

Summary of public submissions

**National Parks and Wildlife Service
Cycling Policy Review and Sustainable
Mountain Biking Strategy Discussion Paper**

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Acronyms for groups and organisations

Acronym	Group or organisation
ABC	Association for Berowra Creek Inc
AOC	Australian Orchid Council
APS-NS	Australian Plants Society: North Shore group
BMCC	Blue Mountains City Council
BMCS	Blue Mountains Conservation Inc
BRCA	Belrose Rural Community Association
CBC	Confederation of Bushwalking Clubs NSW Inc
CEC	Clarence Environment Centre
CFFW	The Colong Foundation for Wilderness Ltd
CTMTB	Central Tablelands Mountain Bike Club
EA	Ecotourism Australia
GCTA	Gap Creek Trails Alliance
HCR-CMA	Hunter–Central Rivers Catchment Management Authority
HMBA	Hunter Mountainbike Association
HSMBA	Hornsby Shire Mountain Bike Association
HT	Highlands Trail
HVMBR	Hastings Valley Mountain Riders Inc
IMBA	International Mountain Bicycling Association Australia
JOD	Jonathon O’Dea, Member for Davidson
KT	Kosciuszko Thredbo Pty Ltd
LCBR	Lake Crakenback Resort Management Pty Ltd
LGSA	Local Government and Shires Association of NSW
LS	Leisure Solutions®
MB	Mike Baird, State Member for Manly and Shadow Treasurer
MBA	Mountain Bike Australia
MDMTBO	Mountain Devils MTB Orienteering Club
MT	Makin Trax Australia
MTBW	MTB Wagga Inc
NPA-Exec	National Parks Association of NSW, Executive Officer
NPA-CV	NPA Clarence Valley Branch
NPA-H	NPA Hunter Branch
NPA-SH	NPA Southern Highlands Branch
NPA-SS	NPA Southern Sydney Branch
NPA-TV	NPA Three Valleys Branch
NSHPA	North Shore Horse & Pony Association
ORP	Outdoor Recreation Party

Acronym	Group or organisation
PB	Perisher Blue Pty Ltd
RCT	Revolution Cycle Training
RHHFFPS	Ryde Hunters Hill Flora and Fauna Preservation Society
SBC	Springwood Bushwalking Club Inc
SCA	Sydney Catchment Authority
SCC	Shoalhaven City Council
SC-RAC	South Coast Regional Advisory Committee
SEMTB	South East MTB Co
STEP	STEP Inc
STRAA	Stanwell Tops Residents Awareness Association
TTF	Tourism and Transport Forum
WAA	Warren and Associates, responsible tourism consultants
WARRC	Warringah Council
WBC	Woomargama Bypass Committee
WH	Wild Horizons
WSMTB	Western Sydney Mountain Bike Club

1. Introduction

On 10 September 2010, National Parks and Wildlife Service (NPWS) part of the Office of Environment and Heritage NSW (OEH) launched a discussion paper to seek public comment on mountain biking opportunities in the state's national parks and reserves. Public submissions were accepted in an online forum, *Shape your State*, via email and mail until 25 October 2010. NPWS made a commitment that all submissions would be treated equally and no submission method considered more valuable than any other. In addition, open public forums were held from 23 September to 19 October 2010 in north and south Sydney, Newcastle, Port Macquarie, Springwood, Nowra and Jindabyne.

The National Parks and Wildlife Advisory Council, National Parks Association (NPA) and International Mountain Biking Association Australia were briefed in separate meetings. These meetings were on the discussion paper and consultation process prior to the public release of the paper and they were asked to promote the consultation among their members. Several media releases were issued and picked up by numerous media, including a large page-three article in *The Sydney Morning Herald*, many local newspapers and several radio stations. Each public forum was advertised in local papers and on the OEH website. Emails were sent to all key statewide and local stakeholders to inform them of the consultation process and the forums.

The online forum received 5,743 unique visitors, who made over 9,000 visits. Visitors spent an average of 5 minutes 16 seconds on the forum and viewed an average of 3.41 pages. Online forum participants were asked to respond to six questions (paraphrased below). There were 2,310 comments posted from 1,061 individuals. Email addresses were collected and used to ensure there was no double counting if a respondent made the same response to more than one question. Appendix 1 presents the age, gender and location of respondents.

The six questions were:

1. Do you support the idea of allowing mountain biking in some NSW national parks if there are controls in place?
2. Do you think well-designed mountain bike tracks in national parks will reduce conflict between mountain bikers and other park users? What has been your experience?
3. Based on how the National Parks and Wildlife Service defines cross-country and all-mountain riding, do you agree that development of tracks for these styles rather than other styles of mountain biking should be the priority?
4. What do you think is needed to deliver a world-class experience?
5. Are there any other considerations you would like to see to minimise the impact of mountain biking?
6. What should be included in a code of conduct for mountain biking in national parks?

► One hundred and eighty nine submissions were received via email, 18 of which were also received via mail. Fifty-six submissions were received from groups or organisations that represent a number of people. These submissions are noted separately to the individual submissions, which only represent a single person. There are a large number of groups, so acronyms have been used throughout the report. These are in a table following the contents page.

Around 350 people attended the open public forums. NPWS briefed the forum participants on the proposals in the discussion paper, then participants were invited to comment on the proposals. An external contractor facilitated the discussion. NPWS recorded every comment made during the forums and the forums were also electronically recorded. All participants were invited to make additional comments on butcher's paper and were encouraged to make submissions on the online forum, via email or mail.

Following the public consultation process, concerns were raised by some members of conservation groups that the process did not allow their views to be adequately considered. To do so, NPWS collaborated with the NPA and Nature Conservation Council (NCC) to organise additional targeted workshops. These were held in north and south Sydney, Newcastle, Port Macquarie, Springwood, Nowra and Jindabyne between 14 February and 1 March 2011. They were promoted through the NPA and NCC networks to allow members of conservation groups to contribute any comments they felt unable to express during the open public forums.

There was little interest in the workshops in Newcastle, Jindabyne, Port Macquarie and Sutherland. With three or less people responding to the RSVP, these were cancelled. The people who responded were offered an opportunity to provide their feedback over the phone. Around 35 people attended workshops in Springwood, Nowra and North Sydney. Six people provided feedback by phone. Comments raised in targeted workshops and teleconferences with members of conservation groups are noted separately to those raised in open public forums.

In preparing this report, all comments received were reviewed by an external consultant and classified according to the major sentiments expressed. The classification process was, by its nature, a subjective process. This is because the comments collected via the three different mediums were all qualitative, so this needs to be taken into account when reviewing the final quantitative figures presented here. However, there were significant consistent sentiment trends contained in respondents' feedback.

In presenting the numbers contained in this report, individuals participating in the online forum were only counted once as supporting particular arguments, even if they had made multiple comments on a topic. This rule also applied to all submissions. In reporting on open public meetings and targeted workshops the reporting reflects comments made at these events rather than attempting to reflect any form of consensus. Not all comments made in these meetings are reported but, rather, those that engendered the most dialogue.

2. NPWS role in providing mountain bike experiences

Discussion paper reference: Section 1, particularly 1.6

► Of all respondents, 803 personal and 20 group¹ submissions support the provision of mountain bike experiences, including sections of singletrack, in some NPWS parks, agreeing it will reduce illegal use. Comments were also made at open public meetings and in 1 targeted workshop in support that it will reduce illegal use. In addition, submissions argue that provision of legal opportunities will:

- foster a love of nature (109 personal + 12 group² + 3 open public meetings)
- be sustainable if conducted on well-designed tracks (88 personal + 3 group³)
- have similar environmental impacts to bushwalking if conducted on well-designed tracks (25 personal + 5 group⁴)
- have health benefits (97 personal + 7 group⁵ + 1 open public meeting)
- encourage children and families to get outdoors to experience nature rather than spending their time playing computer games and watching television indoors (75 personal + 4 group⁶)
- provide social and wellbeing benefits for the community (70 personal + 8 group⁷)
- reduce conflicts with other recreational users (209 personal + 11 group⁸)
- increase visits to parks (48 personal + 12 group⁹ + 1 targeted workshop)
- lead to mountain bike riders becoming champions for NPWS (16 personal + 4 group¹⁰)
- be safer for participants than road cycling (18 personal)
- foster stewards of national parks among the next generation (1 personal + 3 open public meetings + 2 targeted workshops).

► Of all respondents, 10 personal and 15 group¹¹ submissions specifically seek the cessation of, or do not support, the provision of mountain bike experiences, including sections of singletrack, in some NPWS parks. In addition, there was opposition based on the arguments that it will:

- not reduce illegal use (5 personal + 9 group¹² + 1 open public meeting)
- cause damage to vegetation, impacts on wildlife, soil erosion and compaction, and spread diseases (5 personal + 15 group¹³ + 5 open public meetings + 3 targeted workshops)
- create safety risks for park users (1 personal + 5 group¹⁴ + 1 targeted workshop)

¹ BA, CTMTB, GCTA, HCR-CMA, HMBA, HSMBA, HT, LCBR, LGSA, MB, MDMTBO, ORP, PB, SCA, SCC, TTF, WARRC, WCSMBC, WH, WSMTB

² CTMTB, EA, HSMBA, HVMBR, LGSA, RCT, SCC, SEMTB, TTF, WAA, WCSMBC

³ HSMBA, SEMTB, CEC

⁴ BA, HVMBR, IMBA, MTBW, WCS, MBC

⁵ CTMTB, GCTA, HT, IMBA, SEMTB, WCSMBC, WH

⁶ HMBA, IMBA, WSMTB, HVMBR

⁷ HSMBA, WCSMBC, EA, RCT, SEMTB, LGSA, HVMBR, NPA-Exec

⁸ BA, SBC, GCTA, EA, SEMTB, MTBW, HMBA, IMBA, WH, NSHPA, WCSMBC

⁹ HSMBA, CTMTB, WCSMBC, EA, RCT, SCC, WAA, TTF, SEMTB, IMBA, LGSA, HVMBR

¹⁰ MDMTBO, WH, NSHPA, HVMBR

¹¹ ABC, AOC, APS-NS, BMCS, CEC, CFFW, LS, NPA-CV, NPA-Exec, NPA-H, NPA-SH, NPA-SS, RHHFFPS, SC-RAC

¹² AOC, APS-NS, BMCS, CEC, CFFW, NPA-Exec, NPA-SS, SC-RAC, WAA

¹³ AOC, APSNS, CEC, CFFW, JOD, LGSA, NPA-CV, NPA-H, NPA-SH, NPA-TV, RHHFFPS, SC-RAC, STEP, STRAA, WARRC

¹⁴ SC-RAC, SSC, NSHPA, CEC, WARRC

- erode the positive health benefits of contact with the natural environment due to the large numbers of participants (1 group¹⁵)
- spread weeds and introduced pathogens (3 group¹⁶ + 3 targeted workshops)
- reward illegal behaviour (2 public meetings)
- damage cultural sites (2 personal + 5 group¹⁷ + 1 open public meeting + 1 targeted workshop)
- erode the conservation value of the park system (2 personal + 6 group¹⁸ + 3 open public meetings + 2 targeted workshops).

▷ One personal submission does not support the provision of mountain bike experiences as it sets a precedent for provision of other single-purpose recreation activity. This comment was also made at 3 targeted conservation meetings.

▷ One personal and 4 group¹⁹ submissions, 3 open public meetings and 3 targeted workshops expressed opposition to the provision of mountain bike experiences on the grounds that tourism and recreation is not the primary purpose of national parks and national parks should not provide opportunities for commercial enterprise.

▷ In addition, 4 group²⁰ submissions and comments made at 1 open public meeting do not support the provision of mountain bike experiences on the grounds that the statistics provided in the discussion paper demonstrate a low demand for mountain biking. However, 1 personal and 2 group²¹ submissions, and 1 open public meeting comment argue that the statistics provided in the discussion paper underestimate demand for mountain biking because NPWS currently provides little opportunity for it. Seven group²² submissions and 3 open public meetings argue that the methodology used in the research was flawed, skewed or the sample sizes were too small.

sample comments

'I fully support that Mountain Biking is considered for appropriate areas for both National Parks as well as accommodating mountain bike riders' needs. This is a fantastic step in the right direction and will help eliminate illegal trail riding.'

'The allegation in the discussion paper that illegal mountain bike use will decline with the provision of legal high impact singletrack is false. The proposed policy does not suggest construction of exclusive downhill track for mountain bike riders. These illegal tracks will continue to be built by a lobby that has shown itself to openly encourage its members to break the law.'

'Countless studies have been conducted throughout the world, in every imaginable type of terrain, on the relative impact of cycling vs walking on properly constructed narrow trails. The conclusion from all these studies has been undeniably clear; cycling is at least comparable to, if not less than, walking in terms of impact on the environment ... it is completely illogical to allow access to walkers and yet deny access to riders on environmental grounds.'

¹⁵ NPA-H

¹⁶ EA, AOC, CEC

¹⁷ JOD, APS-NS, SC-RAC, STEP, WARRC

¹⁸ LS, AOC, SC-RAC, NPA-CV, STEP, NPA-EXEC

¹⁹ CFFW, LS, APS-NS, STEP

²⁰ SCRAC, NPA-H, RHFFPS, NPA-SS

²¹ MTBW, IMBA

²² CFFW, BMCS, SCC, ABC, APS-NS, CEC, NPA-EXEC

'A favourite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people and the environment than hiking, and that science supports that view. Of course, it's not true ... I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favoured. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favour mountain biking, and came to the opposite conclusions ... Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay.'

2.1 Singletrack experiences

▷ Eighty-six personal and 11 group²³ submissions, and comments made at 5 open public meetings specifically support provision of opportunities for riding on singletrack in NPWS parks. Thirteen personal and 14 group²⁴ submissions, 1 open public meeting and 1 targeted workshop expressed support for allowing mountain biking on public roads and management trails only.

2.2 Need to assess mountain bike trials

▷ One personal and 5 group²⁵ submissions, and comments made in 4 open public meetings and 1 targeted workshop argue that the results of current NPWS mountain bike trials should be assessed before a decision is made on providing mountain bike experiences. In addition, 2 personal and 4 group²⁶ submissions and comments made at 2 open public meetings argue that the existing NPWS mountain bike trials should be examined because their success can be replicated in other areas.

sample comments

'I am also concerned about the use of the phrase on page 6 of the discussion paper "A small number of world-class mountain bike experiences, some including sections of singletrack". No mountain bike experience will be "world-class" without the inclusion of singletrack.'

'Controlled XC MT biking in the national parks is a great idea and that recognised fire trails should be utilised for this activity. As long as there is the appropriate use of these trails the damage to the environment should be minimal.'

2.3 Alternative proposals for managing mountain biking in NPWS parks

▷ Eight personal and 16 group²⁷ submissions suggest a whole-of-government, cross-tenure planning approach to providing mountain biking in NSW. Some suggest it could be led by the Department of Sport and Recreation or Department of Planning. This comment was also made at 3 open public and 1 targeted conservation meetings.

²³ GCTA, HMBA, IMBA, MDMTBO, MT, MTBW, NSHPA, RCT, SEMTB, WCSMBC, WH

²⁴ APNS, APS-NS, BMCS, CBC, CFFW, NPA-CV, NPA-Exec, NPA-SH, NPA-SS, NPA-TV, NSHPA, RHHFFPS, STEP, SC-RAC, STRAA

²⁵ BMCS, NPA-EXEC, NPA-SS, NPA-TV, RHHFFPS

²⁶ HSMBA, MB, HMBA, IMBA

²⁷ NPA-SH, BA, EA, JOD, WAA, MTBW, HMBA, IMBA, WH, SC-RAC, SSC, NPA-H, NSHPA, RHHFFPS, CEC, NPA-SS

Submissions propose the following alternatives to providing mountain biking experiences in NPWS parks:

- in areas managed by other agencies such as regional parks, crown recreation reserves, state parks, state forests and local councils (3 personal + 16 group²⁸ + 3 open public meetings + 1 targeted workshop)
- on private land (1 personal + 1 open public meeting)
- on land purchased by the mountain biking community to construct mountain bike experiences (97 personal + 3 group²⁹)
- in leased areas such as ski resorts, regional parks and state conservation areas only (1 personal + 3 group³⁰)
- in low-conservation land added to the edges of NPWS parks for mountain bike experiences (3 personal + 1 open public meeting).

sample comments

'The planning for the provision of these tracks [wanted by mountain bikers] should be undertaken through an all-of-government approach and not be the sole responsibility of NPWS. The Department of Sport and Recreation would seem a much more appropriate authority.'

'Specialised mountain bike facilities should be located in the first instance on land that is already suitably modified and with appropriate tenure such as some regional parks, crown recreation reserves, state parks, state forests and private land. Western Australia and Victoria have made good and interesting use of a number of their old rail trails and logging tracks that traverse state forests and other state-owned land. This has certainly involved the regional communities and provided business opportunities for a range of off-park products and services. NSW should be looking to promote this model further.'

2.4 Discussion

NPWS acknowledges that mountain bike experiences have the potential to foster a love of nature and provide health and wellbeing benefits for riders and the community. However, it is also acknowledged that mountain bike experiences have the potential to disturb soils, vegetation and wildlife and damage cultural and historical sites and this must be considered in the planning, design and management of any experiences.

NPWS acknowledges that the conservation of nature and cultural heritage are primary purposes of the park system. However, the objects of the *National Parks and Wildlife Act 1974* (NPW Act) equally recognise the importance of fostering public appreciation, understanding and enjoyment of nature and cultural heritage as a means to engender community support, ensuring that conservation areas are protected in perpetuity.

NPWS recognises that the data presented in the discussion paper on the most popular activities during visits to NSW national parks are likely to be influenced by the supply of opportunities for cycling in national parks and therefore the suggestion that the demand for mountain bike experiences is low is not supported. It is noted, however, that the data presented on participation in cycling and mountain biking on an unsealed road or track in NSW are cross-tenure. The suggestion that the methodology was flawed, skewed or sample sizes were too small is not supported. Both sets of research were designed and conducted by research organisations with

²⁸ ABC, APS-NS, BMCS, CBC, CEC, EA, JOD, NPA-CV, NPA-Exec, NPA-H, NPA-SH, NPA-SS, NPA-TV, STEP, WAA, WARRC, WH

²⁹ WAA, NPA-SS, NPA-Exec

³⁰ SEMTB, WH, NPA-H

AS ISO 20252 accreditation (the international ISO standard for market, social and opinion research), Australian Market and Social Research Society membership and Qualified Practising Market Researcher accredited researchers.

NPWS considers it imperative to develop an effective approach to managing mountain biking to reduce illegal use of bikes and the associated risks and impacts. Early evidence from Glenrock State Conservation Area indicates that providing a singletrack experience has reduced illegal use, although it is acknowledged that detailed assessments of current NPWS mountain bike trials are required to confirm this finding. However, NPWS considers that interstate and international experience demonstrates that providing legal opportunities for singletrack mountain biking reduces the use and creation of unauthorised tracks and increases the success of track closures.

NPWS strongly supports a whole-of-government, cross-tenure planning approach as the best way to provide a variety of mountain bike experiences across the landscape. NPWS considers that finalising the *Cycling policy* review and *Sustainable mountain bike strategy* will ensure the agency is in a strong position to contribute to such a process and dictate its role in providing mountain bike experiences.

NPWS recognises that other land management agencies and private land provide a variety of mountain bike experiences, and there may be opportunities for other tenures to provide additional experiences that will contribute towards reducing illegal use of NPWS parks. However, in some regions suitable locations for mountain biking exist in NPWS parks and opportunities for mountain biking on other tenures are limited. NPWS is also concerned that if mountain biking experiences are provided on other tenures only, an opportunity to foster public appreciation and understanding of parks will be missed and this could reduce support for the park system in the future.

3. Mountain bike styles

Discussion paper reference: Section 1.7

▷ Sixty personal and 5 group³¹ submissions, and comments at 2 open public meetings argue that cross-country and all-mountain were the most appropriate styles of mountain biking in NPWS parks, suggesting that these styles:

- are the most popular styles of mountain biking (36 personal + 1 group³²)
- cause less impact on the environment than other styles (33 personal + 2 open public meetings)
- pose less of a safety risk than other styles (1 personal)
- are more appropriate than other styles because they involve exploring and experiencing nature (3 personal + 1 open public meeting).

▷ An additional 2 personal and 7 group³³ submissions, and comments in 1 open public meeting and 3 targeted workshops specifically oppose downhill, free-ride and jumps in NPWS parks.

▷ Seventy-eight personal submissions, 1 group³⁴ submission and comments in 6 open public meetings argue that younger downhill and freeride mountain bikers are responsible for most construction of illegal tracks so providing these experiences is required to reduce illegal track construction and associated safety risks and environmental and cultural impacts.

▷ Seven personal submissions stated that downhill mountain biking should continue to be provided in the resort areas in Kosciuszko. At 6 open public meetings some attendees suggested that the track network should be expanded at Thredbo to allow it to be better managed and maintained.

In addition, submissions suggest providing the following styles of riding:

- mountain bike parks (19 personal + 3 group³⁵ + 2 open public meetings)
- skills parks (6 personal)
- jump parks (4 personal + 1 open public meeting)
- cyclocross riding (1 open public meeting)
- 'low impact' or 'gentle passive' riding, which involves riding on management trails only, and is suitable for scenic and family cycling (4 personal + 3 group³⁶ + 2 open public meetings)
- road cycling (1 group³⁷ + 1 open public meeting).

Comments made at one open public meeting suggested that, rather than putting labels on mountain biking styles, NPWS consider the purposes of management (such as conservation, sustainability and risk) and then consider how to achieve this on a case-by-case basis. A comment was made at 1 open public meeting and 1 targeted workshop that mountain biking is very dynamic and changes in technology lead to changes in riding styles, so policies and papers must be regularly updated to keep up with this dynamism.

Two group³⁸ submissions oppose riding off formed tracks or trails.

³¹ WCSMBC, EA, HT, NSHPA, WARRC

³² NSHPA

³³ BMCS, WH, NPA-H, BMCS, STEP, NPA-EXEC, CBC

³⁴ WARRC

³⁵ GCTA, PB, WARRC

³⁶ BMCS, JOD, NPA-Exec

³⁷ SSC

³⁸ CBC, STEP

▷ One personal submission suggests making special provisions for cases where existing cycling areas are gazetted as NPWS parks; for example, where there are existing downhill mountain bike tracks in a state forest that becomes a NPWS park.

sample comments

'A carefully designed downhill track can still have minimal environmental impact. Having said that, a cross-country circuit will have less environment impact to a downhill circuit. Sustainable trails with lines of different difficulty should be a priority because this would cover the majority of riders and skill levels and allow for riders to increase their skills over time. These should be a priority over a dedicated downhill, free riding, dirt jumping and trials areas because they can be used on almost any mountain bike.'

'... national parks are not theme parks! Maybe a local government area would be more suitable for downhill riding. Cross-country riding/tracks will be easier to manage and look after. We need to be mindful about the very purpose of national parks. They are there to be used but not abused.'

'I would ask that some consideration be given to downhill, freeride style trails and skills areas as these styles of riding are perhaps the ones that cause the most conflict... These styles of riding are becoming increasingly popular, especially with younger people and it is an unfortunate fact that unless appropriate trails are made available, illegal trails will continue to be built. They must of course be in appropriate areas. We, as mountain bikers are not asking for unlimited access but there must surely be some compromise available in areas where the impact can be minimal.'

3.1 Technical challenges

▷ Thirty-seven personal and 6 group³⁹ submissions, and comments in 4 open public meetings support providing mountain bike experiences with technical challenges/features. Submissions also argue that technical features slow mountain bike riders down and can therefore be used to reduce speed, particularly in shared-use areas.

▷ Eight group⁴⁰ submissions do not support providing experiences with technical challenges/features, arguing that experiences with technical features are sport rather than a nature experience and therefore not compatible with the NPW Act. This was also argued at 1 targeted workshop.

A comment was made in 2 personal submissions and at 2 open public meetings that the discussion paper does not define 'technical track features' well enough.

sample comments

'Mountain bikers need trail features such as grade reversals and technical trail features to slow the rider and give a perceived sense of speed (as opposed to actual speed). If the trails can be built well enough the mountain bike riders need not fly along at dangerous paces to other users as they can be slowed and challenged by technical trail features which will keep the rider occupied and unable to reach speeds unwanted on shared trails.'

'... where mountain biking is undertaken as a specialised sport, i.e. for speed, for aspects of technical performance (e.g. jumps), and particularly in extreme terrain, it is incompatible with the objectives of conservation reserves, or at least with those at the higher end of the value spectrum. In these circumstances, such activity is an exclusive use, and one where bushland and its conservation values is secondary (at best) to the pursuit of the sport.'

³⁹ HSMBA, GCTA, MT, SEMTB, IMBA, HVMBR

⁴⁰ CFFW, HT, SC-RAC, NPA-H, RHFFPS, CEC, NPA-SS, NPA-Exec

3.2 Discussion

NPWS acknowledges that some riders seek downhill experiences and that downhill tracks can be sustainable in some circumstances. It also acknowledges that some riders seek free riding, dirt jumping and cyclocross experiences, and that highly degraded areas may support these without additional impacts on the environment. It is unlikely that these styles of riding will align with the natural and cultural values of most parks as the features of these styles of mountain biking are unlikely to meet with criteria such as minimisation of environmental impacts, against which providing such experiences are assessed.

These experiences may align with the values of regional parks and the alpine resort areas in Kosciuszko National Park because these areas allow opportunities for more active recreation. This does not mean that all regional parks must provide for these activities, or that they must be allowed in all parts of a regional park. Environmental assessments will ensure environmentally sensitive areas remain protected.

Providing a diversity of mountain biking experiences that suit a variety of people, including families with children and road cyclists, is a recognised need. The discussion paper defines cross-country riding as including a broad spectrum of terrain, from management trails to singletrack, and may include technical features suiting a wide range of skill levels. This is intended to include experiences suited to scenic, touring and family cycling. Cycling is permitted on all public roads managed by NPWS except where signs are erected in the interests of cyclists' safety.

Riding off formed tracks or trails will not be allowed in any NPWS park.

NPWS acknowledges concerns that land currently allowing cycling experiences may in the future be gazetted as a park type where such cycling is not permitted. However, because NPWS is responsible for managing each park according to the management objectives of that particular park's category, it cannot include special provisions for these cases. This is because different park categories – such as national, state conservation area, nature reserve – have differing objectives.

NPWS acknowledges there are problems with putting labels on mountain biking styles, as mountain biking styles evolve over time and recreational riding is often a combination of several styles. To deal with this issue, NPWS will provide guidance on how to determine which features of mountain bike experiences do not align with the natural and cultural values of each park category.

NPWS acknowledges the importance of providing technical track features for the mountain biking experience, in reducing illegal use of tracks not designated for cycling and in managing speed. It also agrees that constructed, imported infrastructure – such as ramps, see saws and north shore – does not align with the natural and cultural values of most parks (except perhaps in regional parks). However, objects such as rocks and logs that are already on the track may be left in place to create interesting challenges and reduce speed where their use is appropriate and will not cause negative environmental impacts. Subject to environmental assessment, such objects may also be moved to different positions on the track to ensure visitor safety, improve the sustainability of the track or to provide a more enjoyable experience for cyclists.

4. Plans of management

Discussion paper reference: Section 2.3

▷ Three personal and 9 group⁴¹ submissions, and comments at 1 open public meeting support the requirement for the plans of management (POMs) to be amended to permit new mountain bike experiences.

▷ Two group⁴² submissions and comments at 1 open public meeting do not support the requirement for the POMs to be amended to permit new mountain bike experiences on the grounds that the plan may have restricted cycling for sound reasons.

▷ Eight personal and 6 group⁴³ submissions, and comments at 5 open public meetings suggest that a trails strategy be developed to guide future plan of management amendments. These submissions suggest that key policy provisions could be enshrined in regulatory instruments to give them greater legal effect.

Submissions note the amendment process for POMs is relatively cumbersome and suggested that such plans should:

- be reviewed in a reasonable timeframe (4 open public meetings)
- define the types of riding with specific parks (1 targeted workshop)
- be amended wherever practicable (1 open public meeting)
- be drafted to identify outcomes and confer a degree of flexibility and discretion over the means by which outcomes may be achieved (1 open public meeting).

A comment was made at 2 open public meetings that the length of time for the plan of management amendment process was a problem, particularly when engaging young people.

A comment made at 1 open public meeting asked that the proposal in the discussion paper – that POMs be written or amended to permit mountain bike experiences where a *clear need* for new mountain bike experiences are identified – be revised. The speaker wanted it changed so it is on the basis of something other than a *clear need* as such a need is difficult to define.

▷ One group submission⁴⁴ raises concern that if the policy is revised, all POMs will need to be rewritten to encompass the policy.

⁴¹ BMCS, TTF, MDMTBO, SSC, NSHPA, MPA-SS, NPA-Exec, CBC, WARRC

⁴² BMCS, WARRC

⁴³ WCSMBC, MTBW, IMBA, WH, NPA-CV, HVMBR

⁴⁴ BMCS

sample comments

'The mountain biking community would like to see the key provisions of this discussion paper consolidated into a trails strategy that will guide future revisions of park plans of management. This process may allow for "enshrinement" of the key provisions of the policy in regulatory instruments, above and beyond the detail of individual plans of management. This would give greater legal effect and ensure these key provisions could not be changed easily next time there is a change in management direction(s).'

'BMCS queries why all is couched in terms of mountain biking rather than cycling? ... BMCS also asks why a POM, which once restricted cycling for hopefully sound reasons, should be rewritten to accommodate the strident "wants" of "serious" mountain bikers?'

4.1 Discussion

NPWS recognises the concerns regarding POM amendments, but notes that under the NPW Act all activities in parks must be carried out according to the POM and that a timeframe for plan of management amendments is specified. The minimum period of public consultation for an amendment to a POM is 45 days.

Any proposal to amend a POM does not mean that the park must provide opportunities for mountain biking, or that mountain biking must be allowed in all parts of a park. If a restriction is in place for sound reasons there is no intention to amend it. However, NPWS notes that some POMs were prepared several years ago and may restrict cycling because measures now used to manage environmental impacts were not available at the time.

NPWS does not support the argument that individual POM amendments will lead to a confusing array of rules and regulations. The current policy will be maintained that cycling is not permitted on a track unless a sign indicates otherwise.

The NPW Act does not '... allow for "enshrinement" of the key provisions of the policy in regulatory instruments ...' as NPWS does not consider this to be necessary (as in the statement in the comments box prior). The *Sustainable mountain biking strategy* will identify a small number of proposed priority projects to develop or upgrade mountain bike experiences. Feasibility and environmental assessments will be undertaken for these if resources allow. Given that only a small number of projects will be identified, NPWS does not agree POMs should be amended wherever practicable or drafted to confer a degree of flexibility and discretion.

NPWS acknowledges that it may be difficult to interpret when a *clear need* for new mountain bike experiences is identified, and that *high demand* may be more appropriate terminology.

There is no requirement for all POMs to be rewritten to encompass the new policy.

5. Nature reserves, wilderness areas and other management categories

Discussion paper reference: Section 2.4

5.1 Management trails in nature reserves and wilderness areas

▷ Four personal and 9 group⁴⁵ submissions, and comments at 2 open public meetings and 2 targeted workshops do not support permitting mountain biking on management trails in wilderness areas. Some submissions argue that mountain biking compromises wilderness values. In addition, comments at 2 open public meetings do not support permitting mountain biking on management trails in nature reserves.

▷ Four personal submissions and comments at 4 open public meetings support permitting mountain biking on management trails in wilderness areas, arguing that:

- only a small number of people want to mountain bike in wilderness areas, so it will not have a significant environmental impact (1 personal + 2 meetings)
- mountain bikers can cover more ground in a shorter time than walkers, so they provide a means for less adventurous people to see wilderness areas and will have less environmental impact than walkers as they do not need to camp as often (1 personal + 3 meetings)
- it will lead to wilderness areas being conserved (1 personal + 1 meeting).

▷ Eleven personal submissions, 1 group⁴⁶ submission and comments in 1 open public meeting argue that mountain biking should be permitted on all management trails, on the grounds that mountain bikes would have an insignificant environmental impact compared with vehicles that traverse these trails.

sample comments

'NPA is opposed to all forms of cycling on all roads, trails and tracks roads in wilderness areas. NPWS management should not have the authority to approve cycling in wilderness areas without an amended plan of management.'

'While I would agree that such areas are likely not suitable for world-class singletrack networks they may still provide enjoyable riding on firetrails and management trails. Such trails, by their very nature, are designed for 4WD or heavy tanker traffic and as such riding a bicycle on these trails would have insignificant impact compared to those other vehicles. Given the above argument, I would like to see this recommendation reworded to allow cycling on any management or fire trail in any area under the department's management.'

⁴⁵ CFFW, BMCS, TTF, NPA-CV, NPA-H, SCA, STEP, NPA-SS, NPA-EXEC

⁴⁶ WH

5.2 Tracks in nature reserves and wilderness areas

▷ Nineteen personal submissions, 1 group⁴⁷ submission and comments made at 1 open public meeting support riding on tracks in wilderness areas, with some arguing that cyclists should have the same rights as bushwalkers. One group⁴⁸ submission and comments made at 1 open public meeting support riding on tracks in nature reserves because providing legal, managed tracks in a nature reserve may lead to a better outcome for the environment by reducing illegal tracks.

Comments made at 1 open public meeting supported the position of not permitting cycling on tracks in wilderness areas and nature reserves. However, 1 personal and 1 group⁴⁹ submission suggest that special provisions should be included for cases where parks with existing cycling areas are gazetted as wilderness areas or nature reserves.

sample comments

'... the distance covered when cycling generally leads to less time spent on the trail and therefore a reduced impact from human waste and other impacts that arise from overnight camping. This key aspect also relates to the potential impact of cyclists within wilderness areas. Whilst we certainly respect the need for case-by-case management in these valuable locations, the potentially reduced impact of cycling in these remote areas may assist in management rather than hinder. With this in mind we feel that cycling should be considered equally with walking when plan of management reviews occur for wilderness areas. In some cases this may entail access to management tracks, and where a trail is deemed appropriate, we don't think it is unreasonable to create multi-use routes in these remote and infrequently visited areas.'

'IMBA Australia is happy to support the management practice of not providing singletrack for mountain biking in wilderness areas and nature reserves. However, special consideration would need to be made in future if parks with existing cycling areas are proposed to be gazetted as either wilderness reserves or nature reserves.'

5.3 Other management categories

Submissions argue mountain biking should not be permitted in the following management categories:

- areas subject to a BioBanking scheme (1 group⁵⁰ + 1 open public meeting)
- historic sites, karst conservation areas and Aboriginal areas (1 group⁵¹ + 2 open public meetings + 1 targeted workshop)
- Sydney Catchment Authority Special Areas (1 group⁵²).

In addition, a group⁵³ submission suggests that it should be considered whether mountain biking is consistent with World Heritage listing.

⁴⁷ HSMBA

⁴⁸ MTBW

⁴⁹ IMBA

⁵⁰ BRCA

⁵¹ STEP

⁵² SCA

⁵³ MT

sample comments

‘We consider that any bushland that is to be preserved under a BioBanking scheme should be protected bushland and all development, including mountain bikes, be prohibited.’

‘The paper has not considered whether mountain biking, particularly proposed mountain biking on multi-use and preferred-use single trails, within the Greater Blue Mountains World Heritage Area is consistent with the World Heritage listing ...’

5.4 Discussion

NPWS recognises concerns that mountain biking on management trails will compromise wilderness values. It is unlikely, however, that impacts on wilderness values will be the same for all management trails. The POM process is the appropriate means to assess potential impacts in a specific area and determine where cycling may be allowed on management trails in wilderness areas and nature reserves.

NPWS considers riding on tracks does not align with the natural and cultural values of wilderness areas or nature reserves. Riding on management trails in wilderness areas and nature reserves may only be considered where the experience is deemed consistent with the objects and management principles of both the NPW Act and *Wilderness Act 1987*. The features of the experience should be assessed according to planning, design and construction criteria and, if deemed acceptable, an amendment made to the POM.

NPWS acknowledges concerns about parks containing tracks where cycling is permitted, that are subsequently declared as wilderness areas or re-categorised as nature reserves. Cycling on these tracks may no longer be allowed. NPWS is responsible for managing parks according to the management objectives of the park category and in these cases cannot include special provisions.

NPWS notes the suggestions that mountain biking not be permitted in areas subject to a BioBanking scheme, World Heritage listed sites, historic sites, karst conservation areas or Aboriginal areas. NPWS is responsible for managing parks according to the management objectives of the park category, so it is not considered necessary to include specific provisions in the policy for these management categories. Again, NPWS notes the POM process is the appropriate means to assess potential impacts in a specific area.

The *Sydney Water Catchment Management Act 1998* governs access to Sydney Catchment Authority special areas. It is inappropriate for NPWS policy to make decisions regarding access to Sydney Catchment Authority special areas.

6. Developing new mountain bike experiences

Discussion paper reference: Section 3.2

▷ Forty personal and 15 group⁵⁴ submissions, and comments made at 4 open public meetings do not support giving preference to providing new mountain bike experiences by improving or modifying existing tracks rather than constructing new tracks. They argue that modified existing tracks will:

- be less environmentally sustainable than new tracks (15 personal + 11 group⁵⁵ + 4 open public meetings)
- require expensive repairs (3 personal + 4 group⁵⁶ + 4 open public meetings)
- suffer from more conflicts between users (3 personal + 1 open public meeting)
- not be world-class (2 personal + 2 open public meetings)
- encourage creation of illegal tracks (1 open public meeting)
- be unsuccessful in reducing illegal use because they will not satisfy mountain bike riders (3 group⁵⁷ + 1 open public meeting).

▷ Seven personal and 5 group⁵⁸ submissions argue that the environmental impact of creating new tracks can be offset by closing and rehabilitating inappropriate tracks.

▷ Six group⁵⁹ submissions and comments made at 2 open public meetings do not support constructing new tracks or giving preference to improving or modifying existing tracks in order to:

- reduce bush clearing, fragmentation and other environmental impacts (2 group⁶⁰)
- engender support from local mountain bikers (2 open public meetings).

▷ One group⁶¹ submission suggests closure of motor vehicle access to create walk- or cycle-only access to camping areas in some locations.

⁵⁴ HSMBA, BA, GCTA, WCSMBC, EA, MT, MDMTBO, HT, SEMTB, MTBW, HMBA, IMBA, WH, KT, WARRC

⁵⁵ BA, GCTA, WCSMBC, MT, MDMTBO, HT, MTBW, HMBA, IMBA, WH, KT

⁵⁶ MTBW, HMBA, IMBA, WH

⁵⁷ BMCS, CEC, WARRC

⁵⁸ HCR-CMA, HMBA, IMBA, HVMBR, WARRC

⁵⁹ TTF, NSHPA, STEP, HVMBR, NPA-Exec, WARRC

⁶⁰ TTF, NPA-Exec

⁶¹ HVMBR

sample comments

'MTB Wagga Inc is in favour of purpose-built mountain bike trails rather than the proposed policy of reworking old walking trails to provide cycling opportunities. Repairing trails on unsustainable gradients is very expensive and requires intense trail maintenance. The current limitation of only changing a walking trail's alignment within the existing corridor means trail construction cannot follow the best route through the terrain, nor allow for off-trail drainage and sediment controls. The existing trails in NPs were constructed by walkers following fall-lines and often follow the shortest route, rather than the most sensible route. Thus, to implement the IMBA trail building guidelines in full requires purpose-built trails on new and better alignments to achieve the best outcomes for trail users and biodiversity.'

'I am pleased to note that you are using existing tracks for making into mountain bike tracks and not building new tracks so are avoiding clearing bush as much as possible.'

'To minimise the impact ideally this would involve formalising some existing trails and modifying others. Obviously this would involve some minor landscaping to minimise erosion etc. Unsustainable trails (this includes walking trails) should be closed and suitable alternatives made available. Creating new trails is probably not necessary as this will create an additional impact.'

6.1 Discussion

NPWS notes the support for modifying existing tracks to reduce environmental impacts, costs and engender support from local mountain bikers. However, NPWS recognises that in some cases purpose-built tracks or significant re-routing may lead to better environmental outcomes. It is therefore considered appropriate that the decision to provide new mountain bike experiences by modifying existing tracks or constructing new tracks be made on a case-by-case basis.

7. Site suitability

Discussion paper reference: Section 3.3

Several submissions suggest mountain biking should:

- be provided in low-conservation, degraded or weed-infested areas only (9 personal + 6 group⁶² + 1 open public meeting + 1 targeted workshop)
- not be provided in highly sensitive areas or threatened vegetation communities (9 personal + 1 group⁶³ + 1 open public meeting)
- be provided parallel to management trails where the corridor is already disturbed by creation of the management trail (8 personal).

7.1 Discussion

NPWS notes the importance of selecting sites appropriate for mountain biking, and that conservation values, environmental sensitivity and presence of threatened species should be considered in selecting such sites. It will use the relevant parts of the *Sustainability assessment criteria for visitor use and tourism in New South Wales national parks* to match mountain biking opportunities appropriately across the range of settings within NSW parks. Environmental assessments will be undertaken for all prospective mountain bike experiences (this is discussed further in section 8).

NPWS notes the suggestion to provide singletrack experiences parallel to management trails. It will consider this proposal on a case-by-case basis.

⁶² ABC, APS-NS, NPA-H, CEC, STEP, CBC

⁶³ APS-NS

8. Track design, location, construction and maintenance

Discussion paper reference: Section 3.4 and 3.5

8.1 Environmental assessments

▷ Eighteen personal and 6 group⁶⁴ submissions, and comments at 5 open public meetings and 2 targeted workshops support environmental assessments being undertaken prior to developing mountain bike experiences, for the following reasons:

- to preserve valuable environmental features
- to assess the most suitable terrain and track layout
- to minimise the overall environmental impact, particularly when it is due to wet-weather use and overall soil erosion.

8.2 Track standards

▷ Sixty-four personal and 4 group⁶⁵ submissions, and comments made at 2 open public meetings support adopting the International Mountain Bicycling Association (IMBA) track standards, arguing that this will help minimise impacts on the environment.

▷ One personal and 4 group⁶⁶ submissions argue that NPWS should confirm its own standards.

▷ Four personal and 7 group⁶⁷ submissions, and comments at 2 open public meetings support engaging experts and training NPWS staff in mountain bike track design, construction and maintenance. In addition, 53 personal and 3 group⁶⁸ submissions, and comments at 5 open public meetings support engaging professional mountain bike track builders to assist with designing and constructing mountain bike facilities.

sample comments

'IMBA guidelines are key here. These are so well ahead of other practices that South Australia has started to use them to build all their trails – those for walking too!'

'The [National Parks and Wildlife] Service should not put itself in a position of using standards developed by other agencies/organisations in national parks unless those standards are developed specifically for the NSW national park system.'

'This training of staff and volunteers by World Trail occurred in Glenrock and has proven to have been a great asset in the maintenance of trails.'

⁶⁴ BMCS, HSMBA, NPA-SH, NPA-TV, STEP, WARRC

⁶⁵ GCTA, WCSMBC, RCT, WARRC

⁶⁶ MDMTBO, NPA-CV, NPA-Exec, WARRC

⁶⁷ GCTA, MDMTBO, HT, MTBW, HMBA, MT, WARRC

⁶⁸ MT, HMBA, WARRC

8.3 Additional track design and maintenance proposals

► Four personal submissions and comments made at 2 targeted workshops highlighted the importance of regular track maintenance.

Submissions make the following suggestions for designing and maintaining tracks:

- a monitoring program to assess visitor conflict and environmental damage caused by mountain biking (3 group⁶⁹ + 2 open public meetings + 2 targeted workshops)
- wheel-washing stations or chemical troughs to prevent weeds and diseases from spreading (6 personal + 1 open public meeting + one targeted workshops)
- installing raised boardwalks in swampy or sensitive areas (4 personal)
- using recycled wood, tyres and metal for track construction (1 personal)
- rotating areas used for riding to allow recovery of soil, vegetation and drainage (1 personal)
- managing runoff and bulldozing or grading to minimise sedimentation on management trails (1 personal).

In addition, 1 personal submission and comments at 4 public meetings and 1 targeted meeting suggest mountain bike clubs and related interest groups be allowed to design, locate, implement and manage mountain bike tracks in NPWS parks with the advice, but not control of, authorities.

sample comments

'If mountain bike riding becomes a reality I would expect proper precautions would be taken to prevent the introduction of [invasive pests such as *Phytophthora cinnamomi*, *Echium plantagineum*, *Sporobolus fertilis* and *Eragrostis curvula*]. I would suggest a number of shallow troughs be constructed to be filled with a chemical designed to prevent the spread of these pests and diseases. All bikes would then be required to pass through these points so as to neutralise the likelihood of transference of any invasive element into a park.'

'Mountain bikers should self-manage their activities: mountain bike clubs and related interest groups are in the best position to design, locate, implement, manage and assess mountain bike trails in National Parks ... Mountain Bike Australia Inc. has a well-researched policy on mountain bike access to natural areas, which includes detailed consideration of sustainability, biodiversity, safety of riders and others sharing the use of riding trails, and a valid code of conduct. Those who participate in the sport of mountain biking tend to enjoy their personal freedom, are competitive and resent external restrictions. Enforcement of proposed regulations and additional controls would not be achieved without substantial enforcement, costing significantly more than any potential benefits ... mountain bike interest groups, with the advice (but not control) of authorities, are quite capable of ensuring [fragile environments] are protected.'

'Where multi-use tracks remain in use it will be important to monitor user experiences to identify any significant conflict and take appropriate action. We do not want "road rage" against bike riders extending into our parks!'

⁶⁹ SBC, MT, WARRC

8.4 Discussion

NPWS acknowledges concerns about environmental impacts, particularly during wet-weather use, and assessing the most suitable terrain and track layout to minimise impact, but notes that environmental assessments are required for all visitor developments in NPWS parks.

NPWS recognises that IMBA has drawn on significant worldwide experience to develop their track standards, and notes these standards have been adopted by many interstate and international land management agencies. However, by evaluating and monitoring NPWS mountain bike experiences, NPWS may discover more NSW conditions that are appropriate to put into the NPWS adopted track standards.

NPWS notes the support for training NPWS staff and engaging experts.

NPWS recognises the need to regularly maintain mountain bike tracks. All infrastructure in NPWS parks is maintained according to its asset maintenance system.

NPWS notes the additional track design and maintenance proposals. It will consider implementing these proposals on a case-by-case basis.

NPWS recognises that mountain bike clubs and related interest groups have significant knowledge and experience in designing and managing mountain bike tracks. It believes they should be involved in planning, designing, constructing and maintaining tracks where practicable. However, it does not support the suggestion that mountain bike clubs and related interest groups be solely responsible for mountain bike tracks in NPWS parks with the advice, but not control of, NPWS. NPWS is responsible for land reserved under the NPW Act and is responsible for ensuring parks and reserves are managing in keeping with the Act's management objectives.

9. Partnerships with mountain bikers

Discussion paper reference: Section 3.6

- ▶ One hundred-and-eight personal and 22 group⁷⁰ submissions, and comments at 5 open public meetings recommend NPWS work with mountain bike riders, clubs, magazines, websites and other recreational visitors to manage mountain biking.
- ▶ Two group⁷¹ submissions argue NPWS should not waste resources partnering with the mountain bike community. In addition, 1 group⁷² submission raises concerns that memorandums of understanding with visitor groups are non-binding.

sample comments

'Perhaps ambitious, national parks could establish local user groups, who could care take their trails, including regeneration work, rubbish collection, erosion prevention, I know that I would enjoy doing these things, and it would give me a pride that would have me stop others from ruining track-free areas which I had invested time in making nice again.'

'The evidence demonstrates beyond reasonable doubt that throughout NSW, mountain bikers do not regard their ecological situation, particularly on downhill singletracks. Resources would be redeployed misguidedly from core business within the [National Parks and Wildlife] Service chasing a goodwill that does not exist, leading to an already reduced capacity to maintain those assets from which resources are redeployed.'

9.1 Code of conduct

- ▶ Two group⁷³ submissions argue that a code of conduct will not lead to appropriate behaviour. In addition, 2 group⁷⁴ submissions and comments at 1 open public meeting and 2 targeted workshops argue that a code of conduct is only effective if followed, and needs to be accompanied by monitoring and penalties for non-compliance.
- ▶ Nine personal submissions and a comment at 1 open public meeting argue that NPWS should rely on mountain bikers' common sense rather than developing a code of conduct.
- ▶ One hundred-and-one personal and 2 group⁷⁵ submissions, and comments at 3 open public meetings support NPWS adopting IMBA's code of conduct.
- ▶ One group⁷⁶ submission and comments at 3 open public meetings support NPWS developing its own code of conduct that builds on the IMBA code of conduct. Two group submissions suggest NPWS look at codes of conduct used by interstate land managers.

⁷⁰ BMCC, BMCS, CBC, GCTA, HSMBA, HVMBR, IMBA, JOD, LGSA, MDMTBO, MT, MTBW, NPA-EXEC, NPA-TV, ORP, RCT, SEMTB, STEP, TTF, WARRC

⁷¹ BMCS, LS

⁷² NPA-EXEC

⁷³ CEC, WARRC

⁷⁴ CEC, WARRC

⁷⁵ GCTA, SEMTB

⁷⁶ WARRC

▷ Twelve personal and 5 group⁷⁷ submissions suggest the following be included in a code of conduct:

- advise cyclists to slow down, announce their presence with their bell, then pass with care
- advise cyclists that they are not the only users of the tracks
- inform cyclists of limited speed restrictions on shared-use tracks
- advise cyclists on managing slower and faster riders
- advise cyclists to show courtesy and respect to all track users
- advise cyclists to give way to walkers and horse riders
- create a sense of responsibility and ownership among the user community
- encourage cyclists to join an off-road riding association
- advise cyclists not to park across or in the vicinity of residents' driveways, to drive sensibly and keep the noise down
- advise cyclists not to litter and to take their rubbish with them
- advise cyclists to avoid skidding
- inform riders of safe riding practices
- advise riders to use safety equipment such as helmets, gloves and pads
- advise riders to keep to existing trails only and not cut new lines
- advise riders to avoid riding after periods of heavy rain to help prevent erosion
- inform riders of low-impact cycling practices, such as not dragging their rear wheel on downhill sections
- inform riders of local bike services available, to promote bike businesses and obtain support for sponsorship
- advise riders to respect the environment
- advise riders to leave native flora and fauna alone
- advise riders to keep their bikes clean and free of diseases and weeds that could be transferred from other trails and popular areas
- advise riders to report trail problems
- advise riders not to smoke.

▷ One hundred-and-twenty-eight personal and 18 group⁷⁸ submissions, and comments at 4 open public meetings recommend the code of conduct be promoted on signs, and 1 personal and 2 group⁷⁹ submissions and 1 open public meeting submission recommend it be promoted on the website.

▷ Thirty-six personal submissions and 1 group⁸⁰ submission support adopting a code of conduct for all recreational visitors, including walkers, horse-riders and mountain bikers, arguing that this will reduce conflict.

⁷⁷ GCTA, LS, MPA-EXEC, CBC, WARRC

⁷⁸ BMCC, BMCS, EA, HMBA, HSMBA, LGSA, LS, MT, MTBW, NPA-EXEC, NPA-SS, NSHPA, RCT, SBC, SEMTB, STEP, WAA, WARRC

⁷⁹ GCTA, WARRC

⁸⁰ GCTA

sample comments

'A code of conduct has little effect, and a good example of ineffectualness is the code of conduct for horse riding. Monitoring, recording and statistics need to be kept and made transparent and public through the *State of the parks* and other park documents. Appropriate acknowledgement for improvements and appropriate penalties should be recorded, and loss of entitlements applied where usage and impacts do not meet the targets set. If the code of conduct is not adhered to, then access must be removed.'

'IMBA already has a well-developed, internationally promoted set of trail usage guidelines. It would make sense to use this.'

'The IMBA code is sensible but mountain bike activities need to be subject to regulation by NPWS just like any other activity on NPWS land.'

'I've never seen conflict between trail users. It's just common sense and common courtesy isn't it? I'd hate to see trails closed and having massive ridiculous warnings and being micro-managed just because someone might break a nail.'

9.2 Enforcement

► One personal and 1 group⁸¹ submission, and comments made at 1 open public meeting and 2 targeted workshops support NPWS enforcing compliance by mountain bikers through fines and other penalties.

A number of submissions raise concerns that NPWS cannot force mountain bikers to comply with restrictions, making the following comments:

- self regulation does not work (4 personal + 3 group⁸²)
- current policies have not dissuaded illegal mountain biking (36 personal + 4 group⁸³ + 6 open public meetings).

One personal and 1 group⁸⁴ submission, and a comment made at 1 open public meeting support self-regulation by mountain bike riders and clubs.

Four personal submissions, 1 group⁸⁵ submission and comments made at 2 open public meetings suggest NPWS work with the illegal track builders and redirect their energy into building legal mountain bike tracks.

⁸¹ WARRC

⁸² BMCS, AOC, APS-NS

⁸³ CFFW, APS-NS, RHHFFPS, CEC

⁸⁴ ORP

⁸⁵ BMCS

sample comments

'Deliberate damage to an endangered ecological community or core koala habitat; and to take, pick or kill threatened species is a breach of the National Parks and Wildlife Act punishable by a fine up to 2000 penalty units at \$110 per unit. A jail sentence is also an option.'

'The section in the paper devoted to "controlling risks" (page 4) recommends rewarding illegal activity by providing taxpayer funded facilities, as trialled at the Glenrock State Conservation Area. Random patrols, confiscation of bikes, and heavy fines for this illegal activity would seem to have been a cheaper option, but providing adequate staff to monitor illegal activity in national parks has never been one of the NSW Government's strong points.'

'I understand the rationale inherent in the paper but foresee more than a little difficulty regarding total control of this activity. The prospect of riders dismounting to ensure the safety of other users is at odds with everyday occurrences on the road where cyclists ride in disregard of all road signage, traffic lights and vehicles and the expectation of this occurring away from the greater public view is an expectation which will never be fulfilled.'

'NPWS rangers and field staff confront difficult and dangerous situations involving mountain bike riding in parks. Yet, the paper does not consider how NPWS deals with these situations, the suitability of current measures for dealing with these situations, particularly the penalty provisions, nor options for better dealing with these situations.'

'Riders should politely encourage mountain bike riders riding in inappropriate areas to consider the impacts on both the environment in which they are riding and on subsequent more rigorous trail controls introduced to keep negative impacts under control.'

'... that illegal section [on the Northern Beaches] ... was, I have heard, cut by some local boys that lived up near the Ba'Hai temple. An excellent example of how engaging with the youth could create a wonderful and sustainable trail network that is worth promoting to the world rather than laying in wait to penalise/fine some teenagers enthusiasm.'

9.3 Additional partnership proposals

- ▷ Two group⁸⁶ submissions support using mountain bike tours to encourage compliance, ensure safety and increase understanding of the natural and cultural values of parks.
- ▷ Nineteen personal and 4 group⁸⁷ submissions, and comments at 2 open public meetings and 2 targeted workshops support education programs to encourage compliance and reduce environmental impacts. Four personal submissions support track management and education days.

⁸⁶ SEMBT, EA

⁸⁷ EA, RCT, MBNMTBO, HMBA

sample comments

'Providing local mountain biking tours for new riders and tourists could also assist with a better compliance to legal track riding. This would be something I personally would be interested in organising and participating in, particularly for the "Royal".'

'I have taken discovery mountain bike rides mostly with teenager boys in my past roles working with NSW National Parks. It was a wonderful opportunity to teach this age group about indigenous culture and our natural assets. It is important to foster appreciation and understanding in our next generation of users.'

'... education of the MTB public [is vital]. I used to be annoyed by cyclists throwing banana skins around, now it is often gel sachets, punctured tubes or broken reflectors that I pick up on my rides. As with minimal impact bushwalking, minimal impact mountain biking is also vital ... Carry in, carry out should be the catchcry!'

9.4 Discussion

NPWS recognises that effective environmental management can be significantly enhanced by introducing a code of conduct as well as by creating partnerships with mountain-bike riders, clubs, magazines and websites. Enhanced environmental management is also assisted by consulting with other recreational visitors. NPWS also recognises that codes of conduct may be appropriate for all categories of park visitors, as undesirable behaviours are not restricted to those engaging in one recreational activity. NPWS acknowledges that enforcement measures will continue to be required in some cases.

NPWS acknowledges that many riders are experienced, responsible and have a high level of knowledge on low-impact cycling, but believes that a code of conduct will assist to promote a best practise riding ethos even more widely. NPWS recognises that IMBA has utilised considerable experience in developing their code of conduct. In adopting a code of conduct, NPWS will consider the IMBA code of conduct with the additional code of conduct suggestions. NPWS supports the advice that a code of conduct be promoted on signs and its website, and be supported by local and peak mountain bike organisations and well-known mountain bike identities, as appropriate.

NPWS notes that advice to other visitors including walkers and horse riders, may need to be included in the code of conduct.

NPWS acknowledges that mountain bike tours and education programs have the potential to encourage compliance, improve safety and increase understanding of the natural and cultural values of parks. NPWS currently offers a small number of mountain bike tours through our *Discovery walks talks and tours* program. Several licensed tour operators run mountain bike tours in NPWS parks.

10. Wet weather

Discussion paper reference: Section 3.7

▷ One group⁸⁸ submission supports designing mountain bike tracks to be weather-proof and a comment made at 1 open public meeting argues that mountain bike tracks designed to IMBA guidelines drain water effectively.

▷ Seven personal and 5 group⁸⁹ submissions, and comments made at 2 open public meetings support wet-weather closure of mountain bike tracks to minimise erosion. One personal submission suggests the closures be extended to include NPWS vehicles, arguing that damage is caused by NPWS vehicles and illegal motor trail bikes.

Submissions suggest track closures be promoted using:

- track signs (10 personal + 2 group⁹⁰ + 3 open public meetings)
- websites (17 personal + 1 group⁹¹ + 1 open public meeting)

▷ One group submission⁹² argues that NPWS managers should be able to decide to close tracks in wet weather without consulting user groups.

sample comments

'Trails (walking and mountain biking) built to IMBA guidelines will drain water effectively, leading to less closures due to rain.'

'Wet weather closures happily accepted by riders (except for the odd fool).'

'The most damage to tracks in my observations is due to track use by service vehicles during periods of wet weather and by illegal motor trail-bike use. Some service vehicle use may be essential, but should be kept to a minimum when service tracks are water-affected.'

'Manly Dam has a mailing list developed to notify riders of trail closures due to wet weather ... Using social technologies available to us (Facebook, Twitter etc.) may allow for communication between users so that trail damage may be minimised.'

'NPA does not support wet-weather cycling as damage and disturbance from vehicle tyres is increased during wet weather. National park managers should be able to make the decisions without having to go through a consultation process.'

10.1 Discussion

NPWS recognises that well-designed mountain bike tracks may be able to support wet-weather riding, but notes that soil types differ in how readily they erode and some tracks will need to be closed in wet weather. The support for wet-weather closures is noted.

⁸⁸ GCTA

⁸⁹ SEMTB, IMBA, NPA-CV, NPA-SS, NPA-EXEC

⁹⁰ MTBW, CBC

⁹¹ MTBW

⁹² NPA-EXEC

NPWS supports promoting track closures using track signage, websites and, where appropriate and available, social networks. It acknowledges that inappropriate use and damage to tracks and trails may be reduced by using communication methods agreed to by mountain biking groups. Procedures for communicating the closure of trails is currently covered by the *Vehicle access – general policy*. Specific methods of communication mutually agreed with mountain biking groups should be considered case-by-case.

It is NPWS responsibility to close tracks when required to protect the environment, track infrastructure and ensure visitor safety. However, NPWS notes that agreed criteria for closures may increase support for and compliance with wet-weather closures. The procedure for closing trails is also currently covered by the *Vehicle access – general policy*. Specific criteria for wet-weather track and trail closures may be mutually agreed with mountain biking groups case-by-case.

11. Night riding

Discussion paper reference: Section 3.8

- ▶ One personal and 10 group⁹³ submissions, and comments at 1 open public meeting and 3 targeted workshops support a ban on night riding, arguing that it will disturb nocturnal wildlife and cause injuries to animals and riders.
- ▶ Four personal and 3 group⁹⁴ submissions do not support a ban on night riding, arguing that only a very small number of people want to ride at night, so it will not have a significant impact on the environment or neighbours.

sample comments

'The proposed use of tracks for night riding in parks and reserves is strongly opposed due to the risk posed to native wildlife. We are appalled at the suggestion that consideration will be given to permitting night riding in national parks using high-powered LED light systems. This activity might be popular but as most of our native animals are nocturnal and become dazzled and frozen by lights, this proposal should be rejected outright. It's hardly likely to engender an interest in the natural values of the park or scenery, but it would certainly be thrilling – and dangerous.'

'With regards to night riding I would encourage consideration to allow it on the trails but if needed you could limit the hours of operation.'

'Night riding is increasingly popular, particularly due to high participation in 24-hour races. However, night events are not particularly frequent, with a few per year that are unlikely to occur more than once or twice in the same location. Occasional night riding by individuals or small groups is unlikely to have a significant impact on wildlife and is also unlikely to disturb neighbours. [OEH] NPWS should focus on issues of higher priority. This should not be a priority project under the strategy.'

11.1 Discussion

NPWS acknowledges that night riding has the potential to disturb wildlife and park neighbours. Tracks may be closed to night riding as required to manage these risks.

NPWS recognises that light systems are available that allow riders to avoid injuries to animals and riders.

⁹³ APS-NS, CFFW, BMCS, AOC, SCRAC, NPA-CV, CEC, STEP, NPA-SS, NPA-EXEC

⁹⁴ GCTA, SEMTB, IMBA

12. Events

Discussion paper reference: Section 3.9

- ▷ Five group⁹⁵ submissions and comments made at 2 open public meetings do not support hosting mountain bike events in NPWS parks, arguing that:
- claims of economic benefits are unsubstantiated (2 group)
 - events are a sporting activity that do not involve appreciating nature (2 group)
 - events require major track works and visitor facilities (1 group + 1 meeting)
 - events may threaten conservation values and interfere with other park users (2 group + 1 meeting).
- ▷ One personal and 5 group⁹⁶ submissions, and comments made at 1 open public meeting supported mountain bike events in NPWS parks, arguing that events on sustainable tracks will not have significant environmental impacts.
- ▷ One group⁹⁷ submission notes that mountain bike competitions can have environmental impacts due to intense usage, but supports long-distance events in NPWS parks where participants only travel over a section of the course once.

sample comments

'The case study cited "The Thredbo Australian Open of Mountain Biking" in March 2007, raised revenue for Thredbo (Amalgamated Holdings), not for [OEH]. This is generally the case.'

'In practice you will find that you will spend more than you make repairing, maintaining and providing infrastructure to support this sporting activity that has very little to do with appreciating nature. The people selling the bikes and gadgets will be the ones making the money out of this activity while you foot the damage bill.'

'Thredbo has already proven itself to be an ideal location for MTB events. It has hosted events for 18 years without any major environmental issues.'

'I've seen mountain bike events blocked that just needed to traverse a national park on well-used roads that would be hard to scratch with a crowbar and on which a mountain bike would have no impact ... I'd like to see a bit more of a reasonable approach.'

'Mountain bike competition can be very tough on the environment, in particular when conducted on trails not designed correctly for the type of mountain bike activity the trails are subjected to. This, combined with a very intense usage – albeit for a short time – can create adverse wear patterns. Some mountain bike competition activity, however, is very well suited to being hosted within the NPWS estate ... [e.g.] Mountain Bike Marathon – long-distance broad-acre events where participants travel over any one part of the course alignment once ... if one looks at the major events around Australia over the last few years the largest, most economically beneficial to the region, are events of this type.'

⁹⁵ CFFW, NPA-H, CEC, NPA-EXEC, STEP

⁹⁶ GCTA, SEMTB, MTBW, ORP, MBA

⁹⁷ MBA

12.1 Discussion

NPWS recognises that events can provide opportunities to raise a park's profile and benefit local economies, but acknowledges the need to recover costs from events, avoid conflicts with other visitors and protect the environment and park infrastructure. All cycling events will be assessed under the *NPWS events, functions and venues policy*, which requires costs to be recovered and conservation values to be protected. However, NPWS recognises that specific environmental and social conditions may be required for cycling events.

13. Providing a diversity of high quality experiences

Discussion paper reference: Section 4.1

Submissions suggest a variety of features and facilities are required to deliver a world-class mountain bike experience:

- design mountain bike tracks to suit a variety of skill levels (119 personal + 4 group⁹⁸ submissions + 4 open public meetings)
- develop or promote mountain bike experiences near existing facilities, such as public transport, carparks, toilets, drinking water, rubbish bins (36 personal + 6 group⁹⁹ submissions + 4 open public meetings)
- develop long-distance, multi-day experiences utilising a mix of tracks and management trails (60 personal + 3 open public meetings)
- incorporate topography and natural terrain into mountain bike tracks (32 personal submissions)
- take in special points of interest, such as lookouts and water views (5 personal submissions + 5 open public meetings)
- mobile phone reception or fixed-line emergency phones in more remote locations (19 personal + 2 group¹⁰⁰ submissions)
- design mountain bike tracks to enhance track flow – the rhythm of the track (there are two basic types of flow: open and flowing, and tight and technical) (2 personal + 2 group¹⁰¹ submissions)
- loop tracks rather than out-and-back tracks (2 personal + 4 open public meetings)
- signs providing information on the wildlife, plants and other interesting features of the national parks (4 open public meetings)
- basic facilities such as car parking, rainwater at the track head, good signage and shelters (37 personal submissions)
- links to train stations where applicable (9 personal + 1 open public meeting)
- provide areas for bikes on trains and buses (2 group¹⁰² submissions).

In addition, 19 personal and 5 group¹⁰³ submissions, and comments made at 2 open public meetings suggest NPWS investigate successful interstate and overseas mountain bike experiences. Submissions recommended investigating the following sites:

- Stromlo Forest Park (ACT) – 19 personal + 1 group¹⁰⁴ + 1 open public meeting submissions cite this as an example of excellent singletrack, track signposting, technical track features, views, loops and grades to suit a variety of skill levels
- Mt Coot-tha Forest (Queensland) – 13 personal + 1 group¹⁰⁵ submissions cite this as an example of successfully engaging volunteers and mountain bike clubs
- Mt Buller, You Yangs, Forrest and Lysterfield Park (Victoria) – 2 personal submissions cite this as an example of excellent track signposting, maintenance, promotion and marketing, and using mountain biking to support regional tourism

⁹⁸ HSMBA, MT, SEMTV, BMCC

⁹⁹ SBC, EA, MT, SEMTV, LGSA, BMCC

¹⁰⁰ SBC, CBC

¹⁰¹ WH, MTBW

¹⁰² LGSA, SBC

¹⁰³ GCTA, WAA, MT, SEMTB, IMBA

¹⁰⁴ MT

¹⁰⁵ GCTA

- Eagle Park, Eagle on the Hill (South Australia) – 1 personal + 2 open public meetings
- Whakarewarewa Forest, Rotorua, Queenstown and Wanaka (New Zealand) (6 personal + 1 group¹⁰⁶ submission + 1 open public meeting) – submissions cite this as an excellent example of long distance singletrack
- Whistler (Canada) – 9 personal submissions cite this as an excellent example of sustainable practice, including wooden boardwalks to minimise damage on softer ground
- North-eastern England and Wales (United Kingdom), particularly the 7 Stanes tracks – 4 personal + 1 group¹⁰⁷ submission
- Austria – 1 group¹⁰⁸ submission.

▷ Eighteen personal submissions do not support developing world-class mountain bike experiences. These argue that limited funding should be spent on local, low-key mountain bike tracks closer to home and suggest they will have less impact on the environment than world-class mountain bike experiences. In addition, 13 personal submissions support mountain bike tracks that are kept as natural as possible.

▷ One personal submission and 1 group¹⁰⁹ submission suggest Thredbo would be a suitable location for a world-class mountain bike experience because it already has the required facilities.

sample comments

'Linking mountain bike trail-heads to existing infrastructure might be possible in some cases (particularly carparks, possibly public transport nodes). These existing facilities can be augmented with toilets (where not present already). Perhaps bike racks and hoses for washing bikes (bore or rainwater fed) would be valuable in the more highly patronised trails.'

'It is necessary to build trails that cater for all levels. This is no different to the walking trails that range from wheelchair accessible through to overnight hiking trails. This means that the trails should cater for not just varying technical abilities but also endurance abilities.'

'The single most important factor in creating a facility that will be well used and successful is looking at those who are already doing it well. There are world class trail networks on our doorstep and particularly I would strongly urge any decision maker to make a research visit to Rotorua in New Zealand. The quality of their trail network draws people from all over the world and is a fantastic example of what is possible when it is done properly.'

'Personally, I would rather see funding/resources expended on the building/improvement/maintenance of tracks themselves, rather than in providing ancillary facilities (e.g. toilets, kiosks, info centres etc). Mountain biking is a sport that demands self-sufficiency, and just as camping in the wilderness doesn't necessitate man-made amenities, neither does mountain biking.'

¹⁰⁶ MT

¹⁰⁷ WAA

¹⁰⁸ WAA

¹⁰⁹ SEMTB

13.1 Discussion

NPWS recognises the need to provide a diversity of mountain bike experiences, including experiences suiting a variety of skill levels and a range of facilities. All experiences in NPWS parks should be of a high quality and suited to meet the expectations of target markets for that experience. NPWS notes the facilities and features suggested for delivering a high-quality experience. It will consider providing these facilities and features case-by-case.

NPWS notes the recommendation that areas be provided on trains and buses for bikes but observes public transport does not lie within NPWS' responsibility.

NPWS notes the suggested examples of successful interstate and overseas mountain bike experiences. It will investigate these experiences and incorporate similar features and facilities into NPWS experiences as appropriate.

14. Communications

Discussion paper reference: Section 4.3

14.1 Making use of existing infrastructure

▷ Eleven personal and 14 group¹¹⁰ submissions, and comments made at 4 open public meetings support improved communication of existing legal mountain biking experiences, suggesting the following:

- provide maps of cycling routes on the website, park entry station, visitor centres and bike shops (12 personal + 2 group¹¹¹ + 2 open public meetings)
- promote opportunities to cycle and then bushwalk (1 open public meeting)
- improve information on the website (7 personal + 6 open public meetings)
- rangers patrol on bikes and engage with other riders, hand out educational material, carry a first aid kit, bike tools, spare inner tube and water (1 personal).

14.2 Communicating the difficulty of the experience

▷ One hundred-and-sixty-nine personal and 4 group¹¹² submissions, and comments made at 7 open public meetings support the use of signs to inform riders of the distance, difficulty and directions, including maps. Nine personal submissions support implementing a classification system.

sample comments

'Blue Mountains National Park plan of management para 4.3.7 indicates here that cycling is permitted only in a few places including all management trails. I failed to locate a map of management trails on the [OEH] web site. This is an area where communications with mountain bikers could be improved by providing online access to information useful for planning rides.'

'As part of the recognition of cycling as a valid pursuit on trails in the NPWS estate, it would be hoped that NPWS will more commonly provide information on and highlight mountain biking tour routes through the parks publications, visitor centres and websites. There are in existence already, huge opportunities to explore the NPWS estate by bike; opportunities that are rarely noted in information sources.'

'Rangers on bikes is a great idea: giving out information, maps and advice during busier periods. Engaging with riders to create a sense of community. Handing out bike-handling and safety tips. Perhaps carrying some tools, first aid, water and a spare inner tube for those in trouble (in exchange for a donation towards maintaining the trails of course). How great would that be?'

'Just like ski runs all trails are rated, green circle = easy, blue square = intermediate, black diamond = difficult and double black diamond = expert only.'

¹¹⁰ SBC, LS, MT, MDMTBO, SEMTB, MTBW, HMBA, IMBA, LGSA, WH, MPA-SS, HBMBR, NPA-EXEC, GCTA

¹¹¹ GCTA, MT

¹¹² SBC, MT, HMBA, WH

14.3 Discussion

NPWS notes the support for improved communication of existing legal mountain biking experiences along with communication suggestions.

NPWS notes the support for information on the degree of difficulty of the mountain biking experience. NPWS notes that the IMBA Australia Trail Difficulty Rating System is recognised by riders internationally and has been adopted by Tasmania, South Australia and Western Australia. Therefore it is the most appropriate system for adoption by NPWS.

15. Managing experiences for other visitors

Discussion paper reference: Section 4.4

15.1 Potential displacement of other visitors

▷ One personal submission argues that cross-country mountain biking can be compatible with bird watching and provide a means of experiencing bird habitats.

sample comments

'It is interesting that bird watching is identified as an activity at risk of displacement by mountain biking. Cross-country mountain biking (not during races) is entirely compatible with bird watching and there are numerous examples where mountain bike riding/cycling and bird watching are actively encouraged and provide an excellent means of experiencing bird habitats and cycling – see Bharatpur Bird sanctuary in India, Forests of Dean in the UK, Laratinga Reserve in South Australia and areas within Kakadu NP in the Northern Territory.'

15.2 Conflicts between mountain bike riders and other visitors

▷ One hundred-and-fifty-six personal and 11 group¹¹³ submissions, and comments made at 2 open public meetings and 2 targeted workshops support multi-use tracks and management trails. Of these, 105 personal and 1 group¹¹⁴ submissions, and comments made at 4 open public meetings support NPWS providing a combination of multi-use tracks and management trails and single-use tracks. Submissions argue that well-designed multi-use tracks:

- have been successful internationally and in Australia (4 personal + 12 group¹¹⁵ + 4 open public meetings)
- reduce conflict between users (4 personal + 4 open public meetings)
- reduce ongoing management costs (1 open public meeting)
- provide more track for each user group within limited resources (1 personal + 1 group¹¹⁶ + 2 open public meetings)
- are safe because bike speeds are controlled by twists and turns of the track and the terrain (1 personal submission).

In addition, 6 personal and 2 group¹¹⁷ submissions argue that conflict between users tend to be exaggerated, because the majority of park users are motivated by similar outdoor experiences.

▷ Nine group¹¹⁸ submissions and comments made at 1 open public meeting do not support multi-use tracks. Of these, 1 group¹¹⁹ submission and comments made at 2 open public meetings do not support multi-use on narrow tracks but recommended multi-use on management trails and roads. Submissions argue that multi-use tracks:

¹¹³ BA, SBC, GCTA, WSCMBC, EA, SEMTB, MTBW, HMBA, IMBA, WH, NSHPA

¹¹⁴ IMBA

¹¹⁵ BA, SBC, GCTA, WSMBC, EA, SEMTB, MTBW, HMBA, IMBA, LGSA, WH, NSHPA

¹¹⁶ BMCS

¹¹⁷ SEMTB, WH

¹¹⁸ LS, CFFW, NPA-SH, GCTA, BMCS, STEP, NPASS, NPA-EXEC, APS-NS

¹¹⁹ NPA-EXEC

- are dangerous and/or noisy and disturb bushwalkers (1 open public meeting + 5 group¹²⁰)
- are not suitable for bushwalkers because walkers prefer to take a direct route and mountain bike riders prefer looping, technical tracks (1 group¹²¹).

In addition, 10 group submissions¹²² and comments made at 2 open public meetings do not support single-use mountain bike tracks, arguing that they:

- exclude other users from areas of parks (5 group¹²³)
- create a precedent for single-use tracks for other users such as 4WD, trail bike and horse riders (2 personal).

▷ One personal and 1 group¹²⁴ submission and a comment made at 1 open public meeting describe personal experiences where they were verbally abused by mountain bikers while bushwalking. Two personal and 4 group¹²⁵ submissions and comments made at 1 open public meeting describe personal experiences where mountain bikers did not give way to them while bushwalking.

▷ Eighty-four personal submissions and a comment made at 1 open public meeting noted that they have very rarely or never experienced conflict with other recreational users.

Submissions suggest the following be considered when providing multi-use tracks:

- cyclists must give way to walkers (1 group¹²⁶)
- use signage to inform all users that other users may be on the track and promote user safety (6 open public meetings)
- educate park users to increase understanding between user groups (1 group¹²⁷ + 5 open public meetings)
- distribute brochures identifying needs, safety issues and priorities for all recreation users (1 group¹²⁸)
- provide uni-directional loops (16 personal + 2 open public meetings)
- cross-country tracks can be multi use, but downhill tracks must be single use (1 open public meeting).

¹²⁰ LS, NPA-SH, NPA-EXEC, SBC, MT

¹²¹ SSC

¹²² SC-RAC, BMCS, STEP, NPA-SS, NPA-EXEC, SC-RAC, BMCS, STEP, NPA-SS, NPA-EXEC

¹²³ CFFW, NPATV, NPASH, NSHPA, RHFFPS

¹²⁴ BMCS

¹²⁵ BMCS, LS, APS-NS, NPASS

¹²⁶ NPASS

¹²⁷ SSC

¹²⁸ SSC

sample comments

'We feel that multi-use trails are a positive step and reduce trail proliferation and ongoing maintenance costs as well as fostering greater understanding between trail users. Examples of successful multi-use tracks can be found across the globe; from New Zealand to France and the United States.'

'If increased mountain biking is sanctioned, I would like you to consider the following: No Shared Tracks. Tracks that suit walkers would not meet the requirements of bikers. Separate user-specific single tracks would better cater for the needs of both groups and would minimise the risk of accidents. While many argue that there are no accidents at present, this may be because shared single track is very rare at the moment. Bikers predict that legal single bike tracks in national parks will attract large numbers of users, and in this new environment mixing walkers and bikers would seem unnecessarily risky.'

'I have been abused verbally getting towards physical threats by riders when mentioned that they are riding in restricted areas. I am now too scared to say anything.'

'I have been victim to self-righteous walkers putting dangerous stakes and vandalising the bush by destroying saplings and small trees across trails to prevent use from other users. Ironically I am a walker as well ...'

'... it is often difficult to get the best mountain biking experience from multi-directional tracks, due to numerous factors. User conflict becomes an issue with user groups coming head-on at each other. The way to most effectively manage this is through the creation of single directional loop trails that can disperse a large number of users without feeling crowded, providing an inspirational experience in nature.'

15.3 Park neighbours

► Two personal submissions recommend parking be provided away from residential streets to avoid conflicts with park neighbours.

sample comments

'...we consider that any proposal should include consideration of the parking of vehicles and when the national parks are accessed via other properties. This can involve parking in residential streets, the maintenance of bikes in residential streets, meetings in residential streets, riding through private properties, riding through land owned by government corporations, riding through crown lands, Riding through lands owned by the metropolitan Aboriginal land council etc.'

'... [If] Morgan Rd at Oxford Falls and Redhill are sanctioned there will have to be proper trail heads set up away from local residents, they have been amazingly patient but it must be such an annoying invasion of peace and privacy, one day they will crack, we need them onside.'

15.4 Motor bike and motocross users

▷ Sixteen personal submissions, 1 group¹²⁹ submission and comments at 2 open public meetings and 1 targeted workshop raise concerns that motorbike and motocross users may use mountain bike tracks illegally and damage tracks and the environment. Submissions suggest the following measures to reduce illegal motor bike and motocross use:

- penalties (1 group¹³⁰ + 2 open public meetings)
- mountain bikers report illegal motorbike use (1 personal)
- include sections of track where the bike needs to be carried up a ledge (1 personal + 2 open public meetings).

15.5 Discussion

NPWS acknowledges that, in some cases, bird watching may be compatible with mountain bike riding, and that the potential for other uses to be displaced by mountain biking should be considered on a case-by-case basis.

NPWS notes that evidence from NSW, interstate and overseas demonstrates that, in some cases, multi-use tracks can provide safe, high-quality experiences for different visitor groups. However, it is recognised that conditions vary in different areas and in some cases multi-use tracks may not be safe or enjoyable for all visitors. NPWS acknowledges that tracks should only be designated multi-use where a track has suitable visibility, width, surface condition and gradient and where multi-use is not likely to lead to conflicts or safety concerns for visitors. NPWS notes that IMBA has drawn on significant worldwide experience in providing multi-use tracks to develop their track standards, which can be used to guide assessments of whether a multi-use track is appropriate.

NPWS notes concerns with single-use mountain bike tracks, but notes that in some cases single-use tracks, side-tracks or short detours may be required to ensure visitor safety or to protect the environment.

NPWS notes the suggestions for multi-use tracks, and particularly supports the advice that cyclists must give way to walkers on multi-use tracks and that signs and education programs be used to ensure visitor safety and understanding. NPWS supports uni-directional loops to reduce visitor conflicts and to ensure safety.

NPWS recognises that options of car parking need to be considered in planning mountain bike experiences.

NPWS recognises that illegal motor bike and motocross use may cause environmental impacts and damage mountain bike tracks. A chapter is currently being prepared in the *Law enforcement manual* that specifically addresses illegal motorbike riding.

¹²⁹ MTBW

¹³⁰ MTBW

16. Resourcing

Discussion paper reference: Section 5

16.1 Funding

- ▷ Eighteen personal and 14 group¹³¹ submissions, and comments at 6 open public meetings and 2 targeted workshops argue that limited NPWS funding should be spent on conservation rather than mountain bike experiences.
- ▷ Eighteen personal submissions and comments at 6 open public meetings argue that limited NPWS funding should be spent on improving existing walking tracks rather than mountain bike experiences. Two personal and 2 group¹³² submissions, and comments at 6 open public meetings argue that extra funding should be provided to NPWS to support mountain bike experiences.
- ▷ Four personal and 1 group¹³³ submission, and comments at 2 open public meetings and 1 targeted workshop raise concerns that NPWS may have to pay additional insurance because of increased hazards associated with mountain bike experiences.
- ▷ Twenty-seven personal and 3 group¹³⁴ submissions, and comments made at 4 open public meetings support a user-pays system to pay for constructing and maintaining mountain bike experiences. Submissions suggest the following models:
 - an annual registration fee (1 personal + 1 group¹³⁵ + 5 open public meetings)
 - a membership fee (2 personal + 7 open public meetings)
 - donations from riders (2 personal)
 - raising revenue through local mountain bike clubs via club membership and event fees (1 group¹³⁶).
- ▷ Fourteen personal, 5 group¹³⁷ and 1 open public meeting submissions do not support a user-pays system because it may encourage riders to use illegal tracks, it creates over-regulation and that it is not equitable with other user groups.
- ▷ Three group¹³⁸ submissions recommend completing a cost-benefit analysis before developing mountain bike experiences.

¹³¹ CFFW, BMCS, JOD, SCC, AOC, WH, SCRAC, NPA-CV, NPA-H, NSHPA, STEP, NPA-SS, HVMBR, NPA-EXEC

¹³² GCTA, MT

¹³³ LS

¹³⁴ WAA, AOC, TTF

¹³⁵ WAA

¹³⁶ HVMBR

¹³⁷ SBC, WH, ORP, HVMBR, NPA-EXEC

¹³⁸ NPATV, NPASH, RHFFPS

16.2 Volunteers

▷ Seventy-eight personal and 9 group¹³⁹ submissions and comments at 4 open public meetings and 1 targeted workshop support the proposal that NPWS work with volunteers to reduce the resource burden of mountain bike experiences, arguing that volunteering:

- fosters a sense of ownership of the experience (9 personal + 1 group¹⁴⁰ + 1 open public meeting)
- fosters an understanding and desire to protect the track and the environment (4 personal + 3 group¹⁴¹ + 2 open public meeting + 1 targeted workshop)
- provides an opportunity to educate riders (3 personal + 2 open public meetings)
- reduces the costs of developing and maintaining mountain bike experiences (3 open public meetings)
- will ensure a high-quality experience that meets the needs of riders (1 open public meeting).

▷ Twenty-four personal and 8 group¹⁴² submissions state they personally would be willing to volunteer or are already a volunteer.

▷ Three personal and 6 group¹⁴³ submissions do not support the proposal that NPWS work with volunteers, arguing that:

- it will be difficult to obtain sufficient volunteer labour in regional areas (1 personal + 2 open public meetings)
- volunteers lose interest and drop out over time (1 open public meeting)
- managing volunteer groups is demanding (1 group¹⁴⁴ + 1 open public meeting)
- reliance on volunteers may compromise safety (1 group¹⁴⁵)
- reliance on volunteers may lead to litigation (1 personal + 1 group¹⁴⁶)
- mountain bikers may not have the experience, commitment, training and resources required to maintain bushland over the long term (3 groups¹⁴⁷).

¹³⁹ HSMBA, GCTA, WCSMBC, MB, HT, MTBW, HMBA, IMBA, NSHPA

¹⁴⁰ BA

¹⁴¹ LGSA, WH, HVMBR

¹⁴² HSMBA, WCSMBC, RCT, TTF, MBNMTVO, HMBA, NSHPA, KT

¹⁴³ BMCS, WAA, MT, APS-NS, SSC, NPA-EXEC

¹⁴⁴ SSC

¹⁴⁵ MT

¹⁴⁶ MT

¹⁴⁷ MT, BCMS, APS-MS

sample comments

'Being a regular volunteer at one of the national parks ... I highly recommend the use of organised groups of volunteers, especially if they can be led by rangers passionate about the use of mountain bikes in national parks and with an understanding of the issues to be dealt with when developing and maintaining sustainable mountain bike trails.'

'Mountain bike volunteers have and will continue to demonstrate their usefulness and innovative approaches to achieving sustainability. Moreover, IMBA Australia would like to point out that today's mountain bike riders are tomorrow's bush care volunteers. Mountain biking and trail maintenance is a pathway to a better understanding of Australian ecosystems and respect for nature.'

'I have a problem with [the] high reliance by NPWS on voluntarism for the planning, design, construction and maintenance of cycling tracks, in particular their construction and more so their maintenance. I have seen enthusiastic voluntary hands-on organisations, earth carers of various types, neighbourhood safety groups, various user groups, service clubs, sporting groups, home visiting care providers etc wane and lose interest and members, and in many cases they eventually cease ... If this voluntary drop out happens ... has the service [got] the resources to construct and continuously maintain mountain bike tracks when, for instance, weed control is crying out for attention and new parks face dollar shortages for their facilities?'

'Volunteers in national parks usually work to improve the conservation of the natural environment, and are required to have qualifications, training and be assessed or be closely supervised by park staff. There would be a lot of construction and maintenance to do on mountain bike tracks that would divert resources from already deprived conservation projects.'

16.3 Discussion

NPWS acknowledges that funding is limited, but notes resource requirements for mountain biking experiences should be viewed within the context of the annual NPWS spend of an estimated \$70 million on visitor facilities and infrastructure, including more than 2,000 walking tracks, 700 picnic sites, 420 lookouts and 450 campgrounds.

NPWS is covered under the Treasury-managed fund self-insurance scheme. This scheme provides unique insurance coverage for all NSW budget-dependant and other selected government agencies. Additional insurance will not be required for mountain bike experiences.

NPWS notes the support for a user-pays system and the suggested models; however, it acknowledges concerns that a user-pays system may encourage riders to use illegal tracks. NPWS notes concerns that user-pays systems may not be equitable but observes that many parks charge park-usage fees for those who enter by car but not for anyone who enters on foot or bicycle.

NPWS supports costs-benefit analyses to assist planning for mountain bike experiences, including events.

NPWS notes the support for the proposal that NPWS work with volunteers; however, it is acknowledged there may be difficulty attracting volunteers in regional areas and that volunteer groups may fail or lose interest over time. Also keep in mind that NPWS internal management of visitor facilities – including mountain biking experiences – is designed to cope with all impacts of visitation even where volunteers cannot be attracted or volunteer group involvement is intermittent.

NPWS acknowledges that volunteer management is demanding on NPWS resources, but does not support the suggestion that volunteering may lead to safety risks, environmental impacts and litigation. NPWS has *Volunteer operational policies and procedures*, a volunteer management training course and a volunteer operational policies and procedures training course in place to ensure volunteer safety and protect the environment.

NPWS does not support the suggestion that volunteering is not equitable or that mountain bikers expect to be rewarded. NPWS will not make volunteering compulsory in order to obtain access to mountain bike experiences.

In 2010, over 6,300 people volunteered their time across a wide range of parks throughout NSW. NPWS has experienced an average of 12 per cent annual growth in volunteering in the period 2009–11, which supports the importance of volunteering programs to both NPWS and the community.

17. Proposed priority projects

Discussion paper reference: Section 6

▷ Forty personal and 5 group¹⁴⁸ submissions argue that mountain bike experiences in greater Sydney should be given priority, for the following reasons:

- there is currently a lack of mountain biking experiences in Greater Sydney (3 personal + 1 group¹⁴⁹)
- the largest number of riders live in Greater Sydney (3 personal).

▷ One hundred-and-five personal and 13 group¹⁵⁰ submissions, and comments made at 6 open public meetings argue that mountain bike experiences in regional areas should be included in the priority projects, for the following reasons:

- regional areas are often key tourist destinations (2 open public meetings)
- to manage illegal tracks, mountain bike experiences are required across the state (5 personal + 1 group¹⁵¹ + 2 open public meetings).

Submissions propose the following mountain bike projects:

- expand Awaba Mountain Bike Park through neighbouring NPWS and state forest estate
- create links through nature reserves on the mid north coast, including the Googik Track through Lake Innes Nature Reserve
- link existing management trails and mountain bike tracks in Northern Sydney to provide a long-distance loop track including Manly Dam, Bantry Bay, Garigal National Park, Red Hill Reserve (Oxford Falls), Davidson, St Ives, Ku-ring-gai Chase National Park and Terrey Hills
- create mountain bike experiences along Sydney Water and Energy Australia easements
- establish multi-day experiences from Sydney to the Hunter and from Sydney to Wollongong, similar to the Great North walk
- link the Megalong Valley to the Kedumba Valley in Blue Mountains National Park
- link Katoomba through the Nattai Area to Tahmoor and Picton
- link Lithgow to Richmond
- link management trails in Royal National Park to create a long loop track
- link Stanwell Tops to Bundeena
- link Morton National Park with existing mountain bike network in Wingello State Forest
- traverse Kosciuszko National Park, including linking the ACT, Victorian and NSW alps and extend the Thredbo Valley Trail to link with other resorts and Lake Jindabyne
- create safe links from cycleways on highways to management trails (for example, link Ryde Road cycleway to management trails on Lady Game Drive in Lane Cove National Park)
- create links from regional towns to NPWS estates.

▷ Twenty-two personal and 6 group¹⁵² submissions, and comments made at 1 open public meeting stressed the need to begin implementing priority projects quickly.

¹⁴⁸ MB, WH, NSHPA, WSMTB, BMCC

¹⁴⁹ BMCC

¹⁵⁰ HSMBA, WCSMBC, SCC, WBC, MT, MBNMTBO, SEMTV, MTBW, HMBA, IMBA, ORP, HVMBR, HT

¹⁵¹ MTBW

¹⁵² HSMBA, WAA, HT, SEMTB, MTBW, WH

sample comments

'I would especially concentrate initial mountain biking trail network development on national parks around Sydney, where the population is concentrated.'

'It is disappointing to note that the emphasis in relation to pilot projects in the discussion paper is on areas around Sydney. The bulk of NSW national parks are remote from Sydney but often constitute significant tourist destinations. Further, the population pressures may lead to numbers utilising facilities around Sydney which might indicate that a particular pilot project close to Sydney is a failure for some reason. On the other hand pilot projects in regional areas, actively supported by enthusiastic local volunteers may generate a more successful result.'

17.1 Discussion

NPWS notes that the number of priority projects must be limited to ensure the priorities are achievable within resource and environmental constraints. However, it is acknowledged that regional projects may be required. NPWS will conduct additional consultation to identify key priorities that include projects within Greater Sydney and within regional areas.

Appendix 1: Online forum respondents

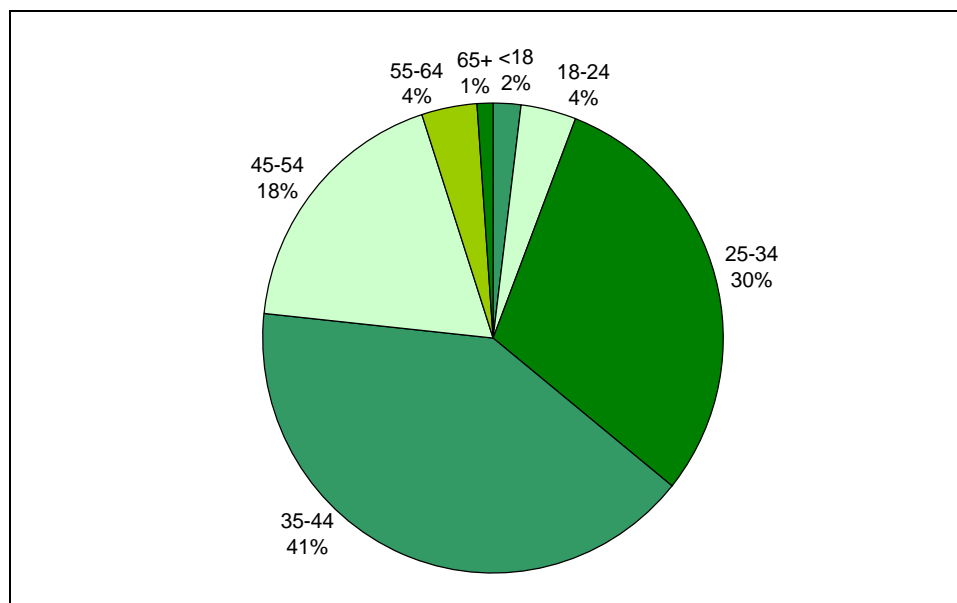


Figure 1 Proportion of responses received from respondents of different ages

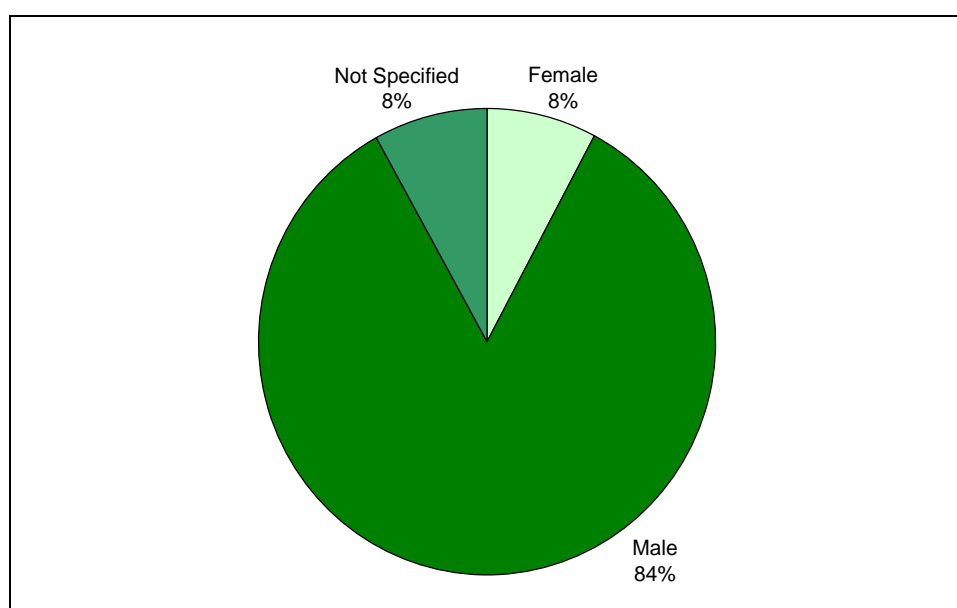


Figure 2 Proportion of responses received from respondents of different genders

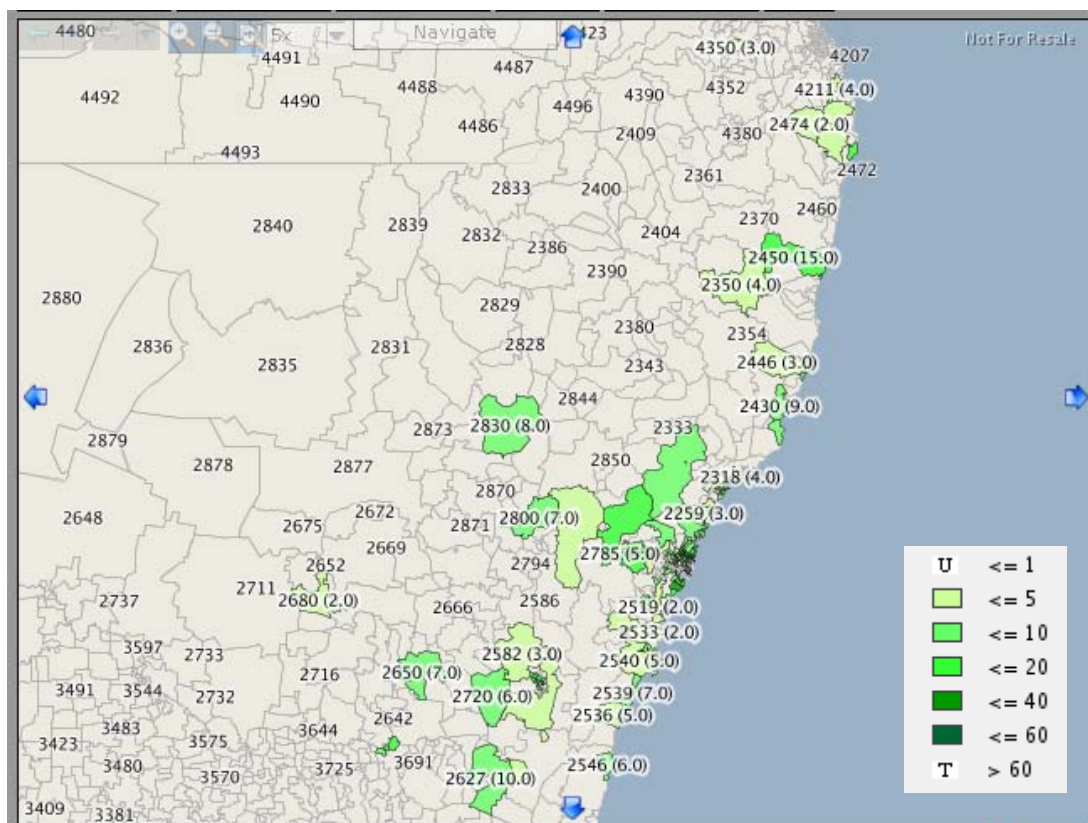


Figure 3 Number of responses received from respondents living in postcodes around the state

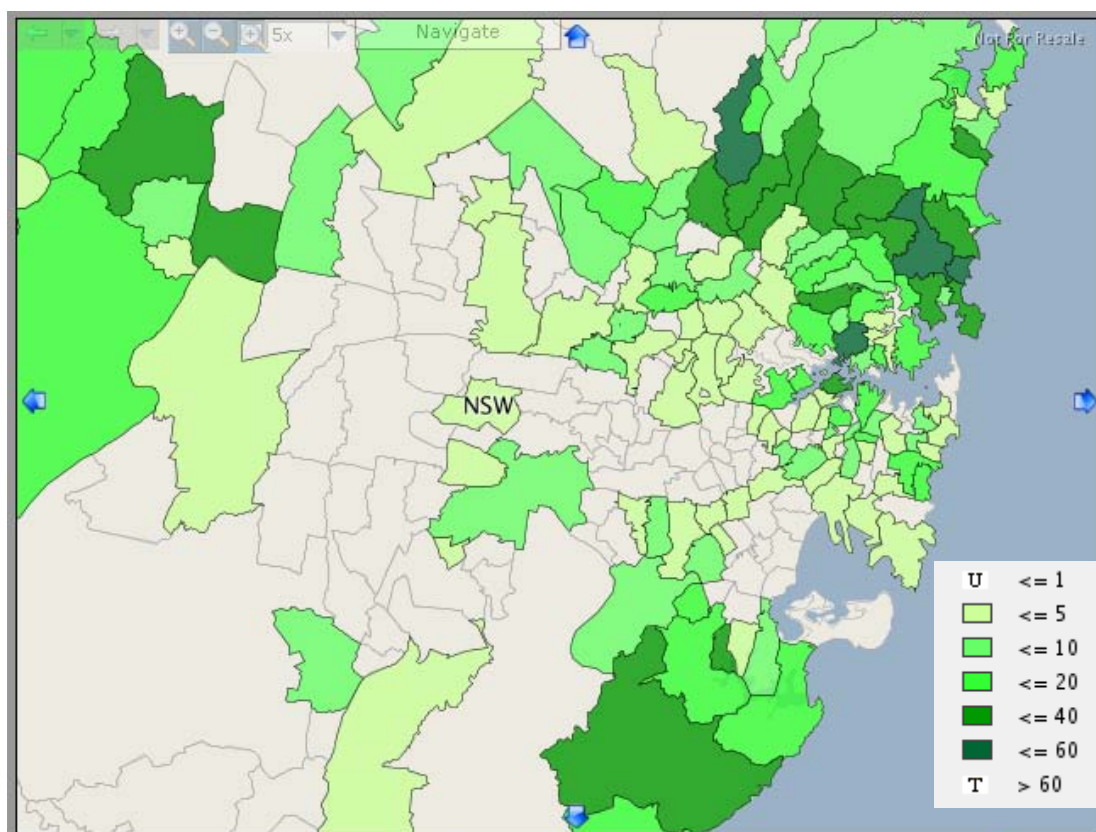


Figure 4 Number of responses received from respondents living in postcodes around Greater Sydney