

## Analysis & Investigation Report:

# Linear Reserve Protection of Rainforest VicForest logging coupe 846-501-0022 Mt Jersey – Yalmy forest block East Gippsland

### Abstract

The analysis within this report indicates VicForest logging coupe 846-501-0022 is within 100m of modelled rainforest coinciding with the linear reserve network and within the protected areas afforded by regional prescription held in the East Gippsland Forest Management Plan (EG-FMP) in the East Gippsland Forest Management Area (EG-FMA). Field verification identified Cool Temperate Rainforest (EVC-31) at this location.

The regulatory framework governing logging operations in East Gippsland, through the East Gippsland Forest Management Plan (EG-FMP) & 'Code of Practice for Timber Production 2014' and its incorporated documents require that "where rainforest stands coincide with linear reserves, include in the SPZ the rainforest stand plus a 100m buffer". The SPZ extending 100m out from the rainforest must be established, within which all logging must be excluded and the area added to the reserve system.

### Relevant Legislation

- "East Gippsland Forest Management Plan 1995".
  - 'Code of Practice for Timber Production 2014', Department of Environment and Primary Industries, The State of Victoria, 2014.
- Incorporated documents:*
- 'Management Standards and Procedures for timber harvesting operations in Victoria's State forests 2014', Department of Environment and Primary Industries, The State of Victoria, 2014.
  - 'Planning Standards for timber harvesting operations in Victoria's State forests 2014- Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria's State forests 2014', Department of Environment and Primary Industries, The State of Victoria, 2014.
  - "Action Statement Flora and Fauna Guarantee Act 1988 No. 238", Appendix 1 Guidelines and minimum prescriptions to protect FFG-listed rainforest communities during forestry operations on public land.

### Active Logging Status of Coupe :

**In Progress:** 846-501-0022

**Status of Site :** Rainforest Mapping for state-wide Victoria dataset name RAINFOR published date 2019 and Modelling (NV-2005) EVC 31, FMZ100 data-sets. On Site Inspection.

Listed Values	Within Proximity (100m) To TRP Coupe	Within TRP Coupe
<b>Modelling: Cool Temperate Rainforest coincide Linear Reserve</b>	<b>Yes</b>	<b>No</b>
<b>Modelling: Cool Temperate Rainforest</b>	<b>Yes</b>	<b>No</b>
<b>Cool Temperate Rainforest Found In Field</b>	<b>Yes</b>	<b>Yes</b>

### Date of Investigation:

26/10/2020

### Date of report:

29-10-2020

### Surveyors:

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## Method Used and Results Summary

### Investigation Report of Cool Temperate Rainforest Detection and Analysis of Forest Management Zoning Requirements.

The purpose of this analysis & investigation was to determine the presence of rainforest, including Cool Temperate Rainforest (EVC-31) that coincides with linear reserves and that occur within 100 meter proximity to VicForest logging coupe 846-501-0022.

This was done with the use of vegetation mapping data-sets, land tenure data-sets and aerial imagery. GIS mapping software was used to process and analyse the datasets and GPS inputs.

Field verification was conducted at this location. The presence of Cool Temperate Rainforest was observed and assessed at this site.

Area of rainforest was found in close proximity (within 100m) to active VicForest Logging operation.

#### Resources Used:

- Rainforest mapping data-set RAINFOR
- EVC Modelling NV-2005.
- Forest Reserve Zoning Scheme FMZ100.
- VicForest Approved TRP Boundaries 2020
- Rainforests and Cool Temperate Mixed Forests of Victoria. Bill Peel. Department of Natural Resources and Environment, 1999.
- Cameron D. (2011) A Field Guide to Rainforest identification in Victoria. Department of Sustainability and Environment.
- GIS mapping software with spacial data & aerial imagery.
- GPS & GPS mapping software
- Code of Practice for Timber Production 2014.
- 'Management Standards and Procedures for timber harvesting operations in Victoria's State forests 2014.
- Planning Standards for timber harvesting operations in Victoria's State forests 2014
- Action Statement Flora and Fauna Guarantee Act 1988 No. 238"

#### Method: Analysis of modelled rainforest and zoning scheme in relation to VicForest TRP

GIS mapping software was used to conduct spatial analysis of modelled rainforest from mapping data-set RAINFOR, EVC data-set NV-2005, in conjunction with FMZ-100 and VicForest Approved TRP 2020, to ascertain where protection had been afforded to rainforest where it coincides with the linear reserve network within proximity to VicForest logging coupe 846-501-0022.

Field inspection occurred on 26/10/2020 into area along eastern side of coupe where Cool Temperate Rainforest was observed, these areas of rainforest were recently burnt in the Black Summer fires of 2019/2020 (burn date 30/12/2019).

The rainforest observed although burnt was easily identifiable as Cool Temperate Rainforest through recovering and non-recovering characteristic species (Rainforests and Cool Temperate Mixed Forests of Victoria. Bill Peel. Department of Natural Resources and Environment, 1999) such as Southern Sassafrass *Atherosperma moschatum*, Black Olive Berry *Elaeocarpus holopetalus*, Banyalla *Pittosporum bicolor* and Gippsland Waratah *Telopea oreades*.

Rainforest was assessed in terms whether to be recovering in a manner where it is likely to remain rainforest, though at current state of time it is at the very early stage of development. Canopy and obligate species were observed to be regrowing, re-sprouting from trunks and branches, coppice growth at base of trees, recruitment of seeding and regrowth of vine and lianes.

The area of rainforest was marked on GPS during assessment and later analysed with reference to GIS mapping software and relevant data-sets.



Burnt Cool Temperate Rainforest, Re-sprouting: Southern Sassafrass *Atherosperma moschatum*, Black Olive Berry *Elaeocarpus holopetalus* and Soft Tree-fern *Dicksonia antarctica*

## **Results Summary: Field assessed & modeled rainforest and linear reserve zoning scheme in relation to VicForest coupe 846-501-0022.**

Analysis of VicForest approved logging coupe **846-501-0022** spatial data from Approved TRP Boundaries 2020 using GIS mapping software in conjunction with Rainforest mapping data-set RAINFOR and modeled rainforest (NV-2005 data-set) where it coincides with the linear reserve system (FMZ-100 data-set). This analysis revealed that VicForest logging coupe **846-501-0022** is within 100m of rainforest of which is protected by regional prescription. This Vicforest logging coupe is current and is being actively logged.

Upon field inspection, a large burnt rainforest area was observed to be within and adjacent to VicForest coupe 846-501-0022, burnt rainforest was observed along the length of gully system on eastern side of coupe, and extending westward into coupe at southern and northern edges.

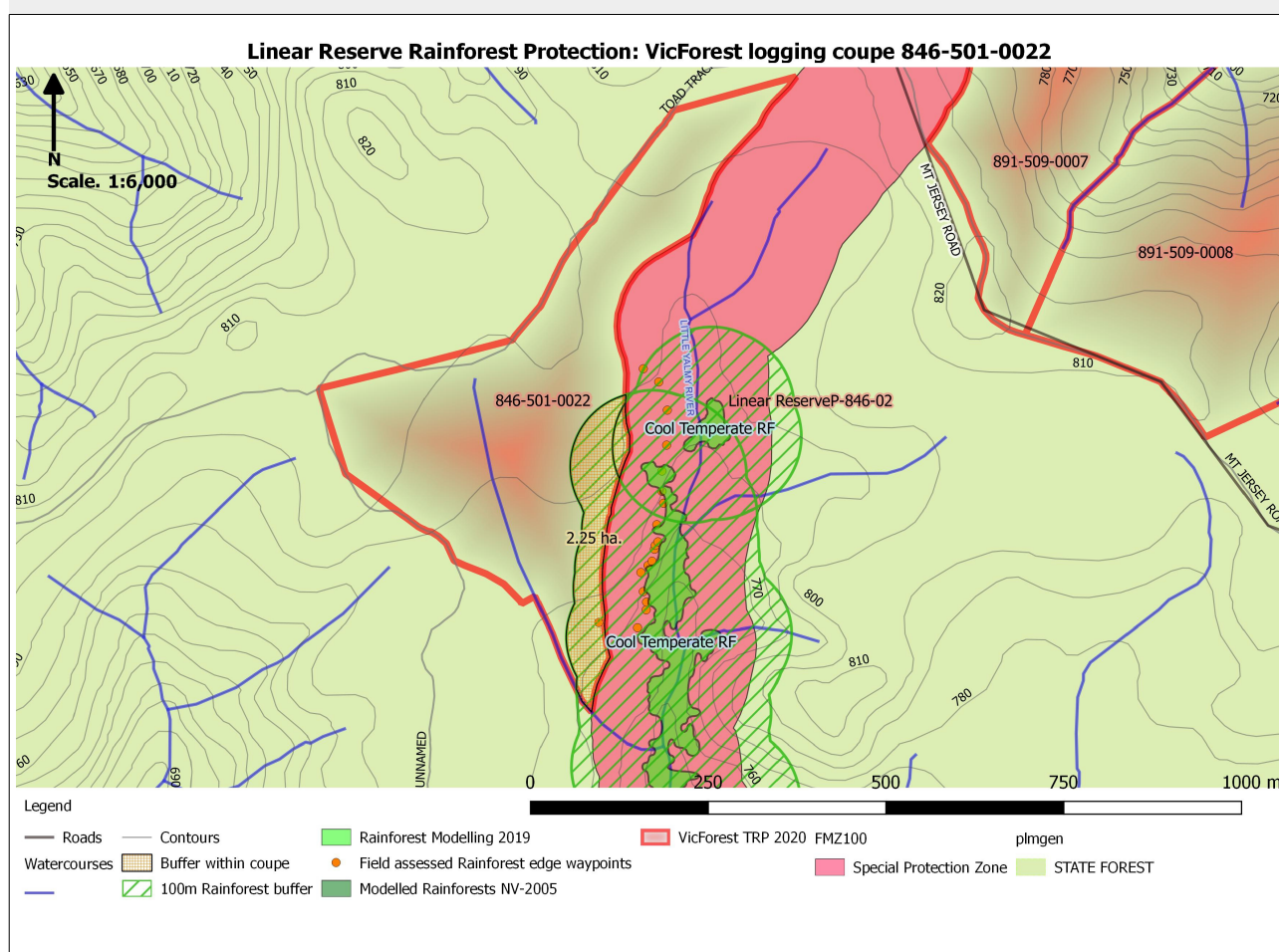
This area identified as Cool Temperate Rainforest by its burnt and re-sprouting rainforest canopy species, this was assessed to be regenerating in a manner where it is likely to remain rainforest and re-establish rainforest canopy as they mature.

An area of 2.25 ha. of rainforest buffer “linear reserve 100m buffer”, based off rainforest modelling data set “Rainfor” is within VicForest logging coupe. This area was checked in the field and was found coherent to modelled area. With the exception of two outlier areas at northern and southern ends. The two areas to the north and south of coupe must be assessed.

Use of the differential species approach has not yet been applied. Upon inspection it was noted that only the first signs (new shoots, first leaves and seedlings) of many rainforest species including re-spouting canopy species were just starting to emerge.

Further time is needed to properly ascertain the boundary of rainforest after disturbance, as the fire has temporarily removed and damaged the canopy, and significant plant taxa are starting to show the first signs of recovery.

### **Map 1. VicForest logging coupe.**





## Results: analysis conclusions & recommendations.

### Analysis of modelled rainforest and zoning scheme in relation to VicForest TRP

#### Conclusions & Analysis of VicForest TRP coupes within 100m of Modelled Rainforest that coincides with linear reserves:

- The analysis of Modelled Rainforest contained within this report conclude that VicForest TRP coupe **846-501-0022** in the East Gippsland FMA, is within the the area protected by regional prescription **4.6.4.1** of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”. (See below).
- This coupe **846-501-0022** currently being logged and listed as **In Progress** on VicForest web site. The logging operational requirements to plan and conduct operations in these VicForest coupes must be in accordance with **2.1.2.1** of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”. (See below).
- The Rooding coupes and rooding activities associated with these coupes are subject to **4.6.4.1** & **4.1.2.2** of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”. (See below).
- The areas within and the surrounding areas associated with this VicForest coupe 846-501-0022 is also subject to **2.1.1.1** of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”. (See below).
- A total area 2.25ha of rainforest buffer (modelling based) was found to be unprotected and within logging coupe 846-501-0022.

#### Conclusions and analysis of the field assessment studies:

- The assessment of this coupe 846-501-0022, found that a large area within coupe is regional prescription to **4.6.4.1**, of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”. (See below),
- Any planned or active operations within this coupe must be in accordance with **2.1.1.3** of the “*Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014*”, and comply with **2.2.2.1** & **2.2.2.2** of the “*Code of Practice for Timber Production 2014*”. (See below).

Excerpts from: “Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014”, Department of Environment and Primary Industries, The State of Victoria, 2014”.

#### **2. Planning and Record Keeping / 2.1 FMZ and planning information**

- **2.1.1.3** Where evidence of a value that requires protection via the establishment or amendment of an SPZ or SMZ is found in the field application must be made to the Secretary or delegate prior to commencement of the timber harvesting operation to create or amend an SPZ or SMZ in accordance with Appendix 5 the Planning Standards. SMZ applications must be accompanied by an SMZ plan and must be complied with during timber harvesting operations.

Excerpts from: “Planning Standards for timber harvesting operations in Victoria’s State forests 2014- Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014”, Department of Environment and Primary Industries, The State of Victoria, 2014”

#### **2. Planning Procedures / 2.1 Forest Management Zoning Scheme / 2.1.1 Establishment and amendment**

- **2.1.1.1** In establishing and maintaining a FMZ scheme, the planning standards in this document that apply to SPZ and SMZ establishment and amendment should be adhered to.

#### **2.1.2 Management Actions**

- **2.1.2.1** In conducting timber harvesting operations, the planning standards in this document that apply to SMZ or SPZ management actions (which may or may not be represented spatially in the corporate forest management zoning scheme) are to be adhered to.

#### **4.6 Vegetation communities – fixed zoning / 4.6.4 East Gippsland FMA**

- **4.6.4.1** Where rainforest stands coincide with linear reserves, include in the SPZ the rainforest stand plus a 100m buffer. Exceptions may apply where an alternative logical boundary exists within the buffer, for example an existing road. Avoid road construction across linear reserves containing rainforest wherever practicable.

#### **Biodiversity 4.1 Linear reserves – fixed zoning**

- **4.1.2.2** Avoid road construction in linear reserve SPZs. Where unavoidable, minimise road width and retain canopy closure over the road wherever possible.

Excerpts from: “Code of Practice for Timber Production 2014, Department of Environment and Primary Industries, The State of Victoria, 2014”.

#### **1 General - 1.2 The Code of Practice for Timber Production**

##### **1.2.6 Compliance on State forest**

Under the *Sustainable Forests (Timber) Act 2004*, compliance with this Code is mandatory for any person planning for or conducting a timber harvesting operation on State forest. Penalties for non-compliance may apply if timber harvesting operations on State forest are not in accordance with the Code.

#### **2 Code Application – State Forests - 2.2 Environmental Values in State forests**

##### **2.2.2 Conservation of Biodiversity**

##### **Mandatory Actions Addressing biodiversity conservation risks considering scientific knowledge**

**2.2.2.1** Planning and management of timber harvesting operations must comply with relevant biodiversity conservation measures specified within the Management Standards and Procedures.

**2.2.2.2** The precautionary principle must be applied to the conservation of biodiversity values. The application of the precautionary principle will be consistent with relevant monitoring and research that has improved the understanding of the effects of forest management on forest ecology and conservation values.

## Results: Analysis conclusions & recommendations - continued

### **Conclusions & recommendation of analysis of VicForest TRP coupes within 100m of Modelled Rainforest that coincide with linear reserve:**

Results of the analysis contained in this report demonstrate that the efforts by the department to apply and maintain the Forest Management Zoning scheme (FMZ) in the East Gippsland FMA in accordance with relevant legislation and requirements associated with linear reserves & rainforest protection, is **inadequate**. As 2.25 ha. of unreserved land require amendment to be converted to reserve system or SPZ. This area currently held as GMZ is contained within VicForest TRP logging coupe **846-501-0022**. See **Planning Standards - 2. Planning Procedures / 2.1 Forest Management Zoning Scheme / 2.1.1 Establishment and amendment:** (2.1.1.1 In establishing and maintaining a FMZ scheme, the planning standards in this document that apply to SPZ and SMZ establishment and amendment should be adhered to.)

- Additional areas must be included into the Forest Management Scheme FMZ.

As it is VicForest's responsibility (as stated in section **2.1.2.1** of the planning standards) to conduct logging operations in accordance with relevant prescription such as (section **4.6.4.1** of the planning standards). There are major compliance issues regarding VicForest TRP logging operations in areas required for rainforest protection, via regional prescription (**4.6.4.1** of the planning standards), where FMZ zoning does not spatially represent the prescription obligation. See: **Planning Standards - 2.1.2 Management Actions:** (2.1.2.1 In conducting timber harvesting operations, the planning standards in this document that apply to SMZ or SPZ management actions (which may or may not be represented spatially in the corporate forest management zoning scheme) are to be adhered to.)

As the Department has failed to implement required zoning prescriptions, and VicForest has failed to conduct operations in accordance with these prescription required. Much damage has already occurred to this area that is required for SPZ zoning, for the purpose of protection from VicForest logging operations. As there are apparent issues with VicForest efforts to identify rainforest in the field, as well as issues in the past with relying on inaccurate modelling (NV-2005) to adequately ascertain rainforest extent relevant to VicForest logging operations. Now that new accurate (1:25000) modelling is available, all areas of rainforest coinciding with linear reserves should be incorporated into the reserve system SPZ.

### **Recommended action:**

- Investigations conducted by the department must be undertaken in VicForest coupe **846-501-0022**.
- Investigation by qualified personnel of the department or 3<sup>rd</sup> party must be carried out in the field to ascertain rainforest extent, using the range of methodology applicable (See below)

### **Conclusions & recommendations:**

As evidence has been obtained on the ground through investigation of these sites involving VicForest logging coupe **846-501-0022**, clearly shows that action needs to be taken by the department to ensure that values including rainforests are identified and protected within the FMZ and in the field. This action of identifying & assessing values protected by prescription must to be conducted adequately by qualified personnel, either by of the department or independent 3<sup>rd</sup> party. This must be done for all areas subject to planned VicForest logging that could contain such values including the coupe **846-501-0022**.

## Discussion – Interpretation & deciphering of legislative prescriptions in relation to identification and protection of rainforest in the field.

As to date VicForest has conducted their efforts of rainforest identification & application of associated protection, at a minimum standard. Occurrences when rainforest is identified the utilisation of only small segments of legislation for rainforest recognition namely through “**canopy assemblage**” of mature primary rainforest is adopted. This methodology is only applicable in circumstances where the extent of the boundaries of **Mature** intact rainforest canopy ends abruptly and clearly throughout the extent of the rainforest assessed.

VicForest have avoided pathways set out in the regulatory framework for further detailed identification & delineation methodology, such as the use of the “**differential species approach**” (Cameron2011). This method is used to encompass areas of rainforest at all stages of development Mature, Non-Mature or in transitional, and where the rainforest canopy at present has not yet conformed to a primary mature canopy assemblage, or rainforest canopy edge is not clear and abrupt. This “**differential species approach**” method would also include areas damaged by past disturbances such as logging & fire, where the presents of recruitment of rainforest canopy species (within or greater than ten years since disturbance) suggest it is likely to result in the re-establishment of mature rainforest in time. Or where the expanse of rainforest species over time without disturbance now encompasses some eucalypt forest i.e. Mixed Forest.

The presents of rainforest “aggregated stands” needs to also be assessed at each site, where linear stand and non-linear stands may conform to a configuration set out in the regulatory framework. To achieve this assessment in terms of impact of logging operations, the extent and distribution of rainforest within proximity to logging coupes need to be investigated. (See below).

As there is new accurate rainforest mapping that was released in 2019 (pre fire), and since the 2019-2020-bushfires have impacted most of the rainforest severely in East Gippsland, FMZ zoning must be applied to modelled rainforest. Including rainforest at Mt Jursey and VicForest logging coupe **846-501-0022**.

These Rainforest areas have suffered much canopy damage or over-story structure destroyed, the field assessment method favored by VicForest (mature canopy assemblage) is no longer applicable to assess rainforest in these ares, as canopy has been removed or damaged. Use of the “differential species approach” is needed in these areas.

A time frame of ten years after disturbance is set out in the Planning Standards 2014 (section**4.4.8.6** ), before the rainforest area can be discounted by the absence of contiguous rainforest canopy set out in VicForest rainforest canopy assessment method.

- The protection of the newly mapped rainforest areas within the (RAINFOR data-set), must be applied to the FMZ, including protection of linear reserve rainforest ( **4.6.4.1** of the “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014*”).
- The use of the “differential species approach” is the only field working method compatible to assessing rainforest when canopy damage has occurred . See section **4.4.8.5** “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014, Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014*”.
- Rainforest can be identified using a range of methods, rainforest areas cannot be discounted within ten years after disturbance due to absence of rainforest canopy. As rainforest canopy species are fairly slow growing small trees to large shrubs, many species taking decades to mature and reach an over-story height and from a canopy in time. See section **4.4.8.5 & 4.4.8.6** “*Planning Standards for timber harvesting operations in Victoria’s State forests 2014, Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014*”.

### Pathways for rainforest assessment - Differential species approach, Aggregated stands & Mixed forest.

- Where there is known disturbance history or evidence in the field of past disturbance within the area or site; where damage may have temporarily (*in-terms of rainforest canopy species reaching/achieving maturity & succession of disturbance species*) have altered the canopy configuration; areas with evidence of disturbance greater or less than ten years, and with the presence of indicators such as: Gaps, Emergent eucalypts, Acacia over-story, Disturbance pioneer species, & Recruitment of rainforest canopy species, in such circumstances the “**differential species approach**” must be used/incorporated. (see below **4.4.8.5 from Planning Standards**).
- Where the canopy is closed (70% projected foliage cover) with the exception/exemption of gaps under 10m wide, and is constructed of broad leaf rainforest character (Peel) species with a contribution of listed (Management Standards) canopy (Management Standards). The boundary of the rainforest where the edge of the canopy dose not end abruptly and is not a clear uniform defined edge, (eg. canopy dispersers or is patchy), the best way to determine the rainforest boundary is with the “**differential species approach**” and must be utilised to ascertain the true extent of rainforest. (see below **FFGA Action Statement No. 238**).

- Where the canopy is closed (70% projected foliage cover) with the exception of gaps under 10m wide, and is constructed of broad leaf rainforest character (Peel) species with a contribution of listed (Management Standards) canopy (Management Standards). And the canopy of rainforest vegetation “transitions” to closed (70% projected foliage cover) of non-rainforest canopy over a distance greater than 10m, the “**differential species approach**” must be used to determine the rainforest boundary. (see below **4.4.8.7 Planning Standards**).
- Where rainforest is identified to meet the criteria “above” and gaps occur at a distance greater than 10m, assessment of “**aggregated stands**” must be undertaken within proximity of the area (linear stands less than 50m apart or non-linear stands gaps to be less than the length of the stands themselves”, the total area of aggregation of the rainforest stands is to be treated as an entire rainforest stand. Use of the “**differential species approach**” can be used to ascertain the true extent of rainforest between and surrounding the aggregated stands. (see below **FFGA Action Statement No. 238**).
- Where the rainforest canopy is or is not closed (70% projected foliage cover) and host eucalypts with a contribution of canopy cover exceeding 10% of total crown-cover, the assessment of “**mixed forest**” must be undertaken. Delineation of mixed forest can be difficult, in the field the best method is to use the “**differential species approach**” for this dose encompass extent of rainforest community in association with surrounding eucalypt forest, so there for is the best approach. (see below **3.2 from East Gippsland -Forest Management Plan**).

## legislative prescriptions in relation to identification and protection of rainforest in the field.

*Excerpts from: “Planning Standards for timber harvesting operations in Victoria’s State forests 2014, Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014”.*

### 4.4 Vegetation communities / 4.4.8 Rainforest field recognition and delineation

- **4.4.8.5 Special care is required when assessing the presence and extent of rainforest where disturbance such as fire has temporarily removed the rainforest canopy or has created temporary canopy gaps. In cases where the canopy disturbance is less than ten years old <sup>6</sup> and further guidance as to the boundary of rainforest is required, the ‘differential species approach’ is to be used (Differential species keys for the delineation of rainforest boundaries can provide reference photos)<sup>7</sup>.**
- **4.4.8.6 Where the rainforest canopy is absent and there is little or no evidence of the regeneration of a rainforest canopy after 10 years following disturbance the ‘differential species approach’ should not be used to identify rainforest and the stand should no longer be considered to be rainforest.**
- **4.4.8.7 Where the ‘differential species approach’ is utilised, the rainforest boundary is the point where the number of rainforest species equals the number of eucalypt forest species i.e. the line along which the floristic signals are of equal strength. This approach would be used where the rainforest canopy tree cover reduces gradually from 70% projected foliage cover. (gradual transition is a transition from 70% rainforest species projected foliage cover to 70% non- rainforest species projected foliage cover over a distance greater than approximately 10 meters).**

<sup>6</sup> *While the rainforest might not have recovered sufficiently to meet the >70% projected foliage cover criterion within 10 years of disturbance, there will be sufficient evidence to indicate whether rainforest canopy species are regenerating in a manner likely to result in the re-establishment of rainforest as they mature. In cases where rainforest is likely to re-establish the differential species approach should be used to identify the boundary with the adjoining forest and the stand should be protected as if it were rainforest.*

*Excerpts from: “Code of Practice for Timber Production 2014, Department of Environment and Primary Industries, The State of Victoria, 2014”.*

**‘rainforest’ means closed (>70 per cent projected foliage cover) broadleaved forest vegetation with a more or less continuous rainforest tree canopy of variable height, and with a characteristic composition of species and life forms, of at least 0.1 ha in area and 20 metres width. Rainforest includes closed transitional and seral communities, with emergent eucalypts, that are of similar botanical composition to mature rainforests in which eucalypts are absent.**

*Excerpts from: “Action Statement Flora and Fauna Guarantee Act 1988 No. 238”, Appendix 1 Guidelines and minimum prescriptions to protect FFG-listed rainforest communities during forestry operations on public land.*

#### **Recognition of rainforest :**

**Field recognition and delineation Rainforest stands are identified in the field when the tree canopy species are present and conform to the definition described above. The boundary of the rainforest and the adjoining**

eucalypt forest is often clear in the field. However, in circumstances where further clarification is required, the boundary can be determined by using the “differential species approach” (DSE 2009). Using the differential species approach, the rainforest boundary is the point where the number of rainforest differential species exceeds the number of eucalypt forest differential species.

*Note: Special care is required when assessing the presence and extent of rainforest where disturbance, such as fire, disease, windthrow, etc., has temporarily removed the rainforest canopy or has created temporary canopy gaps. In these cases, the differential species approach will be the best indicator of the long-term rainforest boundary.*

*Aggregation of stands of rainforest Stands of rainforest may be aggregated to form a larger stand where:*

- each stand to be aggregated is at least 0.1 ha in area and,*
- for linear stands, the gap between the stands is less than 50 m, or,*
- for non-linear stands, the gaps between stands are smaller in area than the stands themselves.*

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*Excerpts from: “Forest Management Plan for the East Gippsland Forest Management Area 1995”.*

### **Chapter 3: BIODIVERSITY CONSERVATION : 3.2 NATIVE FLORA:**

#### **CONSERVATION GUIDELINE - Representative conservation of Ecological Vegetation Classes: Mixed Forest.**

Mixed forests occur within the Wet Forest EVC in situations where the eucalypt canopy is emergent above an understorey of rainforest species. Radic et al. (1985) mapped approximately 470 ha of Mixed Forest on Errinundra Plateau, the only place where substantial areas are likely to occur in East Gippsland. According to the criteria used for determining suitable levels of EVC representation (see previous section), Mixed Forest is rare, occupying less than 0.1% of public land in the FMA. Accordingly, at least 90% of Mixed Forest should be protected within conservation reserves or the Special Protection Zone. The scenic quality and ecological importance of Mixed Forests were major reasons for creation of the Errinundra National Park (LCC 1986). The Park includes about 300 ha (63 %) of the Mixed Forest mapped by Radic et al. (1985). An additional 30 ha (7%) has been included in the SPZ. The remaining 140 ha (30%) is in areas currently mapped as GMZ or SMZ and is scattered in small stands mostly less than 10 ha. Many are in gullies and are consequently protected by prescription. There may however be some stands that would remain accessible for harvesting, and given their rarity, these too, warrant protection.