

**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 has now finished a Review
of that Plan.**

The following is a detailed report to YWG Members –

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 prioritised 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.

All local fire experienced residents and our local fire history was not included in this DELWP controlled assessment.

Vital access roads, and the roll these roads perform in a bushfire senario 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.

Revegetation close to roads, and the tragedies resulting on Black Saturday appear to have been completely ignored.

Set out below are Statements of Utmost Concern for the Safety of our Community and YWG responses to those Statements.

Page 5 (of the YCABRMP): Principles of establishment of the Conservation Area.

Acknowledges and supports the existing management of public land by volunteer groups and individuals, including adjoining landowners, where consistent with the values of the area.

The Grazing/Agricultural/Riparian Licenses were removed without any direct engagement of landowners. The Yellingbo Conservation Area Coordinating Committee graded the adjoining landowners as "of little influence". The local fire experienced community's input and their fire history knowledge was totally excluded from this fire assessment as well as the Haining Farm assessment.

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.

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. Information that is not relevant to the Yarra River and tributaries given as fire facts.

* Trees generally reduce wind speed, and the rate of speed and intensity of fire:

* Riparian land occupies a relatively small proportion of the broader landscape.

Trees may reduce wind speed slightly; this statement only recognizes one influence of trees in a fire scenario. What about the other influences of trees on fire? A fire cannot be fought once in trees. A fire on pasture can be fought from the sides and rear. Once in trees (remember the current crowded revegetated system of grasses, under storey, mid storey and upper storey) it is too dangerous to enter and fight. The fire is now not defendable and has far more fuel that leads to an ability for the fire to produce ember attack ahead given the right conditions. A fire that may have been slightly slowed but now a fire of far more power/intensity, that cannot be fought until once again accessible.

Fire Fact: Increased Fire Fuel - Equals - Increased Fire Risk

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.

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).

" Contrary to popular belief " does this refer to the local fire experience community that was excluded from input into the YCABRMP? Local fire experience excluded that has witnessed fire following a waterway. One such incident trapped DSE and Forestry workers fighting one fire, when another fire, started by lightning ran along a river trapping them, only their practical fire experience saving them.

Fire History - Equals - Fire Fact.

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 Westerly wind would drive a fire at Worri Yallock or Mt Tool_b_e_wong straight up the Yarra taking out Yarra Junction, Wesburn, Millgrove, Warburton and into the Upper Yarra Catchment. A serious fire in the catchment, with ash and erosion debris would deprive Melbourne of up to 70% of its water supply. Wind direction and fire fuel.

Page 15 (YCABRMP): Modified species selection and lower bark hazard vegetation buffers.

In addition to the 100-meter setback, lower bark hazard vegetation buffers will be used to better manage and moderate ember load potential. Tree species likely to produce an area of Very High or Extreme bark hazard, according to the overall fuel hazard assessment guide (2010), will be avoided.

In some circumstances, certain types of vegetation can filter embers and provide relief from the wind (CFA2016). This principle forms the basis of this action.

Modified species? Grasses, shrubs, mid story and upper story is still to be planted. Rough bark, Stringybark trees "may" not be planted. Manna Gums, Swamp Gums, Tea Tree etc. still to be planted. All volatile oil-bearing natives. Manna Gum although smooth bark, shed bark that often forms huge deposits of bark in lower forks, with bark wicks trailing down. Is this statement suggesting that planting volatile oil-bearing natives is fire suppression measures?

"Certain types of vegetation can filter embers." Quoting a CFA document, but totally ignores our fire history. On Black Saturday embers ignited a fire in a creek corridor and due to the fuel load of a connecting revegetated wet land, rapidly increased in size to run up a hill and destroyed a neighboring house. (Yarra Waterways Group Community Fire Report)

Local Fire History - Equals - Local Fire Fact

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?

Quote from the Strategic Bushfire Management Plan 2014 (East Central Bushfire Risk Landscape). *Most towns have large areas of forest to their north and east, with some surrounded by forest. Most forested areas are ash forest and cannot be treated by planned burns.*

So how and where is it possible to do the planned burning??

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 dictatorial 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 riparian land 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 embraces chemical domination of nature, right up to the waters edge on Melbourne's water catchment.

The accepted 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 is on the owner/manager.

Landowners signing Riparian Management Licenses that are limited by dictatorial regulations are legally responsible for fire damage to other peoples and property. Using the acceptable chemical management system of the Yellingbo Conservation Area and Melbourne Waters Healthy Waterways Program. Does this mean that the landowners will also be legally responsible if a court case (class action) is taken against those using chemicals on Melbourne's water supply if proven to be carcinogenic? Legal responsibility transferred from those "implementing" the Yellingbo Conservation Area to those

that have "little", to no say in its implementation. The Yellingbo Conservation Area Coordinating Committee has graded the adjoining landowners as "of little influence".

YCA removes intellectual responsibilities but transfers legal responsibility.

Page 20-21 (YCABRMP): **Monitoring, Evaluation and Reporting.**

Monitoring, evaluation and reporting allows land managers to quantify the success of their bushfire management actions and strategies for achieving objectives. This in turn supports transparent reporting to government and the community on the outcomes of bushfire management.

"Transparent reporting to government and the community". This Bushfire Risk Management Plan has been constructed but has excluded the local community from any input/involvement. DELWP is the lead Agency of the Yellingbo Conservation Area and has graded the adjoining landowners as "of little influence". How could such monitoring have any trust or respect of the community? Monitoring, Evaluation and Reporting seems to be a bureaucratic process to meet bureaucratic requirements and little to do with 'on the ground' fire prevention/management with community support and co-operation.

The following are extracts from a Media Release from the Hon Lily D'Ambrosio, Minister for Energy, Environment and Climate Change dated Wednesday, 23 November 2016 -

"A community led process to assess and manage bushfire risk in the Yellingbo Conservation Area will begin next month."

Quotes attributable to the Minister for Energy, Environment and Climate Change -

" Bushfire We're putting people first by completing a Bushfire Risk Assessment and developing a Management Plan - the first step in implementing an extended Yellingbo Conservation Area."

"A community led process"

"We're putting people first"

"It must be underpinned by the local knowledge and the expertise of landowners and the community"

Why have none of these promises been honoured???

To totally exclude fire experienced local landowners/community and their fire history, is the Victorian Government and its agencies endanger of being judged that the exclusion of local involvement was because it is impossible to implement an extended Yellingbo Conservation Area without increasing fire risk???

Does a bushfire risk assessment that has had all inputs and all exclusions tightly controlled by the Victorian Government and its employees, meet the legal requirements and duty of care requirements to the Victorian Rural communities?

Does this tight control of inputs and exclusions meet the requirements of both the Black Saturday Royal Commission and VC 140 Amendment of the Bushfire State Planning Policy, that prioritize human life as paramount to "all" other policy considerations???

Yarra Waterways Group

