

HAMILTON FIELD NATURALISTS CLUB



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To:

Department of Sustainability & Environment
Fire Planning, Private Bag 260, Horsham VIC 3401

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Submission to Wimmera District draft Fire Operations Plan 2011/12-2013/14

GENERAL COMMENTS

First impressions

Extinction of species and degradation of environmental services is the likely outcome of this process.

- Over the years we have repeatedly stressed the need to avoid burning the new area adjacent to the last year area, yet we see this being advocated again all around SW Victoria. Surely the planners realise that, after several years, this can result in NO effective area left in a whole block (often an ‘island’ in a sea of agriculture) that can support our small mammals such as Potoroo and Brown Bandicoot and birds such as Mallee Fowl. It takes around 10 years for suitable habitat to be created for some species – where is that to be found with your present plans, which all too often result in no patches left unburned (and thousands of hectares adjacent burned in fire escapes or due to arson). We appreciate that it is convenient to burn against the last year’s boundary but it is simply not ecologically sensible to do so.
- Despite our repeated emphasis on allowing sufficient time for burned area to again support both plants and fauna, we see a new draconian input to the landscape – the *Strategic Wildfire Moderation Zone* (SWMZ). The plan, as explained by a DSE staff officer recently, is to burn sections of these wide swathes on a rotation of 8-12 years. That short rotation is ecological lunacy. Some of the EVCs within those long swathes should not be burned more frequently than every 20-30 years. A perpetual 8-12 year cycle is too short for the ‘natural’ biodiversity to function. In some areas whole isolated blocks will be effectively ruined within 2 or 3 cycles. The impact in larger blocks, such as Grampians National Park, will be seen first on endangered species in the swathe.

We contend that the desired protection requested by the Royal Commission can be obtained through the *Ecological Management Zone* (EMZ). It is clear, from many studies, that after about 8-12 years post-fire the fuel accumulation in many EVCs is almost matched by fuel decay (fungi, bacteria and termites) so that any increase beyond Year 10 in supposed fire danger is not substantial. Indeed, the very act of frequent burning maybe counter-productive – inhibiting decay processes and encouraging flammable vegetation (such as bracken), leading to a larger build up in “litter” by Year 8.

- Royal Commission Recommendation 56 is to burn at least 5% of Victoria’s public lands each year. The actual area (ha) to be burned can thus be calculated for each region. However, a large portion of public lands cannot burn (or should not) burn (e.g. roads, rivers, lakes, coast, recreation reserves). The total hectares of forest, woodland or grassland to be burned each year is thus the original total area calculated and will be much higher than 5%. According to calculations by DSE at Horsham, a total of at least 10% of the forest/woodland must be burned each year to meet the overall 5% target (RoundTable meeting, Ararat 4 July 2011). That would require each area to be burned every 8-10 years. Is that what the Royal Commission wanted? To do that would be ecological vandalism, since few pristine habitats can stand that frequency of fire. We will destroy much of our present biodiversity in Victoria in the space of 20 years or less. Clearly, the policy should be to burn no more than 5% of the actual forest/woodlands/grasslands each year. It is time for rational thinking.
- The extraordinary demand that areas burned in wildfires NOT be “counted” in the burn target (unless it was destined to be burned in the FOP period) is so stupid that it would be laughable were the consequences not so bad for “islands” like the Grampians and big areas of Little & Big Deserts.
- We do NOT accept that regional DSE staff should accept orders from “on high” without questioning. Unless DSE staff are prepared to point out the fallacies of such a policy then nothing will change.

Fire Management Zones

Frequency of burning

We understand, from an interview with a DSE officer (Far SW Region) that the SWMZ will be burned on a cycle of 8-12 years (this fact does not appear in your release – why not?).

An inevitable consequence of this plan is that many areas will be torched at a frequency that cannot possibly be ecologically appropriate. It does not allow for areas that either should never be burned or should not be burned more often than about every 20-25 years. The planned swathes are so large – some appear to be 5-km wide – that this will inevitably degrade the reserves. One can imagine, for example, that obligate seeders like Desert Banksia (*Banksia ornata*) could be eliminated entirely over a couple of cycles – as has happened in places in the Little Desert where fires are too frequent. Ten years is simply not an appropriate “catch all” plan for biodiversity. The consequence for Mallee Fowl, Emu Wrens and small mammals – such as Brown Bandicoot, Heath Mouse and Potoroo – would be disastrous. Clearly, climatic and ecological factors point to a greater than 25 year fire cycle for many of the vegetation communities in our region.

Further, the effectiveness of such wide swathes is questionable. We all know that, in a bad fire, firebrands could easily exceed 3 times that distance. We also know that bush burned as recently as a few months earlier burned again in the Grampians during the 2006 fire. Dr Tolhurst has obviously influenced the planners in this matter but what is the effect on biodiversity of this scorched earth approach. What concern was given to fauna? In years past there was no evidence of any concern, just a naive belief that what was good for plants must be good for animals.

We do NOT support the SWMZ approach. The damage that it will do to biological reserves has not been adequately assessed. In our view it is likely that the approach is a degrading process and thus in breach of both the *Victorian Fauna & Flora Guarantee* legislation and, where it is proposed for areas that have nationally-listed endangered species, the Federal *Environmental Protection and Biodiversity Conservation Act* (EPBC). If it is pursued in the manner proposed then challenges are likely. The damage that could be done in the Grampians NP area, in particular, cannot be ignored. We consider that the EMZ approach will give similar results to that proposed for fire control using SWMZ. The EMZ approach allows for periods between burns considerably greater than 10 years AND must consider effects on particular EVCs. Further, considering fire risk, studies have shown that in most environments there is little (or only very slow) NET accumulation of litter after 10-15 years. Why put biodiversity at risk for so little gain?

Burn coverage

While it has been suggested that complete coverage is not the aim, past experience has often shown the following:

- The whole area burns because the fires were lit on days (or times) that were unsuitable, or when the vegetation was simply too dry to afford any sort of control (e.g. Mt Richmond NP fire of 2010).
- The following day, enthusiasts “black out” areas that escaped fire – thus eliminating any sort of “mosaic” effect and the only biotic refuges in what are nowadays huge areas. Groups such as Grampians Asset Protection (GAP) advocate the clean sweep and some foresters have similar views.

We require a much better definition of how much refuge is to be retained within each burn area, if the aim is to burn so much of the landscape.

Ecological assessments

While we understand that a great deal of planning is attempted when devising these burn maps, much relies on a most imperfect knowledge of fauna and flora. Thus, if it does not occur in the database then, for planning purposes, it seems that it does not exist!

One example might illustrate the point. The east half of Fulham Streamside Reserve is scheduled for burning in 2013. Why? Does DSE think that there is no significant vegetation there at risk? We have a flora list of over 320 native species for this reserve and doubt whether DSE has ever used that information in their database (that data is available). We know that the 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.

Much of the western half of Fulham was burned in January 2005, and a great deal of damage done by bulldozers that pushed over dozens of large, old trees, rather than extinguishing fires in them. Is there a plan to avoid that situation in the plan for the eastern half? And why should there be virtually no part of this 860-ha reserve that is unburned longer than 8 years? Surely the DSE ecologists should have a view about that? This is effectively an ISLAND, with nowhere else for flora and many of the fauna to go.

For ecological reasons we do NOT want that Fulham burn to proceed – at least not the area of Slender Cypress and Buloke – and not until the area to the west has recovered more adequately from the fire of 2005. The fire plan for this reserve is simply not sympathetic to the ecology of this valuable reserve

Burn area targets

Areas burned in 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 Grampians landscape, with future prescribed burns potentially rendering most of the area as virtually single-age vegetation status (i.e. less than 10 years unburned). Surely someone in regional DSE ranks has the ability to make that position clear to the bureaucrats in Melbourne? Tourism in the Grampians NP yields some \$260 million annually to the economy, according to a recent report (ABC report in August 2011), and it would be good if the significance of that industry is remembered.

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

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 DSE to take all possible steps to protect such trees in our woodlands by raking away debris from around the trunks.

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?

SPECIFIC CASES

- (1) **Fulham Streamside Reserve** – eastern half scheduled for burning in 2013. As discussed above, we object to any burning in this area. It contains Slender Cypress (*Callitris gracilis*) that has its most southerly extension there, around Pine Hut. Do the planners know that? This stand has regenerated beautifully since stock were removed in 1987. This species is very fire intolerant and fire will devastate this stand that now extends far out from the little fenced enclosure. Moreover, most of the western half of the reserve was burned in 2006. If the rest is burned too, that leaves virtually no part unburned less than 10 years. That must be avoided. This is another ISLAND in a sea of agriculture and one cannot treat such areas in that fashion and expect to retain biodiversity.
- (2) **Claude Austen SF** – we do NOT agree with the classification of this area as SWMZ. We cannot see any justification for ANY part of the forest-woodland that is west of the Rocklands Reservoir to be treated in this fashion. What would be the gain, with a wide body of water to the east? This would seriously damage this tremendous woodland area. It would probably see the loss of most of the mature Yellow Box and reduce the cover, already sparse in many places due to kangaroo grazing. DSE risks ruining a lovely area that presently has a tremendous birdlist (including Diamond Firetail Hooded Robin, Southern Whiteface and Speckled Warbler) and magnificent wildflowers. Why not list it all as EMZ? That would allow a lot more latitude as to burn frequency and extent.

- (3) **Bear SF** – why burn the few patches of bush that have been unburned for a long time? One such area is the forest of Brown Stringy-bark adjacent to Hallams Rd, on the east side of the Forest Signboard as one drives into the forest). To our knowledge that has been unburned since at least 1970 (or more than 60 years, according to an adjacent landholder). There is very little fuel on the ground and thus little reason to burn it from that point of view. It is not a very large area but is an interesting relic that should be retained as a standard to assess impacts of fire frequency

(Note the Royal Commission Recommendation 58 – The Department of Sustainability and Environment significantly upgrade its program of long-term data collection to monitor and model the effects of its prescribed burning programs and of bushfires on biodiversity in Victoria).

- (4) **Rocklands SF** – what is the point of putting all of that “peninsula” (the large area north of the Reference Area that projects into Rocklands Reservoir) into SWMZ? This area is getting a very raw deal from this allocation and we can see no good reason for it. That part, at least, should be EMZ.
- (5) **Serra Range, Grampians NP** – this strip of SWMZ is a monster. The prospect that it would be effective seems to be doubtful. Our concern is that there will be no effective mosaic created within each of the large blocks that are planned to be burned AND that the fire frequency will have a devastating impact on some small mammals and many birds. What plans are in place to ensure that danger is averted? This strip should ALL be EMZ.

The planned autumn **Piccaninny** burn (11.G09) will probably create a scene of desolation, as happened a few years ago on the peaks when the GriffinTrack fire was lit in autumn. Why autumn? Why not a cooler, damper time?

- (6) **Youngs SF** – why would you burn the entire block (in 2012)? There are enough tracks internally to divide the area into several blocks and so achieve some staggering of burn intervals that give the fauna some hope for survival. This area, together with Little Youngs SF, is another ISLAND in a sea of agriculture. We cannot afford to treat these areas in this fashion. The woodland contains a large stand of Buloke and Brown Stringy-bark, both essential for the Red-tailed Black-cockatoo, that feed in this area. This is one reserve where active regeneration of Buloke can be seen. Why burn it?
- (7) **Black Range Muirfoot Track** (1597 ha) – much of this area burned in the 2006 fire. Hopefully those areas are not going to be burned again in the planned burn?
- (8) **Little Desert NP Beekeepers** – this is a huge area (3220 ha). Surely it is possible to reduce that size – it offers many opportunities for calamity – more escapes and the possibility of leaving no parts unburned. We would like to see that burn at least halved in size – but preferably in 3 burns at least 10-20 years apart. That would be far more acceptable from an ecological point of view.
- (9) **Little Desert McDonalds Highway** (6705 ha) – another huge area and our comments here are as above. These “landscape burns” appear to have been dreamed up as a matter of convenience, not science. While achieving a mosaic pattern of burned and unburned areas within that huge block could be achieved by chance, how often is a satisfactory outcome achieved? Unless it is planned we do not believe an effective outcome for biodiversity is achieved. As has been stressed many times, the requirements for species like the Mallee Fowl are for areas unburned over long periods.

We would appreciate consultation with the forest fire planners before the final plan is produced. We would like to have discussion on the points that we have indicated in this submission. As you can see we are gravely concerned at the approach now being suggested for fire operations in SW Victoria, and what we see as the failure of the FOP teams to take any account of submissions we made in previous years to protect biodiversity.

Yours sincerely

Dr Rod Bird
Secretary HFNC