HAMILTON FIELD NATURALISTS CLUB

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To:
DSE Land & Fire Management Officer, Horsham
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HFNC Response to Wimmera Fire District Fire Operations Plan 2009-2012

GENERAL COMMENTS

Our response is primarily concerned with environmental implications of the proposed prescribed burns.

We consider that the information provided for the Wimmera Fire District is insufficient for members of the community to make a proper judgement on many of the proposed burn areas. In particular, the fire history data presented is only for the last 5 years. That does not enable us to understand the full picture. For future Draft FOPs we require the burn history data for the last 20 years for the proposed burn area. Without that information it is impossible to know what impact the proposed burn could have on fauna, flora and particular EVCs (the Wimmera FOP also does not indicate which EVCs are present in the proposed burn area).

Where proposed burns are indicated, burn history data for adjacent blocks is required for the last 10 years. Without that information it is impossible to assess the likely impact of the proposed burn on vulnerable small fauna. About 10 years is required for habitat to recover sufficiently to enable fauna to survive in such areas, to serve both as a source of refuge for animal displaced from the new burn area and as a source for recolonisation of the new burned area. This is a fundamental consideration, one that DSE has failed to address in previous years. It goes to the heart of sustainability of natural systems, fauna and flora.

The base information provided in the Draft Wimmera Fire District FOP compares poorly with that provided in the Draft Far South West Fire District FOP. You will note that the latter provides information for each proposed burn area on:

- Fuel hazard assessment
- Fire history (many decades)
- Grid reference
- EVCs affected
- Comment – e.g. what the burn is expected to achieve.

By comparison, the Wimmera FOP is not transparent and not very useful. This matter needs to be addressed. Why not use the format set out in the Far South West FOP?

Burn area targets – areas burned in the wildfires should have been 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 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 should be central to the planning process:

1. **Fire Intensity** – almost all prescribed burns should be planned as LOW Intensity burns not exceeding 40% cover. There will be more than enough wildfires and uncontrolled "prescribed" burns to give variety over time. One exception may be in areas heavily infested with Radiata Pine, where a moderate fire might be required to kill large trees.

   The prescription for fuel moisture %, humidity, temperature should 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 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 also advocate burning later in the day in order to reduce the severity of the fire.

2. **Fire Frequency** – no area should be burned more frequently than that prescribed for optimal performance of flora and fauna. That will depend on the particular EVC and 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 and we believe that most areas should not be deliberately burned more freqently than every 20 years, if at all.

3. **Fauna and Flora Surveys** – a preliminary survey is not needed if every 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 Bandiccot, Heath Mouse, Smokey Mouse and Potoroo. Where adjacent areas have been burned, or are small in size, remnant areas of suitable habitat should not be burned until the adjacent areas become suitable habitat. The risk of an uncontrolled prescribed fire 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 must be the objective of every burn.

5. **Fire history of adjacent areas** – this must be taken account of when planning a new burn. If the area adjacent to the proposed burn is substantial, less than 10 years old, and has similar EVCs to that in the proposed burn area, then no new 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 ecological principles.

6. **Habitat trees** – the large old trees with hollows provide shelter and breeding places for fauna (bats, birds, gliders, possums and reptiles) 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 managers to protect such trees by raking away debris from around the trunks. Our concern is that this appears to be only applied to trees near the edges. The adoption of candling techniques preceding a planned prescribed burn would, in some circumstances, complement this strategy.

   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. It is not unreasonable to ask that a fire truck equipped to tackle fires high in the tree 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 such as the Spotted-tail Quoll (these animals do have the ability to dig up baits).

8. **Weed species control** – it makes good practical and economic sense to tackle the pest species (e.g. Radiata Pine) when it can be done in conjunction with post-fire operations.

COMMENTS FOR SPECIFIC BURN PROPOSALS

10.G18 Grampians NW Victoria Range Landscape Burn proposal

We need to see a proper plan outlining the ecological benefits based on sond scientific grounds before such an experimental landscape Burn project can proceed or be proposed within the Grampians Bioregion.

We are gravely concerned that this 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 3 years, due to pressure from parties that have no concern for the environmental values of the area. The proposition, as put to us at Halls Gap on 21 July and Hamilton on 6 August, is not transparent and so is subject to mis-management of the last remaining area functioning as critical refuge habitat in the Grampians National Park. We question the reasonng for selecting this particular section within the park for an experimental project such as this.

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. The result –no vegetation age-structure and possibly the extinction of many fauna species. That would be environmental lunacy – yet this is a National Park supposedly high in world standing.

The adoption of any such landscape Burn Project should be conditional on the following factors:

- The project must NOT be part of the time restrictions imposed by the FOP
- Any planned prescribed burn should NOT be in addition to that planned in the FOP
- Any planned pescribed burn must be of SMALL extent, low intensity not exceeding 40% and not environmentally destructive
- Funds must be allocated for meaningful scientific research on the long-term impact of the frequency and intensity of fire on biodiversity, catchment health and ecosystem services, with a view to maintaining resiliant and viable ecosystems
- Areas burned in the wildfires must be considered as part of any burn targets.

We understand that the DSE submission to the 2008 Parliamentary Enquiry on Bushfires stated an aim to burn 80% of Landscape Mosaic Burn areas. That is clearly a concern since the chance of attaining a mosiac of unburned patches across the landscape is doubtful.

We believe that areas unburned for a long time should NOT be targetted – we need these as reference areas that will enable the impact of current fire prescriptions 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 2006-2008 fires have recovered. Monitoring of those areas could provide solid evidence of 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 sceptism.

10.G06 – continued Geerak Track
This is adjacent to the large 2009 prescribed burn and therefore must not proceed.

10.G08 – Jensens Track
This is a long-unburned area and we consider that it should not be burned. It also appears to be an important wildlife corridor. If DSE is determined to burn it despite our reservations, any prescribed burn there must be treated as an ecological burn of low intensity not exceeding 40% in extent, and habitat trees must be given full protection (see General Comments).

10.G09 – Pohlners Rd Nth of Wartook
This important wildlife corridor is adjacent to a recent burn and therefore it should not be burned (see General Comments).

10.G14 Mt Abrupt East
This is adjacent to the intense 2007 prescribed burn and therefore must NOT proceed until at least 2017(see (see General Comments).

11.G11 Yarram Gap Rd
This is adjacent to the large 2006 wildfire and therefore must not proceed until at least 2016 (see General Comments).

10.G16 Beear-McAdams Rd
This appears to be a long-unburned block and we question the decision to burn it. It does not appear to have a high fine-fuel load. If DSE is determined to burn it despite our reservartions, any burn there must be treated as an ecological burn of low intensity not exceeding 40% in extent, and habitat trees must be given full protection (see General Comments).

09.G03 – Rocklands Craigs Rd
This appears to be a long-unburned block and must be treated as an ecological burn of low intensity not exceeding 40% in extent, and habitat trees must be given full protection (see General Comments).

Yours faithfully

Dr PR Bird OAM
Secretary
Hamilton Field Naturalists Club