

Appendix: Classification of Escarpment Parks Access Submissions

About this report

63 submissions were made to the Far South Coast Escarpment Parks Access Discussion Paper (May 2004). Submissions were made online, through email or in hard copy. All submissions (and content) were entered into a database, assigned a number and then comments within each submission classified according to the Sections of the Paper. This appendix contains the comments from the submissions (unmodified) classified according to the section of the paper and also showing the submission identification number.

BACKGROUND, Context

Submission# 343

Ambit claims were made at the forums by parties interested in maximising vehicular access for their own gratification. The Service seems to be making a big effort to accommodate them. NPA regards this as inappropriate in the context of national park management, for reasons which will be explained below.

Submission# 363

As a keen trail-rider and a member of the DSMRA I was pleased to note that the discussion paper considered the interests of trail-riders. The DSMRA ACT branch runs rides regularly that traverse through the National Parks on the Far South Coast.

Submission# 391

Thanks for the opportunity to comment on your access management plans for the Far South Coast Escarpment Parks. My special interest is Monga National Park, which I worked to establish for over 30 years, which I know intimately and where I often walk. I am pleased with some developments in Monga, such as the picnic areas and Penance Grove Boardwalk, but I am not entirely happy with your plans for it and management so far. I feel there has been excessive attention to roads and not enough to walking tracks or consideration of the needs of walkers. I am quite unhappy with some of the proposals in the Discussion Paper on Access Management, although I am pleased with others. Down to specifics.

Submission# 444

On behalf of the South Coast Association of Trailhorse Riders (SCATS) I would like to thank the National Parks and Wildlife Service for the opportunity to comment on the Discussion Paper on Access Management May 2004 and ultimately have input into the Far South Coast Escarpment Parks Draft Plan of Management.

Submission# 477

NPWS interpret the information to suit themselves. Other Conservation groups had children to help their cause by listing issues. Access for All is not satisfied with this Members felt the process is outdated. .

Submission# 511

The Colong Foundation for Wilderness strongly opposes all the proposed actions in the ways forward listed on pages 8,9 12, 13 and 14 because of the environmental impacts listed in Appendices 3 to 6 of this submission.

If the Far South Coast Escarpment Parks are allocated to the access lobby it will be all the harder to move them out at a later date. Ecological fragmentation by roads will remain and the political conflict between the Department and the environment movement will also remain.

The sympathetic support by the Department of Environment and Conservation, Southern Branch of the Parks and Wildlife Division, of the access lobby (mainly vehicle-based) is demonstrated by the Access Discussion Paper of May 2004, which will drive management planning in the Far South Coast Escarpment Parks. The Colong Foundation warning that Community consultation on park management needs to actively avoid the trap of discussing just the park use issues..." and "A narrow recreation management debate would favour the access lobby to the detriment of nature conservation" has been actively ignored (see Colong Foundation correspondence to Carla Rogers, NPWS July 21, 2003). The Department's attempt to co-opt support from access lobby and the local farming community will be counterproductive. We foreshadow that the environment movement will not be able to effectively protect the Department and at the same time attack it over its poor park management practices. The Department's actions in southern NSW in disregarding protection of identified wilderness and advancing the cause of the access lobby in these areas will continue to erode the motivation and loyalty of its supporters in the environment movement.

The Colong Foundation for Wilderness is stunned that bushwalking, which is the only traditional form of access to a national park and the one with least environmental impact, was not considered in the Department's access discussion

paper. Bushwalking should have been examined in detail, not omitted with an apology that it will be dealt with along with camping at some later stage.

Local community is a voice that needs to be heard but local rural communities are generally hostile to national parks, believing national parks are a repository for bushfires and feral animals. The Department is mistaken in its believe that it can co-opt the local rural community into national park supporters by giving them the access that they demand. The Colong Foundation is disappointed that the Southern Branch of the Parks and Wildlife Division considers the views of some high impact users who want to drive in circles through these wilderness escarpment parks should be adopted. There are perfectly good, scenic roads in the region for this sort of activity outside protected areas.

Similar arguments will be mounted by other lobby groups, such as hunters, bee keepers, miners and loggers and if local interests gain ascendancy park management, parks could eventually become multiple use zones. The Coalition, who we believe have a policy of delegating more power to park advisory committees, could let such development occur bit by bit over a period of years.

Submission# 522

I am concerned that the wants of a few are being placed on the same level of importance as the environmental needs of these parks. The lack of consideration of increasing opportunities for the low impact recreation of walking is ludicrous. Road closures can act to encourage walking as has been shown at Mt Kosciuszko.

Submission# 544

I do not like the way that the plan tries to divide up the various interest groups; after all they are all users of the national parks.

Submission# 662

This nonsense of lock out is taking a backward step the parks has many good people but the university people with phd'S WITH NO practical skills are not the the only source of info; keep in mind I am also uni trained so could take insult at my own comments

your plans does not have a hierachy of points and how it all fits together your consultant should review the doc because this is not a user friendly doc and does not set out the structure or where it is going too many words and at the end what is the recourse for the users probably 2% if that of voters use the land for recreational use and granted all should be able to access together how do you address this can the users assist; include them do not shut out good luck parks it would be nice to see you consult and have independant facilitators at all regional centres ie cooma;jindabyne;berriedale;dalgety;tumut etc and do in peoples time not work time here's a clue 6:00pm at each rsl or bowls club don't all other agencies do this; conclusion: fire trails are what most users use: keep them open and include all users; set agenda to get feedback on condition and how to improve; its not all in a book be consultive not obnoxious "

being here 3 years from northern australia and being in bush fires I can only say thank god for the locals and rec users who know and care about the land because the managers in sydney and uni grads with less than 5 yrs experience do not have all the experience and knowledge . what is the real agenda; australia is for all aussies to use educate people don't shut them out your plans have many holes in them with wording being inconsistent and poor science to back itup eg in the tropics of qld they seal roads to stop dust on plants?? ask the question why

In general your management team should be seriously reviewed. They have not considered public access nor CONSERVATION in any way shape or form preservation is misconstrued as a tax payer and citizen I believe in Conservation and education of the public to use facilities sensibly and with a view to sustainable development LOCK OUT IS NOT THIS. As a civil engineer who has worked in many countries world wide and seen much misuse of the environment your management team is not working toward sustainable development; more over they are protecting their own jobs or creating new ones.do they accept criticism well it seems not point: consultation should not occur in Quenbeyaen on a wednesday at 10:00am; it should be undertaken in every community at least twice and at night time after wwork hours; unlike politicians and bueracrats most people cannot skip work to go to a rally that has already got their agenda set. consultation is done out of hours; government and the head of the parks please review your agenda and the laws that are set up for consulting public.

Submission# 691

3 the way the public is informed about managing park preposals, i like many others fell it is very low key kept quiet until its too late to really voice how we feel. 4 am i really just pissing into the wind? or will my voice really be heard .

BACKGROUND, Process for consideration of this Paper

Submission# 85

less than one month to respond to these substantial issues is not enough time

Submission# 477

ONE month is not enough time to make proper comments on various issues. Rural Mail Deliveries should be taken into consideration when distributing papers of this nature which have a time limit.

Submission# 544

Not enough time has been allowed for comment.

Submission# 691

i have 4 questions first why is it that you only give the public less than 1 calender month(10th may to 7th june) to voice our opions on this matter, is it that the less time you give means, the less feed back you hope to achieve?(being the least ressitance)

BACKGROUND, Values Identified through Consultation, Cultural Heritage

Submission# 85

Heritage, albeit from recent times, is a thing dear and precious to many and is not quantifiable. I feel the structure of you public forums and their resulting tables and figures etc. is not a true representation of what the majority of people really aspire to. Public lands as are being discussed belong to the Commonwealth, interpreted by most as meaning 'belonging to all the people of this nation.' You seem to slant towards the extreme green element much to the distaste of folk who live and work in this district, people who's forebears have pioneered these lands and own freehold with common boundaries with NPWS. You travel through my freehold yet if wilderness is declared opposite me, access is denied my justifiable pursuits. NPWS is grabbing more land, unable to manage what you've got now and are going to shed great numbers of staff in our region, all currently. In conclusion, don't deny me my heritage, don't deny me legitimate access to public lands and give it to a vocal yet small interest groups in the major cities that wish to return to medieval times. NPWS is not considered a good neighbour by me at this time. You have lost the track when it comes to your corporate/public/community image. Re-evaluate the current tenure of the lands and their history, all their history is worth \$\$ in tourism etc. Do not lock it all up for carbon points o/seas and go backwards, decide now what you will develop/retain or be it on your heads in the future.

Submission# 346

There has been a traditional widespread vehicular and horse-riding access to many areas of the newly declared Monga National Park when the area was under the control of State Forests. When managed by State Forests the prevailing culture was, in general, one of exploitation. The conservation of ecosystems, natural landscapes and ecological integrity was not part of any of the then management philosophies. Now that the area has been declared a National park it must be managed as such. The 'cultural' heritage derived from previous management strategies has little, if any, relevance today. Activities freely permitted and perhaps encouraged by State Forest could well be anathema to the management of a National Park.

Submission# 477

Cultural Heritage and access to these sites should be one of the Key Values. Access for All has already supplied extensive information on this issue in previous submissions. This Discussion Paper makes very little mention of Cultural Heritage

BACKGROUND, Non-Negotiable, NPWA Act

Submission# 511

The Foundation doubts that the regurgitation of this evidence will be 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 (see Appendices and CD for evidence of environmental impacts). This peculiar application of the precautionary principle is contrary to the definition of that principle in the National Parks and Wildlife Act, 1974.

Submission# 514

On reading this requirement and the others contained within subsections 30E (1) and (2); for example 30E(2)(a): "A national park is to be managed in accordance with ... the conservation of biodiversity, the maintenance of ecosystem function, the protection of ... and the maintenance of natural landscapes" etc, those seeking vehicular access are immediately faced with a seemingly impossible task. The impossibility of the task (of driving or riding a machine into a NP and yet meeting the relevant legislative requirements) is highlighted by the obvious conflict of the impact of these mechanised pursuits (particularly those involving trail bikes) on the environment, and with the "intrinsic values"

identified and listed at the top of page 3 of the discussion paper, such as: “beauty, quite, solitude, peace, the sounds of nature, relaxation, ... an opportunity to escape from civilisation and motor vehicles, seeking a sense of remoteness”, etc. Both groups cannot be satisfied at the same time. I submit that it would be wrong to seek a compromise solution, with both having a little of what they seek. That is not what this exercise is about. It 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.

5. I see horseriding, walking and cycling as consistent with the requirements of the legislation.

BACKGROUND, Non-Negotiable, Wilderness

Submission# 343

NPA is concerned to increase the proportion of this chain of parks which is declared wilderness, as this will increase environmental protection and the proportion of roadless area, notably in the Western Deua area. NPA believes vehicular roads should be kept to a minimum in national parks. All remaining identified wilderness should be declared to help bring this about.

Submission# 439

Our position on Wilderness has been expressed many times, we are against all Wilderness in its current form. We see the legislation as being seriously flawed.

Submission# 477

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.

Submission# 511

The discussion paper's suggested way forward will compromise Far South Coast Escarpment Parks that contain unprotected wilderness values. the political backlash from what environment groups believe to be wilderness mismanagement could continue for many years. The environment movement is unlikely to come to terms with the loss of southern wilderness areas it saved from the loggers after 30 years of effort.

It is difficult to resist reaching a conclusion that the management planning section of the Southern Branch of the Parks and Wildlife Division despises wilderness and is working with anti-wilderness groups to compromise the existing management policy for these areas.

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 (e.g. the central Deua Valley).

That DEC chose not to treat identified wilderness as a value for consideration in the access management discussion paper is disappointing. To provide facts regarding 4WD vehicle use seems pointless if DEC, or at least the Southern Branch of its Parks and Wildlife Division, appears deaf to argument. In the Discussion Paper identified and declared wilderness were not differentiated. No recognition of wilderness values outside areas declared under the Wilderness Act, 1987 was stated in the paper. The debate over vehicle and horseriding access was discussed in regard to declared wilderness, not in regard to access into identified wilderness that remains not declared. This omission is evidence of bias against wilderness management; for access of vehicles and horseriding in declared wilderness is illegal, so why was it exclusively discussed?

The Discussion Paper will become a propaganda tool to justify the mismanagement of the unprotected identified wilderness parks. The Discussion Paper presented no alternatives that adequately protect the identified wilderness. The ways forward only propose vehicle and horseriding access to currently unprotected identified wilderness, which is unacceptable to the NSW environment movement (see Appendices 1, 2, 3, 4, 5 and 6). As NPWS identified wilderness was not mentioned in the report, the report is clearly biased against nature-focused management, supporting continued fragmentation of these areas by roads.

The Foundation's preferred solution is for the Department of Environment and Conservation to disregard the ways forward outlined in the Discussion Paper on Access Management and to immediately declare all identified wilderness within lands reserved under the National Parks and Wildlife Act, 1974, covered by this paper and subsequently to declare the other areas listed in the Wilderness 2000 Protection Plan following reassessment of these wrongly rejected areas.

The Access Discussion Paper is biased against the protection of identified wilderness areas and consideration of any option that would protect wilderness values outside declared wilderness areas. The Discussion Paper should not inform the development of the plan of management because the suggested ways forward will degrade all undeclared wilderness areas and natural heritage values within the parks described in the paper.

Submission# 647

P.3. Intrinsic Values All visitors to parks including those who rely on vehicular transport, may enjoy the intrinsic values listed. Sub sections of visitor groupings should not obtain preferential advantage by the exclusion of others. People use motor vehicles to escape and to conserve precious recreational time. 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.

Submission# 687

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? The intention is also to remove signs, trail markers etc (Pg. 6 C)) And cyclists on their manually powered transport can experience solitude. Can you imagine the solitude of being totally lost on a bike because there are no signs? At least a horse will always remember the way home.

Submission# 688

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? The intention is also to remove signs, trail markers etc (Pg. 6 C)) And cyclists on their manually powered transport can experience solitude. Can you imagine the solitude of being totally lost on a bike because there are no signs? At least a horse will always remember the way home.

Submission# 689

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? The intention is also to remove signs, trail markers etc (Pg. 6 C)) And cyclists on their manually powered transport can experience solitude. Can you imagine the solitude of being totally lost on a bike because there are no signs? At least a horse will always remember the way home.

Submission# 690

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? The intention is also to remove signs, trail markers etc (Pg. 6 C)) And cyclists on their manually powered transport can experience solitude. Can you imagine the solitude of being totally lost on a bike because there are no signs? At least a horse will always remember the way home.

ROAD NETWORK, Regional Context

Submission# 253

R: Roads should be gated and day trippers encouraged to use state forests.

Submission# 346

There are many opportunities for unrestricted 4WD and trail bike access in adjacent State Forests and it does not seem reasonable to grant similar access to an area of national park that should be managed quite differently.

Submission# 477

Access for All believes that because of the excessive wilderness areas in the management area, the closing of access to NP in northern areas, too much pressure is being put on the small areas left for recreation. This will be a management plan for NP. Access to other land tenure should not be used as an opportunity to restrict access to NP. Access to Private Property is already very restricted –0 and so it should be. State Forests were able to maintain access in most of these areas. Why cant NPWS?

This discussion paper should be restricted to National Parks and should not look to outside agencies for access.

Submission# 497

The escarpment plan also showcases other recreational opportunities in neighbouring State Forests. The DSMRA feel this is misleading; as management decisions made by National Parks vary rarely consider neighbouring tenure land impacts. However; in this plan we are unsure whether NPWS has used the State Forest road network to divert attention from their own road network or a true comparison. There are no comments attached to the figure given as to which State Forest these figures apply so we assume that it has been added to the plan as a message to recreational

users of "go and use State Forest for your recreational enjoyment - in National Parks you are not really welcome". That is certainly how it is viewed by our association.

Submission# 511

The 4WD trails in the Far South Coast Escarpment Parks are a small proportion (only 11 per cent – 443 km on park versus 4000 km off park) of the Far South Coast Region. There are plenty of alternative 4WD roads to be used outside national parks. The minority of 4WD roads that are in national parks should not be open to public vehicles, particularly the small proportion within identified wilderness (less than 10 per cent of total 4WD roads). It is a nonsense for the Department to claim that the majority of roads outside protected areas would be unable to provide all the recreation requirements for all vehicle-based users. Horseriders could similarly use other private and public lands. It is only because DEC focuses its considerations entirely upon access to within park boundaries that it makes the mistake of providing access to high-impact users as if protected areas were any other land. The Department made a similar mistake with commercial filming in the Blue Mountains when it overlooked the numerous opportunities to meet the film industry's needs in the nearby Newnes Plateau State Forest because it was not on national park land.

Submission# 636

Regional Context:

Our assessment of just the Bendethera road give an over all figure of 1600 plus vehicle now using the area (including farmers and forestry), therefore one would think your figure for the over all areas are a little shy on. On many of the weekend the Badallaaalal has some 50 cars, on the Pink wood road ie Hanging Mt normal weekend have 30 to 40 and any weekend that has a holiday in either ACT or NSW over 300 car one way can be expected, some 4x4 have had 347 car attend a weekend rally (2002), these cars were counted at Bendethera.

Submission# 647

We submit that this section does not adequately address access "on park", especially the question of destinations. The reference to other areas for vehicular activities as a pretext for closure of on park areas is no more relevant than the arguments for vehicle exclusion by walking groups. These groups can walk elsewhere in declared wilderness areas. We note that the document has no access tally of these remote areas from which vehicular access is already prohibited.

The paper should demonstrate by use of a table the areas exclusively available to walkers compared to areas available to vehicle based groups. Since universal access is not proposed as available, then area availability is an access issue of concern to our members.

The statement that within the region there is over 4,000km of 4WD trails is not what the issues under discussion should be about, they should be about sustainable use of the "on park" trails. Roads should be considered for their opportunities for accessing features of the park., and for meeting the servicing and management objectives of the park itself.

ROAD NETWORK, Current Situation

Submission# 511

It is likely that operation of 4WD vehicles will soon prove too expensive for most people. It is predicted that once petrol exceeds \$1.30 these vehicles will cease to be popular with the middle classes and this is likely within a few years (see SMH, 5 June 2004).

The proposed routes for access loops further illustrate the bias in this discussion paper, by proposing that declared wilderness could be compromised by the excision of the very steep Turtle Road and Gollarabee Road to create further road loops in these escarpment parks. Why mention such an alternative if not to invite comment on an illegal activity?

Submission# 647

Table 2 rightly establishes the total prior use by park visitors for the total of different road types in the Far South Coast Escarpment parks. Access should not be withdrawn from any of these except for maintenance or safety in times of hazardous events. It is recognised that recreational access by vehicles is currently not permissible within wilderness areas, currently affecting 124km of roads.

ROAD NETWORK, Non-Negotiables

Submission# 78

g. The Merricumbere, Mongamula and Minuma Range Fire Trails in Deua Wilderness should be closed and rehabilitated.

Submission# 343

R: The NPA Policy No.4 on Road Systems in National Parks (as amended 1997) includes the following Point 8: Roads in national parks should be minimally provided, They should be short, unobtrusive and peripheral.... The apparent policy of NPWS and the adopted policy of NPA therefore diverge in relation to this important aspect. Whilst to some extent NPA accepts the evident policy of NPWS to utilise only existing roads in national parks, this policy is unavoidably contrary to the "short and peripheral" ideal of NPA due to the length and penetration of many of these roads. This having been said, NPA appreciates the fact that roads in off-park corridors in many national parks (e.g. the Imlay Road which traverses the South East Forests NP east-west) are well established and are "public" as distinguished from "park", so could not be closed by NPWS even if that was a management preference. NPA's opposition to NPWS policy concerns park roads, over which NPWS has total management control. A number of these, many long and deeply intrusive, are proposed in this discussion paper.

The Wilderness Act (16(2)(a) and NPWS' Wilderness Policy prohibits "motorised transport" (non-management) in wilderness, as does NPA's Wilderness Policy (No.18) and other policies. FarSCEP has only one east-west public road crossing of FarSCEP: the Moruya-Braidwood Road, which is necessarily excluded from the parks and wilderness. The five other proposed (4WD-only) park road crossings, from north to south are: Oulia Creek Ft, Bendethera Trail, Falcon Rd – Belowra Rd, Tuoss Rd – Bourkes Rd, and Razorback Ft. Though virtually through declared wilderness, these crossings are enabled by the separation of distinct named wildernesses by in-park corridors (presumably, as these are not clearly shown on the maps). NPA opposes the creation and use of such corridors to provide public vehicular access, as this results in fragmentation of otherwise continuous declared wilderness and an excessive number of park traverses, exclusively by 4WDs.

This 4WD exclusivity is contrary to the spirit of national parks, which includes their availability to all people. The "possible recreation road network", as depicted, is actually contrary to NPWS' own Vehicle Access Policy No.5 quoted in the paper: No special provision for trail bike and four wheel drive vehicles will be made (in national parks). These roads and others traversing national park land are identified in the legend as 4WD and described in the text (p.8) as suitable to 4WDs or trail bikes only. It is clear therefore that "special provision for four wheel drive vehicles" is being made in this proposal! This special provision of 4WD and trail bikes is opposed by NPA This is backed by NPA's own Policy No.4, Point 5: All park roads should be open to the public as a whole, using conventional registered vehicles. No exclusive provision for sectional use, e.g. for 4-wheel drive and trail bike users...should be made).

The general public is thus confronted with non-correlation of NPWS planning with NPWS policy on vehicular access. This does little to advance much-needed public understanding of national parks, public use of them, and NPWS management of that use, all of which have constantly been stated by NPWS to be educational priorities. If NPWS (PWD) is to survive as a respected manager and authority, it must act as one, and stop trying to compromise with its principles in order to satisfy inappropriate demands for park use.

It is noted that Bendethera and a number of other roads or trails are on the boundary of wilderness areas and are presumably (but this should be made clear) located just out of the wilderness. NPA would normally raise no objection to this, nor to roads on or near the periphery of the park. However, where a road, at present on the boundary, would be well within the park on declaration of more identified wilderness, NPA would then object. Some such roads are proposed for public vehicular access on these maps. In NPA's judgment, the public access system proposed for FarSCEP is excessive, particularly in the area west of Moruya.

To sum up on vehicular access: there should be

1. No extensive public vehicular access system west of Moruya.
2. No public access roads on park corridors through declared wilderness.
3. No roads accessible only by, or exclusive to, 4WD vehicles and trail bikes.
4. No controlled access system for sectional vehicular use of management trails.

Submission# 367

- Management trails outside of wilderness areas should be available for recreational driving/riding, although not necessarily 'maintained' above basic 4WD/trail bike standard.

Pages.

- Are not Wilderness Policy (2002) and NPWS Vehicle Access Policy (2002), just that? Policies! They are not "acts of Parliament" and can be modified of varied.

Page 8.

- Management trails available for recreational driving/riding within 'Wilderness Areas' could be easements through such 'Wilderness Areas'. This could be legislated.

Submission# 371

? I would like to see the Gollarabee trail re opened as a corridor track. For example Razorback Tr. Wagdbilliga NP, Deddick Trail Snowy River NP Victoria both through Wilderness areas. This would provide an off road experience north/south, beginning not far from Braidwood.

? The listed network is great with the inclusion of the Gollarrabee Trail

Submission# 497

Again the DSMRA stresses that the non-negotiables are a disgrace and there is no reasonable; scientific or true management reason why the Wilderness area road network should be off limits to responsible recreational forests users. The Wilderness decisions that relate to the Escarpment parks; in-fact entire Wilderness Act represents minority group opinions that are not in the best interest of park management. The word "park" by pure definition is a place for the people - all people; not just fit bushwalkers.

Submission# 522

The paper appears to be endorsing the current level of vehicle use and looking to increase it. Given that these are protected natural areas; the Service should instead be trying to reduce the opportunities for such high impact activities in these parks.

It is pleasing to see the Service standing firm on the inviolability of declared wilderness.

The road network is unacceptable as it allows access to identified wilderness areas and other areas that should be declared wilderness; such as around Bendethera and in the Donalds Creek area of Deua NP. There needs to be further recognition of the wilderness values of undeclared areas including quiet and solitude. Also; the closer the vehicles are brought to declared wilderness areas; the more people will access and impact on them.

Submission# 577

I would like to see Bumbery trail upgraded and responsibly used as access to Tuross Falls. I would like to see better access to all trigsites especially the Wadbiliga trigsite. I urge you to keep the National Parks open to all Australians and to recognise the right of all Australians to act in a responsible way.

Submission# 589

R: As a road registered trail bike rider and responsible user of National Parks I am opposed to ALL road/track closures within the Parks. The increasing number of wilderness areas is not doing anything to help most of the people who visit these places and should be stopped. I can understand the need for users to be "accountable" but as a licenced and registered rider I already am.

Submission# 600

Further; presentation of "non-negotiables" such as Monga and Wadbilliga in such a way is unfair - these areas have had constant human use for many years and can't truly be considered wilderness. Monga in particular is of great tourist benefit to the region and existing trails should remain open.

Submission# 647

NPWS Vehicle Access Policy (2002) is inadequate in the framework of population wants and needs, vehicular use and management practice. As policies may be changed from time to time, the assignment of non-negotiable recognises only the current situation. The NPWS vehicle access policy has been unnecessarily restrictive and out of date for a considerable period of time and the access policies

3. We recommend that public access to management trails under conditions approved by the park manager to reflect the current situation as it already exists in NSW.

4. Our Association is in agreement that no driving off roads should be permitted except where allowed on camp grounds, but contend that access for all properly identifiable groups having public liability cover should be allowed on management trails at the park manager's discretion.

Submission# 657

I am a registered trail bike rider and am totally opposed to ANY reduction in the trail network in the park and therefore oppose ANY road closures. - the "non-negotiables" are a disgrace and Monga and Wadbilliga should be reopened. These area should not be Wilderness. The fire damage alst year to Namadgi and Kosciusko NP's could have been far less damaging if fire trails had been kept open. Learn from the lessons of the past. "

Submission# 662

the "non-negotiables" are a disgrace TO DEMOCRATIC voters and the spirit upon which this country is founded and Monga and Wadbilliga should be reopened.

Submission# 664

The ""non negotiables"" are a disgrace and Monga and Wadbilliga should be reopened.

Submission# 665

ACCESS EAST WEST AND NORTH SOUTH bOUNDARY FRIETRAIL CONNECTING MONGA WITH DRY CREEK VIA GOLLARIBEE WOULD BE GREAT

Submission# 667

R: There are plenty of roads for 2WD and 4WD use. The main protagonists; just want access to the wilderness and quite rightly this should not be allowed.

Submission# 672

Wilderness Access - The Conservation Council would like to confirm its support for the NPWS' current access policy for vehicular access in wilderness areas.

ROAD NETWORK, Negotiables

Submission# 371

Having been an avid motor bike rider (registered club member) and now a 4WD'er (over 30 years) it has been my experience that a large portion of motor bike riders enter these areas parks with un-registered bikes. In most cases the use of the track network is a race to the end. This has in my years of exploring and enjoying the NSW park system culminated in a number of near misses and a couple of accidents with my group.

This culture has to be strenuously discouraged. As horse riders, 4WD & bike riders will use the track system excessive speed by this group is dangerous.

Submission# 647

In our experience the final issue listed is simply not an issue. The road rules of the State apply providing right of way on trails for horse riders over motorised vehicles.

ROAD NETWORK, Environmental Impact

Submission# 78

Minimal impact for some users is a nonsense – a tour operator for trail bikes regularly takes 40 or so riders on tours in the Deua and probably elsewhere – the impact on any unformed creek crossings, the noise and dust pollution, the likely conflict with other road users, the destruction of wilderness based solitary experience and so on is maximised. Similarly for large groups of 2WD's (club based activities) where road damages is excessive due to the large numbers (eg the river crossing at Deua River camping areas gets absolutely trashed by 4WD;s especially in wet weather.)

Submission# 497

It should also be noted that every impact listed under all the various sections of recreational pursuits are common to bushwalking also. Please ensure this is noted in the main plan that addresses bushwalking. All entries to National Parks cause impact that requires management over time.

Submission# 511

In regard to environmental damage of high impact parks users, the onus of proof has been reversed. Environment groups now must prove to the Department why vehicle access to identified wilderness is not appropriate in regard to the Department's suggested ways forward (see pages 8,9 12, 13 and 14 in the discussion paper). 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) and that horses also damage natural heritage values, including wilderness values.

Submission# 577

National Parks belong to everybody. It follows that National Parks should be open to everybody just like everything else in the community. People accept the rules and conditions that go with everything eg. Roads lakes rivers halls etc. so why should National Parks be any different. How much more detrimental to the environment is living in a house, driving a car in the city, riding in a train or bus, to riding a horse in a National Park or driving a 4WD or motor bike in a National Park. How come these blatant radical conservatives condemn riding or 4Wdriving when they partake in far worse environmental vandalism in the cities. Even worse, why do National Park Management enforce what they know to be insignificant compared to the ???cities community vandalism??? to the environment Roads can be maintained virtually anywhere. The road to Mt Kosiosko has caused far less environmental damage than any

highway, or city road and yet the people who want to use it have been ostracised. No responsible person should be denied the use of a fire trail or road whether it be wilderness or National Park. Responsibility is the key, stopping people is unfair and unjust. To say that riding a horse down the National Mountain track which has????? ??? is ludicrous and unjust. To say that driving a 4WD over the "50 Acre" or Wadbaigia Mountain is worse than the environmental damage done to the Clyde Mountain, Kings Highway is unbelievable and untrue. How can you condone this ludicrous thinking? Responsible use, whether it be 4Wdrivings horse riding or ?????????? Don't be misled by the city vandals. You are the managers of everyone's National Park.

Submission# 636

Indigenous areas:

These area many active special and sacred site still being used today including cave not mentioned on the maps or in your literature, therefore Indigenous people will still visit these areas particularly Oulla creek, Donalds creek Tuross River and Woola creeks healing pools, Tuross falls or falls Badallaaalal (or Ballaba), Witts creek bora site, Duea and Bendethera and Donavan has the same significants as the Mounatin of Wallaga Lake; boras and special areas at Gonalong that is Caterpillar Mt, Ooroonmea or Jerrabattgully creek there are over 60 special sites including burial site and ground which the Far South Coast Escarpment covers just for the Brinja, and we can not speak for the other people such as the families of the Tadera – Manji Budawang, Kurial – Manji or Walbunja, Murramarang Batemans Bay north people; Guyangal – Manji Wallendagan Bermagui (Djiringanj).

It is not prudent for us to discuss the details of these sites since the destruction of the ancient Brinja Bora ring by land owner at Coila Lake in 2003 or the opening of the graves at Bendethera in 2002 by a 4x4 club therefore , the Brinja people now operate on a system as with the forestry they send ARCVIEW map and we will look at the detail and if we say no they place a no go on the areas as the present instruments do not stop people doing what they want, and is why we opt for closures or distances.

Submission# 647

The statement regarding sedimentation is not supported by fact. Sedimentation is a naturally occurring process and the opening paragraph contains only one relevant part which is the reference to the illegal activity of driving off road. Inflammatory statements such as "Associated impacts include littering, vandalism, potential increase in fire hazards, weed invasion, feral animal predation and noise should be withdrawn. Our clubs' combined experience over three decades by many of us is that the opposite is the case. I comment:

? 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.

Submission# 660

I have travelled by 4wd; registered trailbike (and walked the Corn Trail)on a few of these trails. I am very conscious of the erosion damage and poor camping practices of some other individuals. I know that a walking experience is lessened when you are left in a cloud of blue oil smoke and dust with the exhaust still being audible 10 minutes later as they climb the next hill.

Submission# 664

Responsible trail riders ""ie club members"" are not detrimental to the enviroment any more than mountain bikers or bush walkers(I am yet to see some of this rare speicies out there on the trails

Submission# 671

General Vehicular Access I draw your attention to an article on page 3 of the Sydney Morning Herald 3 June 2004 in which the makers of olden and Ford 4WD vehicles stated that their vehicles were "primarily city vehicles that can occasionally venture off road." Yet their advertisements show these vehicles driving in National Parks throughout Australia in very rugged terrain; but they are only part of a commercialisation of the 'wilderness experience' which is one of the greatest threats to our National Parks. As with horse riding; 4W driving has become a fad for many people that involves no real connection with outdoor activity or enjoyment of the natural environment. It is a day-dream response to urban life and is promoted by advertisers of clothing; food and cars as a way to escape the stress of modern life. Pressure on National Parks to open up more areas and accommodate more vehicles arises directly from this marketing of an image of 'getting away from it' while sitting in a large; comfortable car. Lobbying for greater 4WD

access and anger when faced with locked gates is often displaced anger because they reality doesn't match up with the marketed hype. These people can't admit they have been sold an advertising gimmick so they let fly at National Parks and place pressure on politicians to override Park managers and open up sensitive areas. Perhaps one way of bringing home to such people what they are doing is by focusing on safety for Park users and the cost of retrieval of people and vehicles following accidents. I suggest that labelling roads "4WD" is no longer a useful mechanism and that such roads should be labelled "self-retrieval"; that is; users should be warned that if they get into difficulties they will have to get themselves out. The lack of mobile phone service in these areas should also be actively pointed out to users; marked clearly on maps handed out to visitors and highlighted in safety warnings. I suggest that would put paid to a lot of thoughtless and unplanned use of roads by inexperienced drivers and unsuitable drivers.

Violence in Parks There remains a small number of aggressive; hostile 4W drivers and motor bike riders who deeply resent being locked out of Park areas. They usually see themselves as rugged individuals who can take care of themselves in any situation and it is a matter of pride that they can hunt; shoot and drive wherever they want. In lobbying for access they hide behind legitimate clubs but they push a level of hysteria into the political debate. They often make a point of turning up to public consultations for example; and representing themselves as speaking for other bike riders and 4WD users. We have to be clear that a large part of this group are bullies for whom the wilderness experience is largely based on inflated sense of their own strength and cleverness. They often indulge themselves in "scaring the greenies" when they come across bushwalkers; particularly women. Some of this group are 'protecting' an area they want to keep people out of; eg to use for pig hunting. This is largely unreported; in my experience; because of the remoteness of the areas and the difficulties of identifying the perpetrators. Restricting access of 4WD vehicles does reduce this risk of violence and aggressive behaviour. I think this is an important area which is never addressed in any Plans of Management I have seen to date. We don't tolerate this behaviour in our streets; why should it be ignored in National Parks?

ROAD NETWORK, Issues identified through consultation

Submission# 78

The potential for abuse of any controlled access or permit system too high to trust the recreational vehicle and horse lobby – the damage to the Parks is predictable (eg the trashing of Bendetherea camping area by 4WD's when it rains!)

Submission# 343

The possibility of so-called controlled access by public vehicles to management trails is also mentioned, closely followed by an assessment that such a system is unlikely to be justified. Controlled access should no even be considered, as NPWS' Vehicle Access Policy clearly states: 3. Public vehicular access will not be permitted on management trails.

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

Submission# 25

4WD access to the Deua National Park from Araluen, Moruya or Krawarree allows East/west access and access via Merricumbene FT, however, any increased traffic through Alpine is not appreciated; the existing traffic is too much. The section of 4WD track from Merricumbene FT to Mongamula FT goes past Alpine house, through private property and gives access to the river for countless campers, trippers, etc, These people interfere with the management and serenity of Alpine. The publication of the discussion paper with its accompanying maps of the access routes to the Deu4 NP provides many move people with information and potentially creates more problems for Alpine. The repeated references to east/west access routes and circular driving routes, plus actual mention of Alpine, are not solutions to the owners of Alpine. A possible solution is a new track, avoiding Alpine, from Mongamula FT to and/or Merricumbene FT. Private property signs, and locked gates, to prevent access could then be installed. Trail bike riding is excessively noisy and disruptive to all animals in the vicinity -people, horses, cattle and indigenous species. It is not an acceptable activity through private property, nor camping areas. A separate area(s) accessed from existing fire trails for trail bike riding is required

Submission# 78

Gated/locked access to management trails is a good management tool and should be increased throughout the parks, especially where trail bikes are a noise and erosion problem.

Submission# 253

Roads should be gated and day trippers encouraged to use state forests.

Submission# 343

No extensive public vehicular access system west of Moruya.

Submission# 346

It is difficult to see what would be appropriate areas for unrestricted access by 4WDs and Trail bikes as so much of the area is sensitive ecologically and needs to be given the time and opportunity to evolve back to its unmodified state. Access is presently available to the east from the Turtle Fire Trail and the Old Bolaro Road and if it is to continue its impacts should be closely monitored and permitted to continue if it can be conclusively be shown that it does not cause any ecological damage. Access along the western boundary of the Park should be permitted only with similar constraints.

It is appropriate to maintain the following roads as 2WD Dry-weather Access Roads:

- Old Araluen Road
- Reisdale Road
- Burning Road
- Lookout Road
- McCarthy's Road
- River Road

Such a road network would provide access to a representative area of the Park. (Alternatively it might be seen as more appropriate to maintain Lookout Road as a walking track). 2. Care would need to be taken with Milo Road access Perhaps it 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.3. Milo Road south of the junction with Saddle Back Road should be gated to prevent private vehicle access to the delicate Milo Forest Preserve.

Submission# 358

As a keen 4WDer and trailbike rider, I have spent considerable time within the South Coast Escarpment areas, over a number of years. It is therefore pleasing to see that the issue of "access" to some of the areas currently under review for a Plan of Management, is well represented in the Discussion Paper released in May 2004. In particular, 4WDs and registered trailbikes are mentioned regularly throughout the document. This indicates that a significant percentage of the population enjoys the South Coast Escarpment Parks by sensible, legal motorised vehicles.

Submission# 363

Although it was not entirely clear to me from the map attachments exactly how the proposed changes will affect our access to the trails that we use; it was obvious that at least some of the trails that we currently use will be closed to us. This is of deep concern given that we lost access to a considerable number of trails in this area during the most recent round of Wilderness declarations. The trails available for legal trail-riding have been steadily reducing over many years; and this can only have a negative impact on our sport. Not only does it increase the pressure on the remaining trails; but it means that there is a much higher risk of accident as the same number of users are forced into ever-diminishing areas. I beg you to reconsider the closure of any more of the trails in this area; as our access has already been severely affected by the previous round of closures.

Submission# 367

- No further closure of trails within National Parks. Let the difficulty of the trail be self-regulating.
- All vehicles to be fully registered.

Submission# 371

? Totally agree with the 443klm x 4WD and 135 x 2WD.

? North/South, East West, South/North circular routes provide a longer experience fro those who have the time and also variation in travel destinations with camping facilities within reasonable reach.

Submission# 391

1: I am pleased to see that roads to the east of Milo Road, including the Gollarrabee Fire Trail, are not to be open to motorised traffic, except for management vehicles.

Submission# 415

Comment: Is there provision for reasonable 2WD and 4WD access to short and long walking tracks, weather conditions permitting? Reason: The Eurobodalla natural History Society studies , records and publishes an annual record of birds, mammals, reptiles and amphibians, invertebrates, moths and butterflies reported in the shire. Field meetings are often conducted in national Parks. Access by 2WD vehicles to at least some of the walking trails would be greatly appreciated my members who do not own 4WD vehicles. Suggestion: That National Parks gives consideration to reasonable 2WD access to the beginning and end of short and long walking tracks, where possible.

Submission# 439

We are not impressed by tables that show total kilometres and are vague and confusing. We just want to know what trails we will not be able to access and why? A number of trails are not included on the map, does this mean they will close? As mentioned in your opening paragraph (P4) the activity itself, in our case trail bike riding, is often equally important as the destination. We require trails of varying difficulty to provide the challenges and therefore the enjoyment we are seeking in National Parks. We are very concerned that only the major roads and trails will remain open.

It is pleasing to see that the discussion paper proposes the continuation of access East to West and to lesser extent North to South.

Off road motorcycle sales are booming in NSW. The increased number of people riding in local forests necessitate that there be loss of trails If current safety levels and the relative small amount of user conflict is to be maintained.

Submission# 477

Access must not be limited by gates

Submission# 483

R: Road network pages 5 & 8 Circular driving routes within the park as indicated on both maps show access on the Mongamula Ft through private property. NPWS should not give the impression to the public that they can access this circular route without consent or consultation of the owner of private property.

Submission# 497

The DSMRA does not support any permanent road closures in the FSC parks; especially considering the huge losses or trail network under the Wilderness Act.

Submission# 511

The paper's suggestion that there is no north-south route through Monga National Park is a ludicrous proposition. Why should there be such an on-park route when north-south access routes on good dirt roads exist to the east and west of the park? Are parks primarily funded as places for scenic drives? Does the National Forest Policy Statement specify 4WD access as a primary consideration before the protection of park values? What does DEC believe should be the primary driver for park management of the escarpment parks? The only answer that fits all these questions is that the Department believes that there should be priority provision of access for all high impact users before protection of environmental heritage.

From examination of the maps, the proposed way forward intends to maintain all the roads currently in popular use, including those in the identified wilderness. This is a conflict generating management solution. The way forward proposes retention of 578 kilometres of roads, including 443 kilometres of 4WD roads in these parks. The Department of Environment and Conservation appears to be setting itself up in competition with the Roads and Traffic Authority and logically it should be seeking revenue from 4WD vehicle owners for its services.

The Colong Foundation considers that proposed plan to retain vehicle access in identified wilderness as shown on the maps attached to the Discussion Paper to be repugnant to the principles of good park management. The Colong Foundation's vehicle access policy would provide access to the edges of parks on good quality all weather two wheel drive roads; that way the maximum diversity of motorised access is provided without compromise to the integrity of the park (see Appendix 1 for policy). Such an approach also provides access for all vehicle types, without providing exclusive access to any vehicle type.

The Colong Foundation for Wilderness considers the proposed promotion of routes through parks as alternative routes to existing routes, such as the Kings Highway and the Araluen Road, will increase wildlife killed on roads, unnecessarily fragment these wilderness parks and cause other significant environmental impacts (see Appendices 3 and 4). The experience of Royal National Park which has lost its big marsupials due to road kills will be repeated for the benefit of a minor increase in 'windscreen tourism'.

Submission# 515

This club appreciates the content & context of the discussion paper. We support the road network concept and; while disappointed that Turtle FT etc are closed; we believe that our members can continue to enjoy these Parks in a responsible manner to the benefit of young and older members alike.

Submission# 522

Availability of cross routes is not a legitimate concern given the existence of alternative routes. Circuits can reduce impacts and promote user safety if made one way.

but there should be more concern for areas outside (wilderness) in the parks; they should not be sacrificed to increasing vehicle use

The continued existence of 579 kms of public 4WD roads in these national parks is a disgrace and appears to contradict the Vehicle Access Policy which requires "no special provision" to be made for 4WDs and trail bikes. The trend should be towards road closures; management access trails; walking tracks and limited public 2WD access only.

Submission# 539

The recreational network of roads and tracks as proposed on the attached maps seem fair and viable for all parties concerned.

Submission# 571

I propose that the Bumberry Creek Fire Trail be closed to motorised traffic with a locked barrier at the Wadbilliga Road. As this road; a no through road; passes through a declared Wilderness Area; it should be used for management access only. It should be maintained for bush fire fighting purposes; NPWS management and for access in the event of other emergencies; search & rescue etc.. The public are still using this fire trail to access a branch trail which provides access to a good viewing point on the south side of the Tuross Falls. This branch trail is narrow; steep and badly eroded in parts. No one should have any need to use it; given the excellent access to the Cascades and Tuross falls viewing platform. The branch trail also passes through private property (Nadjongbilla) at one point – but that would not constitute a reason not to close both trails. The public also use the Bumberry Creek Fire Trail to access a spectacular viewing point into Tuross Gorge at the end of the trail. This is not a reason to keep the trail open.

Submission# 589

As a road registered trail bike rider and responsible user of National Parks I am opposed to ALL road/track closures within the Parks. The increasing number of wilderness areas is not doing anything to help most of the people who visit these places and should be stopped. I can understand the need for users to be "accountable" but as a licenced and registered rider I already am.

Submission# 615

Specifically: 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;

Submission# 636

Your area advise that we have written to Forestry and Fisheries and National Parks departments in these areas on the following :

1. Advise was given that Brinja people are now concerned for the two autochthonous fish species in the area, one of these the Lamprey is only found in the lower reaches but swims the upper reaches at certain times of the years, the other a small fish of up to 135 mm is found only in one of the rivers and has never to our knowledge been named or researched, therefore studies by Brinja people has started with the help of Southern Cross University staff.

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.

2. All the river in this have endemic Yabbies, research at this stage have found differing feature form other Yabbies in NSW, if the same applies as has happened in Northern NSW then most will be endemic and autochthonous. A shortage of funds is stopping these species from being fully informed upon.

Action needed: 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.

3. 4X4 traffic has become a real problem in the areas particularly along Little Sugarloaf road, this may be endangering the autochthonous. Pink wood trees and other native species.

Action Needed: 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.

Submission# 658

I am a registered trail rider and am opposed to trail closures or restricted access

Submission# 662

R: The discussion paper is not clear on which roads are being closed. What is National Parks hiding? - as a registered trail bike rider I totally oppose ANY reduction in the trail network in the park and therefore oppose ANY road closures.

Submission# 664

As a registered responsible trail bike rider I totally oppose ANY reduction in the trail network in the parks and therefore oppose ANY road closures.

Submission# 665

A ROAD NETWORK IS VITAL

Submission# 667

There are plenty of roads for 2WD and 4WD use. The main protagonists; just want access to the wilderness and quite rightly this should not be allowed.

Submission# 669

o I believe that it would be a great experience to be able to travel north/south as well as east/west through these parks and in order to do so some tracks need to be opened.

I would like to provide a quick summary of my views and my interests in this discussion paper. I am in my late 40's and always had a strong love of the bush including camping and exploring the great outback that our country has to offer. I am an owner of a 4WD and I strongly believe that the bush is for all to enjoy. This issue is quite complex and reducing access to these areas is not the answer, the areas in question, must be available for all to enjoy. It is my experience, in visiting these areas, that has open my eyes as to how precious this resource is and how important it is to preserve these areas for our future.

I will summarise all my views in point form:

- As mentioned earlier, the only long term viable solution is to open the areas to the public, not deny access. Denying access will only create a void in my life, in other areas, this has created many feelings from anger to frustration. I have a right as all Australians to enjoy what our great country has to offer.

Submission# 671

The Parks as Access Routes between the Coast and Tablelands Is this a joke? National Parks as alternate access routes must be the craziest thing going. The purpose of National Parks is to exclude through traffic. The exceptions occur where there is a pre-existing major road such as the Snowy Mountains Highway. People who want to drive between the tablelands and the coast on their way to somewhere else have to use the designated highways. Normal private and commercial traffic between places has no place in any National Park. Nor should it be given any recognition as a legitimate recreational demand in any Plan of Management. It degrades the purpose and function of a Park. It directs the focus of the Park user to speed; road quality and access rather than on the environmental qualities of the Park itself. The next obvious step is agitation for more all-weather roads to reduce travel time between various points on the coast and the tablelands. I submit that all references to access routes between the tablelands and the coast be expunged from the Plan of Management and never mentioned again.

Submission# 672

In regards to the possible solution; the Conservation Council recognises that this solution will be a reduction in the level of the vehicular access and supports this. However; the Conservation Council does not believe that providing west/east alternate driving routes between the tablelands and the coast is a valid reason for providing road access in the FCS national parks. It would appear that at least 4 such routes are provided for in the proposed solution. The maintenance of these routes diverts funding from the key conservation aims of the national parks and increases the potential for damaging processes to occur. The Conservation Council believes the number of through routes should be reduced and monitoring of user impact should be maintained on those routes which remain open.

Submission# 675

I believe access should be maintained and possibly expanded. I am a regular trailbike rider and member of the DSMRA.

Submission# 678

R:I have studied the discussion paper and on most things agree – road tracks etc.

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

Submission# 78

f. All trail bike use to be limited to 60 fathoms at the edge of the continental shelf.!

Submission# 497

On a positive note; the DSMRA felt that the plan did at least mention trail bike riding as a appropriate recreational pursuit. This is something that NPWS have only recently been able to achieve in a small percentage of their plans. Most NPWS plans view trail bike riders as a nuisance to be stamped out. This is no doubt because of the input at the public sessions but it does pose the question; if we had not been there; what would the plan read?

Submission# 514

3. I believe that, on the whole, 4W drivers respect the environment of a NP and drive accordingly. From my observations, that is not the case with trailbikers, who routinely remove the baffles from their bikes' mufflers (as well as the spark arresters) and tear through the beautiful habitat and natural wonder that they abuse. They are there for a rip-roaring time. I'm not surprised to see that "there are also many [trail bike] club members on the mailing list". They have a very big vested interest in NPs. The inappropriateness of trail bikes in National Parks is much the same as that of Jet Skis at a beautiful, quiet, pollution-free beach. No body wants them there except those riding them. They seem to have no appreciation of the peace and natural beauty of the environment that their roaring machines completely shatter. But, never minding these personal views, reference to the legislation is sufficient; it doesn't allow visitor use which is not "compatible with the conservation of the national park's natural and cultural values". Trail bikers in a NP are as compatible with these values as a rock band is with those of a place of meditation. They are notorious for driving off set tracks and making their own way, including up and down riverbanks. Without spark arresters they are a very real fire threat. Trial bikes also provide the ideal means of access and regress for pyromaniacs. Setting speed limits and restricting access will have no impact on the trail bikers. They can 'go anywhere'! Policing of them is, realistically, impossible.

4. I submit that the NPWS really has no choice but to exclude vehicles such as trail bikes, from National Parks. Think of smokers' reactions to the banning of smoking in buildings, restaurants and now beaches. There was outrage, but that has passed. The greater good must prevail – as required by the legislation.

Submission# 522

There is little discussion of trail bike use which is a particular problem from an environmental and user viewpoint as they are noisier and can go further than 4WDs. Their use should be discouraged.

Submission# 669

o I believe that many areas should not be open to 2WD's as it opens the areas to a much larger group of persons who may not have an affinity to do the right thing. The fact that access is available via 4WD at least gives them the opportunity to enjoy the tracks should they wish to do so. (this may sound a bit biased but I finding it hard to put my thoughts in writing).

ROAD NETWORK, Possible Guidelines and Actions, Road Classification

Submission# 229

Most people who now come south from Sydney areas in 4X4 have no where to go – they say our area really is the most natural overgrown, beautiful water, flora, fauna, free to show kids a natural holiday – So the road needs to be kept in a reasonable state most people are being careful with our environment – so please keep the level of access to trails within our south east coast national parks maintained. Maybe our age has something to do with the desire to still drive, horse ride, camp and just be part of the natural surroundings – I want to always be able to access all National Parks here in Australia and through our world, it's a valued experience and great adventures are to be had.

Submission# 253

I don't want to see roads (other than council roads) upgraded or extended to allow 2wd or 4wd or trail bikes into the National Parks; near wilderness areas or along or across watercourses.

Submission# 346

R: It is appropriate to maintain the following roads as 2WD Dry-weather Access Roads:

- Old Araluen Road
- Reisdale Road
- Burning Road
- Lookout Road
- McCarthy's Road
- River Road

Such a road network would provide access to a representative area of the Park. (Alternatively it might be seen as more appropriate to maintain Lookout Road as a walking track). 2. Care would need to be taken with Milo Road access. Perhaps it 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. 3. Milo Road south of the junction with Saddle Back Road should be gated to prevent private vehicle access to the delicate Milo Forest Preserve.

Submission# 385

As a mtb rider; trail bike rider and bushwalker I want to see greater access given to the more difficult tracks. Even many of the tracks labelled as 4WD aren't really; or they may have one short section in them that requires 4wd. This means the rest of the track is not at all challenging. Remember much in life is not about the destination; but the journey to reach it.

Submission# 539

Would it be possible to grade the 4wd tracks in a similar way that walking trails within National Parks are graded. Assuming that the results of this plan of management will be published and promulgated, 1 can foresee unexperienced people with unsuitable vehicles expecting to traverse roads requiring the capabilities of a dedicated 4x4 vehicle driven by a capable operator.

Submission# 647

R: P.8 We are in agreement with the proposal to utilise management trails as possible for recreational driving, especially if the trail has a previous history of such use. This Association would be pleased to advise NPWS on the adventure activity standards of trail classification which is a most useful guide to drivers, especially those with modern AWDs. The potential of the system to reduce work loads on rangers is major.

5. The plan in this statement is inconsistent with other sections of this paper where 4WD trails are identified. 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. Our Association has proposed this to NPWS management for future adoption.

ROAD NETWORK, Possible Guidelines and Actions, Temporary Closures

Submission# 367

Ok to close trails due to wet weather, but they must be reopened when dry.

Submission# 371

? Gated access should be used when tracks are in danger of sever damage eg: after heavy rainfall. When closures are implemented they should also be published on the NPWS web Site.

Submission# 399

The road network should not be reduced by closures and the 'Claytons' closures should cease immediately; eg Trail Impassable

Submission# 522

Positives include the proposal for temporary closures and the provision of info on recreational opportunities outside of parks.

ROAD NETWORK, Possible Guidelines and Actions, Speed Limit

Submission# 367

60 kph limit on all trails.

- 60 kph limit on all trails.

Submission# 539

The suggestion of applying a 60km/hr speed limit within the park can only make the roads and tracks safer for all users and should be given more emphasis especially in the future as variations of 4x4 vehicles become more numerous and used within , National Parks.

Submission# 562

Pages 8 & 9, are Guidelines and Actions, speed limits won't be able to be controlled, hence 4WD Trails SHOULD BE maintained as are Fire TRAILS. Club members will reduce or travel only at safe speeds – if too many 2WD roads are extended you will have more accidents and also Fire Hazard due to neglect to observe Fire Safety.

Submission# 647

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.

ROAD NETWORK, Possible Guidelines and Actions, Regional Opportunities

Submission# 371

? Information should be provided showing places of interest and driving opportunities within the South Coast Areas bordering the parks, and placed via the billboard system mentioned earlier. For Example the Tallaganda NP & Dampier State Forest. This will also result in less impact on known tracks vrs little known.

Submission# 522

R: Positives include the proposal for temporary closures and the provision of info on recreational opportunities outside of parks.

Submission# 647

We give notice that by providing information of recreational opportunities on adjacent lands managed by others as alternatives to the conduct of such activities "on park" will be argued as establishment of prior use agreements when the adjacent areas are added to the national parks network.

ROAD NETWORK, Possible Guidelines and Actions, Collaboration

Submission# 78

R: Codes of conduct work only on an informed and conscientious minority and are a waste of time (refer to the debate on jet ski abuse in the Eurobodalla)

Submission# 358

There is no need for me to provide a large document expressing my opinions, but I would like to let you know that there are many legal drivers and riders, who belong to national legitimate recreational vehicle clubs (such as DSMRA - Dual Sport Motorcycle Riders Association), and who appreciate riding/driving into such areas in a responsible manner. Such organised groups encourage responsible and safe recreational vehicle access to these areas, whilst being sensitive to the environmental impact of accessing these areas. 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. With NPWS unable to provide the resources necessary to adequately maintain the large Park and Wilderness areas, I believe the locking up of additional large areas of land provides a non-sustainable method of management, given the problems such as feral animals, noxious weeds, and fire control which have become apparent in so many other Parks throughout NSW. The issue of responsible access to the Parks must be addressed in any Plan of Management, since it is by far the most raised topic in all of the discussion forums and papers which have been raised in relation to the South Coast Escarpment Parks. I look forward to being able to provide further input in matters relating to access, when a Plan of Management is being drawn up, for the Far South Coast Escarpment Parks.

Submission# 371

? Volunteer Opportunities as mentioned earlier should be increased in both maintenance and policing of the parks. My group would be very willing to play a part.

Submission# 439

The DSMRA has several cooperation arrangements with land managers in NSW and other states. We are always enthusiastic to form new relationships.

Submission# 477

The majority of our members are prepared to contribute in joint management. Access for All fully supports volunteer user groups being involved. We think this would lead to a far better understanding of the whole management issue. Our members would look forward to working collaboratively with NPWS on all issues.

Submission# 511

The Foundation believes that concessions for volunteers is code for 4WD vehicle access to declared wilderness areas (controlled access and volunteer concessions are also mentioned in the same section as the discussion declared wilderness).

Submission# 515

However; we believe that NPWS will need to increase its ability to monitor and prevent trail bike riders from deviating from recognised roads and trails.

We also repeat our commitment to provide practical assistance to NPWS Rangers with road and camping area protection & maintenance. As a responsible club with strong environmental sympathies we look forward to continuing an open & constructive relationship with NPWS.

Submission# 539

Encouragement of individuals to participate in club membership will minimise this prospect by educating in the codes of conduct and driving skills required for this type of recreational pursuit. Working collaboratively with driving and bike groups has already proven to be successful. Southern Tablelands 4x4 club has recently worked with NPWS Queanbeyan (Rob Hunt), Queanbeyan Council and Greening Australia, supplying labour, tools and vehicles to facilitate clean up and maintenance projects.

Submission# 647

We will be pleased to work collaboratively with NPWS on monitoring and maintenance of trails under NPWS management. 4WD codes of practice are already in existence and are applicable to our member clubs. We would be pleased to have NPWS adopt these for universal application for the guidance of all park users.

Submission# 662

users like 4wd AND bike group can be empowered to gather info info can be used to close certain sections and rotate the use of land

let user groups use the fire trails and get them to assist in better management plans because right now the plans are not the best

Submission# 669

- Although the NP&WS do a wonderful job you cannot do it alone and many volunteers be it people, clubs, organizations etc are available and willing to assist.

o this may include clearing tracks (allow approved users to have chain saws) and collecting rubbish etc

o provide feedback on areas that need attention, such as, damaged facilities.

o repair old or damaged facilities, such as, BBQ's, toilets etc

- Security, access and policing is an area that needs to be addressed

-

o I believe that many volunteers would be available (including myself) to report mischievous behaviour, for example, report any acts by individuals who knowingly or unknowingly cause damage to property, bushland, fauna or flora.

o Problem is that we need to be made aware of legalities, what we can do and who to report the matter to etc.

Submission# 675

I would welcome the opportunity to help in the maintenance of tracks etc

HORSERIDING, Regional Context

Submission# 78

Recreational vehicle usage and horse riding should be encouraged in the 90% of the state that is not set aside for environmental protection, not in the 4% or so of the state that is National Park.

Submission# 253

Horse riders encouraged to use private property or state forests.

Submission# 511

There is no evidence in the discussion paper to support the claim horseriding is a popular activity in these parks provided in the discussion paper. Mr Brown's report (March 1997) does not list horseriding in the Deua National Park of significant or moderate importance.

Submission# 677

We are discussing National Parks access, so why bring State Forests or elsewhere outside Service areas into the discussion?

HORSERIDING, Current Situation

Submission# 229

We have over the years been lucky to have ridden along the bridle trails talked of on page 10 and since its not an everyday or even every week thing – I have seen no areas which could be called areas sensitive to erosion – to me its part of our heritage and our love of the bush in which we ride is always looked after. I'm sure the codes of conduct & responsible use will be once the network of bridle trails is open to horse riders again.

Submission# 444

The horse industry is generally thriving. Horse enthusiasts everywhere are contributing economically to their communities on a local level through purchases made in produce stores and saddleries, and payments made to farriers and for veterinary services. Trail riding is very popular in the South, Coast-Area and in Australia. Many clubs have been formed so that members can enjoy a passion for horses and commune with nature by riding in the bush. Many people enjoy trail riding as a means to experience their cultural and historical heritage. The South Coast Association of Trailhorse Riders is focussed on access issues and how they impact on horse riding within the For South Coast Escarpment Parks. Firstly the undertaking by the National Parks and Wildlife Service to assess the historical and cultural significant of the Shoebridge Track is considered a step forward considering the track was originally overlooked during recent Wilderness Assessments.

Submission# 477

Horse riding is a great outlet for family activities. It encourages the older generations to instill in the youngsters an appreciation of their Cultural Heritage, and promotes the responsible use of the NP in general

Access for All has a list of horse riding tracks and their history. It will take some time to put it together. We support your effort to record these tracks. Many more tracks need to be recorded.

Submission# 522

The cultural heritage line 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.

Submission# 651

For over 160 years my family have ridden horses on the Nimmitabel Mountain track to go between properties on the Monaro and the coast as well as the that goes through Yankees Flat Robinsons Hole Greens Hole etc. I feel very strongly that the opportunity to know and use these areas should also be available to my children and the next generation. The intimate knowledge of where to go and how to find their way can only be attained by physically travelling the route. This same knowledge can only be passed on by those who already know their way, hence continuity of use is needed or the knowledge will fade. The use of these areas by horseback forms part of my heritage and I do not wish to be removed from it. Access to Wadbilliga Trig site and Tuross Falls by responsible users should also be permitted.

Submission# 671

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? That was a far more important cultural heritage to the area. Those who demand access for horses are a very small minority even of the horse-riding fraternity itself. Most serious equestrians would not risk their beloved horses in the wilderness. The aggressive demands for horse access to national parks does not represent anything more than a small group who have vested commercial interests; supported by others who resent anyone telling them where they can go and where they can't. It has very little to do with an appreciation of any historical use of horses to settle the area. Horses damage tracks; foul water and spread weeds. That was why people in the area turned to cars. The current craze for horse riding is as much a creation of a bored; overstressed urban population as the craze for 4WD. It has very little to do with culture and will disappear when the next big wet confronts the current passionate riders with the reality of wet tracks; cranky horses and water trickling down their necks. But allowing the access demanded by the horse lobby will have set a precedent for the next craze which comes along or for the foundation of uneconomic horse riding businesses which then become a lobby group for more access. The purpose of declaring areas 'wilderness' as to allow them to recover from incursions which threatened their degradation and the NPWS must hold firm on this.

Submission# 677

Horse riders on the South Coast of NSW have been discriminated against with wilderness Declarations. These horse riders now have to transport/float horses long distances to access the few tracks left open. i.e Track out along Sugarloaf road (which is not really suitable for large horse trucks) and unload & ride along a road used by 4WD and motor bikes before gaining access to the Georges pack track into Bendethera. The same thing applies to access to the Yowrie/Beloura track. Please find enclosed a list of lost tracks. Lost to Wilderness that is. Horses can be ridden up or down the Corn trail, no where else to go.

Submission# 679

page 10 of the discussion paper for the Far south coast Escarpment Parks. Outlines the current situation on horseriding. This does not truly reflect what has been taken away from us. it lists the Bendethera Mountain track as being outside wilderness area but for us to reach this track we have to go through the Coondella wilderness area. or truck our horses on roads unmaintained by Npws rendering them unsafe, The same applies to the Deua River track since Xmas 2004 two separate groups have trucked and ridden to Bendethera Mountain Track and the road was so bad that the truckdrivers refused to ever do the trip again because of the state of the state of the road. the zig zag track is accessible only via Briadwood. considering this draft plan of management is for the far south coast it gives horseriders of this area very little access to non-wilderness areas. In fact only the " track accessible to us is the Com Trail, a short trail less than half a days ride. For those of us who live further south i.e- Pambula it would seem hardly worth the effort of getting there.

Today riding is a very popular activity on the South Coast and all over Australia. There area many clubs formed because people want to continue. riding in our beautiful bushland. Also there are a considerable number Of riders who do not belong to any club and enjoy horseriding with their families. The horse industry, generally is thriving for example Pat Parelli, Monty Roberts and Glen Gough and all their disciples and others like them are making a living and paying taxes, not to mention the local produce shops which sell all number of horse related paraphernalia and charge GST to boot. The question is why are the. horse people being so unfairly treated why am our historical trails, which lead to places that we want to visit being systematically denied to us. What have we done to be denied access to places that we have done no harm to?

Submission# 680

I would like to comment on your discussion paper for the far south coast plan for HORSERIDERS. Current situation Pg 10 We am unable to reach most of line trails that we are allowed to ride on because there is a large piece of wilderness in our way

Submission# 681

There is no mention of the hundreds of years of cultural heritage that horses are associated with the early pioneers who cut the trails with horses to carry them and their gear. No mention of the history that is likely to be lost to us if these trails fall into disrepair.

Submission# 687

The current situation is totally unsatisfactory. After the last round of wilderness declaration we are left with only four tracks (listed on page 10) The trails lost to us were not listed individually in this paper because there are so numerous within the wilderness areas of Donovan Creek, Coondella Creek, Brogo and Tuross.

Submission# 688

The current situation is totally unsatisfactory. After the last round of wilderness declaration we are left with only four tracks (listed on page 10) The trails lost to us were not listed individually in this paper because there are so numerous within the wilderness areas of Donovan Creek, Coondella Creek, Brogo and Tuross.

Submission# 689

This solution is harsh to say the least as I still believe horse riding to be a low impact environmentally friendly pursuit. It is also impractical because: - At present to ride the Shoebridge Track is impassable because the wilderness boundary cuts out the middle section. It would mean moving the boundary one metre to the West for it to be accessible. But it is explained in the paper " a change to the wilderness boundaries cannot be affected by a plan" And in point 2. GP 11 Horse riding is not permitted in wilderness areas. The NPWS Recreation Horse Riding Policy is set in stone also. Even though with management such as what takes place presently with many riding clubs ie ATHRA the treat to water quality rare plants/animals is non existent. Point 4. Pg. 11 does this mean that we will be expected to ride outside the service areas? Where will we end up, confined to the backyard?

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HORSERIDING, Non-Negotiables

Submission# 253

I don't want horseriders in the National Park; near wilderness areas or along water courses or banks in the catchment.

Submission# 343

NPA Policy on horseriding in national parks remains unequivocal: There should be none. We are prepared to "bend" only where long established riding is concerned, but only to the extent of condoning a phasing out of the activity over a period such as one year. In such cases, particularly where closures have been necessitated because of wilderness declaration, every effort should be made, through liaison with other authorities and private landowners, to find alternative riding routes outside national park land. This will not only offset bad feeling against the Service, but will also help to provide for a legitimate and desirable activity.

It is noted that the NPWS is currently reviewing its Recreational Horse Riding Policy. This has been the case for several (?) years, and, given the date of this discussion paper (May 2004), a final policy may not yet have been adopted. Given the extent of the delay, it is probable that NPWS has found it extremely difficult to decide on the degree of compromise between total exclusion and acceding to the demands of the lobby. NPA regards this as evidence of an underlying wish to adhere to best management principle, but tempered by political considerations. 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.

The NPWS should always take into consideration the staff time and funding resources which must be diverted to each inappropriate activity etc which distracts management from its core responsibilities – principally care of the park, its ecosystems, biodiversity etc. For example, consider the systematic annual assessment of environmental impact of horses on tracks mentioned on p.11. Horse unloading and unloading ramps (p.12) add unwanted structures to the parks, with an attendant concentration of horse activity and impact.

NPWS should also consider the social impact of horses and horseriding on other park visitors, whose activities are generally within the bounds of acceptability for national parks. This very real management aspect is not adequately addressed by NPWS, being dismissed with words such as "potential impact on other park users" or (in the Policy), not to be permitted in areas where an alternate recreational use predominates (p.11).

Submission# 444

However we feel that there are tracks that horse riders have been denied access to as a result of Wilderness Declarations (Horse Riding Page 1 1 Key Issues identified through Consultation). The main example of this is the Shoebridge Track which was completely over-looked in recent Wilderness Assessments. The track passes through areas of National Park which have been declared Wilderness therefore preventing a ride the length of the track. Given that there would be no camping on the Shoebridge Track the South Coast Association of Trailhorse Riders would like to see a corridor to allow access to horse riders through the Wilderness sections. A precedent this already been set by the National Parks and Wildlife Service in the Brogo Wilderness for the inclusion of such as corridor where the Razorback Track has been left open with an easement either side. Why could this solution not be applied in the case of the Shoebridge Track. We would also like to note that the Discussion Paper does not mention the culturally and historically significant bridle track from the junction of the Yowrie and Wadbilliga Rivers to Wadbilliga Station. If access to this track is denied due to Wilderness Declarations we feel that an easement to allow horse riders a corridor through would be desirable. Many horse riders feel cheated of the opportunity to ride these historical and cultural tracks in the same manner as their ancestors did. The South Coast Association of Trailhorse Riders and other individuals and groups are determined to continue to pursue their objective of attaining access via a corridor through Wilderness areas.

The review of the National Parks and Wildlife Service Horse Riding Policy is welcomed and we are optimistic that the result will be favourable to the interests of horse riders.

Submission# 511

The claim that DEC will restrict access to horseriders in environmentally sensitive areas is not accepted as credible. The political reversals on decision making in regard to horseriding in Kosciuszko National Park demonstrates that the Department will not effectively regulate horseriding use where the spread of new weeds will be a problem (i.e. limestone environments). In the case of Kosciuszko, horseriding was to be excluded from karst areas and then the decision was reversed after protests from horseriders. Similarly, horseriding was to be excluded from the Pinch River area to prevent illegal use of the Pilot Wilderness, but now draft plan on exhibition prefers the continued abuse of wilderness than to restrict use. 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.

Submission# 522

Horse riding is not an appropriate use in national parks and should be discouraged.

Submission# 544

PLEASE OPEN CORRIDORS FOR HORSE RIDERS MANAGE THE PARK AND ACCESS DAMAGE. LET US ENJOY THE SOLITUDE OF THE BUSH LETS OUR CHILDREN HAVE A PARK TO USE FOR THE FUTURE. SAVE OUR CULTURAL HERITAGE THAT IS THE HORSE. WE WALK; AND ARE ONLY PASSING THOUGH; LET US CONTINUE... RETURN WHAT YOU HAVE TAKEN.

When you look at the damage that can be done and yet horses have been removed from wilderness areas. I can enjoy the solitude and be 64 times more self reliant than any bike and yet I cannot enter the wilderness. The horse helped to open the country up; it was not done on a bike. I think that NPWS should re-think their wilderness policy for the future and for our kids.

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Regarding the wilderness Policy- 3d opportunities for Solitude and self reliance. It is obvious that you do not have the least idea what horse riders do. We very much enjoy the solitude to the bush and are second to none in the self reliance areas. The NPWS have made a mistake with the policies with the closure of so many tracks due to wilderness. Woila/Shoebridge/Donovan creek/coondella/Brogo and Tuross and others that are not listed. This needs to be amended. I see a suggestion for corridors in wilderness for our Bridle trails and urge you to consider this. Forcing us out of areas that were only visited maybe yearly at the most; or now with some of the trails still remaining forcing us on to roads to compete with 4 wheel drives and motorbikes is dangerous and does effect our enjoyment of the solitude of the bush. Horse are our Cultural Heritage and should be treated as such by the NPWS. Where would we be without them? Now no one is saying that the NPWS should not MANAGE THE PARK. To check the tracks for problems and take appropriate action. But Manage them do not continue to take them off us.

I strongly believe that all tracks should be clear and open to all. The rugged terrain of the parks concerned provides a natural wilderness due to its inaccessibility and the values expressed in the discussion paper are available in any number of areas; with the irony of some kind of transport being required to access them; in a reasonable amount of time; by most average working people. Also the plan does not address; or even recognize; the increasing pressure that the northern areas are coming under due to the lack of similar type areas in the state being available. I am

involved with organizing the batemans bay apex charity trail bike ride for the past 6 years; and noticed a dramatic increase in riders/ vehicles/ users in the area (check the volume of traffic of 4wd;bikes on trailers etc.. on the princes & kings hiways any weekend) I am not trying to be elitist ;and I know it may not be a term of reference in the plan ; but should be taken into account in the future; as basically sth coast residents have cared for the area for the last 100 or so years; and don't want to see the area over used due to the lack of similar areas being available in the rest of the state. 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. This would sort out the fair dinkum users from the ratbags and give a controled access to the passionate park users of all persuasions; be they horse riders; motorcyclists; 4&2WDs or cyclists; all of which like to walk and explore these areas when they stop and enjoy these fantastic areas.

Submission# 636

Corn Trails:

These places area National Parks therefore no outside animal should be allowed in other than a seeing eye dog, if one looks at the horse trails at present, they go through the bush and cut a blaze in tree after tree this starts rot and disease, there is no valid reason to continue this obscene practice , they also spread grass, wheat and other seeds through the parks.

Action : this needs to be stopped in all areas where endemic species are likely to occur .

Submission# 667

There is an ever increasing number of horse riders in NP's. NPs are not the place for horseriding. Nevertheless; KNP is bending to their very well organised and vocalised media attentions

Submission# 672

Wilderness Access - The Conservation Council would like to confirm its support for the NPWS' current access policy for horseriding access in wilderness areas. The Conservation Council recognises that with the introduction of Wilderness legislation there has been a reduction in the level of access for horseriders in the FCS national parks.

Submission# 674

R:As a part time rider I go into the bush and the old bridle trails need to be preserved. I believe that aboriginals used these trails as well. After doing history at school it has shown me that we do not have much of our own and need to preserve what we have. We cannot preserve these trails if they are not used; and will in time be lost forever. Keep the horse riding trails open for all.

Submission# 677

wilderness out of the above mentioned track was one of the worst public relations exercises NPWS have ever done in this area. The Shoebridge track was made as a desperate necessity for flood free access, to enable food and supplies to be made available to a near starving population in Araluen. It is unique amongst bridle tracks, there is no reason to camp on it, no water to unfavourably impact on, is certainly historic and therefore has cultural heritage values. Could be one of Eurobodalla shires prized tourist attractions. The Shoebridge Pack Track along with the Georges Pack Track and the W.D Tarlington Tracks epitomise "they won't be beaten" attitude of our very self reliant pioneers, The loss of access for horse riders to the Shoebridge is heart-breaking and very unnecessary Whether the track from the Junction of Yowrie & Wadbilligia River to Wadbilligia Station (P.P) is still open to horse riders needs clarifying. The maps do not make it clear.

Submission# 678

When you send walkers into the wilderness how do you know if they are ever going to come out. Tracks grow over so fast and blackberries out grow most every thing. I ask you to keep all tracks open to people? If not you could save time and money by letting a controlled group of riders through once a year and the job would be done. "Think about it" I would love to see more riding trails we have a great many horses and rides a shame to close down such a great wealth to our community by the sake of a few trails.

Submission# 679

Why will NPWS not listen to us when we explain where an important trail is (Shoebridge) and ask that the Wilderness boundary be along one ide of the trail so that we can still ride through. Surely this would not have, been too much to ask?

Obviously we on the far South coast need some corridors through the wilderness in order to reach the few trails that are left to ride on.

At least give lhe horseriders the same ecess that the cyclists have so that we can get through.

To expect us to ride halfway up the Shoebridge track as far as the wilderness boundary, turn and ride back is a ridiculous expectation.

Demonstrations and Rallies, petitions and submissions all seem to have little or effect. The seemingly inevitable conclusion is:- NOWHERE TO RIDE Where is the joy of belonging to this so called lucky country, when we cannot enjoy it?

Submission# 680

* Corridors through wilderness areas for horses.

Submission# 681

ALTERNATE SOLUTION Our only hope is to demand that corridors through wilderness areas for horse can be opened to enable us to reach the places that we are still allowed to ride in

Submission# 686

Policy can be changed it is not LAW. I think horse riding is more self reliant than canoeing and mountain biking and ab-sailing. Policy is not set in stone and may be changed. We agree with the suggestion that all the historic bridle tracks remain open as corridors through wilderness (page 11) Everything is negotiable in a democratic and free country like Australia. This is what our Grandfathers and fathers and uncles fought and died for – that we may all enjoy freedom and access to public lands in this great country!

Submission# 687

This solution is harsh to say the least as I still believe horse riding to be a low impact environmentally friendly pursuit. It is also impractical because: - At present to ride the Shoebridge Track is impassable because the wilderness boundary cuts out the middle section. It would mean moving the boundary one metre to the West for it to be accessible. But it is explained in the paper " a change to the wilderness boundaries cannot be affected by a plan" And in point 2. GP 11 Horse riding is not permitted in wilderness areas. The NPWS Recreation Horse Riding Policy is set in stone also. Even though with management such as what takes place presently with many riding clubs ie ATHRA the threat to water quality rare plants/animals is non-existent. Point 4. Pg. 11 does this mean that we will be expected to ride outside the service areas? Where will we end up, confined to the backyard?

PREFERRED SOLUTIONS

The practical solutions are moving the wilderness boundaries and creating corridors through wilderness areas. OR I would like horse riders to have at least the same access as cyclists have set out in this paper pg. 14&15

Submission# 688

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Submission# 689

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Submission# 691

2 my family & i are outdoors people(horse riding & trail bike riding) my concern is that in years to come it might get to the stage that we cant enjoy the parks any more because they are all classified wilderness, & which means we cant get access to the parks to enjoy our hobbies.

HORSERIDING, Negotiables

Submission# 677

Very positive if we can in fact still ride, use and help maintaqin the tracks around Bendethera, Deua, Wadbukkuga and within Nomga and Tuross Nationa Park

Submission# 681

In Negotiable The things listed seem to be what we allowed to do now. So the places we am locked out of non-negotiable but what we have left is negotiable ie. likely to be taken away?

Submission# 687

Pg. 11 NEGOTIABLES

Maintaining the trails that we have left is listed as negotiable, could we lose these as well?

Submission# 688

Pg. 11 NEGOTIABLES

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Submission# 689

Pg. 11 NEGOTIABLES

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Pg. 11 NEGOTIABLES

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HORSERIDING, Potential Environmental Impacts

Submission# 78

horses regularly illegally traverse wilderness in the Deua National Park and riders give not a tinker's cuss for hoof damage, weed dispersal (they invariably are grazed on exotic pasture plant species before entering the wilderness) and trail erosion. Horses and protection of bio-diversity are mutually incompatible.

Submission# 444

Page 1 1 Potential Environmental Impacts states that systematic annual assessments by Rangers over a 2 year period showed only moderate impact with no increase on impact. Many horse riders feel that issues such as erosion, compaction, and the introduction of weed and non native plants seeds are so] 1 1 often seen as excuses to deny access. Horse riders greatly appreciate 'Natural Heritage' and 'Intrinsic Values ' as well as 'Cultural Heritage' (Values identified Through Consultation Page 2 - 3). We desire only to use already existing tracks and have no desire to 'bush bash' through sensitive areas. Similarly conflict with other park users has the potential to be used to deny access. There would be very few instances where recreational activities would clash for example horse riders would not like to ride in areas which are highly popular with trail bike riders.

Submission# 511

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)

Submission# 522

Weeds; vegetation damage; fouling; compaction and erosion make it a particularly unacceptable activity from an environmental and user point of view.

Submission# 544

What happens in the future; if we a left but a few small areas the potential is there for alot more damage. I believe

that horse riding is comparable to bush walkers; soil compaction is only an issue as is erosion when we are locked into these smaller and smaller areas. Horses do not spread weeds. If you are going to get serious about weeds you need to PREVENT ALL BIRDS FLYING OVER. Far more weeds would be spread by seeds on the bushwalkers clothing. The areas that we are discussing in this plan are not the sensitive sandstone area; but generally shale country. Hard shale country.

Submission# 677

R: How bad was the soil erosion and weed problem on the closed tracks! Currawongs and foxes spread/carry more weeds into the National parks than ever horses will. Wombats, rabbits and wild pigs can do cause more erosion than horses. Please put the blame where it belongs. I can't believe this new Discussion Paper is still quoting furphys. Horses travelling on established historic bridle tracks do not have an unacceptable impact on water quality (page 11 point) areas where horses etc.

If NPWS insist on printing the old furphy re horses, weeds & erosion and water quality, then perhaps its time NPWS took a delegation from key horse riding groups in the area we are discussing into the area under discussion and show us the damage etc on the long established tracts that we are accused of creating.

Submission# 679

myths such 'horses spread weeds' are still being used as an excuse to deny our access, even though it is obviously untrue and has been proven so.

Submission# 680

Horses do not spread woods. So that if some soil gets compacted, it would not be an increasing problem and for the enjoyment it brings us I think it is worth it.

Submission# 681

On page 11 it says that we conflict with other recreation users, it does not say anywhere in the draft how others might conflict with horseriders. As for the Rangers assessing the impact of horses on non-wilderness tracks for two years, this is a ridiculous waste of their time and our money, What was the reason for this study? To tell us that it is OK to us to keep riding outside of wilderness?

Submission# 686

Horses do not cause erosion in this area due to the hard stony ground this is NOT a sandstone area. Horses do not spread weeds – we feed pellets and weed free chaff before entering National Parks. Horses do not have any impact on water quality – no more than wombats or kangaroos they eat all vegetation

Submission# 687

The discussion paper seems to deem horses as an environmental menace, polluting water, eroding soil, spreading weed, this is NOT the case

Submission# 688

The discussion paper seems to deem horses as an environmental menace, polluting water, eroding soil, spreading weed, this is NOT the case

HORSERIDING, Key Issues identified through Consultation

Submission# 681

In Key issues How does anyone have the authority to say that horseriding is inappropriate in wilderness or NP's, I cannot think of a more appropriate way to travel through any remote area,

HORSERIDING, Possible Guidelines and Actions, Horse Riding Network

Submission# 25

Horseriding, page 10: 1-horse riding along the Alpine to Canoolie to Bendethera bridle track, involving access through private property is a possibility, however., the numbers of riders should be limited; : the number of occasions per annum should be limited, adequate notification should be made; : environmental pollution and damage should be minimised; 9 environmental education and responsibilities should be maximised; no vehicles should accompany the horses through Alpine.

Submission# 346

Monga NP - Horse riding is an inappropriate activity in such a sensitive National Park especially when the proximity of State Forest areas offering alternative rides is taken into consideration,

It is difficult to see how Monga National Park is a suitable venue for horse riding. Climatic conditions mean that:

- The area is very sensitive to erosion in many places
- There are many environmentally sensitive areas
- Weed invasion is a threat to some of the unique values of the park.

Submission# 444

A further point of concern is that the map does not indicate where tracks pass through private property. We are concerned that many readers may make the assumption that the existing tracks and bridle tracks are entirely within the National Parks. As a Trailhorse Riding Club we feel this is important to respect private property and ensure that permission is received before travelling through. e.g. Bendethera to Canoolie to Alpine. The lack of identification of areas of private property may give the impression that the public, horse riders and others can freely go through these places. Similarly the maps and discussion paper do not specify where tracks traverse State Forests. Horse riders have no issues with access in these areas. This raises the concern in our minds as to the future direction of the National Parks and Wildlife Service with respect to claims over areas which are now within the State Forests.

Submission# 477

Your Possible Solution – once again promotes the use of Private Property and we find this quite unacceptable

Submission# 483

R: Horse Riding Pages 10 – Deua River track 11 – Alpine to Canoolie to Bendethera Alpine to Fairfield Zig zag Bendethera to Krawarree

All these tracks cross, start or finish on private property/. This fact greatly reduces tracks for horse riders. I think the publication of these tracks is misleading for horse riders and unfair on private property owners. NMPWS could with the help of local knowledge find other tracks not mentioned in this paper. More consideration should be given to private property owners in or neighbouring the national parks.

Submission# 511

The proposal to allow cycling on the Corn Trail is unwise as it is too gullied for such use to be possible, even for 'extreme' riders. These ruts are found extensively on the section between Murrenburg Mountain and the Buckenbowra River. The steep sections of this section are very deeply rutted and impassable. This suggestion demonstrates ignorance of this Trail or a failure to understand what can be done on a bicycle. Narrow ruts or gullies deeper than half a metre and less than a metre wide cannot be negotiated by bicycle. Allowing such use will leave the Department open to negligence claims arising from accidents involving cyclists.

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. A similar story can be seen in the Department's acquiescence to demands by the Access for All lobby for a cultural survey on the Shoebridge Trail (see Town and Country Magazine March 17, 2003). The proposal to undertake horseriding from Alpine to Bendethera would mean horseriding through the centre of the Deua Wilderness. This proposal is repugnant to the Colong Foundation as it would see legitimised a series of horse camp related environmental impacts, including trampling of river bed vegetation and subsequent bank erosion, establishment of horse yards, introduction of exotic weeds and grasses at these camps, loss of native vegetation and distribution camp rubbish (see also Appendices 5 and 6).

The proposal to allow continue to allow horseriding on the Corn Trail between Murrenburg Mountain and the Buckenbowra River is unwise as it is too narrow and too steep. The deep ruts in this track were caused by horseriding, demonstrating its unsuitability, yet the Department will again be unlikely to act on local evidence that establishes unsuitable use, contradicting its own inverted position on the precautionary principle. The Department is being demonstrably incompetent by suggesting continued use of the Corn Trail by horses as a way forward.

Submission# 522

If bridle tracks are permitted only those leading around or away from declared wilderness areas should be retained. Bridle tracks that are open at either end with closed sections traversing wilderness are inviting riders to illegally enter wilderness. As with my comments for vehicle use the Service should not be feel compelled to accommodate horse riders.

Submission# 544

Now no one is saying that the NPWS should not MANAGE THE PARK. To check the tracks for problems and take appropriate action. But Manage them do not continue to take them off us.

Submission# 615

R: horse riding and mountain bike riding should not be permitted across karst areas

Submission# 671

Horse riding should be limited to areas which are already subject to considerable degradation.

Submission# 672

The Conservation Council does not object to access to the recreational road network but has concerns about the use of bridle trails given that overusage of these can lead to significant degradation (refer potential environmental impacts identified in the discussion paper).

Submission# 673

I have only just turned 18 and only ride every now and then; but I think that as many tracks as possible should remain open; for us all to enjoy. I may have children one day and I would like them to ride in these areas with my Mum who loves to ride in the bush.

Submission# 674

As a part time rider I go into the bush and the old bridle trails need to be preserved. I believe that aboriginals used these trails as well. After doing history at school it has shown me that we do not have much of our own and need to preserve what we have. We cannot preserve these trails if they are not used; and will in time be lost forever. Keep the horse riding trails open for all.

Submission# 678

I have studied the discussion paper and on most things agree – road tracks etc.

Submission# 681

Having read Your draft Plan Of management it seems that NPWS are on a mission to keep horse out. They will not be satisfied until we are reduced to riding around the back paddock.

HORSERIDING, Possible Guidelines and Actions, Camping

Submission# 253

No horse camping or vehicle depots

Submission# 346

If horse camps are provided there will be considerable localised impact on vegetation and water quality. A booking/permit system would need to be put in place to monitor and manage impact.

Submission# 444

The inclusion of permitting vehicle based camping with horses is extremely encouraging.

Submission# 511

The Discussion Paper risks management planning for the Far South Coast Escarpment Parks being visitor-based, not nature-based. For example, the proposed trail bike use of, and horse camp and horse ramp facility for Monga National Park would degrade this very biodiverse and intact park. This approach is not supported (see attached Appendices 5 and 6 for evidence of environmental impacts).

The proposal to allow camping with horses in the Monga National Park will surely degrade this park, which should have been reserved as a nature reserve in view of its high biodiversity. The declared Buckenbowra Wilderness is a 'Claytons wilderness' that follows the escarpment edge, despite repeated requests by the Foundation to extend the boundary to the River Road west of the Mongarlowe River so as to protect the undeveloped escarpment edge and environs.

Submission# 522

Horse camps focus and prolong these impacts so they should be located outside of NPs. Where horse riding continues to be permitted one day trips should be encouraged instead. The reference to vehicular based camping with horses (p12) is unacceptable if it refers to bringing in horse floats given their impact on the roads and other users.

Submission# 544

LOOKING FORWARD TO THE EXTRA CAMPS/LOADING FACILITIES.

Submission# 671

R: In addition; areas for horse camping and loading/unloading of horses must be remote from water courses. Of course this is an inconvenience for horse riders but they are experienced in providing discreet water containers for their stock in their normal quarters and this practice can easily be extended to occasions when they use the Parks.

Submission# 677

Permit vehicle based camping with horses at Sutherlands Camp etc. Great news very positive.

HORSERIDING, Possible Guidelines and Actions, Loading and Unloading

Submission# 253

R: No horse camping or vehicle depots

Submission# 343

R: Horse unloading and unloading ramps (p.12) add unwanted structures to the parks, with an attendant concentration of horse activity and impact.

Submission# 444

The South Coast Association of Trailhorse Riders and other horse riding groups would welcome the provision and/or establishment of loading and unloading facilities at Sutherland's Camp, (Wadbilliga National Park), Mongarlowe River(Monga National Park) and Bendethera Fire Trail (Deua National Park).

Submission# 477

Access for All applauds NPWS for taking the initiative it install horse loading/unloading facilities, and would be pleased to assist with the construction of facilities like this.

Submission# 511

The Discussion Paper risks management planning for the Far South Coast Escarpment Parks being visitor-based, not nature-based. For example, the proposed trail bike use of, and horse camp and horse ramp facility for Monga National Park would degrade this very biodiverse and intact park. This approach is not supported (see attached Appendices 5 and 6 for evidence of environmental impacts).

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Submission# 677

Horse loading and un-loading ramps in places mentioned is great news and the way to go.

Submission# 679

The roads into Sutherlands camp In Wadbilliga NP are unsuitable for any truck loaded with horses so there seems little point in providing unloading facilities there or at Little Sugarloaf Road because we cannot truck our horses there.

HORSERIDING, Possible Guidelines and Actions, Walk Horses Policy

Submission# 477

On sections of heavily trafficked tracks/trails – We need more information on what this means.

Submission# 522

The suggestion of having horse walking tracks is naive and will be unenforceable.

Submission# 544

What is meant by the policy of walking your horse? We generally 99.9% of the time walk our horses. As apposed to trotting etc. Or are we required to get off and walk our horses; what and have the impact of 3 pairs of feet instead of 2?

Submission# 681

on page 12 2nd last point What do you think that walking a horse along an already compacted trail will achieve? Surely the track would not become less compacted.

HORSERIDING, Possible Guidelines and Actions, Collaboration

Submission# 78

R: Codes of conduct work only on an informed amd conscientious minority and are a waste of time (refer to the debate on jet ski abuse in the Eurobodalla)

Submission# 444

The South Coast Association of Trailhorse Riders welcomes the opportunity to work in collaboration with the National Parks and Wildlife Service on issues such as track monitoring, maintenance and the development and promotion of codes of conduct.

Submission# 477

Where possible, work etc – Delete “where possible”. – “work collaboratively with recreational horse etc.”

Submission# 677

Horse riders look forward to working with NPWS and keep tracks open and maintained if given the opportunity.

CYCLING, Current Situation

Submission# 664

A rare speicies on the trails.

Submission# 692

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 withing the Escarpment Parks is relatively low. However, the popularity of off-road cycling has grown significantly in recent years, particulary 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.

CYCLING, Non-Negotiables

Submission# 343

Here again, some of those present at the forums indicated a wish to extend use or potential use of bicycles in FarSCEP. In this case, NPWS and NPA policies are similar, except that NPA policy excludes bicycles from wilderness, whereas NPWS proposes to allow them on specified management trails.

The activities of cyclists in national parks is one of several man-made factors modifying the ideal state of unmodified nature in national parks. Its impacts, both environmental and social, have become more evident with growth of the activity. The environmental impacts are as listed on p.14. The social and physical impacts on walkers include danger

from reckless riding, and startle with potential danger from silent passing (cyclists should use their bells while 50m or so behind walkers).

NPA policy (No.20, Point 9.8.3) opposes cycling in wilderness, including on management roads, and urges NPWS to adopt this policy. 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.

Submission# 346

2. Cycling should not be permitted in Wilderness areas

Submission# 522

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.

CYCLING, Possible Guidelines and Actions, Cycling Network

Submission# 25

Cycling, page 14..

Cycling On all the existing tracks, except on private property, should be permitted. An alternative track, avoiding Alpine, as proposed above, would suit cyclists as well as 4WD vehicles, and the owners of Alpine.

Submission# 253

I would like cyclists to stick to existing roads.

Submission# 346

3. 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.

4. 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.

Submission# 367

• Cycle access to all areas of National Parks including Wilderness Areas.

Cycle access to all areas of National Parks including Wilderness Areas.

Submission# 385

Let them in and let them ride.

Submission# 391

2: I see no reason why mountain bikes should not have access to these management trails as well as walkers. There is good reason to place cyclists on mountain bikes in a different category from motorised transport. There is no noise problem, and on most wide trails like fire and management trails (such as River Road or Boundary Fire Trail) there is only minor potential for environmental impact or conflict with walkers. Cycling is something to encourage, I think, on the whole, on health and environmental grounds. I have spent considerable time working in the USA, and have often walked along tracks that are shared, mostly without major problems, between walkers and mountain bikes. These have always been sizeable, double track trails.

Submission# 511

R: The proposal to allow cycling on the Corn Trail is unwise as it is too gullied for such use to be possible, even for 'extreme' riders. These ruts are found extensively on the section between Murrenburg Mountain and the Buckenbowra River. The steep sections of this section are very deeply rutted and impassable. This suggestion demonstrates ignorance of this Trail or a failure to understand what can be done on a bicycle. Narrow ruts or gullies deeper than half a metre and less than a metre wide cannot be negotiated by bicycle. Allowing such use will leave the Department open to negligence claims arising from accidents involving cyclists.

Submission# 522

Although the environmental impacts of such activity may not be great I am concerned at the possibility of cyclists straying off track or onto walking tracks in wilderness areas and the numbers of people that may be attracted there with easier access. Cycling has become a real problem on the walking tracks of some parks such as Royal NP. Cycling use generally needs to be monitored closely to prevent such abuses. Cycling is worth encouraging in certain places as an alternative to higher impact activities.

Submission# 615

horse riding and mountain bike riding should not be permitted across karst areas

Submission# 667

Cycling is such a growth activity. Keep out of the wilderness area; and don't make exceptions in this POM. Accommodate on other access roads and tracks.

Submission# 668

Unlike most NPWS POMs I have read; this paper gives cyclists very good access. A few (very) minor points: # Razorback FT appears to go through the middle of wilderness

Submission# 671

Bike Riding in Wilderness Areas I strongly object to permission for mountain bike riders to access wilderness areas when "approved by a Regional Manager" and for "Trails suitable for cycling within wilderness areas may also be specified in plans of management." Why? The nature of trail bike riding is to go as far as one can; as fast as one can; hopefully downhill and over bumps. They must brake using the friction of the track to stop themselves; that is they cannot brake without degrading the track. How does wilderness enhance this activity? If in fact it is the wilderness experience they are seeking; it is not unreasonable to ask them to walk within the wilderness. If it is the thrill of mountain biking; then that activity in its nature threatens the wilderness values. Bikers must, like the rest of us; choose between convenience and thrills outside wilderness and walking gently within wilderness. To ask them to walk their bikes through wilderness areas and then remount at the gate is just plain silly. To allow bikers to use management trails to ride in wilderness is to invite riders to push into the undamaged bush. The resources required to police their activity in wilderness areas is clearly out of the question; therefore they must not go there. The following trails must be removed from permitted cycling trails: Gollarabee FT; Belimba FT; Jillicambra FT and Green Hills FT.

Submission# 672

While evidence exists that shows cycling has little impact on formed management roads this is not the case for walking tracks or similar non formed trails. A concern that the Conservation Council has is that touring on formed roads forms only one part of the overall mountain biking experience. The Conservation Council sees regular evidence that formed road policies in reserve areas are not obeyed. The Conservation Council is therefore reluctant to agree to access in wilderness areas for mountain bikes and fully supports the educative actions identified in the "possible Guidelines and Actions".

Submission# 692

With particular reference to the Access Management Discussion Paper, CORC makes the following points:

1. CORC supports the proposal to permit cycling on the public road network and on management trails including those within wilderness areas.
2. In addition to this, CORC proposes that cyclists also be permitted on bridle trails, provided they adhere to a Code of Conduct, which would include slowing down and giving way to horse-riders.
4. Within the Escarpment Parks there is tremendous scope to develop Icon Trails - looped cycle routes which showcase the features of the Park. These would utilise public roads and management trails, as well as single-track designed built according to internationally recognised standards. Cycling on an Icon Trail allows Park users to experience a whole lot more of what the Park has to offer, in a peaceful manner with low environmental impact. Elaboration of the concept of Icon Trails and discussion of trail building principles is given in subsequent sections below.

CYCLING, Possible Guidelines and Actions, Cycling on Walking Tracks

Submission# 391

6: Mountain bikes and horse riders are already well provided for through access to management trails. Walkers are not at all well provided for in this area, since most existing fire and management trails are too hard and too wide to make pleasant walking. Much of the area in the escarpment, especially Monga, Budawang and Morton National Parks is trackless wilderness which is dense and very difficult to walk through. There is a severe shortage of single tracks suitable for walkers in this area, yet the paper proposes to make one of the few popular day walking tracks

available unsuitable for walkers by allowing completely open access for hazardous mountain bikes.

7: In my opinion it is invalid to make proposals or decisions about other forms of recreation without considering the needs of walkers, the potential for other forms of recreation to conflict with the needs of walkers, and whether adequate and fair consideration has been given to the needs of walkers as opposed to other forms of park travel. This paper is particularly deficient in these respects and in my view should be withdrawn and completely rewritten to enlarge the discussion and include planning for single track walking trails..

3: I am much more concerned however about the discussion paper's proposal to give mountain bikes access to the Corn Trail. I walk this track quite often, as it is one of the few good-sized tracks in this area for a walker. This is definitely not a double track, and I hope you do not intend to try to make it one. It is a narrow and very steep downhill track with mostly poor visibility on which bikes could get up a great deal of speed. There is great potential for speeding mountain bikes to conflict seriously with walkers and cause environmental damage to track edges and surrounding vegetation, especially if this became a popular route. Because it is all downhill, it is quite possible that this will become a 'thrills and spills' challenge track for cyclists, a bicycle version of the notorious 4WD Turtle Fire Trail. Walkers can be injured and even killed in collisions with mountain bikes. I believe that bicycle challenge riding would not be a suitable use for a track traversing a large area of very fine forest in which endangered animals like Koalas and Quolls have been sighted. Yet the paper proposes unrestricted use by mountain bikes.

4: The discussion paper states that (p 14) "Cycling is not to be permitted on single track 'walking' tracks unless a sign indicates otherwise. These are generally narrow tracks used principally by walkers and are not suitable for, or maintained for, the purpose of cycling." The paper then proposes, without discussion or explanation, to make an exception for the Corn Trail. I think it is a serious deficiency in the discussion paper that it does not address the potential for conflicts with walkers on the Corn Trail or explain why such an exception has been made in the case of the Corn trail, which is for the most part, and should remain, a single track trail.

5: There is good reason for the NWPS to prioritise walking in the case of conflict as the form of recreation best suited to realise values of study and appreciation of nature provided for in NPWS legislation, and also because it is the form of recreation that minimises environmental impact and best promotes community health. Yet walking seems to have been given the lowest priority, if this paper is anything to go by. I think this is astonishing. There is also a complete failure in the paper to address the question of potential conflict between walkers and biking or horse riding, especially in the case of the Corn Trail.

Submission# 544

Please also see above comments- Cycling on the Corn trail. As the riders come down at great speeds there is many safety issues. What happens if a rider comes down and comes across a group of walkers or riders. This is a recipe for disaster. He/she would not stop in time. There is also the erosion issue to the tyres; as they corner at great speeds

As for the Cycling i.e. on the Corn trail. There is a great deal of danger here. Bike riders do not ride up. They ride a great pace down. And unlike a motor bike are silent. My brother was almost killed in Victoria on a mountain bike when he hit a deer (that's how silent they are.) Please see more below.

Submission# 668

R: shared use bridle/cycling trails: was this given any thought? Perhaps they are way too rough/steep/horrible due to horse damage

Submission# 678

On the Bike problem, I don't dislike bikes but to put the two together on the same track is very stupid a Bike is silent and same can be said for horses until the two connect then there could be death doesn't anyone stop to think, Bike only come down the corn trail and at great speed there is no time to stop and most places very dangerous.

Submission# 686

Corn Trail Was re-opened by horse riders with a Bi-Centennial grant. Has been maintained and kept open by horse riders ever since. Our view is that (cycling page 15 Corn trail Monga National Park) Mountain Bikes are totally unsuitable for the trail and shouldn't be allowed due to the steep trade of the track and sharp corners. They will ruin the track for walkers and horses by causing ruts and erosion on the corners and steep descents not to mention the safety aspect to horses and walkers. Horses can not see or hear fast moving bikes coming from behind and become terrified when they suddenly appear! This is first a bridle track which we are happy to share with walkers but not destructive and dangerous mountain bikes. This track was not opened or designed for mechanical transport of any kind.

Submission# 692

3. CORC suggests greater provision for cycling on "single-track", as this is by far the most popular enjoyable form of off-road cycling. The Discussion paper proposes that this be permitted only for the Mongarlowe/Corn Trail link and the Corn Trail itself, both of which are already utilized by off-road cyclists.

CYCLING, Possible Guidelines and Actions, Walk cycle policy

Submission# 515

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.

Submission# 522

The proposal to have push or carry areas for cyclists is as unenforceable as the horse walking idea.

Submission# 668

walk bicycles (& horses) on heavily used areas: if it's heavily used by vehicles; I doubt it would be any safer to walk. As the vehicles are the dangerous part of the equation; I hope No. 1 priority should be to get vehicles to go slow/bear some responsibility. # shared use bridle/cycling trails: was this given any thought? Perhaps they are way to rough/steep/horrible due to horse damage

CYCLING, Possible Guidelines and Actions, Promotion

Submission# 692

R: CORC promotes the responsible use of our natural resources, in order to minimize environmental impact and ensure compatibility with other user groups. CORC encourages all mountain bike riders to adopt the internationally recognised International Mountain Bike Association's (IMBA) "Rules of the Trail". This code is based on mutual respect for other visitors, respect for the environment and supports the minimization of impact on trails.

CORC believes that every effort should be made to educate off-road cyclists with respect to this Code. To this end, CORC promotes these principles both on its website, as well as through its newsletter. Furthermore, CORC is always keen to work with land managers to develop and promote Codes of Conduct for off-road cycling specific to the local environment.

Single Track (Narrow Trails)

Cycling in natural areas is aligned and compatible with the generally accepted concept of 'self-reliant recreation'. It is significantly akin to other 'self-reliant' recreational pursuits such as camping, walking, hiking, backpacking, canoeing, mountaineering, orienteering and rogaining. Off-road cycling should be afforded equitable access opportunities to natural areas. Studies have demonstrated that on correctly designed narrow trails, mountain bike riding has a comparable impact as hiking². The placement of a trail is more critical in controlling erosion than the type of low impact trail use. Off-road cyclists tend to remain on formed trails - as such, environmental impact is confined to the localized area of the trails, and less vegetation and wildlife tends to be disturbed when compared to other less directed forms of "low impact" recreation.

Single track (narrow trails) through natural bushland is a desirable trail type, hence the development of these trails are important. Properly developed single track has the additional advantage of minimal impact on the environment.

Shared Trails

Generally, shared trails are preferable to single-use trails. Shared trails build a community of trail users and shared trails reduce the need to build new trails for each different user group. Shared use trails have the following advantages for user groups and land managers alike.

- ? Shared use trails can best accommodate the needs of the most users.
- ? Sharing trails help build a trail community by increasing the need for all users to cooperate to preserve and protect a common resource.
- ? Shared trails are most cost effective for land managers.
- ? Shared trails enable responsible, experienced users to educate "outlaws" and novices.
- ? Single-user trails increase demands for the construction of additional trails to serve other single user groups.

However, at times, different single use trails may be required to cater for different trail users and avoid conflict - particularly if the trails are heavily utilized by a number of different types of users.

Icon Trails

An off-road cycling route linking together a number of interesting features of the Parks would constitute an Icon Trail. This would consist of shared multi-use trails, management trails and open roads. Icon Trails allow Park users to visit and experience more features of the Parks, in a peaceful and low-impact manner, than would otherwise be possible on foot. Of course, walkers and hikers would also be expected to utilize the Icon Trail, although this would probably be at a lower level than that of off-road cyclists.

Icon Trails have been developed with great success in other states. Notable examples include the Mawson Trail in South Australia, and the trails parallel Bibbulmun Track (specifically designed for off-road cycling). Both of these are long (hundreds of kilometres in length), yet and cater for both day cyclists as well as off-road cycle touring.

In order to maximise the use of Icon Trails, every effort should be made to link up with other (pre-existing) trails, as well as convenient entry/exit points (trail-heads) such as carparks. Icon Trails should also incorporate smaller loops, allowing users to rider part of the Icon Trail, and return via a different route. Relevant information and education could be provided at the trail-heads. This would include details of the Code of Conduct, a map of the area showing the trail route(s), and an outline of what to expect, in terms of ride duration / difficulty and noteworthy natural features likely to be encountered. Finally, access to overnight camping facilities should also be incorporated into Icon Trails. This would encourage campers to participate in off-road cycling, as well as provide a facility for off-road cycle touring.

Conclusions

Off-road cycling is an ideal low-impact means by which people can move throughout the National Parks - visiting key attractions and enjoying a "back to nature" experience. If managed properly, the impact of off-road cycling is similar to that of hiking, yet it allows people to cover significantly greater distances than would otherwise be achieved by walking. An opportunity exists, through the development of the Access Management Plan, to promote off-road cycling within the Far South coast Escarpment Parks and significantly expand the range of opportunities available to Park users.

While it is encouraging that off-road cycling is recognised as a legitimate form of recreation within the Escarpment Parks, more should be offered to promote its participation. Specifically, 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.

CYCLING, Possible Guidelines and Actions, Collaboration

Submission# 78

Codes of conduct work only on an informed amd conscientious minority and are a waste of time (refer to the debate on jet ski abuse in the Eurobodalla)

Submission# 371

? However the same standards apply as to the establishment of a code of conduct for these activities and policing of illegal activity.

Submission# 544

AND LOOK FORWARD TO WORKING AS A COLLABORATION.

Submission# 672

R: The Conservation Council is therefore reluctant to agree to access in wilderness areas for mountain bikes and fully supports the educative actions identified in the "possible Guidelines and Actions".

Submission# 692

CORC promotes the responsible use of our natural resources, in order to minimize environmental impact and ensure compatibility with other user groups. CORC encourages all mountain bike riders to adopt the internationally recognised International Mountain Bike Association's (IMBA) "Rules of the Trail". This code is based on mutual respect for other visitors, respect for the environment and supports the minimization of impact on trails.

The principles of this code are:

- ? Ride on open trails only. It is your responsibility to find out where you can ride. Respect land managers' decisions about closures.
- ? Leave no trace: Keep to the trail. Don't cut corners. Don't skid. Don't litter.
- ? Control your bicycle: Obey speed limits. Be aware of other trail users. Ride within your ability.
- ? Be courteous: Warn others of your approach. Give way to other trail users.

? Don't startle animals: Give animals extra room and time to adjust to your presence.
? Plan ahead; be prepared; know your equipment, your ability and the area where you are riding. Wear appropriate clothing and a helmet.

OTHER, Education

Submission# 346

Additionally a public awareness program on the basic philosophical changes in the land management of these parks should be undertaken as a matter of urgency.

Submission# 662

I shall attach a further document to my points being new to NSW I find the government and this department to be like the catholic church do as I say not as I do. education on use ; sustainable use is the best way forward from what I see the recreational users are your best form of aid as managing the vast areas better incorporate these people and users groups in your plans to gather info and better manage

Submission# 669

- Education will be a major factor in preserving our very important bushland not isolation. What does this mean? I have a number of ideas and to be honest I cannot say which will work, but I know that one will be the answer. Some thoughts are:
o Training various individuals or club members about our bushland
o This will enable them to approach campers etc and provide information that educates campers/4Wders/etc on the right thing to do
o In particular, provide local knowledge on fauna and flora or others areas of interest.
o How to assist the NP&WS via donation, support etc

OTHER, Resources/User Pay

Submission# 371

? All off road capable vehicles should be contributing to the upkeep of the parks and the track systems.
? This should come about via a greater share of, or a nominal increase in all vehicle registration fees. This is something that can be actively perused via all the clubs, motor bike, and 4WD, Horse & Groups writing and seeing their Local Members.

Submission# 477

Our members are opposed to paying fees. We already own the area and there is no guarantee that the money will be spent in the recreational areas.

Submission# 522

Parks with remaining significant 4WD use should have entry fees to cover the damage.

Submission# 669

o Licensing or form of admission fees could also be considered and accepted but must be reasonable to attain or pay.

OTHER, Quality of Information Base/Maps

Submission# 25

R: The publication of the discussion paper with its accompanying maps of the access routes to the Deu4 NP provides many move people with information and potentially creates more problems for Alpine. The repeated references to cast/west access routes and circular driving routes, plus actual mention of Alpine, are not solutions to the owners of Alpine.

Submission# 343

R: The maps are also unsatisfactory in that they do not distinguish between public and park roads (only 2WD and 4WD, major sealed, minor sealed etc) a distinction which must be made in the plan of management but which also should have been made on these maps, so that the discerning public could know whether or not the Service has any jurisdiction over certain roads which are proposed to be available for public vehicular access within FarSCEP (e.g. Minuma Range Ft, Misty Min Rd, Oulia Creek Ft, Bendethera Ft).

Submission# 363

Although it was not entirely clear to me from the map attachments exactly how the proposed changes will affect our access to the trails that we use

Submission# 439

The road access network trails are confusing. Which roads and trails are included is unclear and appears that some are included shouldn't be and vice versa. Public roads, such as Araluen road are included on the maps, are these considered to be under the jurisdiction of NPWS, I think not. State forests and other public roads are also included in some calculations, why? Note for table 1- more confusion We are not impressed by tables that show total kilometres and are vague and confusing.

Submission# 477

The maps supplied are of very poor quality. The time frame leaves very little time for research.

Submission# 497

R: The DSMRA has concerns that the plan does not make clear if there are to be any road closures.

Submission# 511

There are no data on vehicular use of trails in the Far South Coast Escarpment Parks provided in the discussion paper that will drive the development of the subsequent draft plan of management. Mr Ian Brown's report to the NPWS Tourism Project on 'Adventure Recreation Demand in Protected Areas of NSW' does not mention horseriding or 4WD vehicles recreation as significant users of the escarpment parks (March 1997). The proposed ways forward (i.e. recommendations) of the discussion paper appear to be made with the objective of increasing vehicle-based visitation for the promotion of tourism development in the local community. Similarly, while reference is made to the impact of horseriding in the park, no site specific information on impacts has been provided and again the way forward is to promote tourism based on horseriding. These Departmental strategies are biased against the protection of these wilderness parks and will run the gauntlet of major ongoing controversy with the NSW environment movement for generations.

Submission# 600

Lack of clarity on which roads are being closed concerns me greatly. It becomes difficult to comment on such plans consistently if the real information that matters is not being presented.

Submission# 657

R: The discussion paper is not clear on which roads are being closed. What is National Parks hiding?

The discussion paper is not clear on which roads are being closed. What is National Parks hiding?

Submission# 662

The discussion paper is not clear on which roads are being closed. What is National Parks hiding? - as a registered trail bike rider I totally oppose ANY reduction in the trail network in the park and therefore oppose ANY road closures. you must allow people somewhere to undertake activities - the "non-negotiables" are a disgrace TO DEMOCRATIC voters and the spirit upon which this country is founded and Monga

Submission# 664

The discussion paper is not clear on which roads are being closed! What is National Parks hiding?

OTHER, Fire Management

Submission# 78

R: g. The Merricumbere, Mongamula and Minuma Range Fire Trails in Deua Wilderness should be closed and rehabilitated. All fire control in the Deua should occur adjacent to neighbouring properties at the periphery of the wilderness eg along Oulla Ck Ft

Submission# 85

NSW RFS Fire Commissioner Phil Coberburg stated today on ABC Canberra Radio 666 That there is a great threat to the North, South and East of Canberra this fire season after all there is nothing left west of Canberra now. My question

to you is: there is no mention of improvement of fire trails especially in these vulnerable S/E regions. All these trails should be safe, passable, free from debris and maintained for the safe and efficient operation of RFS volunteers, you could use these fire trails to burn off strategically placed or at least maintained to HR areas in a mosaic pattern to the benefit of flora and fauna.

Submission# 477

The outcomes of this paper should be part of a Fire Management Plan. The road network would then server two purposes.

Submission# 562

A far greater impact on the Far South Coast ESCARPMENT PARKS is the establishment of PINUS RADIATA PLANTATION under construction at present on the BREDBO River CATCHMENT. The 2003 Fires in Canberra, Brindabella right down to Victoria are fresh in everyone's MIND.

Even though Wilderness Areas are non-negotiable according to legislation – Do not Forget the Ferocity that created these firestorms., my submission to the Premier Bob Carr and DIPNR are available, also my comment to Bombala Council re PLATYPUS country and Pines relationship

and possible loss of Native BIODIVERSITY which has been ignored by DIPNR in preference to pines, due to consumer demand as has been stated by MP's Hence access through fire trails(Not for the public) into wilderness areas are a necessity , to extinguish lightning strikes, sooner rather than later. R: – if too many 2WD roads are extended you will have more accidents and also Fire Hazard due to neglect to observe Fire Safety

Submission# 636

One important point to remember these areas were not burnt on a fire stick principle, Brinja people did not carry out burning nor did any of the other Yuin people inland, they did burn in some areas along the coast.

Submission# 659

NPWS have got a lot to answer for during the fires of January 2003; I suggest your plan contains actions to increase fire trail access and quality so you can at least put fire trucks into areas BEFORE fires get out of control and comes and burns us out again. Most of the fire trails I have been on in NSWNP have been a disgrace. I have heard that they are left that way to discourage persons in vehicles from using them. Naturally wilderness areas should be left and managed correctly but the hoo hah over previously grazed lands is enough to make me ill. Lift your game and sort access out for responsible people and enforce actions against those who are not and do the wrong thing.

OTHER, Private Property - General

Submission# 25

R: Road Network, Page 8.

4WD access to the Deua National Park from Araluen, Moruya or Krawarree allows East/west access and access via Merricumbene FT, however, any increased traffic through Alpine is not appreciated; the existing traffic is too much. The section of 4WD track from Merricumbene FT to Mongamula FT goes past Alpine house, through private property and gives access to the river for countless campers, trippers, etc,

These people interfere with the management and serenity of Alpine. The publication of the discussion paper with its accompanying maps of the

access routes to the Deu4 NP provides many move people with information and potentially creates more problems for Alpine. The repeated references to east/west access routes and circular driving routes, plus actual mention of Alpine, are not solutions to the owners of Alpine.

A possible solution is a new track, avoiding Alpine, from Mongamula FT to and/or Merricumbene FT. Private property signs, and locked gates, to prevent access could then be installed. Trail bike riding is excessively noisy and disruptive to all animals in the vicinity -people, horses, cattle and indigenous species. It is not an acceptable activity through private property, nor camping areas. A separate area(s) accessed from existing fire trails for trail bike riding is required, Horseriding, page 10: 1-lorsefidiig along the Alpine to Canoolie to Bendethera bridle track, involving access through private property is a possibility, however., the numbers of riders should be limited; : the number of occasions per annum should be limited,

adequate notification should be made; : environmental pollution and damage should be minimised; 9 environmental education and responsibilities should be maximised; no vehicles should accompany the horses through Alpine.

Cycling, page 14..Cycling On all the existing tracks, except on private property, should be permitted. An alternative track, avoiding Alpine, as proposed above, would suit cyclists as well as 4WD vehicles, and the owners of Alpine.

Submission# 444

R: A further point of concern is that the map does not indicate where tracks pass through private property. We are concerned that many readers may make the assumption that the existing tracks and bridle tracks are entirely within

the National Parks. As a Trailhorse Riding Club we feel this is important to respect private property and ensure that permission is received before travelling through. e.g. Bendethera to Canoolie to Alpine. The lack of identification of areas of private property may give the impression that the public, horse riders and others can freely go through these places.

Submission# 477

The most used track down the Deua River requires consent from about 12 Private Property owners. In most cases these owners resent the inclusion of the track on private property being included in the management plans. Your Possible Solution – once again promotes the use of Private Property and we find this quite unacceptable

Circular Driving Routes appear to enter Private Property. This is NOT acceptable. There must be no control by our expansion of NPs onto private Property.

Private Property owners can address this issue by reaching an independent agreement with each user group.

Submission# 483

Road network pages 5 & 8 Circular driving routes within the park as indicated on both maps show access on the Mongamula Ft through private property. NPWS should not give the impression to the public that they can access this circular route without consent or consultation of the owner of private property. Horse Riding Pages 10 – Deua River track 11 – Alpine to Canoolie to Bendethera Alpine to Fairfield Zig zag Bendethera to Krawarree All these tracks cross, start or finish on private property/. This fact greatly reduces tracks for horse riders. I think the publication of these tracks is misleading for horse riders and unfair on private property owners . NMPWS could with the help of local knowledge find other tracks not mentioned in this paper. More consideration should be given to private property owners in or neighbouring the national parks.

BACKGROUND, Values Identified through Consultation

Submission# 371

? In addition to the listed values the elderly, very young and the frail are able to enjoy the mentioned values via the tracks that are available in the parks. This can only in most cases be achieved via vehicular access and specifically 4WD and 2WD.

BACKGROUND, Non-Negotiable

Submission# 346

The legacy of this dichotomy of interests must be recognised by both management and the general public. The non-negotiable legislative considerations listed on page 3 must be maintained to protect national park and wilderness values.

Submission# 514

1. The legislative 'non-negotiables' referred to in the Discussion Paper provide a very useful and firm base upon which all discussion and outcomes ought to be based. "Useful", because the provisions 'spell out' exactly what activities are and are not acceptable; and "firm", because these provisions must be adhered to. Paragraph 30E(2)(e) of the NPWA, for example, clearly and succinctly presents the parameters for "sustainable visitor use". Such use must be "compatible with the conservation of the national park's natural and cultural values" (emphases added).

Submission# 615

However, we consider access to and across the karst areas within the Deua National Park needs to be very carefully managed to protect cave and karst hydrological regime,,, and ecosystems. For the same reasons, special care also needs to be taken to ensure that access issues do not adversely impact upon catchment areas for any of the karst areas. We believe that all the karst areas within the Park and not just those identified on the maps supplied (ie Wyanbene Caves and Bendethera) must be considered under the "Non-Negotiable" category (page 3). These areas should receive full protection under the NS~ legislation. There is a significant risk of environmental impact to karst areas from each of the 3 access options discussed (Road network, horse riding and cycling) if they are not appropriately managed CSS inc recommends. maximum protection for these areas when considering access options

Submission# 647

All items listed are noted and are not incompatible with 4wd touring which is properly managed. We would be pleased to jointly participate in soundly based research and monitoring of visitor use and enjoyment, item (g).

ROAD NETWORK, Possible Guidelines and Actions

Submission# 78

R: Recreational vehicle usage and horse riding should be encouraged in the 90% of the state that is not set aside for environmental protection, not in the 4% or so of the state that is National Park.

d. Permit system? – a costly waste of time and money without a good gate system and adequate policing by a thoroughly understaffed NPWS e. No tag along tours in wilderness

Submission# 229

Having read through the papers sent on managing the Far South Coast escarpment parks, all the suggestions and possible solutions, have been covered very well –

Submission# 346

Monga NP - The principal access for all visitors is via a limited choice of roads. Horse riders and vehicles are often in conflict.

If Park Managers regard 4WD and Trail bike access to be essential then it should only be permitted under the auspices of responsible, licensed Tour Operators and a realistic fee, based on the user-pay principle, should be applied.

Submission# 367

All vehicles to be fully registered.

Submission# 371

? All off road capable vehicles should be contributing to the upkeep of the parks and the track systems.
? This should come about via a greater share of, or a nominal increase in all vehicle registration fees. This is something that can be actively pursued via all the clubs, motor bike, and 4WD, Horse & Groups writing and seeing their Local Members.

Issues identified through consultation Page 7.

? A permit system should be adopted and access on a selected basis to management trails. The more trails that are available the less impact by spreading the use.

? All camping areas should have a maximum of 20kml on all access tracks within the camping confines.

? Driving in camp areas must be limited to entry, exit and viewing the sites. Camp areas must also be designated as quiet areas with minimal driving. My last experience at Bendethra was a Motor Bike group speeding through camp areas endangering my children. This is not limited to Motor Bike as I have experienced 4WD's also speeding endangering people and animals.

It is imperative that a greater ability to police illegal activity be implemented to help facilitate and maintain access and to preserve the pristine nature of these areas. ? By utilisation of sign posted information at the beginning of all trails and in all camp areas explaining the codes of conduct, the potential penalties associated with illegal activity and the importance of these areas. ? These locations should also carry loose pamphlets that can be taken by the visitors and should specifically spell out the importance of the area and the codes of conduct within that area. They should also clearly state the penalties and fines associated with illegal activity. ? During seasonal busy times representative policing should be mandatory and come in the form of volunteers/NPWS handing out pamphlets as described above at all entrances to the parks and camp areas. This will also provide securitisation of the entry. ? Education via the billboards and pamphlets will provide a starting point and with the support of the NPWS, clubs, groups and selected individuals a presence will be established and will establish a visual deterrent to the illegal individuals. The recent prosecution of an individual ex Bendethera is an example.

Submission# 477

Access should not be dependent on the issue of permits.

Submission# 522

There appear to be no adequate measures to prevent further vandalism in the Bendethera area. Permits and limited numbers need to be introduced for campers in addition to monitoring and the threat of closures. There are no provisions to prevent road kills or have cleaning bays for vehicles entering sensitive areas.

Submission# 544

R: I strongly believe that all tracks should be clear and open to all. The rugged terrain of the parks concerned provides a natural wilderness due to its inaccessibility and the values expressed in the discussion paper are available in any number of areas; with the irony of some kind of transport being required to access them; in a reasonable

amount of time; by most average working people. 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.

Submission# 615

The Canberra Speleological Society Inc (CSS Inc) has no objections to the range of access options available under the Draft

Submission# 660

I very earnestly however request that these trails not be closed to 4WDs and trail bikes. If the trail has been put in in the first place then most of the damage has been done. The separation of walkers and horse riders to motorised transport could be done on a roster basis of one weekend per month is foot or hoof traffic only. Access at other times on many steeper or more sensitive trails could be on a permit basis to members of responsible 4WD or Trailbike clubs. The closing of access is to deny a national resource and increase pressure on other areas. If necessary the sale of a Forest Trails Access license to 4WDs and trailbike owners could fund track maintenance in the same way as Fishing licenses fund Fisheries inspectors; weed control; fishery improvements etc.

Submission# 662

R: users like 4wd AND bike group can be empowered to gather info info can be used to close certain sections and rotate the use of land

Submission# 666

Possible guidelines and Actions' have not been made with consideration to this commercial operation. More discussion is required before these points are even considered.

Submission# 669

o Many persons who own 4WD's have a greater affinity/love of the bush, unfortunately, the growing number of 4WD's in recent times will provide access to persons who have other reasons for owning these vehicles. Hence it may be necessary to ensure that access to tracks be to persons with the necessary driving experience, etc

o Many management tracks traverse through these great areas and are restricted to NP&WS etc personnel. I believe that these tracks should be made available to individuals, clubs etc that have met certain NP&WS guidelines. Those that have proven to show support for the environment etc, whether it be an education session, proven aid/support to an area etc.

Submission# 672

The Conservation Council believes the number of through routes should be reduced and monitoring of user impact should be maintained on those routes which remain open.

Submission# 675

Policing needs to be increased; to protect sensitive areas and responsible riders from accidents. . A permit system; fees and associated fines; may contribute to maintenance and policing costs.

HORSERIDING, Possible Guidelines and Actions

Submission# 522

Where horse riding is permitted there should be facilities for cleaning their hooves and lower bodies to prevent the spread of weeds and other exotic organisms into the parks. Horse riding should also be subjected to entry fees and number limits.

Submission# 672

The Conservation Council recommends that continued monitoring of usage numbers and environmental impacts occur for all bridle trails used by horseriders and that action be taken to restrict access where unacceptable environmental impacts are found to be occurring.

Submission# 677

I am most impressed with the way NPWS are actually using the word tracks instead of the dreaded word trail!!!But you (NPWS) have slipped up a few times in the discussion paper??!!

Submission# 678

My opinion is that all tracks where horses may be taken be clearly written and a book be produced with maps and whereabouts of same not everyone knows the bush. So many riders mow and so few places how soon will it ne and there wont be any thing left to our children and grandchildren.

CYCLING, Potential Environmental Impacts

Submission# 692

The paragraph titled Potential Environmental Impacts, under the Management and Recreational Issues section, contains the statement: Similar to driving and horse-riding, there are the potential impacts associated with cycling, which include erosion of soils and tracks, increased soil compaction, introduction of weeds and plant species not native to the area, and littering. CORC is 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.

CYCLING, Possible Guidelines and Actions

Submission# 229

R: Having read through the papers sent on managing the Far South Coast escarpment parks, all the suggestions and possible solutions, have been covered very well

Submission# 477

Access for All fully supports the contents of these pages. Cycling is a great recreational sport, but would certainly need to be regulated for safety reasons.

Submission# 615

R: The Canberra Speleological Society Inc (CSS Inc) has no objections to the range of access options available under the Draft

OTHER

Submission# 229

I have only to say that enjoyment and access for all should be allowed – the bush seems always to re-grow so quickly after fire wind storms – flood rain – natural nature things. Some of your fears seem groundless as the roos wombats wild-dogs and pigs do much more damage than people, horses, cyclists and vehicles

Submission# 477

The socio-economic impact must be addressed in any decision made. Refer to the previous submissions lodged by Access for All. This has been addressed in detail in these submissions.

Submission# 636

When it come to the making of money from other people or exploiting other people on one needs to go park the parks service as an example, I do not know of ano one else who has go land for nothing and then charges the same people for they took it from, that included the people culture, therefore a standard policy if NPWS do not have the right us use any Brinja information or there language, and no one speaks for Brinja people other than the Brinja person of the Baragalia Aboriginal Elder Group.

There is one glaring problem, no where in the document does it say Brinja people will be able to continue to use the areas, you might like to confirm that we will still be able to use the areas

Note If at any time NPWS would like to obtain advise on Brinja area for a particular spot please write and let us known what you would like to do and where , we will put that to a meeting and get back to you.

The Far South Coast Escarpment covers three Aboriginal groups, the Traditional areas the The Yuin national cultural areas are defined by the drainage of the river running to the East, that included the Shoalhaven and rivers south to and including the Towamba River. This then was split into family speaking groups e.g. Tadera – Manji for the Braidwood (Howitt, 1904) Budawang, Benalong point, South west to Nerriga down to Braidwood east to about Termeil (exact location unknown). Bugelli-Manji Moruya to Narooma west to Green swamps and west to North Black Range or Caterpillar Range. Brinja people Kurial – Manji Walbunga family or Gunday (Howitt, 1904) Moruya River to Batemans Bay, west to Reidsdale, to South of Braidwood. Murramarang about Termeil (exact location unknown) to

long beach west to Braidwood to Nerriga. Guyangal – Manji Wallendagan Bermagui (Djiringanj) to Barinda Point N.S.W west to Greens swamps and west to Brown Mt top.

The sea formed part of every day life, as food was gathered daily from the particularly areas the family would be staying at the time. The Cultural area included the coast and islands, and as such has the same rights as any other nation. The Yuin are the oldest of the Aboriginal people in Australia (Fairbridge , 1960. Leoahard, 1954. Warner 1966). They have enjoyed the land and sea for thousands of years undisputed. During that time Yuin people have built up a massive amount of information on the Flora, Fauna and soil of the Lagoon Coast.

In applying that knowledge passed down , the Brinja continue to travel the land and keep a close eye on the special, sacred and traditional areas, these maps of the Far South Coast Escarpment clearly cover traditional lands.

Caves:

There area many cave in the area a lot of which are not marked on your maps, most of these caves are special places and would prefer you staying away, we recognise the problem with Bendethera therefore we would prefer the smaller cave to be kept closed or simply not mentioned on any maps or sign posts.

The family as the Brinja call the site just south of Bodalla is a special burial site of the family that dreamtime says was murdered is also a special place and the rock mining needs to be controlled .

Economics:

Submission# 665

DUE TO THE LACK OF PUBLIC LIABILITY INSURANCE MY LICENCE APPLICATION FOR NSW HAS BEEN ON HOLD I HAVE OPERATED FOR 6 YEARS IN VICTORIA WITH A GREAT RECORD. THE PAST 4 MONTHS I HAVE BEEN INVOLVED WITH SETTING UP OF FOHVA GROUP AND HAVE FORWARDED ALL PAPERWORK TO THE NARROOMA OFFICE THIS GROUP WILL WORK TOGETHER WITH NPWS AND RECREATIONAL GROUPS TO ENSURE A BRIGHT FUTURE FOR BOTH PARTIES.

AS A TRAIL BIKE TOUR OPERATOR WITH TRAINED STAFF AND 6 YEARS EXPERIENCE THESE TRAILS CAN BE EASILY RIDDEN BY COMMERCIAL TOUR GROUPS WITH NO DAMAGE AND NO ASSISTANCE REQUIRED FORM PARKS OR EMEGENCY SERVICES; ACCESS BY UNORGANISED GROUPS IS HAZARDOUS; MOTORCYCLES ARE SOFT TIRED AND CAN TRAVEL FAST AND ARE BETTER KEPT GOING IN ONE DIRECTION AS A GROUP; COMMERCIAL TOURS HAVE PROVEN THIS COMMERCIAL LIENCED OPERATORS SHOULD BE ABLE TO ACCES MORE TRAILS THAN PRIVATE GROUPS OR INDIVIDUALS DUE TO THEIR BACK UP AND KNOWLEDGE INCLUDING SOME TRAILS THAT HAVE BEEN CLOSED RECENTLY TRAIL BIKES DO NOT REQUIRE THE TRAILS TO BE AS WELL MAINTAINED AS FOUR WHEEL DRIVES AND NOR DO THEY CAUSE AS MUCH DAMAGE ON ANY TERRAIN TRAIL BIKES DO NOT HAVE WINCHES TO RINGBARK TREES AND RIP GATES OFF EITHER AND COMMERCIAL TOUR GROUPS OPERATE UNDER STRICT PROCEDURES TO AVOID ANY DMAGE TO TERRAIN AND PICNIC AREAS ETC

Submission# 666

KTM Trail Tours - Australia was initially invited and participated in workshops hosted by NPWS regarding the use of hinterland and coastal parkland; however; invitations ceased without reasoning. As the only Commercial Off Road Motorcycle Adventure Tour Business operating in this area with no form of address to the NPWS regarding use of such parklands I find access to cooperation totally lacking. There has been no discussion about my Business requirements even though a lengthy submission has been submitted many months ago.

Submission# 669

- Past experiences:

o I have been to the Duea National Park and many others several times over the past few years and rarely have I seen a track that a 4WD can transverse apart from the formed tracks. Nonetheless, idiots like those that damaged the Bendethera campsite are exceptions.

o I have experienced registered and non registered bike riders disturb campers and traverse areas that are outside formed NP&WS tracks. In fact some have been reckless in driving past our vehicles dangerously.

o rarely, have I seen acts of vandalism, but around many campsites I seen broken glass and other forms of rubbish. In many occasions, the culprits can be identified. Do you report or educate them??

o In many cases the problems encountered can be tackled by simply educating the persons involved.

Overall, driving my 4WD throughout these areas is one of my greatest pastimes and is of prime importance to me. I trust that the above comments may assist you in a positive manner so that our great land can be experienced by

those who love to enjoy what it has to offer.

I would like to provide my views regarding this very important issue and firstly, like to thank the NP&WS for providing this opportunity. From my initial analysis of this paper it appears the NP&WS has shown some common sense rarely seen by many other government bodies.

ROAD NETWORK, Funding

Submission# 439

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?

Submission# 511

It is our belief that the process of preparing the draft plan of management would be further flawed if there is no consideration of road maintenance expenses for the proposed access routes described by the ways forward in the Discussion Paper. A estimated cost of \$500/kilometre/year would make the total annual maintenance cost for the 578 kilometres of roads proposed in the ways forward of about \$2.9 million. In other words, the expense of accommodating the access lobby's demand for 4WD roads in national parks could be a primary manage cost for the Far South Coast Escarpment Parks.

If DEC persists with developing 4WD roads as alternate routes from the tableland and the coast as local interests are demanding, it will find the maintenance of these routes beyond existing budgetary allocations. In these circumstances the users will seek the assistance of the Roads and Traffic Authority to maintain these routes, as has been the case with Kosciuszko National Park.

Submission# 636

Funding:

One notes the comment NPWS maintains roads; only in Sydney I have never seen NPWS machinery in the Deua area working on roads, it must be remembered NPWS fort tooth and nail not to have the Deua as a wilderness area because of the cost of looking after it, and it still have as big a pig problem as it ever had, therefore shutting of road rather than road closure will do much more damage, as for funding, if NPWS don't like it hand it back to the Brinja who own it anyway, as we will keep it as a natural area with rational road and area closures. It is important that people be able to use the areas, it is only when endemic species are involved that areas need to be locked off and as yet we do not have the research to do that in any area.

One notes the comment Minimisation of human impacts within the Parks, human have been in the areas for thousands of years and the whole concept is management not stopping people from using the areas, the only reason NPWS do that is lack of funding, and that's not our problem as people buy their ticket to enter the say Deua in Sydney and Sydney spends that on Sydney.

I note the opera house, again catering for every one outside the area yet not one meeting with traditional people or either the Walbunja ie Keith Stewart or Kevin Smith and no one from the Brinja people, had it not been for my grand mother (Janie Ferguson) in the early days asking for the Deua to be protected under the Primitive land use today it would be cleared farmland. See trip by Percy Davis and Mile Dunphy from Burra to Cooma via the old Brinja track.