

# HAMILTON FIELD NATURALISTS CLUB



PO Box 591, Hamilton, Victoria, 3300  
hamiltonfnc@live.com.au



To:  
**Land & Fire Management Officer**  
DSE  
Heywood Office  
PO Box 217  
Heywood, Vic 3304

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## Re. Draft Far South West Fire District Fire Operations Plan 2009-20012

### Preliminary comment

Our response is primarily concerned with environmental implications of the proposed fires.

HFNC considers that the information provided for the Draft South West Fire District is helpful and much better than that presented in the Wimmera District FOP, where no information is given on affected EVCs, reason for the burn, fuel hazard assessment, or comment on the aim. We were also heartened to hear that the DSE Heywood team has acted on some key messages from HFNC at past FOP meetings.

In order for us to understand the full picture, for future Draft FOPs we need the burn history data for the last 20 years for each new proposed burn. Without that information it is impossible to know what impact the proposed burn could have on both fauna and flora in particular EVCs.

Where proposed burns are indicated, burn history data for adjacent blocks is required for the last 10 years. Without that information it is impossible to assess the likely impact of the proposed burn on vulnerable small fauna. About 10 years is required for habitat to recover sufficiently to enable fauna to survive in such areas, to serve both as a source of refuge for animal displaced from the new burn area and as a source for recolonisation of the new burned area. This is a fundamental consideration, one that DSE has failed to address in previous years. It goes to the heart of sustainability of natural systems, fauna and flora.

**Burn area targets** - areas burned in the wildfires should be considered as offsetting the burn targets. It would be illogical not to have factored that in to the calculations, e.g. the extra 6,000 ha burned as a result of arson activity in 2009. We are uncertain as to how that has been handled for this district FOP.

### Criteria for prescribed burns

Our assessment of the environmental appropriateness of suggested prescribed burns in the FOP is based on the following criteria, which we consider should be central to the planning process:

1. **Fire intensity** – almost all Prescribed Burns should be planned as LOW Intensity burns. There will be more than enough wildfires and uncontrolled “prescribed” burns to give variety over time. One exception may be in areas heavily infested with Radiata Pine, where a moderate fire might be required to kill large trees.

The prescription for fuel moisture %, humidity, temperature should be adjusted to take account of a drier climate and changed fuel conditions and fire intensity. Thus we suggest that fuel moisture levels nearer 20% rather than 12% should be considered. The effects of this difference were readily seen in the two Grampians fires (Geerak Tk 2009 and Griffin Tk 2008) where parts of the Griffin Tk burn resembled a summer wildfire in intensity.

Burning in the early autumn period before any substantial rain has fallen and temperatures have abated is a recipe for disaster. We also advocate beginning a burn later in the day in order to reduce the severity of the fire.

2. **Fire frequency** – no area should be burned more frequently than that prescribed for optimal performance of flora and fauna. That will depend on the particular EVC and species concerned, with desired frequencies usually varying from 10-100 years (with some areas never to be burned). We know of no instance where burn frequencies less than 10 years can be justified and we believe that most areas should not be deliberately burned more frequently than every 20 years, if at all.
3. **Fauna and flora surveys** – a preliminary survey is not needed if every burn was conducted as if the area contained rare and endangered fauna. Such burns must, however, result in a true mosaic burn pattern and be of low intensity. Currently in the Grampians/Gariwerd NP, little effective habitat remains for species such as Brown Bandicoot, Heath Mouse, Smokey Mouse and Potoroo. Where adjacent areas have been burned, or are small in size, remnant areas of suitable habitat should not be burned until the adjacent areas become suitable habitat. The risk of an uncontrolled prescribed fire destroying that community is too great.

Preliminary surveys to justify a burn are of dubious value, since these species are not easily trapped or otherwise detected. Thus a negative survey result does not prove the absence of the species or justify burning the area.

4. **Mosaic burns** – unburned areas must be retained in each EVC (or group of similar EVCs) within the planned burn area. This is especially critical in the suggested Landscape Burns where several thousand ha could be completely burned, leaving no refuge areas at all. We suggest that it is also important to avoid burning the same area each time (e.g. Stringybark rises are often burned while the flats are not). The mosaic burn pattern must be the objective of every burn.
5. **Fire history of adjacent areas** – this must be taken account of when planning a new burn. If the burned area adjacent is substantial, less than 10 years old, and has similar EVCs to that in the proposed burn area, then no new burn should be conducted. As indicated elsewhere, this is vital to ensure survival of vulnerable fauna species. The practice of burning adjacent blocks in subsequent years may be convenient for management but is a disaster for fauna. It ignores the vital concept of mosaic burning.
6. **Habitat trees** – the large, old trees that provide hollows for fauna (bats, birds, gliders, possums, reptiles) that must have such shelter and breeding places must be protected, otherwise after several rotations of burns there would be few left, as is already apparent in some of our landscapes. We applaud the current move to protect such trees by raking away debris from around the trunks. Our concern is that this appears to be only applied to trees near the edges.

We also want a greater effort to prevent fires that lodge in such trees from destroying the tree, or causing the tree to be considered “unsafe” and thus cut down or bulldozed in the aftermath of the fire. It is not unreasonable to ask that a fire truck equipped to tackle fires high in the tree be deployed at each fire where such events are likely to occur

7. **Predator control** – we would like to see an active control of cats and foxes before and after the planned burns, although we recognise that this is not always effective. Particular care should be taken to prevent baits being taken by non-target species such as the Spotted-tail Quoll (these animals do have the ability to dig up baits).
8. **Weed species control** – we applaud the current trend to remove unwanted species such as Radiata Pine from areas that have been prescribed-burned. It makes good practical and economic sense to tackle the pest species when it is easiest to do so and when it can be done in conjunction with post-fire operations.

## Comments for specific burn proposals

### **P07-391 Mt Napier Menzels Pi-Cole Track**

We acknowledge the intention to only burn the area in winter. That, at least, would reduce the damage that you will cause.

We continue to protest ANY deliberate burning of this forest. As stated on many occasions, all that fire does in this simple bracken-dominated understorey is to make it more dominant, increasing the fire hazard. It is utter folly. There is no indication whatsoever that fire is needed here for purposes of flora diversity. That argument can not be supported. We provided the evidence against burning of this particular landscape in our submission to the 2005-8 FOP. Where is there any counter evidence? The reason stated in the current Draft FOP is pure invention.

We advise DSE to actually visit the landholders who wish to burn it and to point out what happens with fire and bracken. DSE should take them to the areas long unburned (e.g. near the old entrance to the Reserve, off Mt Napier Rd access) and compare that with areas burned in more recent times. That would be a much better outcome – and far less expensive exercise.

You may not be aware that in recent years Yellow-bellied Gliders have been reported in this forest and that ought also to be taken account of.

The burn area is stated to be 384 ha – we regard that as greatly excessive. If any burn was approved then it should only be done in a strip along the Cole Track. That was an infrequent practice many years ago, done in mid-winter when the fire merely trickled through the bracken for a couple of hundred metres. There is no case for burning any of the area adjacent to Menzels Track and we deplore any move to do that. Any burning there would not be seen as giving any protection to adjacent landholders. All it would do is burn the Blackwoods, encourage more bracken and mess up the tourist drive.

### **Bullrush Swamp**

While no work appears to be scheduled there, we saw last year that the area had been sprayed by on-ground means, apparently to reduce the growth of “fairy grass”. That followed the aerial spraying in the previous year, a policy that we protested against on environmental grounds. We object to the practice and consider it quite unnecessary in that environment.

### **P09-494 Bogalara**

This appears to be a long-unburned block – perhaps pre-dating 1967? Why burn it now? Incidentally, there seems to be conflict in data shown on DSE Fire SW Fop map and that from DSE website Interactive Statewide map (one shows 2008 and the other 2003 for a block adjacent)

### **P09-448 Landscape Mozaic Burn Cobboboonee (Coutout Dam Rd- Cobboboonee Rd)**

According to the Draft, 660 ha to be burned in Year 1, 380 ha in Year 2 and 480 ha in Year 3.

The obvious error in this is that Year 1 burn is adjacent to year 2 burn, which is adjacent to year 3 burn.

At the very least this pattern should be altered so that there is at least a year recovery between blocks.

As we pointed out in the Preliminary Discussion, the practice of burning adjacent blocks is very poor and should be avoided. We do not approve of this plan, although it is an improvement on that proposed in 2008. It cannot ensure optimal conditions for vulnerable fauna.

**P09-526 Narrawong Flora Reserve** – shown on map but not in the text. Where is it on the nre map?

Yours faithfully

Dr PR Bird OAM

Secretary

Hamilton Field Naturalists Club