

HAMILTON FIELD NATURALISTS CLUB



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To:
District Manager
Department of Sustainability & Environment, **Land and Fire**
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Submission to Wimmera Fire District Fire Operations Plan 2010-2013

The members of the Hamilton Field Naturalists Club (HFNC) are appalled by the level of prescribed burning proposed in the FOP for the Grampians Bioregion.

Inevitable extinction of species and degradation of environmental services will be the outcome of this Wimmera FOP.

- HFNC questions the legality of the prescribed burns as most may be in breach of State and Federal legislations as the FOP is likely to adversely affect critical refuge habitat of state and nationally listed fauna and flora species.
- HFNC questions the logic of having the Grampians Bioregion set to a 10 year fire cycle when clearly climatic and ecological factors point to a greater than 25 year fire cycle for many of its vegetation communities.

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 Grampians 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. The effects of this difference were readily seen in the two Grampians fires (Geerak Tk 2009 and Griffin Tk 2008) where the intensity of parts of the Griffin Tk burn resembled that of a summer wildfire.

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 within the Grampians Bio-region 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 prescribedburn planing.

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. Currently in the Grampians/Gariwerd NP, little effective habitat remains for species such as Brown Bandicoot, Heath Mouse, Smokey Mouse and Potoroo. 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. This is especially critical in the suggested Landscape Burns where several thousand ha could be completely burned, leaving no refuge areas at all. 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. Examples of planned burns in this FOP which should be postponed are 11.G22, 12.G08, 13.G10.

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 DSE to take all possible steps to protect such trees by raking away debris from around the trunks. Candling techniques preceding a planned prescribed burn might 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.

Grampians NW Victoria Range Landscape Burn project

We need to see a proper plan outlining the ecological benefits based on sound scientific grounds before such an experimental Landscape Burn Project can proceed or be proposed within the Grampians Bio-region.

Our members are seriously concerned about this proposal, as it is contrary to sound ecological principles.

We are gravely concerned that this project has been put in the FOP process without due plan or process in place, implying that some part (perhaps the whole 20,000 ha) could be burned in the next three years, due to pressure from parties that have no concern for the environmental values of the area.

We question the need for a Landscape Burn within the Grampians National Park considering the fragmented state of the landscape and the importance of this last remaining area functioning as critical refuge habitat.

We have misgivings about this proposal because so much of the Grampians Bio-region has already been burned and it seems foolish in the extreme to burn the rest of it, creating a park that has little left in it that has not been burned in the last 10 years. Hence no mixed vegetation-age structure and inevitable extinction of many fauna species. That would be environmental lunacy – yet this is a National Park supposedly high in world ranking!

The adoption of any such Landscape Burn project must be conditional on the following factors:

- The Landscape Burn Project must NOT be part of the time restrictions imposed by the FOP.
- Any planned prescribed burn must NOT be in addition to that planned in the FOP.
- Any planned prescribed burn must be of small extent, low intensity not exceeding 40% and not be ecologically detrimental.
- Funds must be allocated for meaningful scientific research on the long term impact of the frequency and intensity of fire on habitats, bio-diversity, catchment-health and ecosystem services, with a view to maintaining resilient and viable ecosystems addressing the habitat needs of all, fauna, flora, invertebrates and fungi.
- Areas unburned for a long time must NOT be targetted – we need these as reference areas that will enable our current works to be judged in the long term.

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

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Vice President HFNC