

FOBIF AND THE FIRE QUESTION

As the fire season approaches, questions about land clearing and management burning are increasingly being aired, and some controversy has already broken out about vegetation issues on the Castlemaine town perimeter.

FOBIF has consistently maintained, with the overwhelming majority of conservation organisations, that fire can be a useful tool for managing the natural landscape. We do not think it is a simple matter, however.

In other words, burn offs can be good—when they reduce bushfire risk, and encourage regeneration of suitable plant species.

Or they can be bad—when they increase bushfire risk by encouraging weeds and regrowth of flammable species, and prevent appropriate regeneration by preventing regeneration of fire sensitive species.

In other words, it all depends on how it's done, where it's done, and how often it's done.

The following excerpts from our newsletters will give an idea of FOBIF's stance on this question over the last few years.

Fire Management: Newsletter August 2005

The DSE *Code of Practice for Fire Management on Public Land 2005* has been released for public comment.

The new document shows signs of the pressure the department has come under as a result of the 2003 fires and subsequent enquiries. In particular it is clear that the department has been under conflicting pressure recently to a). burn more, and b). burn less. The code makes no decision on this one, and refers us to current fire plans.

The new code simplifies the zoning system used in current fire plans, partly in response to the Esplin report's recommendation to '[reduce] the number of zones so as to focus clearly on (i) asset protection (especially at the public/private land interface), and (ii) ecological burns.'

On the latter, the code seems more interventionist: 'Management will involve the active use of controlled (prescribed) fire to alter habitat structure and plant and animal community composition to achieve biodiversity conservation outcomes.' (p 9). This is in line with the 2004 *DSE Guidelines for Ecological Burning*. FOBIF is concerned at the confidence expressed in this policy: we believe that the current state of knowledge about the effects of fire on biodiversity should make land managers cautious about being too gung ho in the use of fire.

FOBIF is not opposed in principle to the use of fire as a management tool, but has consistently argued that it should be accompanied by careful monitoring and research.

Official documents, including the 2005 *Code of Practice*, support this policy, but managers on the ground tend to plead lack of resources to implement it, particularly when it comes to Zone 1 Asset Protection burns, where monitoring is not compulsory. This is important to us, because The Monk, one of Mount Alexander's most important natural areas, is in such a zone.

On August 12 Kane Weeks, the newly appointed Fire Ecology officer for Parks Victoria in Bendigo spoke to the Castlemaine Field Naturalists. He spoke very positively about a new culture of fire management in the Parks service, and said among other things that 'conservation values will be taken into account [in burn operations] regardless of the zone.'

The current Bendigo Fire Protection plan provides for monitoring and research on the effects of burning. The 2005 *Code of Practice* says: 'The Department must engage in coordinated research into the effects and effectiveness of prescribed burning in a range of environments and to continuously improve operational methods to better meet fire management objectives.'

We hope Kane Weeks's optimism is justified, but in the mean time believe that the managers' fire practices need to be carefully watched. They need to be under community pressure to implement the constructive parts of the Department's policies.

Burning Questions: Newsletter 2006

FOBIF members, together with members of the Castlemaine Field Naturalists and Friends of Kalimna Park, met with DSE officers in the Fryers Ranges State Forest on August 29 to discuss the ecological side of the Department's burns program.

We sought this meeting because we are concerned that the ecological monitoring side of DSE's burns program is not being followed as diligently as it should be.

The current Bendigo Fire Protection Plan provides for monitoring and research on the effects of burning. It's targeted at species/vegetation types which are 'sensitive to prescribed burning regimes', or species/vegetation types burned 'over most of their distribution.' (p37) The 2005 Code of Practice for Fire Management is more general: 'The Department must engage in coordinated research into the effects and effectiveness of prescribed burning in a range of environments and to continuously improve operational methods to better meet fire management objectives.' (p 21)

This policy is common sense: we all know that successful enterprises run research on their practices, and use the research to improve what they're doing.

There are two obstacles to the effective implementation of these praiseworthy objectives, however. One is that the Government does not resource the Department adequately. Like most governments it likes to put out glossy policies and hope that will convince people that the right thing is being done. The second is that fire managers have traditionally not

been concerned with the ecological effects of their burns: they have been interested only in bushfire control.

The first problem can only be solved by community pressure on the government to resource its conservation policies. The second is a problem in DSE culture: are DSE officers really interested in how their control burns affect biodiversity and forest health?

Our meeting with DSE officers was part of a dialogue on these matters. It is fair to say that the meeting was constructive, and that residents attending learned something about DSE's fire management strategies. We are hopeful—but not certain—that the concerns put to the forest managers by us were heard, and that they will bear them in mind in future operations.

Among these concerns were two. First, that the fire officers should identify natural assets in the forest when conducting burns, so as to avoid unnecessary damage. This concern was prompted by the destruction of large trees in the Helge track burn last year: the scarcity of such trees means that they are valuable assets which should not be destroyed in any control burn designed only to reduce fuel loads on the ground.

The second concern relates to the creation of exclusion zones inside large burn areas, either for wildlife refuge or because of the particular ecology of the area.

In a time of natural community concern about fire safety it is important to point out that FOBIF is not opposed to fire as a management tool. We are opposed to ignorant use, or use which assumes we know all we need to know on this subject. We know that the Aborigines burned the woodlands in pre settlement times: but their methods in this part of the country are not known. Only proper research can go some way to recovering some of the knowledge they had.

We believe that with a proper sense of priorities we can achieve safety for the community and a healthy forest. We're not sure that we have that at the moment, but will try to continue to engage in dialogue with DSE on the matter.

Climate Change and Bushfires: Newsletter December 2006

It was perhaps inevitable that someone would try to use the bushfires we are now enduring to attack environmentalists. The following is a reply by Phil Ingamells to one such attack. It is taken from the *Advertiser* (December 11):

‘Stewart McArthur, of the Stretton Group, is right to worry about the effects of fire on our water catchments. But he also claims that in the past, forest fuel management was provided successfully by foresters, the timber industry and graziers, and that the severity of fires today is a result of locking these people out of management processes.

‘But Justice Stretton (after whom the Stretton Group is named) laid some of the blame for the terrible 1939 fires on those same groups of people in his Royal Commission report.

‘Thankfully, some things have changed since those days. Most importantly, the progress of fire is monitored and recorded in great detail now, so that after a fire we can base our assessments of management actions on real evidence, rather than prejudice. And we have fuel reduction burning programs that operate across all land tenures, including national parks.

‘But anything we might still do to improve management of fire is dwarfed in significance by another issue.

‘Because of the climate crisis, the low pressure systems and cold fronts that normally bring rain to southern Australia are steadily moving further south. This is serious and heralds a future of less rain, more frequent and dangerous fires, and a greatly changed landscape in southern Australia.

‘We must do all we can to persuade our governments to act decisively to reverse global warming. The health of our farms, the survival of a great many of our native plants and animals, and our own wellbeing all depend on that.’

National Parks and Bushfires: newsletter 1 07

Members who read the correspondence columns of various newspapers—including the *Castlemaine Mail*— will have noticed a spate of accusations recently against the state’s parks and their managers on the subject of bushfires. These come usually in three types: Parks Victoria doesn’t do enough control burning; Parks has ‘locked up’ the bush by closing or downgrading tracks, so firefighters can’t do their job; and by removing certain activities—like cattle grazing from the Alps—Parks have rendered areas of the bush more fire prone.

On fuel reduction burns: DSE and Parks have a very clear program of such activities in our region and a code of practice for its implementation. These are public documents open for public comment. Local anti environmentalist critics of public land managers have never, to our knowledge, taken the trouble to offer an alternative to this.

Should Parks and DSE be burning more or less of the bush? As the current issue of VNPA’s *Update* has it: ‘The VNPA, and most environmentalists, have long supported appropriate fuel reduction burning in parks and reserves.’ The question is, what does ‘appropriate’ mean? We have argued that whatever burning is done should be monitored by rigorous research—which is DSE’s policy, but not always its practice—to help answer this question.

On the other two matters it is worth quoting a letter to the *Weekly Times* (Jan 24) by the director of National Parks:

‘There is no scientific support for the view that grazing of public land by cattle reduces fuel levels and therefore fire behaviour and impact.

‘Whether or not an area burns and the intensity of the fire is determined primarily by the vegetation type and the weather conditions at the time.

‘Research resulting from the 2003 Alpine fires demonstrated there was no difference between grazed and non-grazed areas.

‘Immediately prior to the 2003 fires, several thousand head of cattle grazed the Alpine National Park. The fires burned 41 of the 61 licensed areas with 30 of the 61 having at least 50 per cent of their area burnt.

‘It is fallacious and mischievous to imply Parks Victoria and other public land managers have banned access to public land.

‘Parks Victoria alone manages more than 14,000 km of roads of which about 11,000 km are open to vehicle use by the public for all or part of the year (some roads are temporarily closed due to seasonal or emergency conditions) and the remainder are specifically maintained for emergency/management vehicle access and walkers...

‘On average 46 per cent of the area of public land burnt each year is from lightning. All the highest land in the state is public land and hence far more prone to lightning strikes—the largest single cause of bushfires—and the majority of Victoria’s forested land is public land.

‘Compound this with a seven year drought and it is of little surprise that there is a significant number of bushfires on public land.’

Some attacks on National Parks are obviously self interested. This applies to those emanating from the timber industry. It is worth recalling that Victoria’s worst bushfires were in 1939, when the timber industry had a virtual free hand in our forests, cattle covered the high country and there was no Alpine National Park.

FOBIF has its own criticisms of the management and resourcing of our Parks system. There is a lot of difference, however, between constructive criticism and an evident desire to dismantle the system of environmental protection we have. It is important in very difficult climatic circumstances that we are not bullied into thinking that we can downgrade ecological values in the management of our forests.

Post script: there were 28.6 million visits to Victoria’s national parks in the 2004-5 financial year, according to Tourism Victoria. The parks are not ‘locked up.’

Fire and Ecology in Box Ironbark Forests: Newsletter November 2007

In August DSE published a study by the Arthur Rylah Institute entitled *Ecological Burning in Box Ironbark Forests*. The study was commissioned by the North Central Catchment Management Authority, and comes in two parts. Part One begins with a literature review. The executive summary of this follows. We have highlighted some phrases in bold:

1. The review has not been able to shed light on historical aboriginal burning regimes. Some have suggested that seasonal burning was probably undertaken, but little direct evidence exists, and what evidence there is relates to landscape-wide observations that are not site- or vegetation-specific. Fire has probably played a minor part in influencing the vegetation structure and faunal assemblages in Box-Ironbark ecosystems. **Management should now be geared towards the needs of the forests as they exist today, not as they existed in some idealised pre-European state.**

2. The response of the understorey to applied burning will depend heavily on the nature of individual remnants, season, landscape position, soil type, seed bank, disturbance history and susceptibility to edge effects. Some species, particularly leguminous shrubs and short-lived obligate seeders, will be promoted by fire in the short-term. Resprouting species that make up a large proportion of the flora will be little affected unless burning is frequent. Few species rely on fire for germination, and most species that are stimulated by fire will still recruit at a low level in the absence of fire. No species should be lost through burning provided the inter-fire period allows all species to reach reproductive maturity (a minimum of 10-20 years) but absent species are highly unlikely to reappear. Most species will persist even when the interval between fires exceeds 50 years. **Further research is required into the germination requirements of Box-Ironbark shrub species, and the effects of applied burning (taking advantage of DSE's fuel-reduction program).**

3. The response of the canopy will depend on the intensity of the fire. In most instances, fire in small remnants is unlikely to be of sufficient intensity to lead to canopy replacement. **In any event, most Box-Ironbark species show continual recruitment in the absence of fire, and thus do not rely on it.** In any one patch, the minimum inter-fire period for a fire that kills or severely reduces the overstorey and that allows full recovery of structure is likely to be around 60 years. **Further research is required to determine the germination requirements for Ironbark eucalypts.**

4. Litter plays an important role in nutrient cycling, and provides important habitat for invertebrates and small vertebrates. **Frequent burning (for example, 3-5 year intervals) will disrupt natural processes in the short-term and may eventually lead to a depletion of soil nutrients and loss of habitat.**

5. Research into the effects of fire on invertebrates is confounded by high natural variability, and it is often difficult to determine the baseline or climax community. Short-term effects are intimately linked in many cases to burning of the litter layer, and burning at frequencies as high as every three years should be avoided. More research is required into the effects of fire on

termites, known to be key drivers of secondary productivity in these forests.

6. The effects of fire on birds are strongly dependent on the severity of the fire and the structural components of the forest that are burnt, and recovery of populations is linked to the recovery of the vegetation. Some seed-eaters may be advantaged in the long-term if fire promotes new vegetation growth. Other species may be advantaged in the short-term by the availability of post-fire carrion or the reduction in protective cover for prey. However, species that rely on the ground layers for nesting or foraging may be disadvantaged in the short-term by low-intensity fire, particularly if it interferes with breeding. The minimum inter-fire period is likely to be similar to that which will allow full recovery of understorey structure (i.e. at least 25 years).

7. The effects of fire on mammals are also linked to the effects and recovery of the vegetation and the intensity of the burn. Some common herbivores take advantage of the flush of new plant growth, but small animals dependent on the ground layer will be disadvantaged in the short-term. Arboreal mammals are likely to be disadvantaged only if the fire is of high intensity. **In general, it is believed that small mammal populations will not be disadvantaged, provided the minimum inter-fire period is at least 15-20 years. However, in isolated private remnants, recolonisation by small mammals after fire may be difficult. Further research is required, particularly in regard to bats and arboreal mammals such as possums.**

8. Many reptiles and frogs are likely to be disadvantaged in the short-term by any burning due to their dependence on the litter and ground layers. Spring burning will affect the breeding of many reptile species, while autumn burning may affect the breeding of some frog species. **In remnants, isolation is likely to be a barrier to recolonisation after fire. Further research is required on this fauna group.**

The report poses the question, ‘Is there a need to burn box ironbark?’ Its answer is cautious, but includes the comment: ‘There is generally a lower amount of litter accumulation with age in Box-Ironbark forest compared to other forest types. An estimated 7-15 years is required to build up fuel sufficiently to allow a good burn. However, despite these forests being almost semi-arid, they will still burn very hot if conditions allow, even with little fuel on the ground.’

The report, written by Arn Tolsma, David Cheal and Geoff Brown, confirms the position frequently restated by FOBIF, that in the light of our inadequate understanding of the effects of fire in our forests, any use of fire by forest managers by way of reduction burns should be accompanied by careful monitoring and research as to their ecological effects. We are not at all confident that this is actually being done: our impression is that fire managers are hampered by lack of resourcing, and that in any case, many of them are

uninterested in the ecological effects of their burns—or, worse, think they already know everything there is to know on the subject.

California Fires: a lesson for us? Newsletter November 2007

The following comment occurred in a November 15 *London Review of Books* report from California on this year's disastrous bushfires:

'The loss of more than 90 per cent of Southern California's agricultural buffer zone is the principal if seldom mentioned reason wildfires increasingly incinerate such spectacular swathes of luxury real estate. It's true that other ingredients—La Nina droughts, fire suppression (which sponsors the accumulation of fuel), bark beetle infestations and probably global warming—contribute to the annual infernos that have become as predictable as Guy Fawkes bonfires. But what makes us most vulnerable is the abruptness of what is called the "wildland-urban interface", where real estate collides with fire ecology.'

The article mentions McMansions with great ocean views—but surrounded by what foresters describe as 'diesel stands' of flammable bush.

The point made here illustrates the stand FOBIF has repeatedly made in planning panels about housing developments in bushland. Such developments are either firetraps, or they require for safety reasons that the bush around them be effectively destroyed. It is for this reason, among others, that we welcome the Council's recent decision to commence the long awaited Urban Forest Interface Study. The Council has agreed with FOBIF's argument that the interface study has to be done in conjunction with the \$100,000 Diamond Gully Structure Plan Study. This Study has just been put out to tender. The Study will investigate how the Diamond Gully area can be opened up to housing development while, amongst other criteria, minimising the damage to the significant native vegetation of the area.

Victorian Parliamentary Enquiry on Bushfires: Newsletter July August 2008

The report of the Victorian Parliament's Environment and Natural Resources Committee on the impact of public land management practices on bushfires in Victoria was released early this month.

Of the report's 20 recommendations, 12 relate directly to the matter of prescribed burning: the committee recommends an effective tripling of the area burned per year, to 385,000 hectares. Further, the committee found that 'landscape scale mosaic burns' are a 'key strategy for minimizing the fire risks associated with climate change.'

At a local level, FOBIF has heard that this could result in burns of 5000 hectares in and around the Castlemaine Diggings NHP. It either dramatically changes the meaning of the word 'mosaic', or is an effective abandonment of the long standing principle of mosaic burns as we have understood them. If implemented in our area the policy could see the majority of the National Heritage Park burned in one go.

It is evident at every point that the committee believed that the threat of bushfire is so great that it is worth risking the ecological damage that might result from too frequent or too widespread management burns. Scientific testimony to the committee persistently drew attention to the complex effects of fire on different systems, and the impossibility of making generalizations about its good or bad effects over a wide area. In the end, it seems this advice was not heeded.

It is worth noting that much testimony attacked scientists for their unwillingness to subscribe to the opinion of the person in question: one witness called for funds to be cut off from the CSIRO and Latrobe University because their views did not suit his!

If nothing else, such opinions demonstrate the damaging division of opinion existing in the community on the subject of fire. It is arguable that this division is the consequence of something FOBIF has often drawn attention to: the scandalous and long standing under resourcing of public land management. Many—probably most— submissions to the committee agreed that this had not only resulted in inadequate management practices; it had also damaged the relationship between country communities and those responsible for public land . The committee, however, concentrated only on recommending additional resources to areas directly related to fire fighting. We suspect that the cutting of resources to Land for Wildlife may be a consequence of DSE diverting its attention from biodiversity to fire protection. Our view is that the two should never be separated.

FOBIF made a submission to the committee on the matter of new building in fire prone areas. The final report did not deal with this matter.

VNPA Comments on Bushfire Enquiry: Newsletter July August 2008

VNPA Update contains the following comments on the Parliamentary report:

‘The proposed level of burning appears to derive at least in part from flawed information from DSE, which was in turn based on papers about computer simulations of fire behaviour in Tasmania and USA.

‘Apart from the quite different fire environments involved (button grass plains and pine forests), the papers appear to be misquoted. The American research in fact suggested a far lower level of burning, while the Tasmanian research involves burning 3% of the button grass plains only, which occupy just 23% of the total landscape, and leaving unburnt the 77% with other ecosystems (ie, burning only 0.9% of all vegetation).’

Proposed burning operations in the Diggings Park: October 2008

DSE plans to do a management burn in the CDNHP in the area bounded by Porcupine Ridge Road, Loop Track and Wewak Track.

FOBIF organized a visit to this site in August with PV Ranger Noel Muller. We have submitted the following letter to DSE as a result of the visit:

‘The proposed burn covers an area of unusual botanical interest.

‘The area abutting Wewak Track, for some distance both north and south, is covered by probably the most extensive patch of Matted Bush Pea (*Pultenea pedunculata*) anywhere in Central Victoria. This area also contains other plants of interest. It is quite spectacular in Spring, and is a significant attractor of visitors to this section of the Castlemaine Diggings National Heritage Park, both by car and via the nearby Great Dividing Trail.

‘Examining it recently, we found that it seemed to have a very low fuel load. In fact, in the categories of surface fine fuels, bark fuels and elevated fuels, this patch must be assessed as low or very low.

‘The effect of a management burn on this particular environment is uncertain, especially given the extended drought. Already many of the trees in the proposed burn area look extremely stressed, and it should probably be assumed that the understorey is also vulnerable. Recovery of burned species, especially if the burn is followed by a warm dry Spring and a hot Summer, could be in doubt.

‘Given all this, we would strongly urge that the area in question [that is, adjacent to the Wewak Track and the north section of the Loop track], be largely excluded from the burn. For scientific reasons it would be justifiable to burn an isolated patch of the pea, in order to monitor its recovery for future reference. Careful attention should also be paid to the situation of such rare species as Fryerstown *Grevillea* (*Grevillea obtecta*) and Scented Bush Pea (*Pultenea graveolens*).

‘Given that the fire protection strategy for this type of burn allows for 65% only of the proposed area to be covered [*Bendigo Fire Protection Plan* page 35], we do not think this is an unreasonable request.

‘We note that it is proposed to burn the adjacent Limestone Track area in 2009. In the light of the uncertainty surrounding the botanical effects of the Wewak Track burn in the context of the drought, we would like DSE to consider postponing this proposed burn for at least two years, to allow proper monitoring and followup of the 2008 burn.’

At this stage it is uncertain when the proposed burn will take place.

As we go to press, we have received a letter from Les Vearing, Bendigo Fire Management Officer, stating that ‘an area along Weewak (sic) track is to be excluded from burning...Monitoring and surveys of this site will continue to be part of the ongoing management of this area.’ The Limestone Track area is scheduled for a management burn in 2010/2011.

The area under discussion is currently in flower (October 27 2008). Members are urged to take a trip down to see it. A photo is on the Fobif website. We will continue to take a close interest in the matter.

Landscape Mosaic Burns: What are they?

A series of ‘strategic conversations’ was held by DSE at Big Hill in August to present to the community the idea of ‘landscape mosaic burns’. Community representatives’ responses to the idea have ranged from concerns centred mainly around safety to those about environmental health. Somewhere in the middle have been such people as beekeepers, who have looked for reassurance that burns over a large area do not affect honey production.

What are landscape mosaic burns?

First, the idea is vague. In particular, a ‘landscape’, on current working definitions, might be five thousand hectares—or it might be as little as a thousand ha. Even this smaller area is big, however, compared to what we have been used to in this region: this year’s Wewak track burn, for example, was relatively large for this area, and it was only 241 ha.

A 5000 ha burn would cover most of the Diggings Park (which is only 7000 ha), and is clearly out of the question. DSE officers at Big Hill acknowledged this. Even a 1000 ha burn, however would present serious problems in managing the different environments which would be covered in such an area.

Second, these burns are not an entirely new idea. In the current DSE Fire Protection Plan, a Zone 3 management burn is described as a ‘broad area reduced fuel mosaic.’ In this zone the burn is uneven, and 35% of the named area is not burned at all. A management burn of the new type will also burn only a proportion of the area in question: somewhere between 30% and 80% has been mentioned. This is much more flexible than the 65% which is presently aimed at in Zone 3 burns, but the upper figure is one which gives some cause for concern, for reasons explained below.

Third, Landscape Mosaic Burns will ‘usually take several years to complete.’ We are obviously dealing with a very complicated exercise here, which could not be completed in the limited time available each year for management burns. The number of days each year when the bush is dry enough for a burn to be possible and not so dry that it could be dangerous is strictly limited. If the Landscape burns take place over a number of years, it’s not really clear how they differ from the current Zone 3 burns.

Fourth, the intervals between such burns in the same area will vary, depending on the monitored fuel loads and vegetation recovery: burn intervals could be as short as ten or as long as fifty years—the same as for Zone 3.

And lastly, the Landscape burns are separate from current Fire Operations Plans, and superimposed upon them. This makes the situation even more confusing.

The stated intentions of such a burning practice are both ecological enhancement and reduction of severe wildfire risk. It is at this stage hard not to be cynical about this dual objective: the first objective looks like it’s there to soften the second, especially in the

light of pressure to drastically increase targets for management burns. Putting aside this cynicism for the moment, we are still entitled to ask, in what way is this new system better than the zoning which has been used by DSE for years? How is a 'landscape mosaic burn' better than a 'broad area reduced fuel mosaic'?

In any case, the ecological objective is the one in which we have a particular interest. A literature review produced by the Arthur Rylah institute, and produced in our newsletter in 2006, recommends an extremely cautious approach to the use of fire for ecological management, in the light of our limited knowledge of box ironbark ecosystems. Burning over a very wide area is extremely ambitious, if one considers the range of ecosystems and sensitivities to fire in, for example, the Castlemaine Diggings NHP.

In order to approach this dimension of the task, fire operatives have sought advice from Deakin University. We will look with great interest at whatever advice the University offers. In addition, DSE monitors its own burns, and among other things uses 'indicator species' as a guide to recovery from fire.

FOBIF's concerns around management burns have mainly centred on the vagueness of this research basis. So far as we know, the research is not available to the public, which makes it hard to know how credible or useful it is. What is at stake is not just aesthetics: **it is important to manage the bush so as to maximise its health at a time of great climatic stress. If burning too frequently contributes to declines in forest health, we will have been in the position of having 'destroyed it in order to save it.'**

Moreover, even the first objective, reducing fire risk, may not be achieved in this system. As Phil Ingamells points out in the article printed above, **'well-intentioned prescribed burns can actually turn some relatively fire-resistant forest types into drier, shrubby forests, making them more fire-prone.'**

We look forward to a discussion of this whole matter in the second half of the Royal Commission's deliberations in the coming months. In the mean time, DSE has floated the idea of a landscape burn in the Heathcote Graytown area. For more information, go to

[http://www.dse.vic.gov.au/CA256F310024B628/0/82811E605B271B01CA2576070081F248/\\$File/LMB+discussion+paper_2009.pdf](http://www.dse.vic.gov.au/CA256F310024B628/0/82811E605B271B01CA2576070081F248/$File/LMB+discussion+paper_2009.pdf)

for a DSE discussion paper on the subject. FOBIF has written to DSE [September 20 2009] seeking clarification on some of the above matters.

