Outline of response to Engage Victoria survey of 'fuel breaks'

https://engage.vic.gov.au/strategic-fuel-breaks/otways-break-upgrades Submitted online to Engage Victoria Monday 29 November

Text from survey or other DELWP materials is in italics.

As part of our planning, we must complete thorough environmental and cultural assessments to manage any impacts on animals, important native vegetation, and cultural sites. This is where we need your help. Please complete any or all of the questions for your area of interest.

For the information of readers, the online questionnaire goes as follows with FoL responses indicated.

Introductory Qs

What is your connection? Options full-time resident, part-time -resident, work in area, visitor, other Chose 'other', state that Friends of Lorne has members in many categories

Which strategic fuel break are you most interested in? Answer not compulsory No response. **NB** the breaks immediately around Lorne are not included in this survey

Are you interested in another strategic fuel break? Answer not compulsory No response

Please tell us which other strategic fire breaks interest you and why

We are interested in the following tracks dealt with in the context of this survey: Gentle Annie Track, Seaview Road, Jamieson Track, Normans Track

Constructing the breaks

Do you have any local details we need to be aware of when constructing these breaks? You can choose more than one.

- other works that may conflict with the breaks
- opportunities to coordinate construction with any other works
- $\square \quad how \ construction \ should \ be \ done \ on \ site$
- any local events we need to work around
- any personal circumstances we should be aware of
- Other (please specify)

No selection

What should we focus our monitoring on?

After construction, we will monitor. What do you think we should focus on? Please rank the following ideas from most important to least

- 3. Specific item (eg important plant or animal)
- 5. Rate of regrowth
- 1. Weed invasion
- 2. Effects of mulching

4. Erosion

- 6. Illegal uses of the area eg camping, trail bike riding, 4WD
- 7. Litter

Is there a question you want answered through monitoring? If Yes

What is your question for monitoring -

Representative, replicated sites; demographics of tree populations; edge effects; carbon storage

There was insufficient allowance for the elaborations below.

- (1) monitoring should be at sites selected as 'representative' i.e. it should not be needed on all routes. These representative sites should be replicated to the extent needed for statistical relevance.
- (2) Question: is recruitment of seedlings sufficient to sustain the tree population as trees die (or are removed as 'hazardous')
- (3) Question: to what extent do the works have a flow on affect to bounding areas (edge effects), how wide is the zone (edge) influenced? This work should include the prevalence of weeds.
- (4) Question: soil carbon storage. This should be quite high at the point of first clearing/works. Changes (probable losses) should be quantified.
- (5) Question: above ground carbon storage, particularly changes from original condition to condition after conversion to fuel breaks.

Do you want to be involved in monitoring? If yes Provide email committee@friendsoflorne.org.au

What should we do with the trees we remove?

Rank the following from most important to least Firewood Habitat enhancement elsewhere Chipped on site Milling Community projects/artwork Other Not answerable, no response

How should we balance the impacts on native vegetation in the local district?

What type of work should we focus on? Rank the following.

- 1. Acquisition of land into parks or reserves
- 2. Habitat restoration
- 3. Vegetation planting and establishment
- 4. Weed control
- 5. Pest animal control
- 6. Threatened species response

Final question

Are there any other comments you would like to make about the strategic fuel breaks? If Y

The structure of the survey suggests that DELWP is unable to meet its responsibilities for ecosystem management. It is inappropriate, and suggestive of tokenism, to place the responsibility for it on respondents. FoL hopes that the following criticisms of some matters raised in this survey will be used by DELWP staff to argue for better resourcing.

How does DELWP imagine that an effective 'balancing of impacts' could be achieved without addressing all the points we are asked to rate in the previous response?

Effective monitoring requires careful design and a long-term commitment. It is expensive. We note that the Auditor General has criticised DELWP's past efforts and it is implied in this survey that no monitoring has been done to date. It is disappointing that monitoring is only now being considered - after the major disruptions of 'construction' and maintenance. Is it not essential to have information about the original condition? How can loss of habitat/biodiversity/carbon storage, or indeed anything at all, be quantified and offset without that baseline data? Is DELWP intending to treat the views of respondents, many of them anonymous, as expert opinion?

According to DELWP documentation, *State and Commonwealth regulatory obligations* ... require that DELWP offsets any losses to native vegetation or biodiversity. Offsetting is complex. Meaningful offsets must be like for like. But the implication in the section How should we balance the impacts on native vegetation in the local district is that any benefit will do.

In a 2020 discussion on the strategic fuel breaks FoL was informed that FFMV could only get approval to clear to a maximum of 40 metres, but would have preferred 60 metres. If hazardous trees are removed from strips one tree length wide outside the approved 40 metres as proposed, then the total break in forest connectivity, for at least some forms of life and allowing for destruction associated with tree removal, could be as much as 80-120 metres. It is therefore not immediately obvious that the proposed works are consistent with the original undertaking. This is particularly true along the Seaview Road where removal of all woody plants (all storeys) on both sides of the road has already disrupted connectivity for many species and where trees in the bounding vegetation are tall.