

3 January 2017

Dave Boverman
Manager Development Assessment & Planning
Locked Bag 17
Granville NSW 2142

cc Superintendent David Cook Team Manager Far North Coast Team

Dear Mr Boverman

Updated Bush Fire Prone Vegetation mapping for Byron Shire

Byron Shire Council (Council) has prepared a draft Byron Bush Fire Prone Vegetation (BFPV) map in accordance with the NSW Rural Fire Service *Guide for Bush Fire Prone Land Mapping Version 5b November 2015* (the Guide).

Council has received feedback from the Rural Fire Service (the RFS) Headquarters and the RFS Far North Coast District on the draft Byron BFPV map. Feedback suggests that with most of the Byron Shire mapped as Vegetation Category 3, the fire risk for the Byron Shire is exaggerated and likely to trigger fire-risk assessments for development proposals with negligible fire risk. More critical is the issue of how to ensure that mapped Vegetation Category 3 can be consistently applied across the broader Far North Coast.

Background

Byron Shire Council (Council) contracted Dr. Andy Baker, principal consultant and founder of the Wildsite Ecological Services Pty. Ltd to update Council's existing Bush Fire Prone Land map (the BFPL) using the Guide.

The first draft Byron Bush Fire Prone Vegetation (BFPV) map was prepared in accordance with the Guide (Attachment 1) and forwarded to the RFS Headquarters on 29 February 2016 for feedback.

On 6 April 2016, Council was advised by the RFS Headquarters that with most of the Byron Shire mapped as Vegetation Category 3 the fire risk for the Byron Shire was exaggerated and may trigger fire-risk assessments of development proposals with negligible fire risk. Council was directed to liaise with the RFS Superintendent David Cook Team Manager Far North Coast District to investigate reclassifying the subject areas to a lower risk category.

Following a meeting held between Council and RFS Superintendent David Cook and several other representatives from the RFS Far North Coast District on 19 April 2016, the following three key decisions were proposed:

1. Exclude "managed grassland" based on Council rate class "operational farmland". The rationale was that in order to identify properties with grasses maintained at levels recognised as no risk (i.e. ≤ 10 cm) from a desk top, a categorisation of properties needed to be established. For a property

owner to qualify for the discounted rate class, they need to regularly prove to Council that their property is actively managed.

2. Downgrade the remaining mapped “grassland” to Vegetation Category 2 to better reflect the region’s fire history in the context of minimal grassfires (i.e. a general inability to ignite local grasslands, even when it is desired given the area’s high summer rainfall, dominant grass types, and lack of a clear “curing” period for un-kept grasses).
3. Seek input on above criteria from the Far North Coast Bush Fire Management Committee.

Based on the feedback from the meeting held 19 April 2016, a second draft Byron BFPV map was created (Attachment 2) and forwarded to the RFS Headquarters on 13 May 2016 for comment. Council was subsequently advised by the RFS Headquarters that in order to exclude “operational farmland” from the grassland provisions of the bush fire prone land mapping process, the following justification was required:

- the height of the grass would be expected to be managed to a height of $\leq 10\text{cm}$ and
- should the grass height exceed 10cm, that the risk of ignition and rate of spread was low due to grass type and environmental conditions.

Council staff also met with the Far North Coast Bush Fire Management Committee (the BFMC) on 18 November 2016 to get feedback on the second draft Byron BFPV map. At that meeting Fire Inspector Matt Inward verbally confirmed that the BFMC did not see a review of the second draft Byron Bush BFPV map as a matter for the BFMC to comment on, or to resolve the issue of mapping Vegetation Category 3 within the broader Far North Coast. The BFMC instead recommended that Council develop Vegetation Category 3 criteria applicable to the Far North Coast for the RFS Headquarters to consider and approve for application.

Key Issues arising from 19 April Meeting with the RFS

1. Excluding “managed grassland”

The purpose of excluding managed grasslands is to improve the reliability of the fire risk maps and avoid triggering unnecessary assessments of development proposals with negligible fire risk.

Council acknowledges that the “operational farmland” layer applied in Appendix 2 is likely to include areas of unmanaged grassland $\geq 10\text{ cm}$ and grasses such as tall Pigeon Grass that would otherwise be categorised as a Vegetation Category 3 medium bush fire risk. Therefore, Council’s broad application of this criterion as a basis for identifying grasslands of negligible fire risk cannot be justified across the Shire.

To exclude “managed grassland” Council would need to prepare new mapping that delineates managed and unmanaged grasslands. This is likely to be resource intensive, and is ultimately unrealistic where grassland fire risk changes rapidly and frequently on the Far North Coast. For example, many areas of grassland are slashed, mown or grazed irregularly and grass height can range between 5 and 150 cm depending on time since management. Critically, the management frequency or the likely fuel risk range can not be reliably determined from aerial photography or site inspection (Appendix 3).

2. Downgrade the remaining mapped “grassland”

The purpose of downgrading the grassland risk category is to better reflect likely fire risk of grasslands in the Far North Coast region.

Council's main concern is that the current mismatch between the mapped risk (medium) and actual risk (predominantly low) may aggravate end-users (i.e. residents and planning consultants) and potentially undermine the integrity of Council's mapping processes and accuracy.

Importantly, downgrading the grassland risk category will not reduce any approval requirements as the BFPV map is simply a trigger for further assessment, identifying the subject land is either bush fire prone or not. The categories only influence the buffer distances from the mapped vegetation (e.g. Vegetation Category 1 requires a buffer of 100m while Vegetation Category 2 and 3 require a 30m buffer). Once identified as bush fire prone land, irrespective of category, any development will be subject to detailed site-based risk assessment under the Planning for Bush Fire Protection 2006. Presumably at this stage, any lands surrounded by "managed grasslands" would be identified as such. As Attachment 1 shows, almost every rural property with the Byron Shire will trigger the requirement for a Bushfire Assessment Report.

Conclusion

Under Section 9 of the Rural Fires Act 1997, the RFS is a fire authority and identified as the agency primarily responsible for responding to an emergency due to fire occurring in rural fire districts. The RFS also has the function of providing advisory services relating to matters with respect to which it has expertise. To resolve the mixed messages that Council has received to date on its revised BFPV mapping, it is requested that the RFS:

1. accept 'Attachment 1 – first draft Byron Bush Fire Prone Vegetation map' as being prepared in accordance with the Guide; or
2. provide a revised criteria to assist Far North Coast councils to more accurately map Vegetation Category 3; and
3. provide Council with more authoritative advice on other bush fire prone land mapping matters which it has expertise in (i.e. to enable more informed planning and development decisions).

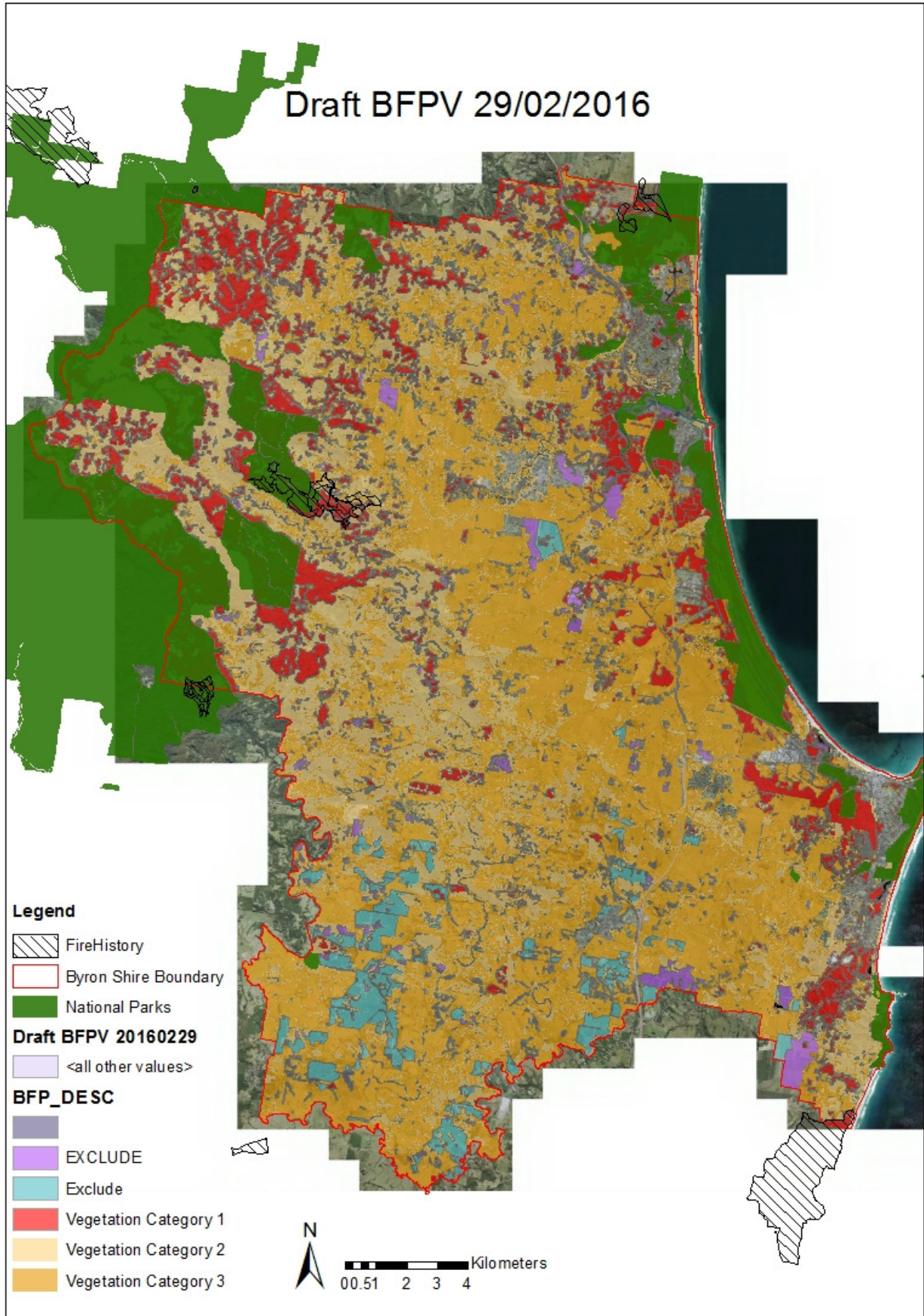
If 'Attachment 1' is considered acceptable for certification by the RFS, Council will forward the supporting GIS mapping layers for incorporating into the statewide database.

Council looks forward to receiving your early response to the matters requested above. If you have any questions or require further information in the meantime, please contact Ms Clare Manning on (02) 6626 7324.

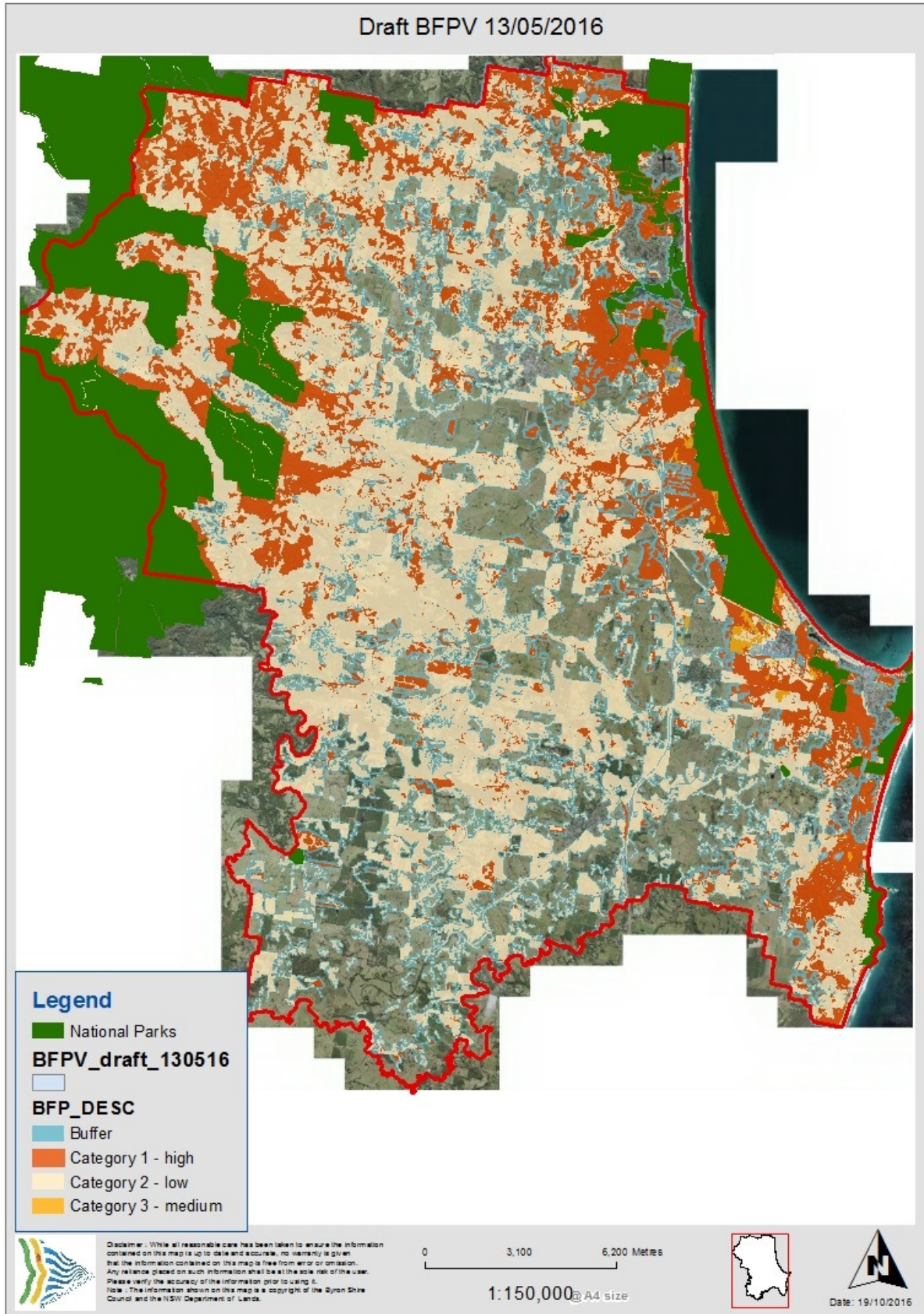
Yours sincerely

Alex Caras
Acting Manager – Environmental & Economic Planning

Attachment 1 – First draft Byron Bush Fire Prone Vegetation map



Attachment 2 – Second draft Byron Bush Fire Prone Vegetation map



Attachment 3 'Managed grasslands' adjacent to Gulgan Road, Mullumbimby NSW 2482 at different times of the management cycle, including a) grass ≤ 10 cm height after slash/harvest and b) same grass at approximately 100cm height several months after slash/harvest.

