



Mr Dominic Lane
Chief Commissioner
Emergency Services Authority ACT

Dear Commissioner

Thank you for the opportunity to comment on the 2014 draft of the ACT Strategic Bushfire Management Plan (SBMP). As you know, members of the National Parks Association of the ACT have a considerable interest in the development and application of the SBMP and we would like to begin with congratulating you and your team on the extensive community consultation process which has preceded the development of this draft.

The layout is a particular strength in this version, enabling a more strategic discussion of the major issues. It makes the document much more citizen-friendly and should increase community understanding of the plan and its role in protecting our territory for the impact of unplanned fire.

We strongly support the move to identify bushfire risks in the urban areas and to place specific building standards on additions or redevelopment in these areas (11.1.6). This is an essential element of a sensible approach to fire management in our city and long overdue. We also welcome the restrictions on building in fire prone areas in section 11.1.5. These elements significantly strengthen our city's capacity to reduce the impact of unplanned fire.

The section on Bushfire Management on the Urban Edge is particularly important, given the demonstrated conflict between effective fire management strategies and commercial development values. The proposed process for resolving this conflict in existing areas however is quite vague. For example, referring to "case by case" management of conflict between development and protection of high value conservation areas around Asset Protection Zones is inadequate. It does not provide sufficient direction to protect environmental values or resolve the legal obligations of land managers where a specific conflict exists between ecological values and fire management.

The emphasis on early identification of Asset Protection Zones in new estate development is welcome. We strongly support making it standard to locate the inner APZs within the development area. This is an essential step in responsible management of Territory assets. But we have serious concerns that there is a default allocation of outer APZs to adjacent lands. We consider that this does not adequately reflect the conditions outlined in the following paragraph. We suggest this line should read "... and outer APZs will be permitted on adjacent lands only where the following conditions are met."

National Parks Association of ACT submission on the ACT Strategic Bushfire Management Plan

It is good to see throughout the plan the continuing role given to protecting environmental assets and to reducing conflict between nature reserves and asset protection zones. However it is disappointing that supporting documents to Section 3.5 (which discusses the role of ecological communities) are not available in the hard copy itself but only on-line. There needs to be a clear, readily available discussion in the body of the document on the relationship between protecting environmental values on the landscape and an effective long term defence against unplanned fire.

This section should also emphasise the need for more research into the impact and role of fire in environmental sustainability. Also missing is reference to the role of fauna and fungi in the ecology of fire.

We support other references to the importance of understanding the role of a healthy environment in managing fire:

- 13.1 (p 32) “identifying naturally occurring areas of vegetation with inherent fuel loads consistent with SFAZ standards” could also include a reference to protecting areas which offer natural moisture advantages, eg wet gullies.”
- We strongly support the statement on the same page that “that strategic areas of low fuels are maintained in the landscape without the need for repeatedly burning the same areas.”
- 22.2.2 refers to the need to ensure helipads do not contaminate remote locations and we strongly support that also.

We are concerned that references to research into the various elements of fire management are distributed throughout the plan and hence lose focus. The plan needs to consolidate its research strategies into a long term strategic plan for conducting and publicly reporting on research into issues such as the impact of prescribed burning vegetation regrowth and the long term flammability of different types of local ecosystems.

Fire management in the Blue Range area remains a concern. We noted there were no specific strategies in the Regional Fire Management Plans for managing the fire risk in this area, presumably because of the cost of such strategies. This area will remain a serious fire risk unless sufficient funds are allocated to rehabilitate this and similar ex-forestry areas. This should be a matter of the highest priority.

It is good to see that strategies for addressing fire management on private rural lands and on National Land have been given increased emphasis. This has previously been a weakness in previous plans.

Overall this draft is a significant step forward and, with minor changes, should serve the ACT well for the next five years.

National Parks Association of ACT submission on the ACT Strategic Bushfire Management Plan

We would be happy to discuss any of the issues raised within this submission and can be contacted, either by writing to our office address or through email (noting that the NPA ACT office is manned by volunteers and a daily presence is not able to be maintained). Alternatively, Christine Goonrey and I can be contacted on 6321 8395 or 0410 875 731, respectively.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths
President
29 July 2014