

Submission on the Strategic Bushfire Management Plan for the ACT – version 1

From the National Parks Association of the ACT

Introduction

The National Parks Association of the ACT was formed in 1960 as part of a national movement to create a system of properly managed national parks and to promote environmental awareness. NPA ACT worked for nearly twenty-five years for the creation of Namadgi National Park, which was finally gazetted on 3 October 1984. Over the following years, members have brought considerable scientific, organisational and political skills to the rehabilitation and conservation of the park.

Following the bushfires of January 2003, the issues of restoring and preserving the park have taken on a new magnitude. Ninety-five percent of Namadgi National Park was burnt at a level of severity which will prolong its recovery over several decades. At the same time, pressure is being exerted to increase prescribed burning and a network of service roads within the park to protect the park's neighbours.

We understand that the Bushfire Management Plan for the ACT has been developed within a challenging economic and political environment. Nevertheless, this pressure must be balanced against the overriding purpose of Namadgi National Park which is the protection and enhancement of the natural values of the environment as an ecologically viable and sustainable system.

- Namadgi National Park contains unique plants and animals, including insects and birds, which would alone justify the most rigorous care and protection. In addition it has important examples of coastal, mountain, woodland and grassland ecosystems which are rarely seen in such close conjunction. Namadgi National Park contains a unique mingling of these ecosystems and often marks the most northern or western extent of important species.
- It is also an integral part of the Australian Alps environmental system, its landforms and landscapes. Policies and management practices of the different parks in this system require careful and close alignment to protect their unique and inter-related values.

Maintenance and enhancement of wilderness areas is crucial to the purpose of Namadgi National Park. It is important also to note that those areas which survived the bushfires in 2003 better than others now have a very special value as refuge/regeneration areas. Fire prevention works and activities should be kept to a minimum in these areas and the lowest environmental impact options should be selected when planning such works and activity.

General Comments on the Plan

- In general the Strategic Bushfire Management Plan has many excellent statements of purpose in the first sections but there is little reflection of these when it comes down to specifics and measurable goals. For example, the specific targets in the table in Appendix 10.2 are in some cases well beyond

the limits of sound environmental practice. This dichotomy between good intentions and prescriptive standards is a disturbing feature of this draft.

- The report lacks research or references to support proposed changes to existing practice. For example, the fuel reduction cycle for the Landscape Division Zone has been changed from the present 12-15 years to 8-12 years without supporting evidence for such frequent burning which has the potential to permanently alter sensitive landscapes.
- The hierarchy between this plan and Bushfire Operational Plans is not clear. For example, the strategic principles on fire access (page 36) would appear to require or authorise the construction of an extensive network of fire trails, roads and other infrastructure such as dams for Namadgi. Yet these principles are so vague as to be virtually meaningless in determining the actual extent of works in sensitive areas. It appears an important argument about the extent of such infrastructure is being carried out away from the public gaze and this is not acceptable.
- The plan does not demonstrate an appreciation of the very real conflict between fuel reduction and protection of natural values in national and urban parks. Invasive practices such as construction of broad, well graded roads may be seen by some as an essential part of fire management in remote areas, but they are a threat to the wilderness values of the national park and invite illegal access by off-road motor vehicles to the most sensitive areas.
- The plan offers no mechanism for resolution of potential conflict between different land managers, and between land managers and individual land holders regarding fuel reduction and fire management. It attempts to resolve the current blame game simply through prescriptive fuel reduction regimes. NPA ACT believes that such conflict can be resolved through education, sharing of values and experience, and use of appropriate research to inform opinion and action. There needs to be a substantial section in the plan to address these strategies or the whole plan will be undermined by suspicion and self-interest.
- The plan relies on traditional, orthodox equipment and methodology, eg large tankers and prescriptive fuel reduction, which are not appropriate in wilderness areas. It needs to set out strategies to develop more appropriate fire management techniques for sensitive areas over the next few years.

Specific comments on the Draft Strategic Bushfire Management Plan

1. Context of the Plan

- The discussion of environmental impacts of fire is too brief and what is there is not reflected in the fire management strategies except in the vaguest terms. There is not an adequate exploration of the perceived conflict between fire management and management of the National, Nature and Urban Parks. This is an appropriate place to discuss this perceived conflict and establish some principles for resolving it.
- There is a lack of detail and of focus on protecting ecological systems and biodiversity and scant mention of the significance of biodiversity (only

mentioned on p. 61). For example, there should be vegetation maps showing dominant plant communities and distribution of fauna; there should be checklists of rare and endangered flora or fauna species. This needs to apply not just to Namadgi but across the ACT's parks and conservation areas.

- There is no flow chart to show how different fire agencies operate and communicate or to show how the chain of command works.

2 Bushfires and the ACT

- The NPA ACT agrees with the statement that “The majority of fire ignitions are from arson... people are the major source of bushfire ignitions...” (p 25, section 2.2) The implications of this statement should be reflected in the rest of the plan. The proposed road network in the Namadgi Wilderness area will increase people's access to these sensitive areas and hence increase the risk of fire through arson and accidental ignition.
- The maps on page 23 are too small and impossible to read. Including the effects of the fires on surrounding regions would make them more useful.
- There is inadequate discussion about the impact of climate change. Page 25 contains one of the few references to climate change but it is specifically related to fire fighting and the nature of fires. The plan needs to demonstrate some understanding of the impact of climate change on the overall viability of ecosystems, their sensitivity to fire and related factors such as growth and regeneration rates. For example, prolonged drought has the capacity to reduce growth in our native forests and impair the capacity of forests to recover from even relatively mild burns. There needs to be a discussion of how this plan would operate under different climatic conditions.
- The pragmatic analysis of opportunities for prescribed burning on pages 25-27 is not reflected in the setting of actual targets for prescribed burning in the table at 10.3. The frequency targets could lead to periods in which prescribed burns were conducted which caused unacceptable damage to the park, simply because the weather was right.

3 Bushfire Risk Assessment

- There is not sufficient research cited into the different types of fire, impacts of fire reduction, effectiveness of fire management strategies. There need to be planned research targets and strategies and an inbuilt capacity to respond to new research findings as they become available.
- There is no reference to satellite imagery or related research and analysis to refine and delineate risk areas so as to protect fragile ecosystems from both prescribed burning and bushfire.

4. Prevention

- It is nice to see the acknowledgement that “fuel management is not the panacea for bushfire protection and it will not eliminate the risk of severe bushfires.” However, the plan then goes on to ignore this valuable principle and discuss fuel reduction as if it is to take precedence over competing priorities such as conservation. If this is to be the case, the plan needs to specify this and to give sound research-based reasons why a prescribed

burning target should override a more conservation-based strategy in the event of a clash.

- As it stands, the proposed prevention methods are a model of orthodoxy rather than seeking clever solutions to competing priorities. Surely the ACT can take a leading role in developing low impact fire prevention and management strategies, given the scientific resources, the inter-connectedness of our urban and remote landscapes and the wealth of experience we have on hand.
- The discussion on the role of grazing is confused and inconclusive. It appears to use grazing as a legitimate fire reduction strategy for leased land and in regard to hoofed animals. Yet the plan does not mention the risk-reduction role for native animals grazing on native grasses in parks and reserves. Why is this not included?
- The section on standards and indicators on page 37 is simply inadequate for public discussion and comment.

5. Preparedness

- The problems of keeping an appropriate level of community awareness are outlined but no real solutions or strategies are set out. This reinforces the need for the plan to set strategies on a long term education and information program which instils in the community an understanding of their role in fire management in the ACT.
- Fire fighters need to be trained to recognise and understand the environmental values of the areas they are dealing with. For example, back burning to protect a vulnerable forest is counter productive if it burns through an alpine bog. Fire fighters in urban parks are usually unaware of rare plants which need to be conserved such as orchids endemic to the area. A clearer understanding of the ecology of the bush would enable fire fighters to better plan, prepare and manage fire in these areas.
- Automatic lightning detection systems for large areas of bush have been developed in Australia but again there is no mention of establishing this technology in the ACT in order to improve our ability to implement low impact strategies (p. 43).
- The discussion on use of aerial fire suppression is an excellent example of the mixed messages in the plan on environmental protection. It flags expansion of remote area helipads in Namadgi as a matter of course without regard to its environmental impact and then talks about being sensitive to the environmental impacts of fire retardant. This plan needs a thorough review by expert environmental managers before it is finalised.

6. Response – Reacting to Bushfires

- It is not stated clearly in the principles in 6.3 on page 45 where responsibility for fighting fires within Namadgi National Park will actually lie. We strongly support park management as having a key role in managing the response to all unplanned fires within the park, except where the extent of fires makes this impractical.
- We also support the principle of ‘the use of appropriate equipment suitable for the terrain’. Very large tankers and low loaders are not suitable for the

wilderness terrain and this must be acknowledged in the plan. Suitable alternatives such as aerial fire suppression should be specified.

7. Recovery – Restoring Bushfire Damage

- Research gets a mention here but it should play a much larger role than this, as specified above.

8. Standards, Monitoring and Reporting

- This section asks for consistent monitoring and reporting yet the only reportable standards in the plan are those for prescribed burning. This is deeply worrying. It indicates an approach to practice-driven fire management rather than research or science driven management.
- We do not support the inclusion in the reporting section (8.4.5.2) of “burning for ecological outcomes”. This reference gives support to a contentious notion that ecological outcomes can be achieved by burning and this theory is not applicable to large areas of the ACT. It reflects a tendency to rely on unexamined assumptions that all Aboriginal communities used burning in the past to increase food supplies. In many areas of the ACT, frequent burning promotes shrubby undergrowth – and increased fuel loads - at the expense of other species such as grass and hence inhibits food gathering.
- We support an adaptive and flexible approach to planning (page 55) but cannot see where this approach is spelled out in any detail in the plan. Flexibility is not synonymous with lack of detail. The plan should be driven by a research-based approach which follows a cycle of observe, assess, evaluate and adapt. This approach should be built into the Strategic Plan from the outset.

9. Resource Requirements

- Resource requirements should include adequate provision for ameliorating erosion, and setting up weed control programs where fire prevention infrastructure has damaged the area. It should also include the cost of patrolling and policing to prevent illegal access where fire trails have opened up previously inaccessible areas or improved access for illegal vehicles.

10. Appendices

- The map in this section is impossible to read with any accuracy but it appears that the proposed Landscape Division Zone includes areas of wilderness which should not be subjected to the severe fire management regimes proposed. There needs to be more accurate and careful delineation of this zone if it is to achieve the desired intention without causing severe damage.
- The prescribed burning cycles are too broad and do not address the different responses of different ecosystems to fire. For example, the targets appear to focus on managing *Eucalyptus macrorhyncha* (red stringy bark) forests and to set standards for management of fuel loads in this type of forest which are inappropriate to other types of forests.
- The terminology is unclear and unreferenced. For example, what does ‘fuel hazard <35’ on page 65 refer to? There is no table defining fuel hazard ratings in the plan.

- In previous fuel management plans, description of fuel loads has been in terms of tonnes per hectare. This appendix refers to Overall Fuel Hazard, litter bed depth, elevated fuels, ungrazed grasslands fuel hazard bark fuels, surface fine fuels and litter bed height without specifying how they all work together or how they relate to previous practice. This further emphasises the need for a glossary or section defining such terms and listing references in regard to their development and use.
- Referring to the proportion of DUS land in these tables appears to establish all DUS land as interchangeable in use and value, and this is very clearly not the case. This plan needs to list different strategies for different land uses within the broad categories of land delineation. For example, “unleased land awaiting development” can wear a far more rigorous prescribed burning regime than Canberra Nature Parks. Then, within Canberra Nature Parks themselves, different strategies need to be applied to different areas. For example commercial grazing is proposed for the grasslands on Cooleman Ridge but this would be completely inappropriate for the grasslands in Aranda. Combining all these areas together, even at this broad level of planning, conceals the complexity of the issues which is not helpful.
- As mentioned elsewhere, the cycles of prescribed burning are too harsh and too general. The time periods are not related to any supporting research and they do not differentiate between different types of bush or different stages of the climate cycle. Yet they are the only numerical targets in the plan and hence would come to dominate managers’ planning and accountability. This is unacceptable.
- The plan does pay some attention to ecological impact at this point but it is so vague as to be virtually meaningless. As stated before, there are conflicts between fire management and ecological sustainability of our parks and nature reserves. These conflicts need to be laid out and addressed in the plan.