

# Grassy Plains Network response to the Western Outer Ring Main Gas Pipeline Project Inquiry Environmental Effects Statement

16 August 2021



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## The Grassy Plains Network

The GPN represents over 200 land management professionals, academics, ecologists and community concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management.

## Unacceptable loss of critically endangered grassland

**It beggars belief that this project is being proposed in such a way as to cause the completely avoidable loss of 3.8 ha of Natural Temperate Grassland of the Victorian Volcanic Plain, 9 hectares of Western Plains (Basalt) Grasslands Community, 4.3 hectares of Western Plains Grassy Woodland, 2.3 hectares of Grassy Eucalypt Woodland of the Victorian Volcanic Plain, plus substantially greater areas of habitat for Golden Sun Moth and Striped Legless Lizard.**

The grasslands of the Victorian Volcanic Plain have been described as Australia's most endangered ecosystem. This ecological community is classified as Critically Endangered under the Federal EPBC Act, and as threatened under Victoria's Fauna and Fauna Guarantee Act.

Many individual species that make grasslands their home are also on the edge of extinction. Plants such as Spiny Rice-flower (*Pimelea spinescens*), Matted Flax Lily (*Dianella amoena*), and fauna such as the Growling Grass Frog (*Litoria raniformis*), Striped Legless Lizard (*Delma impar*) and the remarkable Plains Wanderer (*Pedionomus torquatus*) are all critically endangered.

Grassland once extended across the Victorian Volcanic Plain all the way from the Yarra River to the South Australian border. Sadly, less than 2% of that original extent remains, and much of what does remain is heavily degraded.

One of the biggest threats to the remaining grassland is urbanisation, with substantial patches of grassland in Melbourne's west and north feeling the pressure as Melbourne grows.

WORM is contributing to the ongoing decline of this critically endangered ecosystem. That should be unacceptable, especially given it is easily avoidable.

The grasslands of the Victorian Volcanic Plain are undergoing death by a thousand cuts. The 13+ hectares may not seem much, but it is another cut. A patch of roadside here, a suburban block there.

**This diminishment of our critically endangered grasslands is ongoing, shows no signs of slowing, and has to stop before there is nothing left.**

For the record, the unique grasslands community of the Gippsland Plains is already extinct. That is an entire ecosystem – gone. Grassland destruction has to stop.

## Damage will be substantial and beyond the construction corridor

The impacts of vegetation removal will extend beyond the construction corridor, introducing weeds and exacerbating management issues. Moreover, as summarised in Table 18-5, the project is likely to:

- Fragment or increase fragmentation of an ecological community leading to a significant impact
- Significantly impact an ecological community through a reduction in the area of occupancy
- Interfere with the recovery of an ecological community.

**The only appropriate course of action is to avoid these impacts.**

## Directional drilling best and most appropriate solution to avoiding grassland impacts

Directional drilling is an entirely appropriate method of construction, especially in environmentally sensitive areas. Most, if not all, grassland species will not have root systems deep enough to be impacted by the drilling process.

Open trenching and the clearing of a 30 metre wide corridor will destroy grassland. “Restoration” will be inadequate, failing to capture the ecosystem’s complexity and diversity. Open trenching also will also greatly increase the potential for weed invasion.

**Directional drilling must be used to avoid grassland destruction.**

## Offsets not an appropriate response

Victorian and federal legislation mandates that the clearing of native vegetation should be avoided, minimised and offset – in that order. The first rule is to avoid. **There is no adequate rationale for open trenching through grassland when trenchless drilling is a viable option.** The loss of the 16 ha of grassland from the current proposal is completely avoidable. To not avoid that loss is unconscionable.

## Unacceptable open trenching of creeks

Open trenching is the most destructive process imaginable for crossing Merri Creek and Jacksons Creek. It will cause immense disruption and sedimentation, and create long-lasting damage, not just at the trenching site, but to the ecological communities upstream and downstream. **Open trenching at Creek crossings must be avoided.**

## Poor salvaging method for Striped Legless Lizard

The EES proposes moving critically endangered Striped Legless Lizard populations from areas being impacted by trenching using the tilling method. This process, which involves violently ripping up the lizards’ habitat so that individuals can be located in the wreckage, is an absurdly poor method for moving Striped Legless Lizard and is known for its high mortality rates. The better process, as practiced by Dr Megan O’Shea at Copernicus Way, is to lay tiles and manually catch and transport the lizards. **Dr O’Shea’s method is a more time consuming but also a more effective method, one which the WORM timeline can easily incorporate, and the only appropriate method to be used.**

## Desktop assessment known to be flawed

Hoary Sunray, Maroon Leek-orchid, and Swamp Everlasting were excluded from targeted surveys because a desktop level assessment considered their presence unlikely. Desktop assessments have proved remarkably flawed, and it is overconfidence to put any confidence in them, especially when dealing with matters of national environmental significance. The Western Grassland Reserves are an outstanding example of this, with large portions of the proposed reserves found to be in exceedingly poor condition despite been assessed by desktop at being of excellent quality. The MSA used desktop assessments extensively, and that has led directly to the loss of much good quality grassland. Desktop assessments are done simply to save costs. The models used are only as good as the data put in, and they are based on numerous assumptions that do not necessarily stand up to detailed scrutiny.

**On-ground surveys need to be undertaken for Hoary Sunray, Maroon Leek-orchid, and Swamp Everlasting.**

## Rapid assessment known to be flawed

The assessment process used rapid field assessment from road reserves – i.e. looking over the fence from a car. This is inadequate to identify anything of significance. The same flawed process was used in the Western Grassland Reserves and the MSA and produced data of embarrassingly poor quality. **A detailed on-ground review must be undertaken of all areas rapidly assessed and found to be of no environmental significance.**

## Reckless attitudes

The attitudes that lie behind this proposal are reckless, unconscionable, and should be an embarrassment to the State of Victoria. They reflect the same set of irresponsible beliefs and practices that have brought about the rapid climate change that presents an existential threat to not just grasslands, or humans, but to the rich panoply of life on earth. **This sort of practice must not be allowed to continue.**