilly, Pauline. The Lyrebird p. 83
- 87 Victoria's Biodiversity Directions in Management p.83
- 88 Victoria's Biodiversity Directions in Management p. 83
- 89 Report of Panel Hearing on Applications by Amcor Plantations September 1996 p.43
- 90 *ibid* September 1996 p.46
- 91 Victoria's Biodiversity Directions in Management p.83
- 92 Doeg T (1990) ...Effects of Forestry Practices on Aquatic Values
- 93 Nationally Agreed Criteria for the Establishment of a CAR Reserve System for Forests in Australia, p.4
- 94 Report of Panel Hearing on Applications by Amcor Plantations September 1996 p.57
- 95 Correspondence, May 5 1998
- 96 "2,000 hectares of previous cleared land now supporting understorey species which could be reforested". Peter Ryan, May 5, 1998. Some of this forest has been regenerating since early this century and fits the definition of 'native forest' described in the National Forest Policy Statement. p.48
- 97 Nationally Agreed Criteria for the Establishment of a CAR Reserve System for Forests in Australia,
- 98 *ibid* p.2
- 99 *ibid* p.10

- 100 Moulds, Francis R (1991) The Dynamic Forest Lynedoch p. 106
 101 Nationally Agreed Criteria for the Establishment of a CAR Reserve System for Forests in Australia, p.5
 102 ibid p.16
 103 ibid p.14
 104 ibid p. 10
 105 ibid p.4
 106 ibid p. 14
 107 Independent Panel Report. p. 45
 108 Shire of South Gippsland Planning Scheme
 109 Foster Mirror, May 27 1998. Councillor Western also raised questions about the classification of certain areas in the SSF as plantation.
 110 Foster Mirror, 15/7/97
 111 Sentinel Times, May 26 1998
 112 See the list of related newspaper articles dealing with the privatisation of the SSF and the RFA meetings in the bibliography
 113 Foster Mirror 17/6/98
 114 Leongatha Star, 2/6/98 p.8
 115 Age 17/3/98; Environment Victoria Newsletter, March 1998; FoE, Fitzroy Newsletter, Dec, 1997
 116 Hansard, 29/4/98
 117 Listed in virtually every guide book in just about every language as a place well worth a look
 118 National Geographic March 1997
 119 Welcome to the Strzelecki Forest Drive, DCNR
 120 Wilsons Promontory Management Plane June 1997 p.21\
 121 Tourism Victoria Research Branch Profile of Travel to Victoria's Regions



From Sites of Botanical Significance in Central Gippsland, C,F&L & National Herbarium 1984

4. Gunyah vicinity
 5. Ryton vicinity
 3. Tarra

APPENDIX 1 RARE AND ENDANGERED SPECIES IN THE STRZELECKI STATE FOREST

Threatened flora and fauna (F&F Guarantee Act 1988) which occur in South Gippsland:

Thelymitra epipactoides Metallic sun orchid
Thelymitra mathewsii Spiral sun orchid

Threatened flora and fauna (F&F Guarantee Act 1988) which occur in the Strzelecki State Forest:

Adiantum diaphanum Filmy maidenhair
Cyathea Cunninghamii Slender tree fern
Dasyurus Maculatus Tiger Quoll
Ninox Strenua Powerful owl
Tyto tenebricosa Sooty owl
Megascolides australis Giant Gippsland Earth worm
Prototroctes maraena Australian Grayling
Miniopterus schreibersii Common Bent wing Bat

Threatened Community: Cool temperate rainforest community

Rare Species found in the Strzelecki State Forest:

Ninox connivens Barking owl
Accipiter novaehollandiae grey goshawk
Galaxias truttaceus spotted galaxis
Gobiomorphus australis striped gudgeon
tmesipteris elongata forked fern
Potorous sp. Potoroo
Petaurus australis Yellow bellied glider
Mastacomys fuscus Broad-toothed rat
Dishia rodwayi fungus

Rare and Interesting Vascular Plants in the Eastern Strzeleckis, South Gippsland identified by A.C. Beaglehole, OAM : The Distribution & Conservation of Vascular Plants in the South Gippsland Area, Victoria.(1984)

Acacia Howittii (c3) Sticky wattle
Deyeuxia rodwayi Bent grass
Dichopogon Fimbriatus Nodding Chocolate lily
Juncus Prismaticarpus Branching rush
Microsorium scandens (c3) Fragrant fern
Montia Fontana Water blinks
Nertera Reptans Dwarf nertera
Phebalium bilobium Notched Phebalium
Poa ensiformis type of Tussock grass
Pterostylis decurva Summer Greenhood
Sarcophilus australis Gunn's Orchid

The following are vascular plants (Beaglehole) of South Gippsland, exclusive to D sector and cannot be found in any other sector of South Gippsland and thus are of regional significance. (Sector D includes the Eastern Strzelecki Ranges, the South Gippsland foothills and part of the Latrobe Valley because of this, it cannot be fully known whether all of these species are found within the proposed reserve).

acacia acinacea Gold dust wattle
obliquinervia Mountain hickory wattle
Atherosperma moschatum (c3) Southern sassafras (also at Wilsons Prom)
Nothofagus cunninghamii Myrtle Beech

eucalyptus angophoroides (c1) Apple topped box
 eucalyptus elata River peppermint (not in reserve, grows 30-700m)
 eucalyptus rubida Candle bark (not in reserve)
 eucalyptus sideroxylon Red ironbark (not in reserve; dry forest)
 epilobium pallidiflorum Showy willow herb (not in reserve)
 montia fontana Water blinks
 Lomatia myricoides River lomatia (not in reserve)
 Persoonia confertiflora Cluster flower Geebung (not in reserve)
 Pomaderris langigera Woolly Pomaderris (not in reserve)
 Pomaderris vacciniifolia (c1) Round leaf Pomaderris (not in reserve)
 Galium liratum Furrowed bedstraw (not in reserve)
 Correa lawrenciana Mountain correa
 Dodonaea angustissima Slender hop bush (not in reserve)
 Veronica serpyllifolia Thyme speedwell
 Solarium linearifolium Mountain kangaroo apple (not in reserve)
 Tetratheca labillardierei Glandular Pink bells (not in reserve)
 Verbena bonariensis Purple topped verbena (not in reserve)
 isoetes drummondii Plain quillwort (also found in f)
 microsorum-scandens Fragrant fern (also at Prom)
 tmesipteris obata (c2) oval fork fern
 lepidosperma tortuosum tortuous sedge
 Vallisneria gigantia eelweed
 Juncus prismatocarpus branching rush
 Corybas aconitiflorus Spurredhelmet orchid
 Thelymitra chasmogama Globe hood sun orchid
 Thelymitra Macmillinii Crimson sun orchid
 Amphibromus fluitans Graceful swamp wallaby grass
 Marsdenia rostrate Milk vine
 Callitriche umbonata Water starwort
 Wahlenbergia communis Tufted blue bell
 Stellaria caespitosa Star wort
 Einadia hastata Saloop Salt bush
 Haloragis heterophylla Varied Raspwort
 Prostanthera sp.aff howelliae type of mint bush
 Amyema Miquellii Box mistletoe

c1: confined to South Gippsland Study area for Victoria except for 1 other study area

c2: confined to South Gippsland Study area for Victoria except for 2 other study areas

c3: confined to South Gippsland Study area for Victoria except for 3 other study area

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