Dear Chief Fire Officer,

CC: Office of the Conservation Regulator, The Hon Steve Dimopoulos &

Tanya Plibersek

Protection of Hollow-bearing Trees within areas proposed for log removal operations and post-logging burning in the Dandenong Ranges National Park

Please accept this Technical Memo from the Victorian National Parks Association (VNPA) and Southern Dandenongs Landcare Group (SDLG) about the recordings and documentation of Hollow-bearing Trees in areas proposed for log removal operations and post-logging burning, in the Dandenong Ranges National Park.

During 2022-23, the VNPA & SDLG have thoroughly documented 281 Hollow-bearing Trees at the Olinda – Bartlett Track Site, and 318 Hollow-bearing Trees at the Kalorama – Track 13 Site; in areas proposed for log removal operations, off-track heavy machinery disturbance and post-logging burning. For each of these 599 trees, all obvious hollows have been described, documented and photographed by the VNPA & SDLG, as has the circumference and diameter at breast height for each tree.

We note from previous correspondence with Forest Fire Management Victoria (FFMV) representatives that only a small percentage of these trees were identified during their survey of the sites for biodiversity values to protect during log removal operations or post-logging burns.

We also note FFMV's commitment (*10th May 2023 Via Email Carmen A SanGil On Behalf Of Chris S Hardman*) to the protection of all Hollow-bearing Trees through exclusion zones throughout the implementation of this project.

FFMVs recent operations in the Cobaw Ranges Special Protection Zones and within the Silvan Reservoir water catchment after the 2021 wind throw event have left the public and local community questioning the validity of these commitments to protect Hollow bearing trees and biodiversity during FFMV operations. Issues surrounding these operations can be read here;

Pressure mounts against rogue logging in Dandenong Ranges National Park;

Cobaws rogue loggers exploiting loopholes;

Threatened hollow-dependent fauna such as the Vulnerable Powerful Owl (FFG Act) and Vulnerable Yellow-bellied Glider (FFG Act & EPBC Act) have been recorded by the VNPA across these two sites proposed for operations, highlighting the significance of these Hollow-bearing Trees for threatened wildlife.

We also note that *Loss of hollow-bearing trees from Victorian native forests* and *Loss of coarse woody debris from Victorian native forests and woodlands* are listed as Potentially Threatening Processes under the Flora and Fauna Guarantee Act 1988.

We are concerned that the proposed operations will likely cause inadvertent damage to these trees and their root systems by off-track heavy machinery disturbance, disturbance to nesting/denning wildlife and in particular through critical stages of their breeding cycles, as well as the removal of these Hollow-bearing Trees through the "Hazardous" Tree Removal processes.

Section 4B of the FFG Act sets out a clear duty and obligation on public authorities to consider potential biodiversity impacts when exercising their functions. We also note that under the FFG Act, the Loss of hollow-bearing trees from Victorian native forests is listed as a potentially threatening process.

No information has been made public to outline how FFMV/Department of Energy, Environment & Climate Action (DEECA) will ensure their duty is being performed and that an action taken (or to be taken) does not threaten significant ecological values such as Hollow-bearing Trees. This is leading to a high level of distrust in the community toward these and future works by FFMV/DECCA.

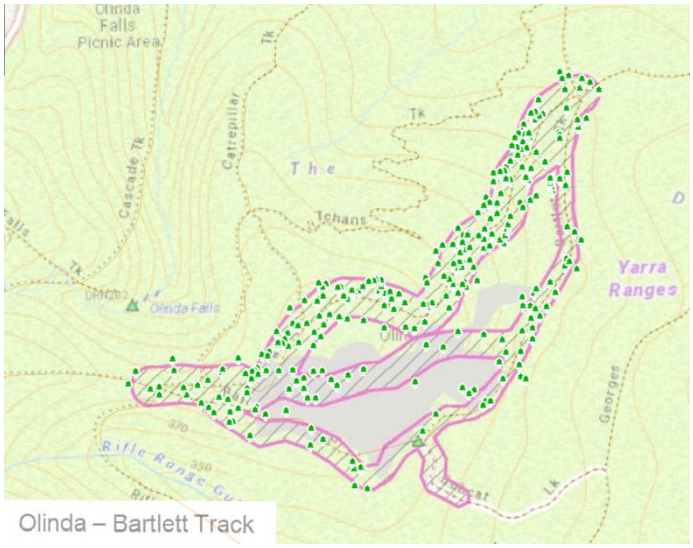
Recommendations

-As a minimum, heavy machinery excluded from Tree Protection Zones (TPZs) around all Hollow-bearing Trees, in accordance with the *Protection of Trees on Development Sites (AS 4970-2009).* The size of TPZs are determined based on the diameter at breast height for each Hollow-bearing Tree and the VNPA is currently finalising the spreadsheets containing this data

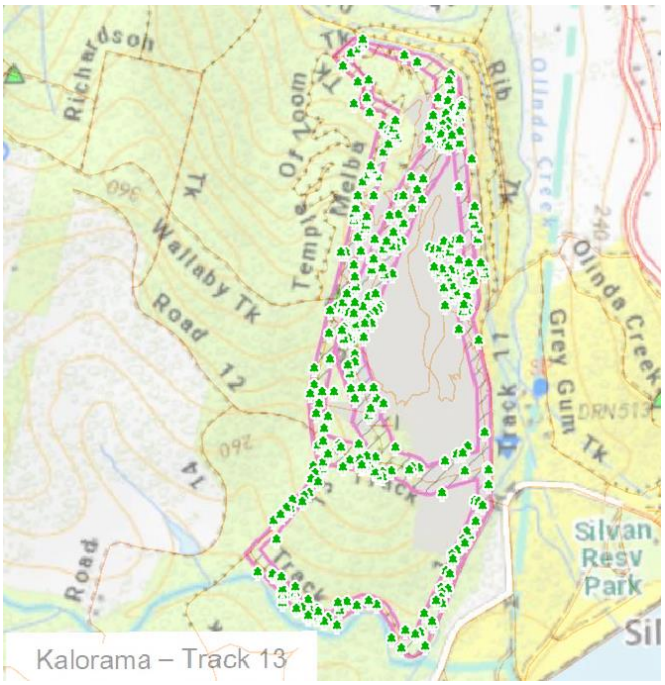
-Independent fauna spotter on site during any operations as per other State Government operations: e.g. Metro and West Gate Tunnel

-FFMV/DECCA make public their planning processes and how damage to park values and FFG Act / EPBC Act listed species and threatening processes will be avoided and minimised, including greater transparency about any planned Hazardous Tree Removals

-FFMV/DEECA refer their proposed storm debris removal operations in areas of possible habitat of EPBC Act listed species under s 70 of the *EPBC Act* for a decision as to whether the proposed operations are a controlled action under the Act



Map 1. Hollow-bearing Trees documented by the VNPA and SDLG at the Olinda – Bartlett Track Site



Map 2. Hollow-bearing Trees documented by the VNPA and SDLG at the Kalorama – Track 13 Site

Note for Maps: the pink hashed areas are proposed for log removal operations including off-track heavy machinery usage and post-logging burning.

Results – Sample images of Hollow-bearing Trees below. Each Hollow-bearing Tree seen in Maps 1 and 2 has been photographed and can be provided upon request.

Figure 1. Sample of photograph series taken for each Hollow-bearing Tree documented. Tree in top right; Circumference measurement and GPS coordinates in top left; Obvious hollows in bottom left/right