

SUBMISSION

Mildura District Fire Protection Plan Draft June 2007



MALLEE EMU-WREN - PHOTO: BILL LABBETT

Submission by: Mary J. Chandler

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I am greatly concerned that the Mildura District Fire Protection Plan proposes to use methods that will lead to extensive vegetation clearing and comprehensive alteration of habitat. The Precautionary Principle has been totally disregarded with the volume of “clearing “ and “burning” proposed. If, as it appears to me and many others whom I have spoken with, this idea that more clearing is necessary to boost the achievement of state targets by honing in on areas distant from state assets then it beggars belief. DSE, who is charged with the custodianship of our precious biodiversity, are completely ignoring their responsibility in what would appear to be less than a transparent manner.

It would appear that about 225km of chained breaks 100m wide is planned to be used around the Big Desert, as well as another 85 km of undefined width. This represents over 2,250ha of clearing which to me seems to be a very large area indeed.

The fact that in Zone 2 there will be wide prescribed burns where Mallee Emu-wren, Eastern Long-eared Bat, Threatened Diurnal Lepidoptera and other long-unburnt mallee dependant fauna are found, including the area west of the Calder Highway at Nowingi is unbelievable.

I am also concerned that fragmentation of the several already tenuous corridors between Flora and Fauna Reserves and mallee Parks will occur making them more susceptible to loss of threatened fauna and flora in the event of fire and apparent global warming. Once again I state the Nowingi corridor as one of those corridor in question. I also believe that these last three points, the chained breaks around the Big Desert National Park, the prescribed burns in places where threatened species are known to occur and the fragmentation of Flora and Fauna Reserves should be referred for assessment under the Environment Protection and Biodiversity Conservation (EPBA) Act. I query whether this has been done as yet, as I am not confident that DSE validates everything it does. An example that comes to mind was the proposed Toxic Waste Dump, which was not submitted for assessment until Dr. Fiona Murdoch and members of the Food Bowl insisted that this be carried out.

The “spin doctors” apparently are starting to believe in their own “spin.” We are constantly assured that “to burn is good”. I also question the strong reflection of “asset protection “ in many instances throughout the Plan, which implies that in order to be protected the few remaining unburnt areas need to be burnt, i.e. the Nowingi Block.”

I challenge this assumption that “to burn is good.” Whilst I acknowledge that fire management is necessary on public land, I do not believe that the Mallee community necessary agrees with the way it is carried out in the mallee. Fire may be a natural part of Biodiversity, but to have it subjected to “the protection of life and property” without balancing the needs of fauna and flora (particularly those most threatened) is obviation of responsibility of the highest degree. It is important that DSE weave an acceptable path to gain everyone’s agreement and at the same time give due recognition that environment, social and economic outcomes are in competition but at the same time are very much interdependent

The Mallee and the Alpine areas are the lungs of Victoria and as such are vitally important. Fire Management is a complex issue and I believe it is important to

collect exhaustive data on the biodiversity of each area before decision-making is made. Little attention appears to have been given to the importance of the biodiversity of the Nowingi Block, with fire management decisions over-riding this very important area. This obviously occurs throughout the whole of the Mallee.

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 advise 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 ningauai, paucident planigle, and Mitchell's

hopping mouse) or are limited to this and closely related areas (silky mouse, western pygmy-possum, and eastern 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 mallee 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.

Malleefowl *Leipoa ocellata*



MALLEE FOWL WORKING MOUND – PHOTO: LES CHANDLER

1. The Mallee fowl is the only mound builder in the world to live in dry inland areas.

The historical range of the Mallee fowl in Victoria included the entire Mallee region, and the northern and western Wimmera to the southern fringes of the Little Desert. It also included much of the North-Central region, almost to Echuca, and through the Central Goldfields to southern outliers in dry Mallee woodlands east of Melbourne and as far south as the Brisbane Ranges.

Today it is mainly confined to parts of the Murray-Sunset, Hattah-Kulknye National Parks – Annuello in the north, Wyperfeld in the west and Little Desert in the south. Populations are also found on small reserves in the north eastern Mallee, with larger ones in the central Mallee at Wathe and Bronzewing.

In the north west of Victorian, clearing for cropping has been the principal reason for the shrinking of the Mallee fowl's range.

2. The Victorian Mallee Fowl Recovery Group has built on this research, and their ongoing study gathers data to assess the trends in breeding activity, and therefore population stability and viability including Hattah and the Sunset Country. In 2004 they were monitoring 26 grids and close to 900 mounds annually. (Paper, Neil Macfarlane, President VMRG at National Mallee Fowl Forum 2004). In the immediate vicinity of the proposed site, for the past ten years, the VMRG have monitored several established grids in the Hattah- Kulkyne National Park, the nearby Murray Sunset National Park, and the corridor between the two parks. An analysis of the trend data over these ten years show a decline of Mallee fowl breeding population of 50% from 1995 to 2004 (Beshemesh 2004).

This trend should alert people to the problems faced by the Mallee fowl and working with community groups such as the Victorian Mallee Fowl Recovery Group is a must. More Recovery Groups should be established to monitor other endangered and vulnerable birds, mammals and reptiles.

Mallee Fowl Management issues for Victoria are:

- Fragmentation of habitat
 - Wildlife corridors – creation and extension
 - Salinity
 - Fire – impacts and management
 - Clearing (including illegal and incremental)
 - Climate Change
 - Temperature
 - Rainfall (totals, and seasonality)
 - Rate of change
 - Implications and responses
 - New monitoring grids
 - In burnt areas of Big Desert Wilderness
 - Wychitella
 - Little Desert
 - Private property - relationship with landholders
 - With Mallee Fowl on their land
 - Adjacent to reserves
 - Possible purchase of further small reserves as available.
3. During the current eleven-year drought, Mallee Fowl have been marginally more resilient in the Hattah Kulkyne National Park than in the Murray Sunset National Park, almost to the point where they are critically endangered in the Murray Sunset (VMRG database 1995-2004). Members of the VMRG are worried that within two years the birds could be extinct

in Murray Sunset and further down the track the same plight could await Hattah-Kulkyne unless all corridors remain intact.

4 The Action statement under the Flora and Fauna Guarantee (FFG) Act for the Mallee Fowl states that *“The extent and frequency of fires pose a serious threat to the conservation of Mallee Fowl as remaining populations may be destroyed and habitat quality reduced for 40 years or more.”*

MALLEE EMU-WREN

The Mallee contains a number of delightful little birds, belonging to the wren family. The Mallee Emu-wren is a nationally threatened, tiny, exquisite bird, weighing only 5-7 grams and smaller than a mouse. The bird flutters mainly at ground level and at the slightest sign of intrusion will head straight into porcupine grass, where it can remain hidden for years. Its feeble contact calls are high-pitched and are unable to be heard by many people.



MALLEE EMU-WREN - PHOTO: BILL LABBETT

The Mallee Emu-wren is an enigmatic cousin of the fairy wrens found almost exclusively in National Parks of north west Victorian and eastern South Australia. The South Australian and Federal governments, local, national and international scientists and ornithologists have provided us with robust, scientific information on the distribution, abundance and threats to this bird. Its distribution is patchy. I was privileged to catch a sight of this exquisite little bird once, when out in the Mallee in the Nowingi area with my father. There is still much to be learnt and understood about the Mallee Emu-wren.

Due to the poor dispersal ability of the bird, and recent serious declines in abundance, all locations at which it occurs are likely to be critical for foraging and breeding. The scientific community believes that much of the apparently suitable habitat for this bird is unoccupied but is still not exactly sure why this is. This

species is most sensitive to human induced impacts such as fire and vegetation clearance.

The species is on the brink of extinction in South Australia, and Dr. David Paton believes the species should be re-listed in the Critically Endangered category.

The Mallee Emu-wren occupies habitats containing mature Spinifex (Triodia) vegetation in the northern half of their range and older growth Mallee heath land communities in the southern portion of their range. On the site, their nests are well- hidden domed nests in Triodia, usually containing 2-3 eggs within low woodland dominated by Mallee eucalypts.

An Interim Report produced by Dr. Rohan Clarke in January found 16 individual or group sightings of this species, 15 in Murray Sunset National Park and 1 in Wyperfeld National Park. The survey did not include Hattah-Kulkyne or Nowingi, as it was known there areas contained 26 records in surveys conducted by Biosis in February 2005, as well as an additional 10 incidental records between August to December 2006. The species was absent in areas where it had previously been recorded, i.e. Big Desert Wilderness Park/State Forest (northern sectors), Wathe Flora & Fauna Reserve, and Bronzewing Flora & Fauna Reserve.

A current Recovery Plan for the Mallee Emu-Wren, Red-Lored Whistler and Western Whipbird has been received in Draft Plan, along with other threatened mallee birds, and it is my concern that the Mildura Draft Fire Plan is a further threat to these species.

EASTERN LONG-EARED BAT

During work done by Biosis during the EES process for the Nowingi site, there was great excitement when only the fifth discovery of this species since 1888, was trapped. Since then, more work has been done in the area and, nine species have been trapped, including a lactating female. The large hollow trees are very important to this species, and in future controlled burns, areas with large hollow trees, should be eliminated.

It is a strange rationalisation to state that in burning the area that contains the Mallee Emu-Wren and Eastern Greater Longer-eared Bat, DSE will be saving these species. How can this be, when they will be wiped out and be unable to procreate? This thinking by DSE, is neither logical or rational.



EASTERN LONG-EARED BAT - PHOTO: SALLY KOEHLER

- 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”

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 like 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 likely 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 fire-shadow 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."



Bat Harp trap used in recent research on the area between the Power lines and the railway line, which is in the proposed burn area. The Draft Recovery Plan for the Mallee –emu wren and other threatened mallee birds states that:

- “Areas last burnt 20 or more years ago are important refuges for almost all threatened and declining mallee bird species;
- Areas last burnt 40 or more years ago are of central importance to a number of species, particularly those currently listed as most threatened” (p22)

The Fire Plan talks about 10-15 year intervals and 5-10 year intervals between burning but nowhere does it state clearly the fire-interval requirements for species such as the Mallee Fowl, the Mallee Emu-wren, Black-eared Miner, Eastern Long-eared Bat and other important threatened species. It must give clearer commitments of the minimum extent of the areas that DSE aim to leave unburnt for longer than 20, 40 and 60 years, excluding the occurrence of wildfires. I am not opposed to the use of fuel reduction burning in appropriate vegetation types using the parallel strips proposed. But the placement of some of these with respect to fire-sensitive fauna do give rise to grave concern and I do not agree with their use in wilderness areas.

Framework for natural and cultural values protection

As mentioned in the above paragraph, I am greatly concerned about any likely impact on species of national significance. Any works that will occur in areas where these exist must be referred to the EPBC unit in Canberra. No work should be undertaken until this has been done, and I will be referring this submission to Canberra myself.

It is necessary to maintain large areas of long-unburnt mallee to support viable populations such as the Mallee Fowl and those species located at Nowingi and throughout Murray Sunset such as the Mallee Emu Wren. It is vital that before anything further is undertaken, an analysis be made of what long-unburnt vegetation currently exists, as well as vegetation that might close to this age. It is important that these areas are maintained as 30-60+ years to support viable populations such as in Nowingi, and in the Murray Sunset and Hattah-Kulkyne larger areas are required for the Mallee Fowl, eg. 700 hectares at least over which they can forage and roam. More specific information must be contained in the fire plan before we will be satisfied that fire burning can be carried out.

The maintenance of rare and threatened wildlife habitat does not appear to have been dealt with in the Fire Plan. Many of the species need 40-60 years according to the scientists and field naturalists who have studied them. The Fire Plan should be altered to include this. I believe these species are threatened in the first place because of habitat shrinkage and no further stress should be put on them by shrinking their habitat areas even further.

Murray Sunset National Park- boundary protection.

Whilst I agree that small mosaic burns should take place, and maybe in some areas slightly larger ones to protect the rest of the park and to prevent the fire from jumping the boundary, I am really disturbed that consistent burning is proposed to take place every year, instead of breaking between burns. It is important to retain the biodiversity of the area and to give the vegetation in the differing habitats more than sufficient time to regenerate and allow species to return to an area once again.

The proposals to burn in Zone 2 at Settlement Road and Rocket Lake Track to Mopoke Track; along Pheenys, Last Hope and One Tree Plain Tracks appear to cover areas identified as current habitat for the Mallee Emu-wren by Dr. Rohan Clarke (2006) and highly suitable for other threatened mallee birds. I am totally opposed to any burning of Mallee Emu-wren habitat or other species dependent upon old growth habitat. I realise recent fuel reductions have already been undertaken in some of these areas and believe that any subsequent burns should not be placed close to those already undertaken in case control burns escape and wipe out further habitat. Time needs to be allowed to see if some of the threatened species will migrate across the strips already burnt.

Eastern Boundary (MSNP and State Forest – West of Calder Highway)

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.

A “Survey of Threatened Diurnal Lepidoptera in North-Western Victoria, 2006/7: Plus current Management Recommendations, Fabian Douglas, July 2007-07-23 states that:

“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 rare species surveyed alone should be enough to upgrade the Nowingi Block to Zone 4 and I would like to recommend that this happens.
- I also ask that the Nowingi Block decision be reconsidered and it be upgraded to National Park, either as part of Hattah-Kulkyne that is across the Calder Highway, or Murray Sunset. It is obvious that this is a very important Block and at least as important if not more so, a conservation area, than Hattah Kulkyne. It therefore warrants a status of Zone 4.
- In 2006, during the Panel Hearing, DSE burnt the other side of the Calder Highway in Hattah-Kulkyne. As this area has already been burnt, much as I deplore the fact, I would recommend that it be used as the strip to prevent a fire jumping the Calder Highway, should this situation ever arise.
- During the Panel Hearing, the many experts called for the Government stated that if the Toxic Waste Dump was built, there was no need to burn around the facility. Instead the fire could just rage over the facility without damaging it. So, now that the Dump will not be built, what has changed?
- A large area under the power lines has been rolled to protect the lines from fire. The poles are concrete and therefore this area should be safe from fire.
- The railway line has been sprayed along both sides and there is quite a clearing between it and the sprayed area. Therefore, why should a fire jump from the Block, past the railway line, across the road, into a burnt area of Hattah-Kulkyne? Much as I deplore the suggestion, this burnt area should be retained as a fire break.
- With previous experience, one cannot help wonder, what is the Government's and DSE's purpose in burning such a high quality environmental area as the Nowingi Block. It should be left wholly intact. And, why was a committee formed recently, when it is proposed to burn the site? I find this infinitely strange and disturbing. Is there a hidden agenda?

- The Nowingi Block is an important corridor for several species between Hattah-Kulkyne and Murray-Sunset and this must not be fragmented. There is absolutely no logic in burning the strip proposed and as custodians, DSE should not allow further fragmentation of precious reserves, Parks and forests which are Victoria's last places of contiguous biodiversity.
- Because of the fight against the Toxic Waste Dump at Nowingi, the Nowingi Block is held as an area of special significance to the Mallee community. The community will only be satisfied if the Zone 2 is upgraded to Zone 4 and it is included into one of the National Parks and there will be complete outrage if it is burned.
- I would also like to ask whether Mallee Emu-wren and Mallee Fowl are situated where the proposed burn will take place on the north side of the Mallee and Red Ochre Tracks and the Konardin Tracks? If so, why is this area being burnt? Surely areas where the Mallee Emu-wren exists must be preserved at all costs. They will not move into other areas of Triodia – they will die in the fire. Time must be given to areas where Mallee Emu-wren exist, other than the Nowingi Block. During time, it should be monitored to see whether the species will expand into other areas of Triodia. They appear to be very particular where they live, and this makes the preservation of all the habitat essential.

Wildfire does not occur every year, and therefore why is control burning not well spaced in time, instead of being carried out yearly as it currently the case. There is no opportunity for areas to regenerate and to repopulate.

Annuelo flora and Fauna Reserve

Why would you roll the already burned boundary strip with a width that has not been defined? Is this absolutely necessary? Why fragment this already vital Fauna and Flora. And why burn the north-south strip 3km wide in a block that is much smaller than the Murray-Sunset National Park. With Global Warming and the determination to continue burning in the absence of any supportive Decision-making data covering all the mallee area, it seems to me that in a few years time we will be left with huge cleared areas and very extinction of many mallee species.

This Fire Management Draft Plan and DSE members hold the future of all the mallee species in their hands. Huge public investment is committed year after year into biodiversity preservation and fire management. The public expect responsible, considered evidence to be taken into consideration, when Fire Plans are drawn up. It certainly expects areas such as the Nowingi Block to be preserved at all costs, and it expects the Government and DSE to listen to the community and not just give lip consideration to proposals.

I would like to conclude by stating that for the reasons stated above, the Draft Mildura Fire Management Plan is unacceptable in its unsatisfactory of the issues raised. I cannot understand why anyone would burn during the spring, when species are breeding and unbounded control burns are criminal. However, I have little confidence that any notice will be taken and the draft Plan will be accepted as is. I weep for the mallee, its fauna and flora and its inevitable destruction if this occurs.



The sight faced after the escaped control burn in the spring of 2006. How long before species will be able to move back into this huge aarea?