

Report: Escarpment Parks Access Submission Summary

About this report

This Report summarises the content of submissions to the Escarpment Parks Access Paper. Content has been summarised under the section of the paper that a comment related to. The appendix to this report has the original text from each submission classified according to the section of the paper. Each submission is identified by a number.

In reading this report, you will note that there are numbers against each summarised comment. It is possible to check the summarised comment against the original submission through the following steps:

- 1) Check the number against the comment (for example 999, 800);
- 2) Check the section heading (for example Background, Context); and
- 3) Go to the appendix, find the relevant section heading and then the comment with the corresponding numbers (999, 800). This is the original text from the submission.

This report also contains a comment and recommendation from the Far South Coast Regional Manager and a recommendation of the Regional Advisory Committee to the Far South Coast Region.

BACKGROUND, Context

Planner's summary

- Appreciation expressed to the NPWS for on-going opportunity to be involved in the Escarpment Parks planning process and to comment on the Access Discussion Paper (363,391,444).
- Concern expressed about the way the NPWS/Government undertakes consultation with the assertion that it is undertaken during normal business hours and not within Regional Centres (662).
- Concern that the public is not informed of park planning proposals, given adequate time to respond and questioning whether responding is futile: "will my voice be really heard?" (691).
- Through the consultation process for the Escarpment Parks and the preparation of this paper, the Service is making an inappropriate effort to accommodate interests of certain user/ special interest groups (343, 477,511).
- Concern expressed about a focus on recreational use of the Park within the Paper (and especially on access) with inadequate emphasis on and to the potential detriment of conservation values (343,511).
- This paper and consultation approach and the Departments disregard for identified wilderness and "advance of the cause of the access lobby" (511) will erode the motivation and support of the environment movement for the NPWS/DEC (511).
- Bushwalking should have been considered within this access paper with adequate consideration being given to the needs of, provision for and potential conflict of other uses with walking, with walking being considered within the context of all recreational uses (391,511,522).
- Concern expressed about the way in which the Paper separates uses and therefore potentially divides various interest groups. (544)

Regional Manager's comment

The NPWS has placed considerable effort into designing a consultation program that is as accessible, equitable and transparent as possible and to which all interest groups and neighbours have opportunity to contribute. The consultation program is based on best practice and has utilised a wide variety of techniques (for example community forums, media releases, direct contact, Internet) so that people have a range of ways through which they can contribute. Meetings have been conducted in both Capital Cities and Regional Centres, all outside of working hours. The NPWS has responded to all input, which has been recorded, and made this response available to the community through reports such as this.

The Access Discussion Paper was prepared in response to feedback from the community through the Open House Forums and through other input (see Report on Open House Forums, NPWS, 2003) and responded to possibly the most contentious issues identified though the forums being access via horses, cycling and vehicles. While the paper focussed on these access issues, they were considered within the context of conservation and recreation management principles.

The NPWS agrees that access via foot (bushwalking) could have been included in the paper (although not identified as a contentious issue). Bushwalking and all other issues will be integrated in the draft plan which will be exhibited for further comment for a minimum of three (3) months.

Regional Manager's recommendation

- Emphasise opportunities for further comment/assessment by the community, especially the 3 month exhibition of the draft plan.

Regional Advisory Committee recommendation

To add: "Continue to inform the community of the role and contact numbers of the Regional Advisory Committee, emphasising the liaison role of the Committee between the NPWS and stakeholders".

BACKGROUND, Process for consideration of this Paper

Planner's summary

- One month considered inadequate time to respond to this paper (85, 377, 544, 691).

Regional Manager's comment

The one month exhibition for the access paper was within an ongoing 12 month consultation program contributing to the preparation of a draft plan which will culminate in a 3 month exhibition of the draft. Within this context 1 month for the access paper was considered a reasonable fit.

Regional Manager's recommendation

- Emphasise opportunities for further comment/assessment by the community, especially the 3 month exhibition of the draft plan.

Regional Advisory Committee recommendation

To add: "Continue to inform the community of the role and contact numbers of the Regional Advisory Committee, emphasising the liaison role of the Committee between the NPWS and stakeholders".

BACKGROUND, Values Identified through Consultation, Cultural Heritage

Planner's summary

- Access to the Escarpment Parks including wilderness is argued as a legitimate part of a persons (especially a park neighbours and people who live and work in surrounding areas) cultural heritage. Public lands are 'belonging to all people of this nation'. Within this context, inadequate consideration in the Paper of access as cultural heritage (85, 477).

- Previous land use and access (including for example management philosophies of State Forest) asserted by some as 'cultural heritage' has little, if any, relevance to management practices/philosophies today (346).

Regional Manager's comment

Cultural heritage values and assessment will be undertaken within the context of cultural heritage policy and also the Far South Coast Cultural Heritage Management Strategy 2001 - 2006 (NSW NPWS). The Strategy recommends historic sites that require active management and identifies operational strategies/priorities for these sites. The Plan for the Far South Coast Escarpment Parks will identify priorities for cultural heritage management in accordance with this strategy.

Regional Manager's recommendation

- Identify in the draft plan priorities for assessments of cultural heritage values in accordance with the Far South Coast Cultural Heritage Management Strategy 2001-2006.

- Acknowledge in the plan the cultural heritage connections that many people in the community have with the Escarpment Parks.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

BACKGROUND, Non-Negotiable

Planner's summary

- Maintain the non-negotiable legislation (346)
- The listing of the non-negotiables a useful discussion base (514)
- All karst areas should be considered as non-negotiable (615)

Regional Manager's comment

Regional Manager's recommendation

- No change to access paper or recommendation for draft plan

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

BACKGROUND, Non-Negotiable, NPWA Act

Planner's summary

- Supplied evidence of the environmental impacts of recreation activities argued as not likely being of interest to the Department: "because the Department now believes that scientific proof must be established for each particular circumstance before the case is proven for that circumstance . This peculiar application of the precautionary principle is contrary to the definition of that principle in the National Parks and Wildlife Act, 1974." (511)
- The impact of mechanised activities (especially trail bike riding) is argued as being inconsistent with NP&WAct and the identified intrinsic values. This planning exercise is " not about pleasing as many people as possible, or upsetting as few as possible. It's about seeking to accommodate reasonable expectations within the legislative framework" (514)
- Horseriding, walking and cycling considered consistent with the legislation (514).

Regional Manager's comment

The NPWS agrees that all activities must be within the parameters of the legislation which has been defined as 'non-negotiable'. Both potential and actual environmental impacts of access activities have been considered in the access paper.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation and non-negotiables

BACKGROUND, Non-Negotiable, Wilderness

Planner's summary

- All remaining identified wilderness should be declared. Concern expressed that "No recognition of wilderness values outside areas declared under the Wilderness Act, 1987 was stated in the paper....The Discussion Paper presented no alternatives that adequately protect the identified wilderness" (511).
- "The Discussion Paper wrongly assumes that provision for horseriding, 4WD vehicles and trail bikes should be the park management priority outside of declared wilderness, including within extensive areas of identified wilderness that remain unprotected (eg. the central Deua Valley)." (511)
- "Wilderness legislation is seriously flawed" (439).
- "Access for All believes that with just minor changes to this policy ie: minor boundary changes, a much improved working relationship could be fostered between concerned parties". (477)
- "The management principles for wilderness areas are contradictory. Pg3 b) & c) How can you preserve an area without human interference and still permit opportunities for solitude and self-reliant recreation?" (687, 688, 689, 690)
- All visitors to the Park may enjoy intrinsic values identified : "Exclusive experience of wilderness should be obtained by selecting remote sites to suit the visitors' needs rather than by denying access to others wishing to visit as well" (343).

Regional Manager's comment

Wilderness Policy and Legislation is 'non-negotiable' within the context of this draft plan and the NPWS has made considerable effort to communicate this through the consultation program. Therefore any proposals that require change to the legislation or policy (such as boundary changes to wilderness) cannot be effected through this draft plan. 'Identified wilderness' was considered through the wilderness assessment process and following this was not declared as wilderness by the Minister for Environment. There are no special provisions for identified wilderness under the Wilderness Act 1987 in the preparation of a draft plan of management.

Regional Manager's recommendation

- Continue to emphasise in on-going communication that wilderness policy and legislation is 'non-negotiable' and cannot be changed through the draft plan of management.

Regional Advisory Committee recommendation

- To recognise in the draft plan the remote settings and values of areas that were identified wilderness (not declared) with the inclusion of guidelines for recreational use and facilities within these areas to be of a scale and intensity that is appropriate to these settings and values.

ROAD NETWORK, Regional Context

Planner's summary

- Recreational use of roads (4WD + trail bike) should be encouraged in surrounding State Forest and not within National Parks which have differing management objectives (253, 346, 511).
- Consideration of access within other land tenures is not relevant to this exercise and opportunity within other land tenures should not be used as justification for limiting opportunity within National Parks. This argument is as relevant as is limiting access to walkers in wilderness areas within Park due to similar opportunities outside of Park (477, 497, 647).
- 4WD roads within the Escarpment Parks should be closed to public access and this use encouraged on roads within other land tenure. Assertion that DEC has not considered recreation use of roads outside of the National Parks (511).
- Comment on extensive and increasing use of roads to and surrounding Bendethera (636).
- More consideration should have been given to road access to destinations within the Park, rather than general figures on regional road access (647).

Regional Manager's comment

Consistent with best practice, the Far South Coast Region is undertaking recreation planning and management within a regional context across all land tenures. The framework for this is defined in the Far South Coast Region Nature Tourism and Recreation Plan (2004). This is to ensure as far as practicable that recreation opportunities within each land tenure is complementary, appropriate to the protection status of the land, and to avoid duplication and/or disjointed use. The paper therefore considered regional opportunities for recreational horseriding, cycling and for driving/riding. In relation to the proposed public road network within the Escarpment Parks, under legislation all registered vehicles are permitted on these roads and it is not possible to discriminate between vehicle types (eg 4WD versus 2WD vehicle).

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Current Situation

Planner's summary

- Object to the proposal that certain roads (Turtle and Gollaribee) be excised from wilderness areas (511).
- Trends for 4WD use should be considered with the likelihood of a decrease in their popularity due to expense (511).
- Access should not be withdrawn from any of the roads included in Figures in Table 2 (647).

Regional Manager's comment

The paper does not propose any change to wilderness boundaries (non-negotiable) so the comment in relation to the Turtle and Gollaribee Trails is incorrect. The public road network is essentially roads or trails required for management purposes which are also available for public use while meeting park conservation management objectives. This network is available to all registered vehicles and in this context the type of vehicle and trends in popularity of vehicle types is not a relevant consideration.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Non-Negotiables

Planner's summary

- Opposition to public access to roads between wilderness areas "within corridors", "as this results in fragmentation of otherwise continuous declared wilderness and an excessive number of park traverses, especially by 4wd's". (343)
- Opposition to roads that traverse parks and policy that enables this with a preferred policy position of short and peripheral roads/trails.(343)
- The existence of and proposal for continuation of roads that are accessible by 4WD or trail bikes only is contrary to NPWS policy of "no special provision for 4WD's or trail bikes" (343)

- Opposition to public access roads within identified (not declared) wilderness areas. Concern that access within these areas also impacts on declared wilderness areas. (78, 522)
- Policy can be modified and varied and both the wilderness and vehicle access policy should therefore be negotiable.(367,
- Easement should be created for management trails through wilderness areas to enable public access (for example Gollarabee and Turtle Fire Trails). (367, 371, 577, 647, 665)
- Opposition to non-negotiables, especially Wilderness Act and Policy with argument that public access should be permitted on roads and trails within these areas. In this context, NPWS vehicle policy is outdated. Roads within wilderness in Monga National Park should be opened to public access especially with potential contribution to tourism. (367, 491, 589, 600, 647, 657, 662, 664)
- Support for Services position on declared wilderness and exclusion of public access to these areas. (522, 667, 672)

Regional Manager's comment

Wilderness Policy and Legislation is 'non-negotiable' within the context of this draft plan and the NPWS has made considerable effort to communicate this through the consultation program. Therefore any proposals that require change to the legislation or policy (such as boundary changes to wilderness) cannot be effected through this draft plan. Through the wilderness process, roads that traverse the Park such as Wadbilliga Road were excluded from wilderness areas so that public access would remain possible. Wadbilliga Trig Site is within wilderness and therefore public access to this site is not possible.

'Identified wilderness' was considered through the wilderness assessment process and following this was not declared as wilderness by the Minister for Environment. There are no special provisions for identified wilderness under the Wilderness Act 1987 in the preparation of a draft plan of management.

In relation to NPWS Vehicle Access Policy and the requirement that 'no special provision be made for 4WD's or trail bikes', the access paper is considered consistent. The public road network is essentially roads or trails required for management purposes which are also available for public use while meeting park conservation management objectives.

'Special Provision' would have been made if the roads/trails were not required for management purposes and were made available only for the purpose of providing public vehicular access. Under the NPWS Vehicle Access Policy, public access is not permitted to management trails.

Regional Manager's recommendation

- Continue to emphasise that wilderness policy and legislation is 'non-negotiable' and cannot be changed through the draft plan of management in communication.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Negotiables

Planner's summary

- Concern about the ability to separate conflicting uses (listed as a negotiable) with concern about unregistered trail bike activity and its impact on other park uses (371).
- Separation of conflicting uses not considered an issue as horses have right of way over vehicles on trails (647).

Regional Manager's comment

Unregistered vehicles are not permitted in the Park and are subject to Road rules and Traffic regulations.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Environmental Impact

Planner's summary

- There is more than enough evidence to establish the general case that use of motor vehicles on 4WD tracks cause soil erosion and weed invasion (see High Impact Recreation CD enclosed) (511)
- Environmental impacts are maximised in group situations (tours and club activities) with minimal impact for some

users being a nonsense (78).

- " It should also be noted that every impact listed under all the various sections of recreational pursuits are common to bushwalking also." (497)
- Support access for responsible use for 4WD activity and also for responsible trail riders (664).
- Potential impacts of 4WD activities on areas of cultural significance for example alleged "opening of the graves in Bendethera 2002 by a 4x4 club" (636)
- Acknowledges the impacts of some vehicle activities on walkers (660).
- Refutes potential environmental impacts " When the trails become 4wd, the litter stops. Vandalism is not found along 4WD trails unless "4wd only signs" have been smashed by extremists. There have been no instances of 4WD clubs setting or inadvertently causing bush fires. Weed invasion first requires driving in infested areas. Restricting entry from infestations is a park management responsibility, and occurs on boots more often than tyres. The Association has been a fierce critic of NPWS feral management efforts and supports their removal not increase. Progress through the bush by 4wd groups can be frighteningly silent if bystanders are not listening out for us. The idea of noise issues is a popular myth promulgated by anti-vehicle groups who do not wish to share the parks with other park users." (647)
- Suggests that the plan should consider social impacts and inappropriate behaviour which may be associated with 4WD and trail bike activity: "There remains a small number of aggressive; hostile 4W drivers and motor bike riders who deeply resent being locked out of Park areas... They often indulge themselves in "scaring the greenies" when they come across bushwalkers; particularly women". (671). Suggests that for this reason, amongst others, the plan restricts 4WD access and activity.
- The environmental impact of a 4WD in a Park is less than the impact of a person living in a city. Responsible users should be permitted access to a Park. (577)

Regional Manager's comment

Diversity of comments/responses noted. The paper identified that the impacts were potential only and are often associated with illegal activity. That all recreation activities have potential impacts is acknowledged in the paper and will also be reflected in the plan. While consideration can be given to social impacts of recreation partly through the separation of conflicting uses and design of facilities, it is not possible to associate a certain type of behaviour exclusive to a particular recreation activity.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Funding

Planner's summary

- This section appears to be included purely to justify future trail closures. There is not one trail that could meet all criteria. How can a fine trail be cost effective? (439)
- The draft plan needs to consider road maintenance expenses, with the current proposal and road maintenance costs could be a primary management cost for the FSC Escarpment Parks and is likely to exceed budget allocations (511)
- Funding should not be used as a justification for road closure

Regional Manager's comment

Roads and trails need to be maintained for essential management purposes. Public use is incidental to this. Within the proposed solution, the number of roads available for public access is a decrease rather than increase and therefore it is anticipated that maintenance would not exceed current budget allocations. It is possible however to include provisions in the draft plan to enable the NPWS to close trails/roads to public access if maintenance costs prove to be unsustainable. (The access paper also proposes temporary road closures)

Regional Manager's recommendation

- Include provisions in the draft plan to enable the NPWS to close trails/roads to public access if additional maintenance costs prove unsustainable or environmental impacts are considered unacceptable. Develop specific criteria in the plan for determining such closures.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation with the following amendment:

"Include provisions in the draft plan to enable the NPWS to close trails/roads to public access, WITH CONSULTATION, if maintenance costs are unsustainable or environmental impacts considered unacceptable. Develop specific criteria in the plan for such closures.

ROAD NETWORK, Issues identified through consultation

Planner's summary

- Controlled access should not be considered as it is inconsistent with NPWS policy (78,343).

Regional Manager's comment

Controlled Access is not proposed.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions

Planner's summary

- Permit system waste of time without good gates and policing (78).
- Object to permit and/or controlled access system (78, 477)
- Suggests the development of a management strategy with access to all areas via established tracks, with a permit system for access to wilderness (544).
- Support the notion of a permit system for vehicles and/or in association with user pay fees (371, 660)
- Suggest development of guidelines and education programs (371) and/or to enable restricted access to management trails (669)
- Object to tag along tours in wilderness (78)
- Consider all possible solutions covered well (229) and/or no objections to access options presented (615)
- If 4WD and trail bike access to park permitted, should only be with licensed tour operators paying appropriate fee (346)
- Suggest a speed limit of 20km on all tracks within camping areas (371)
- Suggest cleaning bays for vehicles entering sensitive areas (522)
- Suggest the separation of conflicting uses through a roster system (660, 662)
- Suggest more consideration to commercial operators (666)

Regional Manager's comment

The access paper discussed the advantages/disadvantages of a permit system and recommended that a permit system was not warranted for the escarpment parks. Access in wilderness areas remains a non-negotiable so a permit system within these areas is not possible.

Guidelines and information about appropriate driving in camping areas can be established, instead of speed limit warnings due to the difficulty of policing and resourcing these. The NPWS does not have the resources to implement and or police a roster system for use of the park.

Contractors within the Park are required as part of their contract to ensure that vehicles are clean to reduce potential spread of pest species. While this can be included in codes of conduct for recreational vehicles in the park a cleaning bay is not considered warranted or practicable.

All commercial operators will be considered in the drafting of the plan in a separate section.

Regional Manager's recommendation

- Suggest the inclusion of vehicle preparation/cleaning in relevant codes of conduct.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Road Network (see maps)

Planner's summary

- Objection to use of part of Merricumbene FT and Mongamula FT within private property and/or its inclusion in identified proposed circular driving routes (and identification on maps) (25, 483).
- Support road network as proposed and extent of both 4WD and 2WD trails and/or proposed circular and east/west

driving routes. Although not clear from the maps which trails will be closed, opposed to the closure of any trails especially to trail bike riding (363, 367, 439, 658, 662, 665, 664, 675, 497, 589, 371, 515, 539, 669, 678, 358).

- Support road network as proposed with the exception of Milo Road which "south of the junction with Saddle Back Road should be gated to prevent private vehicle access to the delicate Milo Forest Preserve" (346).
- Objection to limiting access through use of gates (253, 477).
- "That National Parks gives consideration to reasonable 2WD access to the beginning and end of short and long walking tracks, where possible" (415).
- Support management trails within wilderness areas (and closure of these to public access). (391).
- No extensive public vehicular access system west of Moruya. (343)
- Support gated/locked access to management trails (78)
- Object to access east/west and north/south on the basis of potential environmental impacts (increase fragmentation, wildlife kills). Through access (from tablelands to coast) not a legitimate use of a National Park, especially given that there are suitable highways for this purpose. Through routes also diverts funding from conservation activities (672, 671, 667, 511, 522).
- Opposition to roads that traverse parks and policy that enables this, with a preferred policy position of short, 2WD and peripheral roads/trails.
- "Does consideration for access for vehicles take precedence over conservation values? Areas outside of wilderness should not be sacrificed to vehicle use" (511).
- Suggestion that circuits be made one way to increase user safety and reduce visitor impacts
- Proposal that Bumberry Creek Fire Trail be closed to motorised traffic with a locked barrier at the Wadbilliga Road. "Currently utilised to gain access to a viewing area to Falls which is not considered necessary given established, good quality access" (571).
- "Road access should not extend onto karst areas existing fire trails in karst catchments (eg in the headwaters of Moodong Creek) should be stabilised to prevent siltation entering cave streams" (615)
- " Action needed: closure of roads to all traffic including foot traffic in the catchment of the Burra creek, south west of the Deua River, west of Donald's creek until a complete assessment of the fish species can be ascertain, the fish may be a relative of the grayling. No one known if the fish is found in the Tuross or Wadbilliga River, the latest Fisheries research at Xmas did not look properly at the rivers. A catchment management plan and species management plan is along with continued research of the species. Closure of roads to all traffic including foot traffic in the catchments where a road comes to within 100 metre of a creek or river, these river cover the whole catchments from the north to the south, this should happen until fully research and a proper management plan is put in place. Closure of all traffic from the west along Dampier Mountain, closure to all traffic along Merricumbene road or alternative closure of all 4X4 to tourist traffic on a regional basis of one year on and one years off, the more control of fire trucks and the pushing of new tracks because of fires." (636)

Regional Manager's comment

Trails/Roads that traverse private property will be excluded from the map to clearly identify that these roads are not Park roads and that access to public vehicles may not be possible.

In the access paper, roads/trails that were excluded from the recreational access network were those that either did not lead to a destination, are dead-end, enter or exit through private property or are not required for park management purposes.

The map will now show all roads/trails where public access is permitted (2WD, 4WD) and also management trails (where public access is not permitted). Any trail that is not shown on the map will be rehabilitated. Most of these trails are former forestry trails and currently do not have vehicular access.

The proposal that reasonable 2WD access be available to short and long distance walking tracks is supported, with 2WD access being provided in Monga National Park and to Berlang (Deua National Park) for this purpose.

Defined management trails (that are for management use only and/or traverse wilderness) will be gated where possible to restrict access in accordance with NPWS policy. It is agreed that Bumberry Creek Fire Trail, which is partly within wilderness boundaries, should be gated.

It is agreed that all trails, especially those in the catchments of Karst areas, should be and presently are managed to minimise sedimentation and in accordance with soil conservation guidelines. The trail referred to in the headwaters of the Moodong Creek is within private property.

The section of Milo Road south of Saddle Back Road is part of a key recreational access network through Monga National Park.

The position against roads/trails that traverse Parks is noted. Provision can be made in the plan to close certain roads/trails should traffic reach a level where environmental impacts (through for example road kills) and maintenance costs are considered unacceptable and/or unsustainable. (Note also that the access paper suggests temporary closures in certain circumstances). The position of the NPWS is that current levels of recreational traffic do not impose unsustainable costs additional to those required for management (noting that all roads/trails in the recreational access network are required for management purposes).

With current levels of recreational traffic, one-way routes are not considered necessary. If traffic did increase to a level to pose unacceptable risk, then one-way routes or closure may be considered.

Comments in relation to fish species will be referred to NSW Fisheries for action.

Regional Manager's recommendation

- Prepare map to clearly identify private property. Do not show roads on private property to emphasise that access is not assured.
- Prepare map that shows all roads and trails including management trails where public access is not permitted.
- Gate and restrict access on defined management trails including Bumberry Creek Fire Trail.
- Include provisions in the draft plan relating to soil conservation management of roads and trails.
- Include provisions in the draft plan to enable the NPWS to close trails/roads to public access if maintenance costs are unsustainable or environmental impacts considered unacceptable. Develop specific criteria in the plan for such closures.
- Include provisions in the draft plan to enable the NPWS to consider one-way routes or road/trail closures if volumes of traffic pose an unacceptable level of risk and/or environmental impacts are unacceptable.
- Refer and liaise with NSW Fisheries for comments in relation to fish species.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation with the following amendment:

"Include provisions in the draft plan to enable the NPWS to close trails/roads to public access, WITH CONSULTATION, if maintenance costs are unsustainable or environmental impacts considered unacceptable. Develop specific criteria in the plan for such closures.

ROAD NETWORK, Possible Guidelines and Actions, Types of Vehicles Permitted

Planner's summary

- "On a positive note; the plan did at least mention trail bike riding as a appropriate recreational pursuit". (497)
- Trail bike use is inappropriate in a National Park and should be discouraged: "The inappropriateness of trail bikes in National Parks is much the same as that of Jet Skis at a beautiful, quiet, pollution-free beachTrail bikers in a NP are as compatible with these values as a rock band is with those of a place of meditation". (514)
- The impacts of trail bike use differ from 4WD's in that they are noisier and can access more places (522).
- Fewer areas should be open to 2WD's as this may increase traffic and "opens the areas to a much larger group of persons who may not have an affinity to do the right thing". (669)

Regional Manager's comment

The plan proposed the all registered vehicles be permitted on the defined public access network. Such vehicles would be subject to the provisions of Noise Control Regulations. It is not possible for the NPWS for a defined public access network to vary from legislation and for example, specify the type of vehicle permitted (trail bike versus 2WD or 4WD). To this extent, while the public access network is a negotiable, the type of registered vehicle permitted on this network is a non-negotiable.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Road Classification

Planner's summary

- Labelling of roads as 4WD inappropriate and they should be labelled as "self retrieval, that is; users should be warned if they get into difficulties they will have to get themselves out". (671) Suggest labelling of 4WD trails similar to walking tracks for similar reasons (539).
- "It is recommended that ALL roads and trails within the region be classified as has been done in the Victorian parks consistent with the Outdoor Recreation Industry Council adventure standards colour coding for the guidance of visitors". (647)
- Tracks labelled as 4WD are not really, only one section and the track is not challenging.(385)
- Support road classifications as proposed with the following suggestions " Perhaps it (Milo Rd) should be maintained as 2WD as far as the junction with Saddle Back Road. Then Saddle Back Road and Granite Bluff Road could be similarly maintained providing an additional loop to enable visitors to see a different area of the Park" (346)
- Roads need to be kept in a reasonable state to enable access (229).
- Object to any upgrade of roads to allow 2WD, 4WD or trail bikes into Parks (253).
- Management trails outside of wilderness areas should not necessarily be maintained above basic 4WD/trail bike

standard (367).

Regional Manager's comment

In accordance with NPWS policy, roads will be maintained/upgraded to a standard either adequate for management use and/or suitable for public access to a recreational destination. Any other recreational vehicular use of the roads/trails is secondary to these purposes. This means that roads will not be classified and/or maintained to enable a specific type or grade of recreational vehicular access. Under NPWS policy, special provision can be made for walking tracks but not for 4WD or trailbike access. For this reason, it would be inappropriate to grade trails in relation to 4WD difficulty.

The proposals for road classification relating to Saddle Back Road and Milo Road are supported in the access plan.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Temporary Closures

Planner's summary

- Object to temporary road closures which are 'Claytons' closures (399).
- Support temporary road closures (367, 522, 371), subject to being re-opened when dry (367).

Regional Manager's comment

Implicit in a temporary road closure is that they be reopened when the reason for closure is no longer relevant/valid.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Speed Limit

Planner's summary

- Support proposed 60kph limit on all trails (367, 539).
- Speed limits won't be able to be controlled hence 4WD trails should be maintained (562)
- "Speed limit of 60 km/hr is much too fast for 4wd trails, where 40 km/hr may often be too fast. The traversing speed on 4wd trails must vary with conditions along the trail and during weather events. The proposal to introduce a speed limit on any 4WD trail is at best unwise and at worst may be dangerously misleading." (647)

Regional Manager's comment

Agree with comments objecting to proposed speed limit. Due to variable road standards and weather conditions, a generic speed limit could be potentially misleading and the imposition of variable speed limits not feasible in terms of resourcing and policing.

Regional Manager's recommendation

- Do not specify speed limits within the draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Regional Opportunities

Planner's summary

- Information and Interpretation should be provided within and outside of Parks on places of interest and driving opportunities (371)
- Support proposed provision of information on recreational opportunities outside of Parks (522).

- Providing this information will be argued as establishment of prior use agreements when surrounding land tenure becomes National Park (647)

Regional Manager's comment

Providing information on current use/regional recreational opportunities does not establish or imply use rights for future uses should there be a change in land tenure or protected management status. For example, if a regional map shows 4WD trails in a State Forest, this does not guarantee that these trails will remain if the State Forest became a National Park.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

ROAD NETWORK, Possible Guidelines and Actions, Collaboration

Planner's summary

- "Codes of conduct work only on an informed and conscientious minority and are a waste of time" (78)
- Support collaboration/cooperative processes "I feel that access to the current network of 4WD trails and management trails should be maintained on a co-operative basis. This may include permit systems, and such recreational vehicle clubs working with NPWS to assist in management and/or rehabilitation of particularly sensitive or damaged areas of the Park". (358)
- Support adoption of codes of conduct and/or use of volunteer groups and recognised clubs to assist with Park management, monitoring, policing and maintenance and keen to work with the NPWS in this way (371, 439, 477, 515, 539, 647, 662, 669 , 675)
- Concessions for volunteers is code for 4WD vehicle access to declared wilderness areas (511).

Regional Manager's comment

Considerable support for working collaboratively with interest groups and for codes of conduct. Opportunities for such to be identified in draft plan. No concessions for volunteers were proposed in the Access Paper.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Regional Context

Planner's summary

- Encourage horse riders to use private property or state forests (253).
- There is no evidence in the paper to support the claim that horseriding is a popular activity in these Parks (511).
- This is about National Parks, so why bring land outside of the Parks into consideration (677).

Regional Manager's comment

Consistent with best practice, the Far South Coast Region is undertaking recreation planning and management within a regional context across all land tenures. The framework for this is defined in the Far South Coast Region Nature Tourism and Recreation Plan (2004). This is to ensure as far as practicable that recreation opportunities within each land tenure is complementary, appropriate to the protection status of the land, and to avoid duplication and/or disjointed use. The paper therefore considered regional opportunities for recreational horseriding, cycling and for driving/riding.

The NPWS does have information through liaison with horseriders and riding groups on activities and popular routes (for example bridle trails) through the Parks.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

HORSERIDING, Current Situation

Planner's summary

- Have ridden on bridle trails identified for over 10 years and not seen evidence of erosion (229).
- Horse riding are popular, thriving activity that contributes economically to the region (444, 679).
- Supports heritage assessment undertaken by NPWS of Shoebridge Track (444, 477) and suggest that other tracks require assessment (477).
- The assessment of bridle tracks and horseriding as having cultural significance is "a wedge for an elitist and damaging use while walking remains the only truly traditional form of transport in these areas as it has been for millennia". (522)
- For over 160 years my family has ridden horses in the Park, this is part of our cultural heritage and an opportunity and experience that I would like for my children and future generations to have (651)
- Argument against the notion that horse riding can have cultural heritage value: "I must confess to some amusement at the notion that horseback riding somehow involves a cultural right to access areas which otherwise would be denied. In fact my mother; who had to ride or drive the sulky to school in Bemboka; would hoot with laughter. Is there a proposal for sulky routes to be established?" (671)
- The description of what tracks are available and no longer accessible due to wilderness is not a true reflection of what has been lost, while parts of tracks may be accessible, it no longer practical to access them or ride them (due to closure). (444, 679, 680, 677, 687, 688, 689, 690)
- No reflection of use of horses in area for hundreds of years (eg pioneers who cut tracks) (681).
- Not clear from the maps if the track from the junction of Yowrie and Wadbilliga River to Wadbilliga Station (pp) is still open to horse riders - needs clarifying (677).
- Horse Riding is an excellent family activity, opportunity for education about cultural heritage and responsible use of National Parks (477).

Regional Manager's comment

The cultural heritage value of the recreational activity of horseriding itself is contentious with views being expressed both for and against. Under NPWS policies and management frameworks, the cultural heritage significance of tracks and any structures associated with horseriding (for example on bridle tracks) can be assessed and appropriate management responses developed (for example preserve structure or leave in situ). This differs from the actual use/activity with an entitlement to continue a recreation activity not being conferred due to any cultural heritage significance that structures or tracks may have. This also applies to all other recreational activities.

Cultural heritage values and assessment will be undertaken within the context of cultural heritage policy and also the Far South Coast Cultural Heritage Management Strategy 2001 - 2006 (NSW NPWS). The Strategy recommends historic sites that require active management and identifies operational strategies/priorities for these sites. The Plan for the Far South Coast Escarpment Parks will identify priorities for cultural heritage management in accordance with this strategy.

The access paper proposes that the NPWS work collaboratively with horse riding groups and stakeholders and this may include track maintenance for some bridle tracks.

The track from the junction of Yowrie and Wadbilliga River to Wadbilliga Station (pp) within Park will remain accessible for horseriding.

Regional Manager's recommendation

- Identify in the draft plan priorities for assessments of cultural heritage values in accordance with the Far South Coast Cultural Heritage Management Strategy 2001-2006.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation with the following addition: "Acknowledge in the plan the cultural heritage connections that many people in the community have with the Escarpment Parks".

HORSERIDING, Non-Negotiables

Planner's summary

- NPA policy differs from NPWS policy in that NPA considers that there should be no horse riding in National Parks: "The NPA therefore urges NPWS to adopt a policy of no horseriding in national parks, and to pursue liaison and negotiation with other authorities, private landowners and horseriding groups to provide adequately for horseriders off-

park" (343). Management of these activities diverts funds from legitimate park activities. Consideration should also be given to social impact of horses on other park users (343).

- Horse riding is not appropriate in a National Park (522, 667, 253)
- Support the review of wilderness areas and policy to enable the creation of corridors through wilderness areas for continued use and access to bridle tracks on horses (444, 544, 679, 680, 681, 686, 687, 688, 689, 690). Supporting argument for this being that horseriding is an important part of cultural heritage (444, 544, 674)
- Question the interpretation in wilderness policy of 'self reliant recreation and solitude' and consider that horse riding is consistent with this (544)
- Horse riders should have similar access rights as cyclists as defined under wilderness and cycling policy (687, 688, 689, 690, 679)
- Support Wilderness Policy and the exclusion of horses from wilderness areas (672, 686)
- Support access to all bridle trails (674, 677, 678, 679)
- Request possible opening of tracks once a year for horses (678)
- Wilderness policy can be changed it is not law (686)
- Welcome the review of NPWS horse riding policy (444).
- Question the application of NPWS horseriding policy: "The claim that DEC will restrict access to horseriders in environmentally sensitive areas is not accepted as credible.... The Department has no credibility on effective regulation of horseriding in national parks and the reversal of proof environmental impacts will make the regulatory situation worse". (511)
- Consider the proposed solution harsh especially the continued exclusion of horse riders from wilderness areas (687, 688, 689, 690)
- Concerned that because of wilderness areas and potential expansion of, will no longer be able to enjoy horse riding (691)
- " A management strategy with access to all areas via established tracks; with wilderness accessible via permits only is the best option; to satisfy the majority of park users". (544)
- Nimmitable Mtn Track and Pakinsons Trigella Greens Hole Track should be accessible to horse riders (571)
- Horse riding is unacceptable where all endemic species occur (636)
- Horse access to and on Nimmitabel Mountain track, Wadbilliga Trig Site and Tuross Falls (651).

Regional Manager's comment

Prohibition of horses from National Parks is contrary to adopted NPWS policy. The plan proposes that horseriding be permitted on defined tracks only therefore limiting potential impacts on endemic or threatened species.

A change to wilderness boundaries and/or wilderness policy to permit horseriding and wilderness is a non-negotiable and cannot be effected through this draft plan. NPWS wilderness policy does not make provision for occasional access to wilderness via horses.

Regional Manager's recommendation

- Continue to emphasise in communication that wilderness policy and legislation is 'non-negotiable' and cannot be changed through the draft plan of management.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Negotiables

Planner's summary

- If the places that are outside of wilderness and 'left' listed as negotiable - are these likely to be closed to horse riding as well (677, 681, 687, 688, 689, 690)

Regional Manager's comment

The access paper proposes continued access for horseriding in certain areas outside of wilderness.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Potential Environmental Impacts

Planner's summary

- Disagree that horse riding causes pollution or erosion (687, 688, 689, 690, 677, 686)
- Horses and protection of bio-diversity are mutually incompatible with horses causing erosion, weed dispersal (78).
- Horse riders generally appreciate natural and cultural heritage and intrinsic values desiring only to use existing tracks and not to bush bash in sensitive areas (444).
- There is more than enough evidence to establish the general case that horses damage natural heritage values including wilderness values (see High Impact Recreation CD enclosed) (511)
- "Weeds; vegetation damage; fouling; compaction and erosion make it a particularly unacceptable activity from an environmental and user point of view" (522)
- Refutes potential environmental impact of horses spreading weeds (544, 677, 679, 680, 686) and suggest that pest species and birds cause greater impacts (544, 677, 686)
- As areas available to horse ride are decreased, impacts such as soil compaction and erosion are concentrated. The Escarpment Parks are also hard shale country as opposed to sandstone (544, 686)
- Is there any evidence of impacts on existing tracks and offer to visit tracks with NPWS to view impacts (if any) (677)
- Impacts such as soil compaction outweighed by enjoyment (680)
- The paper does not address how other uses may conflict with horse riders (681)

Regional Manager's comment

Diversity of comments/responses noted. The paper identified that the impacts were potential only and in certain circumstances and that current impacts on tracks outside of wilderness were considered acceptable (through ranger observation). That all recreation activities have potential impacts is acknowledged in the paper and will also be reflected in the plan. Consideration has been given to the separation of conflicting uses in the access paper.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Key Issues identified through Consultation

Planner's summary

- Questions how anyone could have authority to say that horseriding is inappropriate in wilderness or a National Park. (681)

Regional Manager's comment

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Possible Guidelines and Actions

Planner's summary

- Suggest that a book be produced showing where all horse riding tracks are (678)
- Facilities should be provided for cleaning of horses hooves etc to stop spread of weeds (371)

Regional Manager's comment

Information on the location of some horse riding tracks can be included in interpretative material. The requirement for cleaning of horses hooves should be included in relevant codes of conduct.

Regional Manager's recommendation

- Consider inclusion of information on the location of some horse riding tracks in interpretative material.
- Include the requirement for cleaning of horses hooves in relevant codes of conduct.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation with the exception of the inclusion of information on the location of some horse riding tracks in interpretative material. Recommend that horseriding as an activity not be promoted/encouraged within the Park and that information on tracks be excluded from interpretive material.

HORSERIDING, Possible Guidelines and Actions, Horse Riding Network

Planner's summary

- Horseriding through Alpine to Canoolie to Bendethera bridle track, involving access through private property may be possible subject to limits on the numbers of riders, occasions per annum, adequate notification should be made; environmental pollution and damage should be minimised; environmental education and responsibilities should be maximised; no vehicles should accompany the horses through Alpine. (25)
- Possible solution promotes use of private property which is unacceptable (477, 444) in practical terms reduces areas available for horse riders and is unfair to private property owners (483)
- Horse riding is not suitable in Monga National Park given climatic conditions which mean that the area is very sensitive to erosion in many places, there are many environmentally sensitive areas and weed invasion is a threat to some of the unique values of the park. (346)
- "The karst areas in the southern escarpment parks are unlikely to be proposed for protection from horseriding in the draft plan of management by the Department, given this Department's supine behaviour on access regulation. These high conservation areas will then be degraded by weed invasion through horseriding use". (511)
- Horse riding should not be permitted across Karst areas (615)
- Object to the proposal to continue to allow horseriding on the Corn Trail between Murrengburg Mountain and the Buckenbowra River as it is too narrow and steep, with the deep ruts in the track being caused by horseriding (511).
- Only those bridle trails leading around or away from declared wilderness areas should be allowed with those trails partly in wilderness closed (522).
- "Horse riding should be limited to areas which are already subject to considerable degradation". (671)
- Supports access to recreational road network but concerned about the use of bridle trails and potential environmental impacts (672)
- Support as many tracks as possible remaining accessible (673, 674)
- Support horse riding network as proposed (678)

Regional Manager's comment

That horseriding access is not assured through private property will be emphasised in the draft plan with recommendations that horseriders liaise with private property owners. Horse riders will be required to remain on bridle tracks within all areas including Monga National Park and Karst areas. The volume of horse riding and associated impacts is currently considered acceptable in these areas. Provision can be made in the draft plan to exclude horse riding from an area if impacts exceed acceptable levels.

Regional Manager's recommendation

- Include provision in the draft plan to review where horseriding is permitted or the conditions under which horseriding can be undertaken within the Escarpment Parks should there be unacceptable environmental impact.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Possible Guidelines and Actions, Camping

Planner's summary

- Object to horse camping (253, 511, 522) based on environmental impacts (511, 522)
- Suggest that if there are horse camping areas, a booking system be implemented to monitor/manage impacts (346)
- Support the proposal to permit horse camping (444, 544, 677)
- Suggest that horse camps be remote from water courses (671)

Regional Manager's comment

Horse camping must be undertaken in accordance with NPWS policy which includes minimum distance provisions from watercourses. Provision can be made in the draft plan to introduce a booking system for horse camping should this be necessary due to either volume of use or environmental impact.

Regional Manager's recommendation

- Make provision in the draft plan to introduce a booking/permit system for horse camps should this be considered necessary due to either volume of use or environmental impact.

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

HORSERIDING, Possible Guidelines and Actions, Loading and Unloading

Planner's summary

- Object to loading and unloading facilities (253, 343, 511) as they add unwanted structures to the parks, concentrating impacts (343, 511)
- Support the proposed loading and unloading facilities (444, 477, 544, 677)
- Facilities must be remote from water courses (671)
- Access into Sutherlands Camp and Little Sugar Loaf Road unsuitable for trucks therefore seems little point in providing loading and unloading facilities (679)

Regional Manager's comment

An unloading/loading facility involves a cleared level area with an earth mound. There are no built structures. Support that these facilities should be a minimum distance from watercourses. Access into Little Sugar Loaf Road is suitable for some vehicles. Agree that access into Sutherlands Camp is unsuitable for most vehicles.

Regional Manager's recommendation

- Provide a horse loading/unloading facility at Little Sugar Loaf Road only.

Regional Advisory Committee recommendation

- Concern expressed about making special provision for unloading and loading of horses through provision of horseriding ramps and the suitability of this within a National Park. Recommend that no provision be made for horse loading and unloading facilities within the Escarpment Parks.

HORSERIDING, Possible Guidelines and Actions, Walk Horses Policy

Planner's summary

- We need more information on what this policy means, does it mean riding the horse at a walking pace or getting off the horse (477, 544, 681)
- Proposed policy naive and unenforceable (522)

Regional Manager's comment

The intent of this policy was to require horse riders to dismount from their horse and lead the horse should there be other traffic such as walkers and cyclists. It is agreed that this policy would be difficult to enforce. Current levels of pedestrian, horse and cycling traffic mean that potential levels of conflict do not warrant application or policing of this policy. It is recommended that this policy be considered in any codes of conduct.

Regional Manager's recommendation

- Do not support or include the proposed guideline (for riders to dismount and walk their horse in areas of high pedestrian activity) in the draft plan. Consider Inclusion of this guideline in any codes of conduct for horseriding within the Escarpment Parks.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

HORSERIDING, Possible Guidelines and Actions, Collaboration

Planner's summary

- "Codes of conduct work only on an informed and conscientious minority and are a waste of time" (78)
- Look forward to opportunity to work collaboratively with NPWS on track monitoring, maintenance, development and promotion of codes of conduct (444, 677)
- Delete "Where possible" (477)

Regional Manager's comment

Considerable support for working collaboratively with interest groups and for codes of conduct. Opportunities for such to be identified in draft plan.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

CYCLING, Current Situation

Planner's summary

- "A rare species on the trails" (664)
- "The Escarpment Parks encompass a variety of terrain that is of great value to off-road cyclists. Currently the utilisation of off-road cycling opportunities within the Escarpment Parks is relatively low. However, the popularity of off-road cycling has grown significantly in recent years, particularly in the vicinity of the ACT and the South Coast. This trend is predicted to continue, resulting in greater utilisation of the Escarpment Parks by off-road cyclists in the future" (692).

Regional Manager's comment

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

CYCLING, Non-Negotiables

Planner's summary

- Support NPWS cycling policy (346)
- oppose cycling in wilderness, including on management roads (343, 346): " The rationale is that cycling, while not motorised, constitutes mechanical assistance and therefore cannot be described as self-reliant. Any argument that tents and sleeping bags, clothing, shoes or boots, prepared food etc are also in this category is invalid, as these are necessities (no hunting is allowed in national parks), whereas a bicycle is not and is contrary to the generally accepted spirit of wilderness recreation". (343)
- "Cycling should be subject to the same restrictions with regard to the use of management trails in wilderness areas as in any other part of the State" (522).

Regional Manager's comment

The NPWS wilderness policy permits mechanical personal transport provided that it is manually powered, for example cycling.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation however consider that the NPWS Wilderness Policy needs review in terms of its definition of self-reliant recreation and consider that extreme mountain bike riding is not a suitable activity in a wilderness area.

CYCLING, Potential Environmental Impacts

Planner's summary

- Strongly opposed to the erroneous likening of the potential impacts of cycling with those associated with horse-riding and driving. The environmental impacts listed in this statement are also potentially associated with bush-walking. The magnitude of the impact of cycling is similar to that of bush-walking , and substantially less than that of either horse-riding or driving. (692)

Regional Manager's comment

The similarity referred to in the paper was that all activities have impacts, it did not refer to the type or extent of those impacts or draw comparisons between such.

Regional Manager's recommendation

- No change to access paper or draft plan

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

CYCLING, Possible Guidelines and Actions

Planner's summary

- Support proposals (229, 615, 477)

Regional Manager's comment

Regional Manager's recommendation

- No change to access paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

CYCLING, Possible Guidelines and Actions, Cycling Network

Planner's summary

- Cycling on all existing tracks except private property should be permitted (25)
- Cycling should be restricted to existing roads (253)
- "Fire Trail access outside Wilderness areas and perhaps on the perimeter of the Park would be more appropriate for cyclists who wanted to leave the established 2WD road network. If a decision is taken to permit cycling on management trails in wilderness a limit to party size and a booking /permit system must be introduced to reduce the hazard to walkers and maintain wilderness values". (346)
- Cycling access to all areas of National Parks should be permitted (367, 385)
- Support mountain bikes having access to management trails (391)
- Cycling use needs to be monitored to prevent environmental impacts and ensure that cyclists remain on roads/trails (522)
- Cycling should not be permitted across karst areas (615)
- Accommodate cycling on roads and tracks outside of wilderness areas (667) and/or object to cycling in wilderness areas (667, 671, 343, 346, 511, 672)
- Support cycling network as proposed (668, 692)
- Proposed that cyclists be permitted on bridle trails, provided they adhere to a code of conduct (692)
- " CORC recommends the construction of narrow multi-use trails departing from carparks, travelling out to (and through) interesting parts/features of the Parks, and returning via a different route. These small loops should be linked with each other, as well as to more distant/remote features in the park, to form an Icon Trail. This would cater for all levels of off-road cycling, and would also provide a resource for other visitors to the Parks, such as hikers." (692)

Regional Manager's comment

With the exception of the Corn Trail, cycling has been limited in the proposed solution to existing roads and management trails. The key decision for which a range of views have been submitted related to whether cycling is permitted on management trails within wilderness. Under NPWS wilderness policy, cycling in wilderness is only permitted on specified management (vehicle) trails and where such use will not degrade wilderness values or threaten the ability of the NPWS to meet its obligations under the Wilderness Act 1987.-

The rugged terrain of the Escarpment Parks, distances to travel and lack of circuit routes are likely contributing factors to cycling not currently being a high volume activity in the Escarpment Parks and without a change to these factors, a substantial increase in recreational cycling traffic is not anticipated. Within this context, the NPWS considers that cycling on management trails within wilderness areas is consistent with NPWS policy objectives. It is possible to include in the draft plan a recommendation that cycling activity (and where it is permitted) be reviewed in 5 years (with an anticipated life of plan of 10 years).

Regional Manager's recommendation

- Include provision and criteria for monitoring of cycling activity in wilderness areas in the draft plan and that if this activity is shown to exceed this criteria then review provisions for cycling in wilderness.

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

CYCLING, Possible Guidelines and Actions, Promotion

Planner's summary

- Agree with proposals for education, promotion and to work collaboratively (692)

Regional Manager's comment

Regional Manager's recommendation

- No change to access paper or recommendation for draft plan

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

CYCLING, Possible Guidelines and Actions, Cycling on Walking Tracks

Planner's summary

- Object to the use of the Corn River Trail for mountain bikes as they are hazardous and also that there are relatively few single width walking tracks.
- Object to proposed cycling on Corn Trail due to reasons such as potential hazard to walkers, safety concerns for riders, environmental impacts. Consider trail unsuitable for cyclists (391, 544, 678, 686, 668, 511)
- Support creation of 'single track' for cyclists and support proposed use of Corn Trail (692)

Regional Manager's comment

From observation by NPWS staff, the Corn Trail is more commonly used by bushwalkers and horseriders rather than cyclists. The potential conflicts cited have therefore not been observed/reported with current levels of use.

The Corn Trail is the only single width trail, accessible to a major road within the Escarpment Parks that can currently be utilised for cycling, which formed part of the rationale (in the proposed solution) for permitting cyclists. The reasons cited in submissions for objecting to the use of the Corn Trail for cyclists relate mainly to hazards and conflict which would more likely arise from a significant increase in cycling use from current levels.

An option is to include provision in the plan to monitor use levels and if there are unacceptable safety hazards, environmental impacts or conflicts with other recreationists, to prohibit cycling.

Regional Manager's recommendation

- Permit cycling on the Corn Trail and the proposed Mongarlowe/Corn Trail link track within the draft plan subject to provision and criteria for monitoring and review of this use within 5 years of the adopted plan.
- Do not promote the Corn Trail as a cycling trail in park interpretative material.

Regional Advisory Committee recommendation

Do not support Regional Manager's recommendation and recommend that cycling not be permitted on the Corn Trail or the proposed Mongarlowe/Corn Trail link on the basis of the popularity of this trail for walking and horseriding and potential conflicts between uses resulting in safety issues. Cycling not an established use on this trail and consider that precautionary principle should be applied before the use becomes established and problems encountered.

CYCLING, Possible Guidelines and Actions, Walk cycle policy

Planner's summary

- Proposal unenforceable (522)
- Vehicles should accommodate cyclists eg slow down (668)
- Our only concern is that mountain bike riders are made fully aware that the road network proposed in the maps attached to this paper will be used by 2WD; 4WD trail bike vehicles (515)

Regional Manager's comment

It is agreed that this policy would be difficult to enforce. Current levels of cycling and vehicle traffic mean that potential levels of conflict do not warrant application, resourcing or policing of this policy. It is recommended that this policy be considered as a guideline in any codes of conduct and interpretation signage.

Regional Manager's recommendation

- Do not support or include the proposed guideline (for cyclists to walk their cycle) in the draft plan. Consider the inclusion of this as a guideline in any codes of conduct and/or interpretative signage, also alerting vehicles and cyclists to potential for other recreationists (horseriders, vehicles, cyclists).

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

CYCLING, Possible Guidelines and Actions, Collaboration

Planner's summary

- Support proposed codes of conduct (672, 692, 371) and/or promotion of existing codes of conduct (692)
- "Codes of conduct work only on an informed and conscientious minority and are a waste of time" (78)
- Support working together collaboratively (544, 692)

Regional Manager's comment

Considerable support for working collaboratively with interest groups and for codes of conduct. Opportunities for such to be identified in draft plan.

Regional Manager's recommendation

- No change to Access Paper or recommendation for draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

OTHER

Planner's summary

- Commercial trail bike tour groups have previously shown responsible riding behaviour and should be able to access more trails than private groups or individuals as they cause less environmental impact (665).
- Enjoyment for all should be allowed (229)
- Socio-economic impact must be addressed (477)
- More consideration to commercial tour groups (666)
- Support overall paper and approach (669)
- Information on Aboriginal culture provided ((636)

Regional Manager's comment

- All commercial activities will be considered in another section of the draft plan.

Regional Manager's recommendation

- No change to access paper or recommendation of draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

OTHER, Education

Planner's summary

- Education a key factor in promoting appropriate park use (346, 662, 669) and also awareness of philosophical difference in managing a Park compared to other areas (669)

Regional Manager's comment

Regional Manager's recommendation

- Include provisions for interpretation and education on National Park management objectives and values in the draft plan.

Regional Advisory Committee recommendation
Support Regional Manager's recommendation

OTHER, Resources/User Pay

Planner's summary

- Object to paying fees (477)
- Support the notion of a permit system for vehicles and/or in association with user pay fees (371, 669)
- Parks with remaining significant 4WD use should have entry fees to cover the damage (522).

Regional Manager's comment

Fees are set and reviewed outside of the Plan of Management process.

Regional Manager's recommendation

- No change to access paper or draft plan.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

OTHER, Quality of Information Base/Maps

Planner's summary

- The maps should have more clearly identified where roads/trails traversed private property or any other land tenure (25, 343, 439, 497)
- The maps should have clearly identified which trails/roads are proposed to be closed (363, 439, 497, 600, 662, 657, 664)
- Maps are of poor quality (477)
- There is no data on vehicular use of trails that will drive the subsequent plan of management (511)

Regional Manager's comment

The map attached to the access paper showed roads/trails that were proposed as part of a recreational road network. Trails/Roads excluded from this map were generally those that either entered or exited through private property, and/or are dead ends.

The Far South Coast Region has recently developed and is implementing a comprehensive visitor data management system, which includes a series of traffic and pedestrian counters in key locations through the Escarpment Parks. Traffic and pedestrian counters are presently being installed. Currently there is less than 12 months of data for most locations. This data in time will provide an excellent resource for management decisions including any review of this plan.

Regional Manager's recommendation

- Prepare map to clearly identify private property and that does not show roads/trails through private property to emphasise that access is not assured.
- Prepare map that shows all roads and trails where public access is permitted and management trails where public access is not permitted,

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

OTHER, Private Property - General

Planner's summary

- Private property owners can make independent agreements with user groups regarding access.(477)
- Object to the access paper indicating/promoting potential recreational use of trails/roads on private property (vehicles, horses and cycling) (25)
- The Access paper should have more clearly identified private property and that public access for recreation is not assured (444, 477, 483)

Regional Manager's comment

The access paper focussed on how recreational opportunities including roads and trails within the Escarpment Parks linked with surrounding land. It is agreed that this was potentially misleading, implying that access through private property was possible. The map could have more clearly identified private property with an emphasis that any recreational use of private property is not assured and is subject to agreement of the private property owner.

Regional Manager's recommendation

- Produce a map which clearly identifies private property. Emphases in the draft plan that any recreational access to private property is not assured and is subject to agreement of the private property owner.

Regional Advisory Committee recommendation

Support Regional Manager's recommendation

OTHER, Fire Management**Planner's summary**

- All fire control should occur in adjacent neighbouring properties at periphery of wilderness (78)
- No mention of improvement to fire trails (85)
- This paper should be linked to fire management plan (477)
- Access to fire trails in wilderness a necessity (562)
- Comment on Aboriginal fire management and fire stick burning (636)
- Plan should increase fire access and quality (659)

Regional Manager's comment**Regional Manager's recommendation**

- Continue to advise people of fire planning processes including the development of fire management plans and of opportunities to contribute to these (which are separate to this draft plan of management).

Regional Advisory Committee recommendation

Support Regional Manager's recommendation