

# HAMILTON FIELD NATURALISTS CLUB



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To:

**Land & Fire Planning Manager,  
Department of Environment & Primary Industries  
110 Natimuk Rd  
Private Bag 260, Horsham VIC 3400**

**27 August 2013**

## **Submission to Wimmera District draft Fire Operations Plan 2013/14-2015/16**

### **GENERAL COMMENTS**

The Hamilton Field Naturalists Club has made annual submissions to the Horsham/Wimmera FOP since at least 2003. We have tried to provide information that would give protection to the natural values (fauna and flora) of the region. We have been particularly concerned about the following aspects of prescribed burns:

- The increased size of the burns (in some cases many thousands of hectares)
- The failure to achieve any useful mosaic burn pattern (particularly in the Little Desert)
- The practice of burning areas within the plan area that failed to burn at the first attempt, thereby removing any refuge
- The practice of conducting a burn adjacent to a burn made in the previous year or two, thereby seriously increasing the time required to effectively re-colonise huge areas of bush, and possibly leading to local extinctions of fauna and flora.
- The practice of burning too early in summer-autumn, with the usual consequence that the fire burns everything and frequently escapes.
- The practice of burning areas in the Little Desert too frequently, thereby preventing any breeding of Malleefowl in large areas of the Mallee (see note below).
- The practice of burning complete 'islands' of Crown Land such as Youngs SF in one go, or in 2 efforts made within a couple of years has dire consequences for small mammals and woodland birds.
- The apparent absence of planning to reduce avoidable negative ecological impacts of burns, whether it be on season, severity, optimal interval for survival or protection of old hollow-bearing trees.

Not once in that time have we felt that our submissions received ANY attention. There has never been any feedback and we cannot see that any plans were changed on the basis of our submissions.

Further, we note in the papers sent to us, that "...*the decision to burn is always driven by the need to reduce the risk of damaging bushfires to human life and property, and all feedback will be considered in that context*". DEPI will apparently take no notice of any impacts of planned prescribed burns on biodiversity.

Therefore, since nothing appears likely to change, we regret that this may be the last time we respond to the Departments request for comments on their FOP. Clearly it has been a waste of our time and yours.

### **SPECIFIC COMMENTS**

- **Grampians Serra Ra Complex** – this planned burn of 13,319 ha seems to be on the area that was burned in 2006. How is that ecologically sensible? The fire interval is barely 10 years and some parts, at least would need to be longer.
- **Grampians Jimmy's Creek** – 2,631 ha - ditto above.
- **Grampians Victoria Point** – almost all of the adjacent areas have been burned within the last year or two. It is not ecologically sensible to burn this 3,675 ha area until at least 8-10 years elapses, at which point the surrounding bush may have recovered. To describe this planned burn as "ecological" is farcical.
- **Grampians Mt Sturgeon –Picanniny** – as stated many times before, it is not ecologically sensible to burn adjacent areas within a year or two. If Mt Sturgeon must be burned then the Picanniny area

should not be burned for at least 8 years. There is very little Grampians area that has escaped fire in the last 10 years and DEPI plans are going to aggravate the situation.

- **Black Range** – it would seem that the whole of the Black Range will have been burned in a space of about 10 years. The Muirfoot Track area was burned by the fire that started from a campfire at Fulham in Jan 2005. Is the Muirfoot area of 1597 ha to be burned again, so soon? That is not desirable. Some areas should not be burned on a cycle less than about 20 years. The areas of Yellow Box woodland will be devastated too, since the old trees with hollows will no doubt burn down. These areas were never burned when the FCV controlled the place – and the reason given then was that the old trees were too vulnerable.
- **Fulham ('Kanagulk') - Edgewood Rd** – we see no justification whatsoever for burning this 235 ha block. As stated in 2012, we object to any burning in this area until the large area burned in 2005 has recovered. The fire plan for this reserve is simply not sympathetic to the ecology of this valuable 'island' reserve. The area shown on the FOP map is NOT one where Stringybark is a major component. Slender Cypress (*Callitris gracilis*) has its most southerly extension around the Pine Hut sand dune. This important remnant stand has regenerated beautifully outside the fenced plot since stock were removed in 1987. So, too, was the remarkable regeneration of the 4 eucalypt species and some Buloke. Any fire planned for that area will set back the stand of Slender Cypress because it will kill the young trees and seedlings and probably the old tree, too.
- **Little Desert** – as discussed above and in previous years, the areas planned to be burned are far too large (many thousands of hectares) and there is no plan that we can see to achieve a mosaic pattern within the planned burn area. On previous performance we expect that the result will be a wipe-out of all the vegetation in the burn area. If DEPI persists in this practice it will eliminate Malleefowl and some other species from the region (see an abridged note from Ross Macfarlane below).

Ross Macfarlane (2011).

*Does DSE want to drive Malleefowl to extinction in the Little Desert? Because if they don't, why are they hell-bent on burning every last hectare in the National Park on a 10-to-20-year cycle?*

*To all those who've had the chance to see Malleefowl at Little Desert Lodge, or elsewhere in the Little Desert, consider yourselves privileged. Large areas of the Little Desert have been burned in wildfires and in DSE controlled burns over the past decade, and the current fire plans increase, not reduce the impacts.*

*There is at least one burn which is high on DSE's 2011-12 list which is right in the guts of an area where we have found evidence of Malleefowl. It's in the vicinity of Mt Turner/Broughton's Waterhole, east of the Kaniva-Edenhope Road, in the centre of the National Park.*

*VMRG and Nhill SES line-searched this area in June 2011 and found several new nests, including at least one that was filled with litter for use in the 2011 breeding season. The burn is 11. No.4, LITTLE DESERT - BARNEYS TRACK, 1052 Ha, planned for Spring 2011. If it goes ahead, that nest will not survive.*

*Why does this matter? Because Malleefowl have a distinct preference for long-unburned Mallee for breeding sites (20-30 years plus), so there is a predominant overhead canopy and abundant leaf litter for compost in their nests. The current DSE / Parks Victoria burn strategy in the Little Desert means there is precious little habitat left where they can breed.*

*VMRG coordinates an ongoing research project started by Dr Joe Benshemesh, who is without doubt the foremost expert on Malleefowl in the world. This is his response to the Bushfire Royal Commission's recommendation for a 5% annual controlled burn target on all public land in Victoria: "**If you want to send Malleefowl to extinction in Victoria, put the whole of the Mallee on a 20-year burn cycle**". [It seems the planned burn cycle is nearer 10-years and thus infinitely worse]*

Yours faithfully

Dr Rod Bird

Secretary HFNC