

# HAMILTON FIELD NATURALISTS CLUB



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

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## Submission to Far SW District draft Fire Operations Plan 2012/13-2014/15

### GENERAL COMMENTS

While DSE has to try and perform the works dictated by the government of the day, it must also take seriously the need to look after the environment. Research is needed to define the impact on biodiversity of measures intended to reduce fire hazards, before irreversible damage is done.

- **Fire history of adjacent areas**

Over the years we have repeatedly stressed the need to avoid burning the new area adjacent to the last year area. Yet, we see that practice being advocated again all around SW Victoria. 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 – the DSE plans 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.

- **Landscape Management Zone**

This appears to be the 2011 "**Strategic Wildfire Moderation Zone**". The name may have changed but the practice persists. Our repeated emphasis on allowing sufficient time for burned area to again support both plants and fauna seems to be ignored. The old SWMZ plan was to burn sections of these wide swathes on a rotation of 8-12 years – it seems that the LMZ has a similar prescription. 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 Cobboboonee, will be seen first on endangered species in the swathe.

Many studies have shown 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** – burn at least 5% of Victoria's public lands each year. We noted our specific objections to that environmentally flawed recommendation last year. Graham Parkes (PV) statement in June 2012 that "*people are starting to feel more comfortable about meeting the 5% target*" is far from the truth and simply means he has not been listening to any ecologists.

In order to meet a State target, in March-April 2012 very large burns proposed for 2013 and 2014 in the South West were brought forward, because it was too wet to burn in Gippsland/Northern Victoria. These woodland areas were NOT places where there is very high danger from wildfire. The whole purpose of the new regime (essentially to reduce the fire hazard in the tall forests near Melbourne, Gippsland and parts of northern Victoria) has been corrupted. Pressure to meet these state-wide targets also results in fires lit when the conditions are going to produce very hot burns, leaving little in the way of substantial unburned patches within each EVC in the total burn area.

- **Achieving an ecologically effective mosaic burn**

The FOP may have an intention of achieving a 'mosaic' of burned and unburned patches but it is rare to see a true mosaic within each EVC in the planned burn area. One area of 1,116 ha at

Rocklands burned in April on a day that was clearly unsuitable. The result was a very hot wildfire. This is a major deficiency in the DSE's prescribed burning. Until there is a real effort made to achieve the objective of an effective mosaic, naturalists will continue to protest the deficiency.

- **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. For example, in the Youpayang Block of Dergholm SP there are a few remnant clumps of Desert Banksia (*Banksia ornata*). These seem to be lucky surviving patches of a once much greater population that has been severely reduced by the too-frequent use of fire in this sandy Stringy-bark country. Since the fires in this area are planned for every 10 years, on average, it seems inevitable that the clumps will vanish, eliminating the species from this block. This species relies on seed to regenerate and it may take up to 10 years to produce much (or any) seed. It is possible in the Wimmera to see that impact where the duration between fires has been too short, killing the shrubs before they can set seed

Another example is that of the Stony Rise vegetation at Mt Napier State Park. We have stressed over many years that fire should NOT be used in the "usual way" for this type of vegetation, dominated as it is by Bracken Fern, Blackwood and Manna Gum. Any fire there perpetuates the bracken fern (it is also as dense as ever within months of a fire), kills all of the Blackwood and many of the Manna Gum. There are no mature Blackwood in any part of that forest that has been frequently burned. The statement in the FOP indicates the reason for burning is "*To promote ecological resilience in Stony Rises Woodlands by manipulating the growth stage distribution*". That statement is nonsense. Instead of promoting resilience it destroys it. Instead of reducing a fire hazard it promotes it, as can be seen by examining the few areas there that have NOT been burned since 1972.

- **Frequency of burning**

We understand that the new fire zones (BMZ & LMZ) will result in forests burned on a cycle of 8-12 years. An inevitable consequence 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. 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 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 some of the vegetation communities in our region.

The damage that could be done in the Cobboboonee area, in particular, cannot be ignored. Any approach must allow for periods between burns considerably greater than 10 years AND must consider effects on particular EVCs. Further, studies have shown that in most environments there is little (or only very slow) NET accumulation of litter after 10-15 years and thus very little increase in fire risk. Why put biodiversity at risk for so little gain?

- **Burn coverage**

It has been suggested that complete burn coverage is not the aim but experience has often shown:

- 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.
- In following days, areas that escaped fire are "blacked out" – 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) are keen on this clean-sweep policy and it is clear that many foresters have similar views. One of our members has observed that blocks in the Heywood area have, in years past, been subjected to this "second burn" tactic.

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

- **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?

- **Feral pines**

The Portland –Horsham Forest management Plan accepted that urgent work was needed for control work on feral pines. It also agreed that this could be done in conjunction with the prescribed burns. Access is much easier in the fire-cleared landscape. Staff are available in the follow-up work immediately after the fire. Why has this proposal been dropped?

**SPECIFIC CASES – we list below just a few of the of the many cases that need urgent review**

- (1) **Digby – Range Track** (1,140 ha) – the Weecurra forest area has been severely burned in years past. The burning, because it is so frequent and extensive, will also badly affect seed production from the Brown Stringy-bark (*Eucalyptus baxteri*) in this forest, and thus diminish the major feed source for the endangered Red-tailed Black-cockatoo. When was this area last burned? It seems, from the reason given in the FOP for burning it, that little regard has been given to the fauna or flora of this area.
- (2) **Mt Napier State Park** (696 ha) – this is Stony Rise landscape. We have stressed over many years that fire should NOT be used in the “usual way” for this type of vegetation, dominated as it is by Bracken Fern, Blackwood and Manna Gum. Any fire there perpetuates the bracken fern (it is also as dense as ever within months of a fire), kills all of the Blackwood and many of the Manna Gum. There are no mature Blackwood in any part of that forest that has been frequently burned. The statement in the FOP indicates the reason for burning is “*To promote ecological resilience in Stony Rises Woodlands by manipulating the growth stage distribution*”. That statement is nonsense. Instead of promoting resilience it destroys it. Instead of reducing a fire hazard it promotes it, as can be seen by examining the few areas there that have NOT been burned since 1972. We object to this burn.
- (3) **Cobboboonee** – the planned burns in the area include Jacky Swamp Rd (815 ha), Cut out Dam Rd (725 ha), Wrights Swamp Rd (285 ha), Inkpot Rd (745 ha), T&W Rd (311 ha), Boiler Swamp Rd (285 ha) and Fish Holes Rd (285 ha). This represents 3,450 ha, spread over 2 years. Why has this area – it appears to be mainly National Park – been so heavily targeted? Is there another motive?

**5FHE0584** (Boiler Swamp-Fish Holes Rd) – this block has Barking Owl, Yellow-bellied Gliders and possibly Masked Owl. Whether this should be burned at all is questionable, given its high value

At the very least any burn must aim for a low intensity fire, patchy burn and little damage to old, hollow trees. No burn should be adjacent to any burned within the last 5 years (as a minimum) – if it is then it should be postponed. However, a number of adjacent blocks appear to have been burned in 2011 or early 2012, adding weight to our misgivings about the FOP. The blocks include

- **Cobboboonee P07288** - this appears to be the block with Yellow-bellied Gliders and many old-growth trees. Southern Brown Bandicoot are probably also there.
- **Cobboboonee 5FHE0582** (Gorae-Fish Holes Rd – this is also a high-conservation area
- **Cobboboonee Rd East P09449** – a high conservation area with Southern Brown Bandicoot.
- **Boundary Rd P07-288** – this block has Yellow-bellied Gliders and many old trees.

Yours faithfully

Dr Rod Bird

Secretary  
Hamilton Field Naturalists Club