

Mary J. Chandler,

**Mildura Fire District Fire Management Officer,
PO Box 905,
Mildura. Vic. 3502**

Dear Sir,

I wish to make the following comments on the Mildura District Fire Protection Plan.

It is a lovely glossy production, clearly set out and easy to follow. However, the Department still seems to be hell bent on burning as much as possible. The frequency of intervals between burns appears to have altered slightly but it still presents a destructive picture.

1. Last year I sent in a submission to the Ten Year Plan and I was disappointed with the lack of engagement in that process.
2. I would like to refer to the following issues in my previous submission:

Threatened species and the decline of biodiversity.

- The Mallee landscape has continued to decline in the decades since widespread clearance of native vegetation concluded, despite efforts of many agencies to arrest this. Australia has the worst recent extinction rate in the world. In addition over 1000 species are now considered threatened nationally, and many more populations are threatened at regional scales and continue to decline to local extinction because of lack of adequate habitat..
- Significant changes in regulation and more investment are required if this situation is to be changed for the better. Some suggestions are:
 1. Strategic mapping of the environment
 2. More targeted surveys of flora and fauna to allow informed decisions to be made
 3. Building of stronger linkages, including to the larger parks and reserves and between the Murray River and regional wetlands
 4. More research to understand the possible affects of climate change on vulnerable species
- Anticipated climate change will exacerbate biodiversity losses. Many of these losses can be prevented if adequate habitat is re-established. Theory suggests that re-establishing functional habitat to cover 30% of the landscape will provide a lasting benefit and halt species loss. Increased areas of reconstructed native habitat will also help buffer species from climate change.
- I believe that re-establishing habitat has to be beyond planting trees, focussing on re-constructing diverse, heterogeneous and resilient habitats that will allow

populations of threatened biota to increase in abundance and distribution. There is an immense urgency to start re-establishing habitats today and not in a few months or next year because biodiversity losses are imminent, and because some components of habitats (e.g. tree hollows) will take more than 100 years to form. In fact I was advised only a couple of days ago, that in the South Australia Riverland, people are actually seeking hollow limbs and boring holes in them, to assist in creating tree hollows.

- Many species known in north-west Victoria, either do not occur elsewhere in the State (red kangaroo, Mallee ningau, paucident planigle, and Mitchell's hopping mouse) or are limited to this and closely related areas (silky mouse, western pygmy-possum, and eastern great long-eared bat).
- *More species have disappeared from the Mallee area since European settlement than from any other part of Victoria.*
- The relatively hot and dry environment of the study area supports a distinctive element of Victorian avifauna that comprises Mallee-dependent birds such as the Mallee Fowl, Red-Lored whistler, Mallee Emu-wren, and Black-eared Miner, and the typically inland species such as the Inland Dotterel, Grey Falcon, White-Winged Fairy Wren, and Crimson Chat.

Some reference has been made to the above in Appendix 2 on Page 64 of the Mildura District Fire Protection Plan and it is pleasing to note some of the outcomes, for example, under Fire suppression:

- Ensure that maps of known habitat are available during suppression operations.

However, it is imperative that extensive research is undertaken to ascertain what species are found in areas proposed to be burnt, prior to choosing that are for a prescribed burn, and in spite of the risk of wildfires, areas such as the Nowingi Block, which appears to be the last remaining stronghold of the Mallee Emu Wren, should be permanently excluded from a proposed burn.

It is also noted that “the rare, specialised, localised, high site-fidelity, fire-sensitive, low-fecundity or low-mobility taxa appear to be in decline.” I think we have all been saying this for quite some time. I would request that after research has been undertaken to ascertain what species are found in a proposed burn, that after the burn, monitoring is done to ascertain whether prescribed burning is actually causing decline in species, or whether other factors such as climate change are also involved, and this data over a number of years could be invaluable for future Fire Plans.

I also wish to reiterate my comments on the Nowingi Block and its species contained in my submission.

Zone 2 “This area, situated between the high voltage power line easement and the Mildura railway line easement from south of Nowingi (State Forest) to the southern boundary of MSNP is approximately 1km wide. The purpose of the area is to reduce the risk of wildfire impacting the Calder Highway and entering Hattah-Kulkyne

National Park from the west. The strategy is to burn four strips to ensure the ongoing integrity of the area.”

I am totally opposed to the burning of the Nowingi Block for a number of reasons. At a recent meeting it was suggested that I come up with an alternative. I suggest that that is the job of DSE, and this is yet another instance when the community is not taken seriously.

- The biodiversity of the Nowingi Block alone should be sufficient to preclude this area from burning.
- Recent surveys undertaken on the Mallee Emu-wren, Eastern Long-Eared Bat and Sun Moths showed that the Nowingi Block holds by far the largest occurrence of these species than anywhere else in Victoria. It has been established, I am sure you will agree, that it is the last large viable breeding site of the Mallee Emu-wren left. It was stated at a recent Meeting with Rob Price and Milton Smith, that the reason this area is to be burnt is to save these species. How can this be so? The Mallee Emu-wren will not be able to escape the burning and it will destroy the roosting sites of the bat. Field Naturalists and scientists are appalled that this area is a proposed burn site. I believe that the integrity of DSE is at stake in proposing this burn.
- I would like to quote from “Preliminary investigations into the status and ecology of the eastern Long-eared Bat, *Nyctophilus timoriensis* (southeastern form) by Lindy Lumsden, Michael Lindeman and Jenny Nelson, Arthur Rylah Institute for Environmental Research, June 2007-07-23

As well as trapping nine individuals of the Eastern Long-eared Bat, 10 species of bat were captured. As well, the White-striped Freetail Bat was recorded by its audible echolocation call, and it is possible that a Little Broad-nosed Bat was trapped. If so, this will be only the second record of this species in Victoria.

“Roosting ecology Page 22

Twenty roost sites were located by radiotracking seven individuals. At least one roost site was found for each individual with multiple roosts found for many individuals. Roost sites were located throughout the Nowingi block and into adjacent sections of Hattah-Kulkyne National Park and south as far as Glencoe Plain.....

“Implications of the study and need for further research

Similar to many threatened mallee birds (eg Clarke 2005...) large-scale wildfires may be a major threat to the conservation of this species in terms of direct mortality and the loss of both roost sites and foraging habitat. The majority of roost sites located in this study were in long unburnt habitats and this is likely to be a key reason for the comparatively high densities found in this area. The threat from fire is likely to be exacerbated for the Eastern Long-eared Bat due to their habit of roosting in dead timber, often low to the ground.

Fuel reduction burns are also like to have a major impact on the roosting habitat of this species. In the recently released Draft Mildura Fire Protection Plan (DSE2007), there is a proposal to regularly burn the 1 km wide strip between the electricity transmission line easement and the Calder Highway within the Nowingi Block, to reduce the risk of wildfire entering Hattah-Kulkyne National Park from the west. Eight of the twenty roosts were located between the easement and the highway, and undoubtedly many more roost sites are used in this area by these and other Eastern Long-eared Bat individuals. It is therefore recommended that the proposal to burn this area is reconsidered and instead fire protections measures are taken to prevent the whole block being burnt by either fuel reduction burns or wildfire. The Nowingi block appears to be in a natural fireshadow area due to the fire-resistant nature of the vegetation on the Raak Plain to the west (Lcc 1987) Although yet to be proved conclusively, it is highly likely that the reason this species occurs in this area is due to the lack of recent fires. If this area was to be burnt it is possible it would severely compromise the conservation of this species in this area. And as this is the most important site found in Victoria for this species, it could also affect the conservation status of the species within the state.

And to quote from “Survey of Threatened Diurnal Lepidoptera in North-Western Victoria, 2006/7: Plus current Management Recommendations, Fabian Douglas, July 2007-07-23

Page 12 Last paragraph:

“Of these areas, it seems that the Nowingi Block, described above, holds by far the largest and strongest occurrence of Sldiscalis. This is suspected because at the time this population was discovered (Oct 12 & 13 2005) 24 males and 10 females were observed by J.T. Noelker and the author during a period of two days. Further, in the course of the surveys for this work that were carried out on 13 Oct 2006, the site was briefly revisited by the author. On this occasion 10 males and 1 female were observed during a period of only 20 minutes. It was obvious on both of the visits to this site that many of the Gahnia langera plants were surprisingly healthy, in spite of the prevailing drought conditions. As this locality hold the largest known population S. dicalis in Victoria, it is strongly recommended that the Nowingi “study area” and the surrounding area of uncommitted crown land should be added to the Murray Sunset National Park. This would also be a very positive and important action towards the conservation of the sympatric and very significant populations of Synemon jcaria and Antipodia atralba that occur there as well.”

- These three rare species alone should be enough to upgrade the Nowingi Block to Zone 4 and I would like to recommend that this happens.
- 3. As I said above, lack of any meaningful information on fauna is still a big disappointment and this should be addressed immediately. Significant research must be carried and it is disturbing to see DPI shedding research staff.
- 4. The Big Desert is a designated Wilderness Area so why would you burn it. This will no longer be a Wilderness area when the 10 year programme has been carried out. The very little vegetation we have left in Mallee National Parks should be nurtured not destroyed.

5. I am still concerned that Mallee gums with hollows and Chenopod Mallee are being destroyed by prescribed burning and that hollow-nesting species are fast disappearing.
6. Today, as I jot down these notes, there is prescribed burning going on out in the Murray Sunset National Park, once again during the nesting season of many Mallee birds. I objected to spring before in my submission, and I still object to it.
7. Prescribed burning throughout the State must add to Greenhouse Gas emissions. DSE must take responsibility for this, and when Greenhouse Gas Emissions charges come down, must pay their dues.
8. I will be watching to see if any escapes occur from the current and future prescribed burns. I believe that DSE, as the body responsible for these escapes, has to accept accountability like any other landholder and should be fined for any and all escapes except in exceptional circumstances.

I am greatly disappointed that DSE is still pushing the idea that “to burn is good.”

I accept that towns and properties have to be protected, but believe that burning areas to cinders is totally unacceptable. Unfortunately most times, the mallee gums are burnt to the ground and it takes years for them to recover, by which time DSE is back to do a re-burn.

Yours sincerely,

Mary J. Chandler