

HAMILTON FIELD NATURALISTS CLUB



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



To:
Peter Scott
Department of Sustainability & Environment, **Land and Fire**
12 Murray Street
Heywood VIC 3304

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Submission to Far south west District Fire Operations Plan 2010-2013

GENERAL COMMENTS

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

Burn area targets – areas burned in the wildfires must be considered as offsetting the burn targets for this FOP. It would be illogical not to have factored that into the calculations. Not to have done so also places undue stress on the landscape, with future prescribed burns potentially rendering most of the area as virtually single-age vegetation status.

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 to be central to the planning process:

1. **Fire Intensity** – almost all prescribed burns must be planned as LOW Intensity burns NOT exceeding 40% to ensure a mosaic burn-pattern in each EVC is achieved. There will be more than enough wildfires and uncontrolled “prescribed” burns to give variety over time.

The prescription for fuel moisture %, humidity, and temperature must 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.

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

2. **Fire Frequency** – no area must be burned more frequently than that prescribed for optimal performance of fauna and flora. The frequency of burning will depend on the particular EVC and fauna 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 except for open native grassland and we believe that most areas should not be deliberately burned more frequently than every 20 years.

We stress that areas burned in the wildfires must be considered as part of the prescribed burn planning.

3. **Fauna and Flora Surveys** – a preliminary survey is not needed if every prescribed 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. Where areas have been burned, or are small in size, adjacent areas of suitable habitat must not be burned until the burned areas once again provide suitable habitat; the risk of an uncontrolled prescribed burn 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. 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 in each EVC must be the objective of every prescribed burn.

5. **Fire history of adjacent areas** – this must be taken into account when planning a new prescribed burn. If the area adjacent to the proposed burn has itself been burned during the previous 10 years, no new prescribed 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 and basic ecological principles.

6. **Habitat trees** – the large old trees with hollows provide shelter and breeding places for fauna (bats, birds, gliders, possums and reptiles) and must be protected; otherwise, after several rotations of burns, there would be few left. This is already apparent in some of our landscapes. We urge you to take all possible steps to protect such trees by raking away debris from around the trunks. The adoption of candling techniques preceding a planned prescribed burn would complement this strategy. All habitat trees must be protected using the above suggestions, not only 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. Is there a possibility that a fire truck equipped to tackle fires high in the tree can 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.

8. **Weed species control** – It makes good practical and economic sense to tackle weed species when it can be done in conjunction with post-fire operations.

Monitoring – we know that some areas are suitable habitat for vulnerable fauna and should not be burned until similar areas that were burned in the 2006-2009 fires have recovered. Monitoring of those areas could provide solid evidence of the presence of vulnerable species. On the other hand, in the absence of a positive result there is bound to be an unwarranted push to burn the area. We need to accept that some species are very difficult to detect and negative results must be treated with scepticism.

Yours sincerely

Dave Munro

Vice President HFNC