ACT Government
City and Environment

ENVIRONMENTAL SIGNIFICANCE OPINION - Roadside Vegetation Management PCS Roads 2025-26 (ESO 202500062)

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 Mr Tyrone Compton, Assistant Director Planning, 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 currently impeded by vegetation regrowth as described in the submission.

LOCATION

Reserve	Block	District	Location(road)
Pierces Creek Forest	320	Paddy's River	
Namadgi NP, Bimberi Wilderness	21	Cotter River	Lick Hole Rd
Namadgi NP	40	Mount Clear	Long Flat FT
Namadgi NP	40	Mount Clear	Burnt Hill FT
Namadgi NP	40; 5, 6, 9, 10, 18, 20, 24, 51, 67, 131, 135	Mount Clear; Booth	Naas Valley FT
Namadgi NP, Bimberi Wilderness	91; 21	Tennent; Cotter River	Cotter Hut Rd
Lower Cotter Catchment	11	Cotter River	Upper Champagne Rd

Lower Cotter Catchment	11	Cotter River	Marshalls Break
Lower Cotter Catchment	11	Cotter River	Shannon's Rd
Namadgi NP	21	Cotter River	Bendora Rd
Ingledeen Forest	183	Tennent	Sunshine Rd
Lower Cotter Catchment	11	Cotter River	Lightning Ridge Summit
Lower Cotter Catchment	11	Cotter River	Pago Break

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 in addition to the mitigation measures contained in the supporting application for an ESO, 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. Conditions of approval including mitigation measures as stated in the application.
2. Access to the site must be granted to Conservation Officers if a random compliance inspection is requested by the Conservator of Flora and Fauna.
3. Individual work plans must be reviewed and agreed to by the Office of Nature Conservation Fire Ecology team prior to work commencing. Plans are to mark out protected plants and exclude riparian areas. Work in areas of significant ecological importance is to be done by hand.
4. Works must be undertaken in accordance with the measures outline in the ESO submissions and the Ecological Guidelines for Fire, Fuel and Access Management Operations (2025).
5. Movement of machinery is to be limited to existing fire trails and access roads. All vehicles/machinery must be thoroughly washed down prior to entering the PCS estate and when moving between sites to ensure that no organic material such as soil/mud or plant material (notably weeds) is transported into the reserve/national park area. Consideration of additional quarantine procedures to address pathogen spread in sensitive areas with amphibian records would be encouraged.
6. Mature native trees (trees with a DBH >50cm DBH) must not be removed without a tree clearance plan endorsed by the Office of the Conservator.
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 the Office of the Conservator for endorsement prior to works.
9. Soil disturbance should be limited by ensuring works are undertaken during appropriate conditions. Works following high rainfall should be avoided, where possible.

Attached is a Statement of Reasons for the decision.

[redacted]

Bren Burkevics
Conservator of Flora and Fauna

12 February 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 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 on 46.19ha of native vegetation along approximately 115.48 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 Namadgi National Park.

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

This 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 hazards to vehicles, as drivers have severely limited view around bends to identify other vehicles and hazards.

Vegetation will be trimmed along approximately 115.48 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 46.19 ha.

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(s) of Authorisation
- Form 1M.

Natural conservation values present

Namadgi National Park 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 covering much of the park with Snow Gum woodland in the high mountain areas;

- open grasslands and frost hollows on the eastern side of the park in the Orroral and Boboyan valleys;
- tall wet forests with Alpine Ash and fern gullies in sheltered locations, especially on the western side of the park;
- wetlands including sedge fens in the valleys and sphagnum moss bogs on the peaks that are important for water catchment and as habitat for the endangered Northern Corroboree Frog (*Pseudophryne pengilleyi*), and
- sub-alpine peaks and alpine communities above 1600m.

Nearly 600 species have been recorded in Namadgi, with at least 30 species listed as threatened under the *Nature Conservation Act 2014*:

- Northern Corroboree Frog (*Pseudophryne pengilleyi*)
- Brown Treecreeper (*Climacteris picumnus*)
- Diamond Firetail (*Stagonopleura guttata*)
- Hooded Robin (*Melanodryas cucullata*)
- Little Eagle (*Hieraaetus morphnoides*)
- Painted Honeyeater (*Grantiella picta*)
- Pilotbird (*Pycnoptilus floccosus*)
- Scarlet Robin (*Petroica boodang*)
- Varied Sitella (*Daphoenositta chrysoptera*)
- White-throated Needletail (*Hirundapus caudacutus*)
- White-winged Triller (*Lalage tricolor*)
- Macquarie Perch (*Macquaria australasica*)
- Trout Cod (*Maccullochella macquariensis*)
- Two-Spined Blackfish (*Gadopsis bispinosus*)
- Key's Matchstick Grasshopper (*Keyacris scurra*)
- Murray River Crayfish (*Euastacus armatus*)
- Broad-toothed Rat (*Mastacomys fuscus*)
- Brush-tailed Rock-wallaby (*Petrogale penicillata*)
- Greater Glider (*Petauroides volans*)
- Koala (*Phascolarctos cinereus*)
- Smoky Mouse (*Pseudomys fumeus*)
- Spotted-tailed Quoll (*Dasyurus maculatus*)
- Austral Toadflax (*Thesium austral*)
- Brindabella Midge Orchid (*Corunastylis ectopa*)
- Dwarf Violet (*Vioa improcera*)
- Hoary Sunray (*Leucochrysum albicans var. tricolor*)
- Kiandra Greenhood (*Pterostylis oreophila*)
- Pale Pomaderris (*Pomaderris pallida*)
- Mountain Skink (*Liopholis montana*)
- Riek's Crayfish (*Euastacus reiki*)
- Alpine Spiny Crayfish (*Euastacus crassus*)

Potentially Significant Environmental Impacts

The Namadgi National Park Plan of Management (2010) identifies the maintenance of fire trails to specified standards as an ongoing high priority action. This necessary work has been undertaken by the Parks and Conservation Service Fire Management Unit over the past few years with careful consideration for environmental values and good collaboration with stakeholders.

The proposed works, including mitigation measures, are 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. The project will have minimal impacts to protected values.

The ESO application did not specifically mention buffering of streams and drainage lines, however we know that mitigation measures are in place already for this in the Ecological Guidelines. Riparian vegetation is important to maintain ground cover, shading and bank stability, and therefore any stream of order 2 and above is buffered as per detail in the Ecological Guideline 12. It is anticipated that onsite visits with ONC will be required to discuss riparian buffering across larger areas for jobs:

- AV333 Lick Hole Road
- AV383 Cotter Hut Road
- Possibly AV340 Naas Valley FT.

Listed aquatic species such as Riek's Crayfish (*Euastacus reiki*) and Alpine Spiny Crayfish (*Euastacus crassus*) occur within the general area 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.

Two records of Alpine Tree Frogs (*Litoria verreauxii alpina*) are listed in site surveys. This species is susceptible to Chytrid fungus, as such consideration of stronger quarantine procedures are recommended in addition to recommended conditions included in this ESO. This could include installing and maintaining footbath stations to limit pathogen spread, ensuring disinfectants (e.g. bleach solution) are regularly topped up to be effective.

Provided the works are undertaken in accordance with the Ecological Guidelines and in consultation with the Office of Nature Conservation and PCS Area Managers, risks associated with these works can be mitigated by addressing protection of environmental values at the works plan and implementation stages of the work.

Conditions have been included to ensure that works minimise vegetation and soil disturbance to the wider reserve areas.

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

1. Conditions of approval including mitigation measures as stated in the application.

2. Access to the site must be granted to Conservation Officers if a random compliance inspection is requested by the Conservator of Flora and Fauna.
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9. Soil disturbance should be limited by ensuring works are undertaken during appropriate conditions. Works following high rainfall should be avoided, where possible.

It has been determined that if the works are undertaken in a manner consistent with the above conditions attached to the ESO in addition to the mitigation measures contained in the supporting application for an ESO, they are unlikely to cause a significant adverse environmental impact.