



Nillumbik Ratepayers Association

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Submission to:

Nillumbik Shire Council Bushfire Mitigation Strategy

We wish to present to council.

We submit two Reports from bushfire experts

1. Bushfire Threat to Nillumbik Shire by David Packham July 2003
2. Bushfire Planning Issues in the Shire Of Nillumbik by Rod A Incoll AFSM July 2003

We request Nillumbik Council incorporate these two bushfire reports into the Nillumbik Planning Scheme.

nb. Both authors have more recently confirmed that these reports are still relevant.

3. CFA Letter 12 August 2003. Both the Packham and Incoll Reports are endorsed by the Victorian Government's bushfire force, which stated "**...both the independent experts have considerable and appropriate expertise in the subject matter.**"

*"Mitigate: make less intense or serious. (Oxford paperback dictionary 3 edition).
Google: Alleviate, reduce, diminish, lessen, weaken, lighten. Bushfire mitigation:
Prescribed burning or removal of combustible material, such a scrub and
undergrowth,..."*

The draft document's focus **is not** on bushfire mitigation (fuel reduction).

A bushfire mitigation strategy must in our opinion seek to mitigate the 5% of bushfires that do 95% of damage to our environment, human death and destruction of our habitat. If we mitigate the 5% that does 95% of the damage, it follows, that we have also mitigated the 95% of fires that do only 5% of damage.

A fire needs

Oxygen-----Fuel-----Ignition

Fuel is the only factor we can mitigate. Fuel is described as: 'made up from dry grass, leaves, bark, and twigs of less than 6 millimetres in diameter.' The increase in fuel quantity exponentially increases the extreme bushfire's intensity.

With large fuel loads we can get large flame heights and extreme radiant heat, uncontrollable bushfires,

With small fuel loads we have small flame height and low levels of radiant heat, mostly controllable fires.

Why with this knowledge, gathered over at least 150 years since European settlement, several Royal Commissions and numerous Government enquiries into bushfires, including Aboriginal knowledge, are we talking about 'strategic controls' and other 'risks', when it is well known in the various findings of those Commissions, enquiries ect, that fuel levels are the biggest risk, and is the only thing that can be controlled by humans, that can and does mitigate bushfires.

We head towards the 10th anniversary of Black Saturday and even after a Royal Commission into that event which recommended a landscape burning (mitigation) regime of 5-8% per annum with a minimum 5% PA (VBRC recommendation) we are asked to comment in NSC, 2018 Bushfire Mitigation Strategy. We know the only mitigation strategy that works is low fuel loads throughout the shire and beyond, if all shires, the State and Federal Govt.s (in their respective areas) did the same we would have a relatively safe shire.

We note there has been fuel reduction burns in Eltham South under this new council and urge council to continue.

According to David Packham, in the almost 10 years since Black Saturday and 15 years for those areas burnt in 2003 and 2006 fire season, there has been a build up of fuels that have now reached around 25 tonnes per hectare, (TPH) this is well above the 3-5 tonnes per hectare considered as safe by experts. This 25 TPH means a fire intensity and flame height some 25 times greater than 'safe' (note as fuel loads increase so does flame height and fire intensity).

If we have fuel loads around 25 TPH (as above) then on an 'extreme' day the fire intensity will be around 60 Megawatts per metre at the fire edge. Kinglake on Black Saturday was around 80-105 megawatts per metre, This is 20 times greater than can be controlled even by Boeing 737 and Douglas wide body aircraft, bulldozers, tankers and new digital radio systems. (Packham)

"It is even more dangerous now as the high intensity fires of 2003, 2006, and 2009 have resulted in changed fuel structures with the forest trash now suspended on regrowth and fire debris, a massive invasion of Ti-tree has made our forests and roadsides the most unhealthy and dangerous ever."

David Packham email Sunday Sept. 9 2018.

If we don't control the fuel loads then we will not control the fires, particularly on

extreme days.

I could not find anywhere in this draft document that acknowledges that the majority loss of life and property occur at the passage of the front (wind change) which usually comes from the south west. *"It should be noted that 46 of the 47 people who died in the 1983 fires (Ash Wednesday) died on the passage of the front or soon after."* (David Packham page 3, Bushfire Threat to Nillumbik.) This was also the case on Black Saturday, when the wind changed and took that fire from Nillumbik. (Strathewen St Andrews areas) up to Kinglake with the further loss of life in that area.

Conclusion

This draft document is generally a lot of bureaucratic speak, much of which is done to satisfy governmental requirements and responsibilities.

There is little concentration on the actions council intend to take to actually mitigate bushfire.

A bushfire mitigation strategy should be solely about reducing the risk of bushfire, how council intends to reduce that risk, and how council can assist landowners, particularly rural landowners, in reducing that risk on private land within the shire.

We say our first statement in this conclusion is borne out on page 13 where it says under the heading

"Control Assessment

A control is effective if:

A. It is designed to meet management requirements;" It then goes on to say in C

"C. The control modifies the risk and must either reduce likelihood (Cause) and/or the impact of the risk (Consequence)."

If point C was listed as priority A then we might have been able to believe that this was about mitigation of the risk and not about management requirements.

Brian Murray

President