



Grassy Plains Network

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Comments on referral 2021/2081

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Image: Mathews Hill Grassland, looking towards Melbourne Airport Rail

Introduction

Who we are

The Grassy Plains Network is an independent organisation representing 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.

Many of our members are acknowledged experts in the management and restoration of grassy ecosystems. Many have led long-term efforts to preserve grasslands across the Victorian Volcanic Plain. Some have been critical to establishment of the native seed industry, others to the development of best-practice monitoring methods for grasslands. We have members who have been working for decades with community to raise awareness of the importance of grassland conservation. Collectively, we have worked at every level of government, across all of Melbourne's north and west, in Landcare, CMAs and in dozens of community and environmental organisations.

Critically endangered

The grasslands around Melbourne are some of the best remaining examples of one of Australia's most endangered ecosystems. Less than 2% remain of the almost endless sea of grass that swept from the Yarra, across Melbourne's West and all the way to South Australia – flower-rich meadows bursting with life that are now, sadly, on the brink of extinction. Urbanisation continues to be a major threat to the little that remains.

The Grassy Plains Network believes that because of the critically endangered status of these grasslands, every effort to avoid impacts must be made, before any consideration of minimising or offsetting is considered. The bar for environmental protection must be set high, and especially so since the grasslands in question (e.g. Solomon Heights) are of excellent quality.

Despite their critically endangered status, grasslands are continuing to be cleared, leading to further decline. This is a death by a thousand cuts. No single act of clearing is particularly large, yet their sum total is substantial.

Entrenched attitudes

Grasslands are underrepresented in our reserve system. They rarely present with the charismatic power of a Mountain Ash forest. They are generally considered as resources, suitable for grazing, rather than areas suitable for nature conservation. There is a tangible lack of public recognition that these are "old growth grasslands", places that have persisted in place and grown since the last ice age, a product of the fundamental bedrock of the west of our state – the basalt of the Victorian Volcanic Plain.

This failure of public and governmental recognition of conservation value is reinforced with every permit granted for their clearing. Too often, the only voice for the conservation of grasslands is the local Friends or other community group. It is up to the government authorities that have jurisdiction in these matters to act and overcome the entrenched attitude that it is simply okay to clear grassland because they are essentially worthless.

Grasslands and rail have a long association

Rail lines are one of the last places of refuge for these grasslands, along with stony rises, land too rocky to plough, pioneer cemeteries and travelling stock routes. Rail lines have a history of frequent burning for biomass removal, which was combined with infrequent or absent grazing and a lack of fertiliser use and has led to the survival of high-quality patches of grassland. Many of the best grasslands in Melbourne are on or adjacent to existing rail land.

Insufficient protections

The referral documents show a project that has insufficiently considered a number of matters of considerable importance.

The Grassy Plains Network understands that some of the points below will not be considered as directly relevant to this EPBC referral. We include them to provide a larger context to the matters under consideration, in the belief that the more informed all parties are, the more likely that we will together achieve the good environmental outcomes we are collectively working towards.

Striped Legless Lizard management

The proposed management of this threatened species is inadequate.

A better salvage method than the one proposed would be to use a comprehensive layout of tiles in likely habitat areas. Where animals are found, then use pit-fall traps to increase the capture rate in those specific areas. The tiling should be done throughout spring and under suitable weather conditions.

It is important to include practices that promote post-relocation survival and home range re-establishment. Striped Legless Lizards occupy very small home ranges. Displaced animals tend to be very active (constantly moving) which is very stressful and dangerous. There is emerging evidence that if animals are confined for a period of time, they are more likely to establish themselves and roam less (reducing stress and danger). Current research is trialling large compounds (approx. 15 m x 30m) but it could perhaps be done on a smaller scale. SLL compounds need to be located in suitable habitat. We assume animals would only be moved a short distance from the construction zone. Compounds ensure that they stay put once they have been moved. The compounds are simply four walls, but the bottoms of the walls need to be buried, otherwise the SLL will squeeze through the bottom - sometimes they even get through when the compound has been buried because of cracking soil and mice tunnelling.

When undertaking ground works, there should be an ecologist present to observe for any undiscovered SLL and these should be managed appropriately. When SLL are discovered during works, the works would need to halt whilst a SLL management plan is implemented.

Overshadowing and fragmentation of Striped Legless Lizard habitat

The shade modelling (p5, 2021-9081 App H - Assessment of MNES Report - Part 3) for June 15 shows significant loss of sunlight north of M80. Changes in solar exposure are likely to significantly impact Striped Legless Lizards and the composition of their habitat in this area. Striped Legless Lizards need to thermoregulate. Their sedentary nature means that if they are forced to travel greater distances in order to thermoregulate because of shading, this will come at a significant energy expense. This will also be true for other ectotherms, including Tussock Skink. For the Striped Legless Lizard, this additional shading possibly means a relocation will be required.

We believe that calculations of the impacts of the viaduct on the MNES in this area have been underestimated.

Design responses should be able to decrease the fragmentation of the Striped Legless Lizard north of the M80. The current proposal lacks articulation of the means by which this east–west movement could occur. Will an appropriate habitat structure be returned? How will maintenance access be incorporated in a way that minimises impacts to east–west movement by the Striped Legless Lizard?

No-go zones

No-go zones should include substantial buffer zones around MNES proportional to the size of the no-go zone. These will provide additional protection from accidental events, compaction of soils, and other impacts. While we are aware that this referral is only focussed on MNES, we note that the proposed no-go zones fail to protect Victorian FFG-listed vegetation communities and species, which indicates a lack of sincerity from the applicant in matters regarding the adequate management of the project's impacts on the environment.

Planning for increase in MNES populations and habitat

The MAR design should allow for an increase in habitat and populations of MNES. For instance, it should create appropriate habitat for Striped Legless Lizard immediately adjacent to areas where Striped Legless Lizard populations have already been identified. The best protection for MNES is to create the conditions under which they can happily expand.

Planning for population expansion means locating bike paths and maintenance tracks away from the edges of existing habitat, and considering plantings that may have future impacts, e.g. trees that may shade future Striped Legless Lizard habitat.

Planning for expansion will be facilitated by expanding the no-go zones.

Insufficient data

Documents lodged under referral 2021/2081 are inadequate to judge if the clearing of numerous small patches of native vegetation along the rail corridor can be reasonably avoided. In particular, we note the removal of native vegetation as shown on p17, 22, 23 and 24 of 2021-9081 App B - MNES Impacts Mapping.

The documents are also inadequate for the purposes of determining the appropriate scale of works necessary, e.g. have all reasonable steps been taken to minimise the overall construction footprint, including maintenance paths and substations.

Offset strategy: Local offsets for local conservation benefits

We understand that some impacts to grassland and threatened species are inevitable, and that these will be offset.

Most importantly, we urge Federal authorities to consider a very targeted and local application of those offsets.

In particular, we would like to see the Melbourne Airport Rail project contribute to the protection of Solomon Heights Grasslands. These Natural Temperate Grasslands of the Victorian Volcanic Plain run adjacent to Melbourne Airport Rail west from the Maribyrnong River crossing. They include critically endangered Spiny Rice-flower, Growling Grass Frog, Striped Legless Lizard and Golden Sun Moth populations. A high level of floristic diversity is present, as are good habitat links to the Maribyrnong River and Brimbank Park. The grasslands are currently in private ownership, but Brimbank Council and other key stakeholders are currently engaged in a process that we are hopeful will bring about a substantial conservation reserve on the land adjacent to Melbourne Airport Rail.

Contributing to the resolution of this process would make an excellent environmental legacy outcome for Melbourne Airport Rail. It would show Rail Projects Victoria to be working with State and Federal authorities to support the local ecosystems fundamental to the identity of Melbourne's West.

New bridge over the Maribyrnong

The railway land on the west side of the Maribyrnong where the new bridge will be built has significant environmental values. The grasslands of Solomon Heights are immediately adjacent. Importantly, too, the weedy land with less native vegetation also has significant habitat value. For that reason, Melbourne Airport Rail should restrict bridge construction impacts to a minimum on the west side of the Maribyrnong.

Revegetation of the rail corridor

The revegetation of the rail corridor is an excellent opportunity to strengthen the environmental values of the project, to support the biodiversity of the remnant grassland, and to maintain the rail corridor's function as a linear green link across a highly urbanised landscape.

Construction impacts greater than indicated

Compaction of soils from construction works is likely to be substantial and alter local runoff around MNES. Appropriate methods of decompaction should be implemented to minimise long-term construction impacts.

Noise walls

We note that noise walls are being considered for human amenity. We wish to stress the importance of noise mitigation to fauna. A substantial body of evidence attests to the fact that noise levels can significantly impact the communications of a wide range of fauna, leading to reduced effectiveness of mating calls, warning calls and disrupting populations. Rail Projects Victoria should consider the use of noise walls adjacent to species-rich natural features such as Solomon Heights Grasslands.

Light pollution

Considerable impacts to fauna, including amphibians, insects and bats, can be caused by light pollution. These impacts have been exacerbated by a move to LED lighting, which tends to be strong in frequencies at the ultraviolet end of the spectrum. We ask that all rail lighting wherever possible be fauna-friendly and help to contribute to darker skies over our important environmental assets.