



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

The Commissioner
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Dear Commissioner

Submission on the ACT Strategic Bushfire Management Plan Version 4 2019-2024

The National Parks Association of the ACT (NPA ACT) welcomes the release of the draft ACT Strategic Bushfire Management Plan (SBMP) and the opportunity to comment on its content.

The NPA ACT is a community-based conservation organisation with more than fifty-nine years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs. Given the potential positive and negative impacts that bushfires and bushfire mitigation actions can have on the environment, this is an area that the NPA ACT has always maintained interest in.

General Comments on the SBMP

The NPA ACT believes that version 4 of the SBMP shows a greater awareness of the needs of the environment in the management of the ACT's bushfire risks than previous versions of the SBMP.

The NPA ACT notes that the SBMP does not prescribe annual hectare targets for bushfire risk reduction and welcomes this approach as in other jurisdictions this has led to inefficient activities based solely on achieving the hectare targets.

Potential for a 2 tier approach

It was disappointing that the SBMP was not able to clearly articulate a more two tier approach to fire management in bushland: with 1) smaller, more manageable burns on a local scale which take into account the nature of the vegetation, topography and weather over the period beyond the actual burn and which leaves the canopy intact to prevent weeds and fire obligate species returning; and 2) more concentrated activities in areas close to key assets.

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Such an approach would require a whole new set of protocols but it is the only way forward with large scale burns becoming increasingly difficult to schedule, risky to execute and subject to extreme changes of weather over a relatively short period.

It is appreciated that the SBMP does refer to the use of mosaic burning. Implicitly this would imply a greater use of low intensity burns and the NPA ACT would strongly support this approach which reduces fuel and has the potential to increase ecological values. The NPA ACT also notes the use of ecological burns as a tool under the SBMP. Both styles of burns are compatible with the 2 Tier approach.

In respect to more concentrated activities in areas close to key assets, these should be articulated in the BOPs and developed using a risk based approach.

Risk Model

The SBMP regularly refers to risk but does not explain its risk model. It also doesn't refer to residual risk. Residual risk is a key concept in risk modelling and indicates the level of risk still remaining after various risk mitigation actions are taken. It is an important concept that allows for the efficient allocation of resources based on where the best outcomes from the deployment of those resources can be achieved. As such it will be an important addition to the revised SBMP.

Residual risk can be applied at an ACT wide scale but for best practice should be applied at a level that identifies the particular risk environment facing the specific assets or grouping of assets needing to be protected.

The current SBMP also doesn't define how risk ratings are defined, another key component of risk management best practice.

A key outcome of the use of residual risk is the realisation that risks cannot be completely eliminated and this is an important message for the ACT community which is only passingly mentioned in the SBMP.

Aboriginal Fire Management Zones

The NPA ACT welcomes the introduction of these zones and would support additional research into the potential for broad scale indigenous fire management practices in the ACT, as a cultural and ecological tool.

Rapid response

The NPA ACT supports the objective to identify and respond rapidly to ignition points, particularly in remote areas.

Other Comments

Page 7 – Vegetation and Bushfire Fuels

It is stated that "(a)mong all factors underpinning bushfire risk, vegetation is unique in that it can be directly managed by land managers prior to a bushfire occurring. Prescribed burning (also commonly referred to as hazard reduction burning) can effectively modify the intensity, flame height and rate of spread of subsequent bushfires, reducing the risk posed by those bushfires." However,

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such action and particularly the frequency of such should also consider whether this is a short-term effect that will lead to an altered and more fire prone landscape. It is important, as is recognised later in the SBMP to protect long term unburnt areas where the vegetation profile limits fire risk.

The use of the residual risk concept and fire behaviour modelling are important in determining the most efficient areas for prescribed burning and will help to ensure the scarce resources of the ACT's fire services are used to their best purpose.

Page 11 A Growing Population

The statement that says that '(t)he ACT Planning Framework, including the Planning and Development Act 2007, the Territory Plan, as well as bushfire-specific zoning system, has effectively minimised the bushfire risk in new greenfield estate.' Should more appropriately say that the risk is minimised as continued work and vigilance is required to ensure the minimisation is continued and enhanced within the boundaries of a development.

Page 12 Planning Requirements

The NPA ACT supports the use of planning tools to reduce fire risks to urban developments. In particular, it sees the benefits in suburban edge roads and the use of graduated fire design requirements for housing based on the housing's bushfire risks.

The NPA ACT supports the ESA's involvement in the planning process for potential new developments and the need to ensure housing is not placed in areas of extreme fire risk. This approach would potentially significantly reduce the potential areas of greenfield developments in the west of the ACT and in areas like the old Coombs tip.

Page 17 Bushfire Management Standards

It is stated that the "ACT Bushfire Management Standards are made by the ESA Commissioner and mandate the technical specifications for requirements imposed by this plan. Among other things, the standards specify widths for Inner and Outer Asset Protection Zones, the fuel management requirements for the various Fire Management Zones, and the technical specifications for fire access roads". The widths for Asset Protection Zones are important and should be used to achieve ecological outcomes as well as fire protection objectives. As stated within the SBMP, Inner Asset Protection Zones should be wholly within the envelop of a development.

Page 17 Cross Border Arrangements

Interstate arrangements should include feedback over the monitoring by New South Wales (NSW) authorities over the actions taken by NSW residents on the ACT border to reduce their fire risk. In reducing their fire risk, NSW landholders should not rely primarily on actions by the ACT.

Page 22 SBMP Objectives

This section would be enhanced if the objectives were linked to risk analysis and there were discussion about how the objectives address the risks and what are the resulting residual risks?

Page 28 Action 1.3 The Technical Regulator will audit and assess the electricity distributor's compliance with its Vegetation Management (Bushfire & Environmental) Works Plan.

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But does this also cover the high voltage transmission lines crossing the ACT? In addition, consideration should be given to ensuring the community is consulted on the standards for powerline clearances and the potential for appropriate vegetation planting under powerlines.

Consideration should be given to working with energy distributors to reduce the number of non-urban power lines through the installation of off-grid renewable power supplies. For example, it is understood that Evo Energy has assessed the powerlines to Corin Dam and Gudgenby house as unacceptable due to their risk of causing a fire. These are prime rural sites for the installation of off-grid power supplies, and the power lines removed.

Page 31 Action 2.5 Develop and implement mitigation strategies to reduce the bushfire risk posed by the Molonglo River corridor and the Murrumbidgee River corridor.

A key strategy would be to limit the level of development of these areas which increase the need to undertake hazard reduction measures.

Page 33 Strategies

At this page the SBMP states “Residents and landholders should firstly assess their bushfire risk by checking whether they are in a BPA. This information is available through maps provided at the ACTMAPi website”. However, when the NPA ACT recently checked this site it did not appear to provide this information.

Page 41 The Necessary Equipment

What is the SBMP’s position on the use of chemical fire retardants in areas of ecological significance? The NPA ACT would see the deployment of such chemicals as a last resort option only in areas of high ecological value and in the water supply catchment.

Page 49 Broadscale Measures

The following statements are strongly supported: “that strategic areas of low fuels are maintained in the landscape, without the need for repeatedly burning the same area” and “maintenance of a fuel age mosaic across the majority of the landscape in the longer term.”

Page 51 Action 7.5

The following statement is strongly supported: “Continue research into post fire vegetation response, fuel age distributions and associated fuel loads to inform RFMPs and to optimise landscape-level objectives that balance fuel age distributions and ecosystem function.”

Page 53 Access

Strongly support the statement: “New fire trails and aerial access points will be constructed only where they provide a clear strategic benefit, and the financial and environmental costs of construction and maintenance do not outweigh the benefits for bushfire management.” Should this be incorporated into the actions for Objective 8?

Clear planning is required to ensure that over-engineering of road access doesn’t occur, i.e. the infrastructure should be sufficient without redundancy for the required level of access.

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Page 56 Adaptive Management

Strongly support the principles in this section.

Objectives 10 and 11 - Planning

The need for urban BPAs to adhere to strict design requirements is supported. In some areas, like the Coombs neck, the associated high fire risk is greater than the mitigation available from design mitigation.

Should you require any further information regarding the NPA ACT's input, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

Yours sincerely



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24 June 2019