



The Yellingbo Conservation Area Bushfire Risk Management Plan (YCABRMP) August 2018 has now been completed and released to the Public.

### **The Yarra Waterways Group Committee Review of This Plan**

The State Planning Policy Framework (SPPF), Amendment VC140 Bushfire State Planning Policy, March 2018 states: The operation of the SPPF has been amended to ensure that the protection of human life is prioritized over all other policy considerations in areas subject to bushfire risk. Therefore, the Yellingbo Conservation Area (YCA) should not proceed if there is any increase in Fire Risk.

Department of Environment, Land, Water and Planning (DELWP), employed fire academics Kevin Tolhurst and Justin Leonard (CSIRO) and DELWP current Employees to undertake the YCABRMP and the Haining Farm Bushfire Risk Assessment. The CFA was allowed limited input.

The PHONENIX Rapid bushfire modelling was used. This is a complex computer modelling system Kevin Tolhurst designed and developed in conjunction with the Melbourne University. (University of Melbourne/Tolhurst Bushfire Service)

A complex computer model means the accuracy of input data is critical as small differences of data, or data included or excluded could result in major differences in outcome.

### **Shortcomings of the YCABRMP**

Vital access roads, and the roll these roads perform in a bushfire scenario have not rated a mention. As the Warburton Highway is basically a one way in and one way out, any closure would push large traffic volumes onto smaller bypass roads.

There is NO mention of any buffer zone (no revegetation) to access roads, nor is there any recommendation for clearing existing fire prone native vegetation that is close to access roads.

The YWG Community Fire Report identifies at least thirteen locations in the North-East Corner alone, where the proposed YCA crosses or comes dangerously close to access roads.

Page 8. (YCABRMP): Bushfire risk in riparian areas. The proposed revegetation is along riparian (streamside) areas. Riparian areas tend to have a limited influence on bushfire spread in the landscape (DELWP, 2018). This is largely because:

\* Fire will spread more quickly on cured grass or crops compared with forest.

Contrary to popular belief, riparian areas do not generally act as a "wick" or "fuse". Fires will generally only burn in the direction of wind (while spreading more slowly sideways) or up slope if burning under light wind conditions (CFA2016).

There has been no history of a major grass or crop fire on the Yarra River flats. Hay is cut before our fire season and most other river flats heavily grazed. Crops grown are not of a highly combustible type. Example: Strawberries, Vegetables. Both subject to irrigation. Our local fire history has documented three serious fires that have spread via riparian area (Wick) travel. Local fire history does not appear to be considered.

Fire is much less likely to start in riparian land than other parts of the landscape, typically because it is not as prone to lightning strikes, is remote to easy access for arsonists, typically has fuel too wet to burn and sheltered from wind and sun.

This statement is once again not relevant to the Yarra Flats and the Little Yarra Flats. Over thousands of years flooding the river deposits silt on its banks. According to Melbourne Waters topographic maps the Flats fall by about a metre to the lowest point. The lowest point distance from the river varies, typically about 150 to 200 meters out.

The banks of these rivers are almost pure silt, that does not readily retain moisture. Simply the banks are the driest point on the flats. An area that holds little moisture. Exasperated by a thick crowded revegetated system competing for moisture. Therefore, the most combustible area of the flats. This assumption may apply in undulating country but not the Yarra flats in the investigation area.

### Wind direction.

Our fire history tells us that a fire is most likely to come from the West, North West or North. Except for the gusty front of a South Westerly change. The Yellingbo Conservation Area runs from Healesville in a southerly direction to Cockatoo. With a fire coming from North of Healesville, and as history tells us, a fire has come on numerous occasions, would flourish with a Northerly wind down the Yarra and Woori Yallock Creek to the current Yellingbo Reserve and then with the intensity of 600 hectares of intense fire fuel, continue towards Gembrook and Cockatoo. Wind direction and fire fuel.

Ember attack over our North-East corner occurred in 1983 and again in 2009, coming from the north, carried by winds high in the sky which dropped and showered over this region. Fuel loads in the proposed expanded YCA would attract this ember attack.

A south -westerly wind change with fire burning at Woori Yallock would send the fire up the Yarra towards Warburton and beyond. A fire burning in a revegetated Haining then subjected to a South-westerly wind change would endanger the residential area of Don valley. A south-westerly wind change with a fire burning in the current YCA would threaten the township of Yellingbo.

Our fire history tells us that a gusty south west wind change followed the period of hot dry northerlies in both 1983 and again in 2009.

Page 17 (YCABRMP): Fuel Management. Fuel management aims to reduce fine fuels, such as leaves, twigs, bark and grass, in order to reduce bushfire hazard. It is typically done through planned burning, or mechanical treatment such as slashing or mulching.

It is not physically possible to mechanically slash or mulch most of the river reserves. Due to the crowded vegetation program and the instructions that landowners are not to remove any native vegetation or woody debris. Removing fine fuels, such as leaves, twigs, bark and grass will attract fires. Planned burns? How can this be achieved on river reserves?

**Stock will not be permitted to graze in already vegetated areas of the Crown frontages:**

Some fanfare is being made that grazing "may" be allowed in some circumstances. No grazing allowed on vegetated areas increases the fire fuel load within the Yellingbo Conservation Area dramatically. Much of the YCA river reserves have already been fenced and vegetated. Responsible landowners, in early summer graze off long grass for fire suppression. The expected increase in fire fuel is not just from the areas that are yet to be revegetated, but a massive build up on areas that have been responsibly managed in the past, but now not possible because of the fines imposed if cattle are grazed for responsible fire management. A massive increase in fine fire fuel, means a massive increase in ember ignition fuel.

***Increased Fire Fuel - Equals - Increased Fire Risk.***

**Fire protection works on licensed riparian land is the responsibility of adjoining landowners, licensed for the management of Crown land water frontage, as specified in the license conditions. On public land where there is no license, DELWP is the responsible agency.**

Fire protection works are the responsibility of licensed adjoining landowners. Yet not involved in or allowed any intellectual input into the management of these areas. Told that they are not allowed to remove wood, debris etc. as this is habitat removal. The implementation of Melbourne Water Healthy Waterways Program is a chemical control conservation system. A system that uses chemical weed control right up to the waters edge on Melbourne's water catchment.

Legal opinion is that fire escaping from property that has natural vegetation is an act of nature. However, if it is revegetated bushland, then responsibility for the damage caused by this fire escaping to other properties **may** be placed with the owner/manager of the revegetated land.

There is little incentive under present proposals for adjoining landowners to sign riparian agreements.

## **SUMMARY**

There are a few positives in this fire plan, namely the working with local CFA for water points, the commitment to keep access tracks clear and the 100 metre buffer zone to dwellings.

But overall local conditions and fire history do not appear to have been taken into account in this fire plan, local topography, wind direction in relation to the vegetated corridors, inadequate protection for access roads, increasing the fuel load when historically our region was subjected to two significant ember attacks in 1983 and 2009, this all adds up to increased fire risk with the expansion of the YCA.

**Yarra Waterways Group Committee**

15 February 2019