



HAMILTON FIELD NATURALISTS CLUB
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Submission to 2007-2008 Fire Operations Plan for the Horsham district.

28 August, 2007

General comments about prescribed burns in the Grampians.

We are concerned that there is a dearth of data on the effects of fire on the biological diversity of flora and fauna in the Grampians area. Bearing in mind that about 70% of the Grampians have been burned over the past 10 years we strongly recommend that plans to burn large areas adjacent to those burned recently be re-scheduled.

Studies in the Red-Tailed Black Cockatoo habitat west of the Grampians has shown that it takes at least 10 years following fire before Brown Stringybark trees produce a seed crop. Gang Gang Cockatoos and other birds in the Grampians also rely heavily on the eucalypt seed or blossom, so would be threatened by further burning on remaining areas in the Grampians that had escaped being burned in the last 10 years.

There is an urgent need to understand the effects of fire upon populations of animals for example: how they use refuge of adjacent unburned areas, and how long before re-colonisation takes place following fire. Monitoring animal movements and how they use refuges is urgently required, and this information should be taken into account when any deliberate burns are planned for areas close to previous wildfire or fuel-reduction burns. Acting without this knowledge puts local populations of animals at risk. It is sensible to be cautious when planning new burns (especially larger areas) when we could be doing irreparable damage to local populations of animals, some of which are endangered. It follows from this that the Flora and Fauna Guarantee Act must also be considered when fuel-reduction burns are planned in areas that are serving as major refuges for populations of endangered species displaced by recent fires. For example, known unburned heathland refuge habitat for the Southern Brown Bandicoot and Long-nosed Potoroo habitat must be protected under the provisions of F&FG.

The Grampians bio-region is recovering from drought, so there is a strong case for reducing the area planned to be burned for fuel-reduction purposes. Current observations in the northern Grampians indicate a 20% reduction in the species diversity of birds (probably influenced by past seasonal conditions and the large Mt Leura fire).

Kevin Tolhurst's research is often cited as a rationale for planned burns, but it must be remembered that much of that work was conducted in an area of higher rainfall and not all vegetation types that occur in the Grampians were covered, so extreme caution is needed in applying all his findings to the Grampians.

We are concerned that the prescription for fuel-reduction burns resulted in a very hot and destructive fire from a "controlled burn" between the Serra Range and the Wannon River last autumn. We understand there was considerable concern among experienced DSE staff that a fire lit under such circumstances (without rain following a severe drought) would burn very fiercely; and so it proved to be. This fire quickly crowned and burned rapidly down to the river, breaking through control lines. We were told that the operational prescriptions (temperature, fuel moisture, wind etc.) indicated that a moderate fuel reduction burn could be achieved but clearly factors governing the severity of the fire were not fully taken into account. We were told that officers on site had to proceed with the burn, despite their knowing from previous experience that it would be destructive.

We urge the fire managers in DSE to use experiences such as this to revise operational prescriptions for fuel reduction in order to reduce the incidence of these burns developing into such destructive fires as was evident in that "controlled burn". Another option could be to plan burns for evenings when the fuel moisture and weather conditions are more appropriate to achieve the stated objectives.

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Comments on specific areas

Burn G17 (Griffin's Track)

The Hamilton Field Naturalists Club (HFNC) is opposed to this Zone 3 burn for the following reasons:

- No case has been provided as to why it is necessary to burn this area at this time, given that large adjacent areas have been very burned recently. An appropriate time would be 5-10 years hence, when adjacent areas are again suitable for small mammals and birds. It appears that pressure from the GAP group, who wish to burn the whole of the southern Grampians, has resulted in this last large unburned area being targetted. Regrettably, Parks Victoria has not protested that move.
- The proposed fire takes scant account of issues of biological diversity (especially of fauna) in the southeast extremity of the Grampians National Park.
- Because of the previous recent wildfire and hot controlled Wannon River Burn, it is very misleading to regard the area planned to be burned as a small percentage of the Grampians as a whole. The area south of Griffin's Track is part of a narrow peninsular of Crown Land and is not part of a larger block. The Mount Lubra wildfire has left this area as an unburned "Island", so the G17 fire would burn a huge percent (30-40%) of the remaining unburned bush-land, *i.e.* more than 50% of the peninsula will be burned if this planned burn takes place. We regard this as utterly excessive and amounts to official vandalism of the National Park, a place that is supposed to support and protect fauna and flora and environmental values.
- The map of areas burned underestimates the area of animal habitat burned by wildfire and controlled burns because much of the area burned recently at Mount Sturgeon was on private land, and was not marked as burned on the maps.
- Areas adjacent to those burned within the past 3 years by hot, destructive fires (Mt Lubra wildfire and Wannon fuel-reduction burn) are serving as a refuge for the Southern Brown Bandicoot and Long-nosed Potoroo (both endangered species). Records of the Museum of Victoria and other observations confirm that this is a refuge and re-stocking site for these species (see attached maps for records of occurrence). The G17 burn will effectively burn the remaining refuge-habitat available for these remnant populations of Southern Brown Bandicoot and Long-nosed Potoroo, and is likely to lead to the extinction of these species within the Grampians Bio-region. A key objective of the National Park is to protect and preserve bio-diversity, and this responsibility should be applied to this area.
- This area contains a restricted Ecological Vegetation Class (EVC), Valley Grassy Forest, 90% of which has been burned by the Mt Lubra wildfire and subsequent controlled burns (see enclosed map). Burning the remaining remnant will almost eliminate this EVC from the Grampians.
- The area planned for burning is on the western side of the Serra Range ridge-line. This is the driest aspect, so recovery of the vegetation, and thus the restoration of habitat will be slower.

Burn 08.G20 (Black Range)

- The Fulham wildfire in 2005 burned about 30% of the southern Black Range. Burn 08.G20 will take out a significant proportion of the remainder. The concerns we have about the Southern Serra Range burn also apply here. We do not think it appropriate to burn such a large area at this time.

Burn 08.G23 (Victoria Valley)

- We see the value of this burn in providing a good strategic fire break, especially as it breaks up blocks in this region.