

# HAMILTON FIELD NATURALISTS CLUB



PO Box 591, Hamilton, Victoria, 3300  
hamiltonfnc@live.com.au



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

25 August 2011

## Submission to Far SW 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 the region. 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. It takes around 10 years for suitable habitat to be created for some species – where is that to be found with the 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 your 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. Even 8 years is too short for 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 Cobboboonee NP, will be to affect 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.
- 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 at Hamilton with a DSE officer from the Far South West 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 (e.g. Cobboboonee and Dergholm) are 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 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.

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 real gain (and real losses) from such a scorched earth approach? What concern was given to fauna? In years past there was scant evidence of any concern.

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 Cobboboonee 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.
- 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 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, if the aim is to burn so much of the landscape.

### Ecological assessments and the burn plan process

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! We remind you that the inventories are far from adequate.

One example might illustrate the point. 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. It appears from your map that the planned wide swathe of SWMZ will take out all of these clumps. 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. If DSE has that floristic data in its database then why is this plan going to be enacted?

### **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 areas of National Parks with future prescribed burns potentially rendering much 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?

### **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?

### **Reference Areas**

Why are these areas not excluded from prescribed burns? Such areas were always intended to be excluded. In the Wimmera, for example, these areas are excluded. We want ALL of these Reference Areas in the Far South West Region treated in the way intended when established by the LCC – no prescribed fires.

Reference Areas provide the only reasonably secure source of a landscape that has not been consistently burned and therefore offers much for scientific study of the effects of fire on biodiversity and litter accumulation over time. There are very few such areas left so why would you want to destroy those possibilities?

*(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).*

### **SPECIFIC CASES**

- (1) **Dergholm SP, Youpayang Block** – the planned SWMZ will probably remove the remnant Desert Banksia from the block (see discussion above) and just create more bracken, ensuring that the area remains a fire hazard. That will compound the problem created by a too-frequent burn policy 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. We do NOT support this plan. We believe that the SWMZ plan should be scrapped and the EMZ plan re-introduced for this area.
- (2) **Sharams Rd area, Poolaijelo** – this is a block of only 389 ha that is reputed to be long unburned (perhaps 50 years). We believe that there is merit in having some such areas left unburned as a standard to assess the new changes in fire practice. We would like to see that adopted here. We do not think that there is any particular merit in burning the area anyway, since it is isolated by roads.
- (3) **SWMZ swathes west of Casterton** – both of the west-east swathes are up to 8 km wide and each is centred on a chain of very significant wetlands. Why is that proposed? What damage will be done by burning these every 8 years? We do NOT support that SWMZ plan.
- (4) **Cobboboonee** – the planned SWMZ swathe should be abandoned, replaced by EMZ (see comments made above in ‘Fire Management Zones’). There is far too much damage likely to occur in this 5-km-

wide strip that appears to have swamps and a variety of other EVCs in the line. It is hard to understand why such draconian treatment has been proposed. We do NOT support the SWMZ plan.

- (5) **Cobboboonee P07288** appears to be the block that has Yellow-bellied Gliders and many old-growth trees. Southern Brown Bandicoot are probably also there, since they have been recorded nearby (P09449). This is a high-conservation area and one hopes that is taken into account in any burn program (i.e. low intensity fire, patchy burn, 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.
- (6) **Cobboboonee 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 conservation significance. 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.
- (7) **Cobboboonee 5FHE0582** (Gorae-Fish Holes Rd) – this is also a high-conservation area and one hopes that is taken into account in any burn program (i.e. low intensity fire, patchy burn, 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.
- (8) **Cobboboonee Rd East P09449** – this block has Southern Brown Bandicoot and is a high conservation area. If any burn is conducted it should be particularly mindful of the habitat requirements of the bandicoots (i.e. low intensity fire and very patchy burn required). No burn should be adjacent to any burned within the last 5 years (as a minimum) – if it is then it should be postponed.
- (9) **Boundary Rd P07-288** – this block has Yellow-bellied Gliders and many old trees. It is a high-conservation area and one hopes that is taken into account in any burn program (i.e. low intensity fire, patchy burn, 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.
- (10) **Bully Ranges No. 2** – this appears to be adjacent to P17-151 of last year. In that burn most of the trees seemed to have been killed by a very hot prescribed burn. Why burn an adjacent block now? As mentioned in the ‘General Comment’ section, burning adjacent blocks in successive years is very poor ecological practice and we see no legitimate reason for doing it. We do NOT support it.

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 faithfully

Dr Rod Bird

Secretary  
Hamilton Field Naturalists Club