

ENVIRONMENTAL SIGNIFICANCE OPINION - BOP ROADSIDE VEGETATION MANAGEMENT PCS ROADS 26-27 (ESO 202600035)

In accordance with section 140 (4) of the *Planning Act 2023* (the Act), I provide the following environmental significance opinion:

APPLICANT

ACT Parks and Conservation Service, as represented by A/g Director Ailish Milner, Fire Management Unit.

APPLICATION and DEVELOPMENT PROPOSAL

The applicant has applied under section 140 (4) of the Act to the Conservator of Flora and Fauna for an environmental significance opinion to the effect that the development proposal set out in the submission is not likely to have a significant adverse environmental impact (the application).

The development proposal is for cyclical vegetation management along existing roads and fire trails in the PCS estate to maintain roads to ensure access for land management purposes, and to clear vehicle sight lines along fire trails which are impeded by vegetation regrowth as described in the submission.

LOCATION

Works are proposed at the following locations:

Reserve	Block	District	Location(road)
Lower Cotter Catchment Reserve	493	STROMLO	Fairvale River Trail (493)
	40, 390	COREE	Blue Range Road (40, 390)
	11, 20	COTTER RIVER	Wombat Road, Nursery Pump Road, Lightning Ridge Road (11), Rockpit Road (20)
	379	PADDYS RIVER	Bfg Road (379)
	170, 173	TENNENT	Unnamed, off Smiths Road (170, 173)
Tidbinbilla Nature Reserve Special Purpose Reserve	240	PADDYS RIVER	Camelback Fire Trail, Tidbinbilla Reserve Road, Koala Enclosure Fire Trail, Wombats Way, Ashbrook Fire Trail, Tid Residence Road, TNR 3 Trail (240)

Namadgi National Park	6, 22, 25, 58, 76, 81, 91, 165, 168, 194	TENNENT	Blue Gum Creek Fire Trail (6, 25, 76, 81, 165, 168), Bushfold Flats Fire Trail (76, 81, 194), Orroral Ridge Road and Link Road (22, 58, 91)
	10	RENDEZVOUS CREEK	Boboyan Pines Fire Trail 4 (10)
	9, 10, 17, 18, 24, 28, 41, 55, 50, 52, 59, 60, 68, 93, 95, 131	BOOTH	Half Moon Creek Fire Trail, Gudgenby Creek Fire Trail, Brandy Flat South Fire Trail (10, 17, 18, 41, 55, 93, 95), Clear Range Fire Trail (9, 24, 28, 50, 52, 59, 60, 68, 131), The Forest Fire Trail (9)
	21	COTTER RIVER	Two Sticks Road, Mount Franklin Road, Bendora Break, Cow Flat Road, Wombat Road, Parrot Road, Flat Rock Spur Fire Trail, Yaouk Trail, Murray Gap Trail, Licking Hole Gauging Trail, Pipeline Road, Stockyard Spur Fire Trail, Mount Franklin Road (21)
	223, 331	PADDYS RIVER	Unnamed, off Corin Road (223, 331)
	39, 40	MOUNT CLEAR	Grassy Creek Fire Trail Clear, Bulls Flat Fire Trail, Sams Creek Fire Trail (39), Range Fire Trail, Upper Left Hand Creek Fire Trail, Mount Clear Fire Trail, Carey Fire Trail (40)

MATTERS TO WHICH THIS OPINION APPLIES

This opinion applies only to the development proposal as described in the application.

OPINION

Provided the works are undertaken in a manner consistent with the following conditions, they are unlikely to cause a significant adverse environmental impact.

This opinion is granted subject to the following conditions made under s140 (4)(b) of the Act:

1. All works must be undertaken in a manner consistent with the mitigation measures contained in the application.
2. Access to the site must be granted to Conservation Officers if a compliance inspection is requested by the Conservator of Flora and Fauna.

3. All works undertaken must be consistent with the prescribed mitigation measures outlined in the [Ecological Guidelines for Fire, Fuel and Access Management Operations \(2026\)](#).
4. Movement of machinery must be limited to existing fire trails and access roads. All vehicles, machinery, equipment and footwear must be thoroughly cleaned and, where necessary, disinfected before entering the PCS estate and before moving between individual work sites, so that soil, mud, plant material, weeds or pathogens are not transported between sites. Where works are in, or may provide access to, areas containing amphibian records or other pathogen-sensitive habitat, site-specific hygiene and quarantine procedures must be implemented in consultation with the Office of Nature Conservation before works commence.
5. Endorsement must be obtained from the Office of the Conservator of Flora and Fauna (OCFF) prior to works where impacts to threatened ecological communities or protected flora cannot be avoided.
6. Mature native trees (trees with a DBH >50cm) must not be removed without a tree clearance plan endorsed by OCFF.
7. No habitat trees are to be removed, especially hollow bearing trees or standing dead trees, unless they present a clear danger to crews.
8. Trees containing hollows must be avoided by works, to limit disturbance to nesting animals. Where impacts to hollow-bearing trees cannot be avoided, a management strategy must be provided to OCFF for endorsement prior to works.
9. Works must be undertaken in conditions that avoid soil disturbance, rutting and damage to the road surface or adjoining vegetation. Works must not commence, or must cease, following high rainfall or while the ground is saturated or otherwise too wet to support machinery without causing such impacts. Works may proceed in those conditions only where required to address an immediate risk to human safety or emergency access, and only where the minimum necessary works are undertaken and additional measures are implemented to prevent and remediate environmental damage.

Attached is a Statement of Reasons for the decision.

Bren Burkevics
Conservator of Flora and Fauna

14 October 2026

STATEMENT OF REASONS REASONS FOR THE DECISION

The proposed development is a proposal mentioned in Schedule 1 of the *Planning (General) Regulation 2023* – requiring environmental impact statement, being:

Part 1.2, item 16 - proposal that is likely to have a significant adverse environmental impact on 1 or more of the following:

- (a) a critically endangered species;*
- (b) an endangered species;*
- (c) a vulnerable species;*
- (d) a conservation dependent species;*
- (e) a regionally threatened species;*
- (f) a regionally conservation dependent species;*
- (g) a provisionally listed threatened species;*
- (h) a listed migratory species;*
- (i) a threatened ecological community;*
- (j) a protected native species;*
- (k) a Ramsar wetland;*
- (l) any other protected matter*

The proposed work areas contain:

Several animal species records listed as threatened under the Nature Conservation Act 2014:

- Southern Greater Glider (*Petauroides volans*)
- Yellow-bellied Glider (*Petaurus australis*)
- Brush-tailed Rock-wallaby (*Petrogale penicillata*)
- Koala (*Phascolarctos cinereus*)
- Gang-gang Cockatoo (*Callocephalon fimbriatum*)
- Brown Treecreeper (*Climacteris picumnus*)
- White-throated Needletail (*Hirundapus caudacutus*)
- Scarlet Robin (*Petroica boodang*)
- Two-Spined Blackfish (*Gadopsis bispinosus*)
- Riek's Crayfish (*Euastacus reiki*)
- Northern Corroboree Frog (*Pseudophryne pengilleyi*)

Multiple protected orchid species.

Part 1.2, item 17 – proposal involving -

- (a) the clearing of more than 0.5ha of native vegetation in a native vegetation area, other than on land in a future urban area; or*
- (b) the clearing of more than 5.0ha of native vegetation in a native vegetation area on land in a future urban area*

The proposal will impact 79.8 hectares of native vegetation along approximately 199.46 km of existing roads.

Part 1.2, item 18 - proposal for development in a reserve, unless the proposal is for minor public works to be carried out by or for the Territory in accordance with a minor public works code approved by the conservator of flora and fauna under the Nature Conservation Act 2014, section 318A;

The proposed works are within the following reserves:

- Lower Cotter Catchment Reserve
- Bullen Range Nature Reserve;
- Namadgi National Park, including the Bimberi Wilderness area; and
- Tidbinbilla Nature Reserve, both National Park and Special Purpose Reserve;

The proponent is seeking an environmental significance opinion to remove the requirement for an environmental impact statement on the grounds that the proposal is not likely to have a significant adverse environmental impact, and has applied to the Conservator of Flora and Fauna for an opinion to that effect.

Meaning of *significant* adverse environmental impact

An adverse environmental impact is ***significant*** if—

- (a) the environmental function, system, value or entity that might be adversely impacted by a proposed development is significant; or
- (b) the cumulative or incremental effect of a proposed development might contribute to a substantial adverse impact on an environmental function, system, value or entity.

In deciding whether an adverse environmental impact is ***significant***, the following matters must be taken into account:

- (a) the kind, size, frequency, intensity, scope and length of time of the impact;
- (b) the sensitivity, resilience and rarity of the environmental function, system, value or entity likely to be affected.

In deciding whether a development proposal is likely to have a significant adverse environmental impact it does not matter whether the adverse environmental impact is likely to occur on the site of the development or elsewhere.

It has been determined that the proposal is unlikely to have a significant environmental impact, based on the documentation submitted, known values of the site, and provided the works and ongoing management are carried out in accordance with the conditions attached to this ESO.

Project description

The Bushfire Operations Plan (BOP) Roadside Vegetation Management of PCS Roads 26-27 project is for cyclical vegetation management along existing roads and fire trails in the PCS estate to maintain roads ensuring access for land management purposes and clear vehicle sight lines along fire trails which are impeded by vegetation regrowth. Much of the

vegetation proposed for removal is re-growth from previous trail and vegetation management. Current vegetation conditions create significant risk to vehicles, as drivers have severely limited view around bends to identify other vehicles and hazards.

Vegetation will be trimmed along approximately 199.46 km of existing roads. Works will be confined to the original trail footprint to a depth of 2m each side, and up to 4m in depth around sharp bends and switchbacks to improve sight lines, for a total treated area of approximately 79.8 hectares in the following locations:

- Lower Cotter Catchment Reserve
- Pierces Creek Forest;
- Bullen Range Nature Reserve;
- Namadgi National Park, including the Bimberi Wilderness area; and
- Tidbinbilla Nature Reserve.

Works will be undertaken with a mulching head mounted on an excavator to cut and mulch woody regrowth on the fire trails. The operator can selectively remove vegetation at a height of between 100mm and 200mm and retain groundcover (grass and low shrubs). Work will take place when the fire trail is accessible and dry enough to ensure excavator tracks do not damage the road surface.

Mature trees greater than or equal to 20cm diameter (10cm for snow gums) at breast height will be retained and only removed if they pose a hazard to the road network. Removal will only occur with approval from a district officer or the Office of Nature Conservation (ONC). Trees greater than 50cm diameter at breast height will be removed only with approval from the Conservator of Flora and Fauna. Trees may be pruned of branches which overhang the trail and encroach on the road footprint with a hand saw, chainsaw or pole saw.

Documentation Submitted

- Explanatory note regarding supporting documentation for the application for an Environmental Significance Opinion;
- List of fauna and flora maps;
- Letter of Authorisation
- Form 1M.

Natural conservation values present

The BOP Vegetation Management project area falls across five separate reserve or forest areas, detailed below.

The Lower Cotter Catchment Reserve is a 6,350-hectare protected area managed to protect Canberra's water supply, to conserve the natural environment and to provide for low impact recreation. The native vegetation remaining along the Cotter River, together with remnant and regenerating vegetation to the south of Cotter Dam, provide an important wildlife

movement corridor linking the northern part of Namadgi National Park with the Murrumbidgee River.

The following records are adjacent to the proposed vegetation clearing within the Lower Cotter Catchment Reserve:

Species listed as threatened under the Nature Conservation Act 2014 (NC Act):

- Southern Greater Glider (*Petauroides volans*)
- Gang-gang Cockatoo (*Callocephalon fimbriatum*)

Rare or uncommon species:

- Rough Tree Fern (*Cyathea australis* subsp. *australis*)
- Eastern Speedwell (*Veronica grosseserrata*)

Both Bullen Range Nature Reserve and Pierces Creek Forest did not present any records of threatened or rare species within the proposed vegetation clearing areas.

Tidbinbilla Nature Reserve (TNR) is 6,466 hectares adjacent to the Namadgi National Park and is comprised of 'National Park' and 'Special Purpose Reserve'. TNR plays a vital role in wildlife management and protection. As the proposal is restricted to roadways, the main impact area is within Zone 3, identified as 'Developed Recreation and Education' within the Tidbinbilla Plan of Management 2012. Whilst Tidbinbilla supports a wide range of wildlife, it is unlikely that any vegetation cleared will significantly impact these species habitat.

The following records were identified within or adjacent to the proposed vegetation clearing within TNR:

Species listed as threatened under the NC Act:

- Southern Greater Glider (*Petauroides volans*)
- Koala (*Phascolarctos cinereus*)
- Gang-gang Cockatoo (*Callocephalon fimbriatum*)
- Scarlet Robin (*Petroica boodang*)
- Riek's Crayfish (*Euastacus reiki*)

Rare or uncommon species:

- Tall Rice Flower (*Pimelea ligustrina* subsp. *ligustrina*)
- Dusky Woodswallow (*Artamus cyanopterus*)
- Brush Cuckoo (*Cacomantis variolosus*)
- Emu (*Dromaius novaehollandiae*)
- Dollarbird (*Eurystomus orientalis*)
- Banks' Brown (*Heteronympha banksii*)
- Satin Flycatcher (*Myiagra cyanoleuca*)
- Flame Robin (*Petroica phoenicea*)
- New Holland Honeyeater (*Phylidonyris novaehollandiae*)

Namadgi National Park (NNP) is located in the south and west of the ACT and covers 106,095 hectares or approximately 46% of the ACT. NNP conserves a wide variety of ecosystems and contributes to regional ecological connectivity through its links to reserves within NSW. The ecosystems include:

- low open woodland;
- open grasslands and frost hollows;
- tall wet forests with Alpine Ash and fern gullies;
- wetlands including sedge fens in the valleys and sphagnum moss bogs, and
- sub-alpine peaks and alpine communities.

The following species have been recorded within or adjacent to the proposed vegetation clearing areas:

Species listed as threatened under the NC Act:

- Southern Greater Glider (*Petauroides volans*)
- Yellow-bellied Glider (*Petaurus australis*)
- Brush-tailed Rock-wallaby (*Petrogale penicillata*)
- Southern Whiteface (*Aphelocephala leucopsis*)
- Gang-gang Cockatoo (*Callocephalon fimbriatum*)
- Brown Treecreeper (*Climacteris picumnus victoriae*)
- White-throated Needletail (*Hirundapus caudacutus*)
- Scarlet Robin (*Petroica boodang*)
- Northern Corroboree Frog (*Pseudophryne pengilleyi*)

Rare or unusual species (list is not exhaustive):

- Tall Acrotriche (*Acrotriche leucocarpa*)
- Rough burr-daisy (*Calotis scabiosifolia* var. *integrifolia*)
- Kosciusko Crane's-bill (*Geranium obtusisepalum*)
- *Grevillea dimunata*
- Bat's-Wing Fern (*Histiopteris incisa*)
- Pomaderris (*Pomaderris phyllicifolia* subsp. *ericoides*)
- Alpine Wallaby Grass (*Rytidosperma nudiflorum*)
- Alpine Triggerplant (*Stylidium montanum*)
- Dusky Woodswallow (*Artamus cyanopterus*)
- Brush Cuckoo (*Cacomantis variolosus*)
- Spotted Quail-thrush (*Cinclosoma punctatum*)
- Red-browed Treecreeper (*Climacteris erythrops*)
- Little Raven (*Corvus mellori*)
- Superb Lyrebird (*Menura novaehollandiae*)
- Powerful Owl (*Ninox strenua*)
- Olive Whistler (*Pachycephala olivacea*)

- Flame Robin (*Petroica phoenicea*)
- Eastern Whipbird (*Psophodes olivaceus*)
- Fuscous Honeyeater (*Ptilotula fusca*)
- Bassian Thrush (*Zoothera lunulate*)
- Satin Flycatcher (*Myiagra cyanoleuca*)
- Brown Toadlet (*Pseudophryne bibronii*)
- Rosenberg's Monitor (*Varanus rosenbergi*)
- Mountain Darner (*Austroaeschna atrata*)
- Small Alpine Xenica (*Oreixenica latialis*)
- Antheliid moth (*Pterolocera sp.*)
- False stink bug (*Stauralia sp.*)

Multiple protected orchid species have also been recorded in the vicinity of the proposed works.

Potentially Significant Environmental Impacts

The proposed works, including mitigation measures, are generally consistent with the *Ecological Guidelines for Fire, Fuel and Access Management Operations*. Works will be confined to the original trail footprint, and much of the vegetation is re-growth post construction. Protected species and communities have been identified, and appropriate mitigation measures have been included in the proposal. It is acknowledged that there are numerous threatened and sensitive ecological values identified within proximity to the maintenance areas identified for vegetation clearing within the submission, as detailed in the “environmental values” document. The project will have minimal impacts to protected values.

Notably, ground disturbance will be avoided through application of appropriate vegetation trimming equipment and suitably qualified ecologists from Office of Nature Conservation (ONC) are engaged to undertake pre-clearance surveys and establish exclusion zones around sensitive values. Appropriate controls have been included to minimise disturbance to waterways, by restricting vegetation clearance around streams with a Strahler order >1 (i.e. permanent waterbodies).

Importantly, no mature native trees or hollow-bearing trees are proposed for removal as part of the vegetation clearing works.

Listed aquatic species Riek's Crayfish (*Euastacus reiki*) occurs within the general area of one proposed clearing site within TNR, and works intersect with their habitat. It is encouraged that riparian areas and threatened aquatic species are considered throughout the vegetation works planning and implementation in accordance with the Ecological Guidelines and consultation with ONC.

The works will result in clearing of 79.8 hectares of vegetation occurring with Southern Tableland Dry Sclerophyll Forests, Southern Tableland Wet Sclerophyll Forests, Montane

Wet Sclerophyll Forests, Subalpine Woodlands, Alpine Heaths and Temperate Montane Grasslands, however these impacts are unlikely to be significant due to the nature of the vegetation being cleared, occurring along previously disturbed access trails and walking trails.

The presence of threatened and rare species has been identified, including rare orchids, however there is a very low likelihood of the proposal impacting rare plant species, particularly with the engagement of ONC. The proposal includes weed and pathogen hygiene conditions

Conditions have been included to ensure that works minimise vegetation and soil disturbance to the wider reserve areas, and to ensure that impacts to mature native trees are avoided as much as possible.

1. All works must be undertaken in a manner consistent with the mitigation measures contained in the application.
2. Access to the site must be granted to Conservation Officers if a compliance inspection is requested by the Conservator of Flora and Fauna.
3. All works undertaken must be consistent with the prescribed mitigation measures outlined in the [Ecological Guidelines for Fire, Fuel and Access Management Operations \(2026\)](#).
4. Movement of machinery must be limited to existing fire trails and access roads. All vehicles, machinery, equipment and footwear must be thoroughly cleaned and, where necessary, disinfected before entering the PCS estate and before moving between individual work sites, so that soil, mud, plant material, weeds or pathogens are not transported between sites. Where works are in, or may provide access to, areas containing amphibian records or other pathogen-sensitive habitat, site-specific hygiene and quarantine procedures must be implemented in consultation with the Office of Nature Conservation before works commence.
5. Endorsement must be obtained from the Office of the Conservator of Flora and Fauna (OCFF) prior to works where impacts to threatened ecological communities or protected flora cannot be avoided.
6. Mature native trees (trees with a DBH >50cm) must not be removed without a tree clearance plan endorsed by OCFF.
7. No habitat trees are to be removed, especially hollow bearing trees or standing dead trees, unless they present a clear danger to crews.
8. Trees containing hollows must be avoided by works, to limit disturbance to nesting animals. Where impacts to hollow-bearing trees cannot be avoided, a management strategy must be provided to OCFF for endorsement prior to works.

9. Works must be undertaken in conditions that avoid soil disturbance, rutting and damage to the road surface or adjoining vegetation. Works must not commence, or must cease, following high rainfall or while the ground is saturated or otherwise too wet to support machinery without causing such impacts. Works may proceed in those conditions only where required to address an immediate risk to human safety or emergency access, and only where the minimum necessary works are undertaken and additional measures are implemented to prevent and remediate environmental damage.

It has been determined that if the works are undertaken in a manner consistent with the above conditions attached to the ESO, they are unlikely to cause a significant adverse environmental impact.