

Midlands District FOP Coordinator
Department of Environment and Primary Industries
25 Vickers St,
Sebastopol, VIC, 3356

30 August 2013

Submission to Draft Midlands Fire Operations Plan 2013 - 2016

Wombat Forestcare has examined the draft plan and considers that an urgent review of the extent of these planned burns should be undertaken.

We calculate that in a period of approximately 6 years, in excess of 10% annually of the Wombat State Forest and the Hepburn Regional Park will or has been burnt in the Planned Burn Program.

We calculate a figure of 15% annually over a 6-year period for the Wombat Forest North Bullarto Block (to Glenlyon), which is approximately 5,300 hectares

Approximately 2011

Glenlyon-Osborne Road (11DA09) – 203 hectares
Glenlyon-Chesterfields (11DA06) – 305 hectares

In 2012 -13

Glenlyon-Wallaby (5MDA 003) – 256 hectares
Trentham-Lyonville (5MDA 0006) – 144 hectares
Glenlyon-Denver Road (12DA07) – 457 hectares
Glenlyon FW Mudlark (12DA FW01) – 86 hectares

Proposed over 3 years

Trentham-Flume Track (5MDA 0027) -799 hectares
Glenlyon-Trailer Track (5MDA 0055) – 1814 hectares
Glenlyon-Hutton Lane (5MDA 0030) - 496 hectares

FESA Research sites – 160 hectares

This totals 4,720 hectares over a period of approximately 5 - 6 years and represents 15% of this block per year.

This also does not take into account areas burnt post logging and a wildfire which are now to be re-burnt approximately 20 years later.

Wombat Forestcare acknowledges the importance of planned burns in the Wombat Forest, however the scale of the burns in the draft Fire operations Plan urgently needs to be reconsidered.

The Wombat Forest supports a range of endangered flora, fauna and vegetation classes as well as a number of regionally significant species. All these are put at risk by excessive fuel reduction burns.

The lack of flora and fauna surveys by the Department of Environment and Primary Industry and the reliance on the meager records that do exist, means that there is a high likelihood of listed species being destroyed. The number of records submitted by Wombat Forestcare indicates that many species that exist in the forest have not been listed.

An issue of major concern is also the extent of planned burns in the Sedgy Riparian Woodlands in the Trentham area. We consider these should urgently be revised and flora and fauna surveys undertaken. This vegetation class is listed as 'vulnerable' and given the extent of burns already undertaken in these areas further planned burns should not be considered in this plan. The area is rich in hollows and habitat values and there is a high likelihood of species such as Brush-tailed Phascogales. Surveys for Spotted-tail Quolls should be carried out in likely habitat as there was anecdotal evidence from an East Trentham resident, who stated that after a particularly hot burn in approximately 2006, east of the Trentham Tip, Quolls were no longer seen near her chook pen.

We request a meeting on site, with DEPI Fire Management and DEPI Biodiversity to discuss the measures in place to protect the large population of Coral Fern in the Millers Crossing burn and also to discuss the Trentham-Blighs Road burn. Some years ago an undertaking was given to provide a 30 metre buffer along the Domino walking trail.

Wombat Forestcare is concerned that the protection of regionally significant flora and fauna is not considered important. We believe that the biodiversity information for each burn site should be made available with the draft FOP and that the map provided should be improved, showing road and track names so that the boundaries of the planned burns can be identified.

Listed below are some important species on planned burn sites.

Glenlyon - Trailer Track (5MDA 0055)

Peregrine Falcon (Vulnerable) S37 19.270 E144 16.010 Annually nests in top of a stag. Important to clear around this to prevent it being destroyed or exclude an area from the burn.

Dwarf Silver Wattle (*Acacia Nano-dealbata*) S37 20.298 E144 16.107 Old log landing on Reed Track, Glenlyon. These flowers approx. one month earlier than other Dwarf Silver Wattles in the Wombat Forest.

Swamp Daisy Bush (*Olearia glandulosa*) S37 22.938 E144 14.974. I do not think there are any other records of this plant in the Wombat Forest.

Wiry Bossiaea *Bossiaea cordigera* S37 22.482 E144 15.946

Glenlyon – Huttons Lane (5MDA 0030)

Greater Gliders are likely to occur on this site and a precautionary approach should be taken to the gullies with large hollow-bearing trees.

Trentham - Flume Track (5MDA 0027)

Records of Dwarf Silver Wattle (*Acacia Nano-dealbata*) from roadside have been lodged, however the site needs to be surveyed for other specimens.

Trentham – Old Blackwood Rd (5MDA 0037)

Mountain Correa

This is on Yankee Road, about 100 metres east of Pronks Track.

Records of Dwarf Silver Wattle (*Acacia Nano-dealbata*) from roadside have been lodged, however the site needs to be surveyed for other specimens.

Small-leaf Pomaderris (*Pomaderris elachophylla*) S37 26.420 E144 19.330

Blackwood – Paradise Track (5MDA 0032)

Due to the great difficulty in reading the map, the record below is possibly on this site or an adjoining site.

Spreading Fan Fern, *Sticherus lobatus* (not listed for the Wombat Forest) S37 28.880 E144 13.086

Trentham – Allan Creek Road (5MDA 0000)

Greater Gliders are likely to occur on this site and a precautionary approach should be taken to the gullies with large hollow-bearing trees.

Roadside clearing in preparation for **Trentham - Coopers (5MDA 0011)**

It should be noted that on Wild Dog Road, clearing has taken place and on two creek crossings, and mature Musk Daisy bushes have been destroyed. These are habitat for Rufous Fantails, which were observed in these locations approx. 5 years ago and are protected under the EPBC Act as migratory birds.

We consider this to be unnecessary destruction of important native vegetation and believe this should be investigated.

As in previous submissions, we reiterate that we consider the most effective way to protect private property from wildfires is to concentrate on very strategic burning and other fuel reduction measures around each town.

Wombat Forestcare wishes to point out that it is not acceptable for our submissions to be unacknowledged and to not receive a response. Our submissions to the Fire Operations Plan are detailed and take considerable time and research to prepare. We expect that we should receive a response to this submission by the 30 September 2013.

We thank you for the opportunity to make a submission to the Fire Operation Plan.

Yours faithfully
Gayle Osborne
Convenor
Wombat Forestcare Inc.