



Inc. #A0003010B

17 March 2025

Dear Forest Fire Management Victoria Team,

Many of our Castlemaine Field Naturalists Club members, along with others in the Castlemaine Area have just received notice of the planned burns in our area.

Several planned burns are of particular concern to our club due to their potential impact on listed threatened species or to our local forests

One of these threatened species is the restricted range Fryerstown Grevillea, *Grevillea obtecta*, (Endangered FFG) that comes in three distinct growth forms (Upper Loddon i.e. Porcupine Ridge, Fryers Range i.e. Taradale, and Drummond North). Each of these forms are obviously different to look at and are found in distinct isolated populations. It is important that the different forms of the plant each receive an adequate level of protection.

The burns that are of particular concern to us are:

- 1 The Glenluce – Wewak Tk between Wewak Track and Helga Track on the eastern side of Porcupine Ridge. Our concerns with this fire are two-fold:
  - a. This area includes part of the population of the Upper Loddon form of Fryerstown Grevillea, which is found within the proposed burn area. There are records from both sides of Wewak Tk where it forms the southern boundary of the burn area. There are also records from a small un-named gully and rough track that leads from Porcupine Ridge east to join Sebastopol Creek, north of Wewak Track. See <https://spatial.ala.org.au/?q=lsid:https:%2F%2Fid.biodiversity.org.au%2Fnode%2Fapni%2F2890992&qualityProfile=ALA> for records of this species.

What measures will FFMV be taking to ensure that there are no adverse impacts to the Fryerstown Grevillea in the Upper Loddon area?

- b. There is a known outbreak of Phytophthora in the area of Porcupine Ridge Rd, Loop Tk and Wewak Tk. There have been reports of dying vegetation along Wewak Tk and the department has closed Loop Tk to reduce its spread. There is also dying vegetation along Porcupine Ridge Rd.

There are many species of native plants in this area that are susceptible to this disease which has the potential to completely change the whole ecosystem. Members of the Proteaceae family are particularly susceptible to this disease.

A recent seminar hosted by the Arthur Rylah Institute discussed this issue. See <https://www.youtube.com/watch?v=1YlaLoNzvgk> for a recording. One point that was made by the speakers in this seminar is that fire exacerbates the problem and that there is a greater spread of Phytophthora following fire. Movement of people, vehicles and other machinery are major contributors to the spread of Phytophthora along with soil disturbance. All these factors will be present when managing the burn.

What measures will FFMV be taking to prevent the spread of Phytophthora during the fuel reduction burning and following the fire?

- 2 Our concerns regarding the Fryerstown Grevillea also apply to the Taradale – Salt Water Tk Planned Burn and the Taradale – Humbolt Tk Planned Burn. In this area the population is the Fryers Ridge form. There are recent records of Fryerstown Grevillea in both planned burn areas with most being near Saltwater Tk and Dearden Tk. The Saltwater Tk area contains or is immediately adjacent to the largest population of this species on Fryers Ridge. There are fewer records in the Humbolt Tk area although we believe there has been less survey effort in this area. On Fryers Ridge we have also noted that while we have found this species along tracks at the edge of earlier planned burns we have not found this species within the burn area itself. It is possible that any plants within the burn area prior to the fire have failed to regenerate.

Again we ask the question, what measures will FFMV be taking to ensure that there are no adverse impacts to the Fryerstown Grevillea in the Taradale area?

- 3 Our third area of concern is the Chewton – Henry St Planned Burn. Surveys over the last five years have located a population of Eltham Copper Butterfly, *Paralucia pyrodiscus lucida*, (Critically Endangered, FFG) in the northern sections of this burn area.

Since 2020 there have been surveys of this area to identify suitable habitat for the Eltham Copper Butterfly. From these a map has been produced showing the location of the most suitable habitat. It is our understanding that these maps have been provided to the department. Contact Elaine Bayes [elaine@wetlandrevivaltrust.org](mailto:elaine@wetlandrevivaltrust.org) if you require further details of these surveys.

There are small populations of Castlemaine Spider Orchid, *Caladenia clavescens*, (Critically Endangered, FFG) in the southern section of this burn area. While this species may survive a cool burn during autumn when the plant is dormant it will be adversely affected by a burn that is too hot. It will also be adversely affected if the burn takes place during the growing season when the plant is likely to be killed. Known plants are relatively close to a track where there is also the risk of soil disturbance during fire management activities.

What measures are planned to protect the Eltham Copper Butterfly site and other high quality habitat within this area?

What action will be taken to ensure that the Castlemaine Spider Orchid is not affected by the fire management activities?

Several of our members have also expressed the concern that given how dry the bush is at present any fires are likely to consume much more of the green vegetation and the litter layer on the soil surface than would be desirable for the ecological health of our forests.

Yours sincerely,



Euan Moore,

President,

Castlemaine Field Naturalists Club.

Phone 0407 519 091.