

HAMILTON FIELD NATURALISTS CLUB



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To:

Department of Sustainability & Environment
Fire Planning, Private Bag 260, Horsham VIC 3400

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Submission to Wimmera 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 as Grampians National Park, 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 Wimmera were brought forward, because it was too wet to burn in Gippsland/Northern Victoria. Wimmera is NOT a place where there is very high danger from wildfire. The whole purpose of the new regime has been corrupted. Pressure to meet these state-wide targets also result in fires being lit when the conditions are going to result in 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 – not a good example of DSE work. Similar effects were produced in some of the Wimmera burns

and, for the last 10 years, there is little evidence that a true mosaic burn was ever sought or obtained. Little wonder then that species like the Mallee Fowl are in serious decline. This is a major deficiency in the application of prescribed burning by DSE. 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. 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 was scheduled for burning in 2013. 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? This is effectively an ISLAND, with nowhere else for flora and many of the fauna to go.

- **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 – we note here only a few of the many cases that need urgent review

- (1) **Fulham Streamside Reserve** – eastern half scheduled for burning in 2014/15. As discussed above, 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 reserve. While the FOP for 2012 has been modified a little from that of 2011, this will still see the greater part of this “island”, of bush having been burned since 2005. That is hardly sympathetic to fauna. While the FOP mentions Red-tailed Black-cockatoo, the area shown on the FOP map is NOT one where Stringybark is a major component. Did anyone in DSE actually look at the area? The Land Management Objective claimed in the FOP is spurious.
- (2) **Beear SF** – why burn the few patches of bush that have been unburned for a long time? One such area is the forest of Brown Stringybark adjacent to Hallams Rd, on the east side. This was planned to burn in autumn 2012 but now appears to be 2015. 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 a fire hazard point of view. There is good reason to preserve at least part of that area from fire, as an interesting relic that should be retained as a standard to assess impacts of fire frequency. We are also concerned that many of the large Yellow Gum (*E. leucoylon*) and Yellow Box (*E. melliodora*) in the northern will be burned down if fire is used in that woodland.
(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*).
- (3) **Youngs SF** – why would you burn the entire block (in 2014)? 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?

- (4) **Little Desert NP Beekeepers** – this is a huge area (4,794 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. The proposed autumn 2013 burn will, on past history, leave no effective mosaic.
- (5) **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. Achieving a mosaic pattern of burned and unburned areas within that huge block could be achieved by chance, but 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 (>20 years).
- (6) **Grampians Jimmys Creek** (3,231 ha) – since this area seems to have been burned in the 2006 wildfire we are puzzled as to why it should be targeted for 2015, less than 10 years later. As mentioned earlier, that does not appear to be sympathetic to small fauna.
- (7) **Grampians Victoria Point** (3,675 ha) – since this is one of the few large areas NOT burned in 2006, when more than 50 % of the park burned, we strenuously oppose burning it in 2013. The reason it has been targeted is the flimsy pretext that it will “*bring the fire age class distribution closer to the distribution in the Draft Greater Grampians Fire Ecology Strategy*”. This area should NOT be burned until the areas burned in the 2006 fires (and more recent extensive prescribed burns) are significantly older. To do otherwise will prejudice the survival of fauna. The *Fire Ecology Strategy* is deficient in consideration of the small mammals and birds in the National Park.

Yours sincerely

Dr Rod Bird
Secretary HFNC