



# Grassy Plains Network

GRASSYPLAINSNETWORK@GMAIL.COM | GRASSYPLAINS.NET.AU | LEVEL 3, 60 LEICESTER STREET, CARLTON VIC 3053

## Additional comments on referral 2021/2081

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Contact:  
Adrian Marshall  
Facilitator, Grassy Plains Network  
[grassyplainsnetwork@gmail.com](mailto:grassyplainsnetwork@gmail.com)  
[grassyplains.net.au](http://grassyplains.net.au)

Image: Mathews Hill Grassland, looking towards Melbourne Airport Rail

# Solomon Heights and River Valley Estates

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## Unprofessional survey work

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The Grassy Plains Network is extremely concerned that, for the Solomon heights and River Valley Estates portion of the project, the applicant appears to be relying on (or following the same methods as) the survey work by Brett Lane and Associates. Serious concerns over these survey methods have been noted by Brimbank Council officers as well as by independent ecologists. These include:

- Not following the Department of Agriculture, Water and the Environment guidelines for the number of tile grids for Striped Legless Lizard surveys. Only two grids were used, when the 15+ ha of possible habitat at River Valley Estate requires a minimum of five tile grids. The survey effort is only approximately half of the effort required by the Department of Agriculture, Water and the Environment guidelines.
- Only surveying Themeda-rich areas for Golden Sun Moth, when it is known to use other habitat in the immediate area (e.g. where Nassella species dominate). The site is within 200m of a known Golden Sun Moth habitat, and Golden Sun Moth is known to occur in areas with as little as 5% coverage of food plants. This important information does not seem to have been considered.

Poor survey work means that large areas of River Valley Estate that are likely to be habitat for Striped Legless lizard and Golden Sun Moth have not been considered as no-go zones. It would be far wiser to invoke the precautionary principle and declare the whole of the River Valley Estate area within the project boundary to be a no-go zone because of the reasonable likelihood of MNES being present.

We believe that the applicant may have accidentally or deliberately downplayed the likelihood of MNES being present. The lack of appropriate no-go zoning at River Valley estate means the applicant would retain the possibility of access to the rail corridor directly through the Estate via River Valley Boulevard. Were this to be deliberately the case, we would hope that such disingenuous behaviour would have serious implications for the applicant's reputation and the overall consideration of this referral.

We are also extremely concerned that any acceptance of shoddy survey data will have serious implications for any future EPBC referrals in this most sensitive of locations. This survey data must be rejected as unfit for purpose.

The referral documents also refers to large amounts of earth isolating Striped Legless Lizard habitat. That earth has been illegally dumped, is currently the subject of investigation, should be removed, and should not be used as an excuse for further damage to MNES.