

Access For All

Submission regarding the Draft Plan of Management Far South Coast Escarpment Parks

Chapter 1: This Plan

General Comments

It has been noted by Access For All members that the author of this Draft plan has commented on the number of community members involved with its development. Access For All members are concerned that only 650 people (as noted on page iv, first paragraph) were involved with its preparation. This would be a low percentage of the actual number of users of the South East Escarpment Parks. This document was prepared by 10 Access For All committee members. Access for all represents some 500 members located from as far north as Sydney, south to Bega on the coast and inland to Canberra & Yass, most of whom use this park, not to mention the number of 4WD enthusiasts who venture from further afield. None of the 650 people's names and/or their affiliation was accurately included in the reference section, nor mention of where or which communities were consulted. It should also be noted that the public are referred to frequently throughout the plan as "visitors"; we are all owners of the South East Escarpment Parks.

This plan must remain a **draft** plan of management (Draft POM) until the broader community are aware of its content. The quality of this plan is questionable. Its format is repetitive and the submission format is edited for brief comment only. The maps are of poor quality, boundaries of wilderness areas, private property and fire trails are non-existent.

Unfortunately the continual separation of aboriginal and present day park uses within the draft POM encourages isolation of both users when both have the same issues. We all have traditional connections to the parks in some way.

National Park & Wildlife Service (NPWS) accountability is non-existent in this plan. There is no mention of specific work programs, past management details or a plan of any type for the public to make informed decisions as to whether their park will be properly managed according to the actual need of users. The plan uses 'changing of community values' as a reason to implement their primary objective of conservation. Access For All would argue that these values are the same and as strong today as they were in the 1880's. Conservation belongs to all who own the parks not just the NPWS.

The most single important factor that will influence this draft plan of management has been merely mentioned. The NPWS Fire Management Strategy and its affect on park users, wildlife & fauna is the biggest threat to our park, not the people using it.

A positive comment about this draft plan is that there is mention of liaison between community users and the NPWS with decision making in some areas. This being the case, Access For All would hope that any amendment to this draft plan will be through a more consultative process with the parks users included.

Access For All members request that the NPWS extend the deadline for submissions and undertake to contact a wider section of stakeholders mentioned in the Draft POM.

1.2 (Talking to People)

Access For All have approached a broad cross section of access groups that actually visit and use the Far South Coast Escarpment Parks and many are not aware of this document.

- The submissions that will be received cannot be taken as representing **all** stakeholders. Considering the number of towns surrounding the park and the number of visitors to the park mentioned in this draft plan of management there has been poor community education of the process, giving the impression that the NPWS do not value or encourage public interest or input.
- Whilst it is appreciated that the local Aboriginal Land Councils be involved with the consultation process so to should all other users and groups. There should be no group of users singled out as being more significant than another.
- No evidence can be found by Access For All members to believe this request for submissions was advertised in the media.
- An example of poor communication & education regarding this draft plan is in the Palerang region. The council chambers in the township of Braidwood received one copy only of this draft and that was on the 27th Oct (this document was printed in July 2006) after a request from a community member to view the document. The council staff promptly rang the local NPWS ranger who kindly surrendered his only copy! Submission for comment is the 17th November, 2006 giving this community member little time to prepare their comment on the plan. A second example of poor communication with users of the park is when fire trails are closed without adequate consultation or notice. This is particularly dangerous in a fire situation when a user happens to find they are faced with a dead end when trying to leave a burning park.

Chapter 2: Management of the Parks

Section 2.1 (Location....)

Unfortunately this document is misleading with comments such as “completion of assessments and decisions about wilderness areas and extensions to the Parks”. There is no completion on wilderness areas or extensions of National Park areas; they continue to grow regardless of the numerous community submissions against them. What good is a plan of management when the NPWS itself continues to forfeit their own definitions/boundaries of wilderness & native reserve areas?

- The area covered by the Draft POM covers the main parks of Deua, Wadbilliga, Monga, and Gourock National Parks – an area of some 252,444 hectares. Of this, six areas covering some 128,629 hectares are declared wilderness. The total area of Parks covered by the Draft POM is equivalent to 49 km x 49 km and the wilderness areas total an equivalent square of some 36km x 36 km. As Table 1 indicates more areas are established year after year!
- The maps included are of poor quality. Boundaries are non-existent, this makes it difficult for users to examine what impact it may have on their usual pathways throughout the parks. There are no corridors for traditional users between wilderness and existing park areas.
- Figure 1 should be redrawn indicating, and naming these six areas of wilderness.

- Figure 1 should also be redrawn with extra, existing major fire trails that are not shown – some of which separate the six wilderness areas.
- Existing bridle tracks should be included on maps and named as such; many of these tracks were bridle tracks long before they became walking tracks.

Section 2.2 (The ‘Non-negotiables’ ...)

Access For All consider this section to be particularly offensive toward all users of the parks.

- All aspects should be considered negotiable at some point of time. This point of time is when there is sufficient need to make changes to laws and policies. This section of the draft plan of management is very authoritarian and undemocratic. All issues must be negotiable and remain negotiable over time. All management plans evolve and change, this is what good management is.
- Past history of the NPWS negotiating with multiple user groups has been poor. A select few are targeted and kept well informed, therefore giving the impression that the NPWS is negotiable within a minority of users only.

Section 2.3 (Management Principles)

- There is no mention of budget strategies in these management principles.
- This section contains some good overall principles and values but it is considered by Access For that detailed works programs (note: these are created annually and therefore should not be a part of the POM) and actions may not maintain the balance between user groups.

Section 2.4 (Key Values associated with the Parks)

Conservations Values

- **There is no Conservation Plan for the Far South Coast Escarpment Parks.**
- It is a concern that the NPWS, although acknowledging the reason for parks being established, it is obvious that they have become short-sighted when allocating the amount of resources/and or funding used in which areas of conservation.
- Habitat, flora & fauna certainly are significant but so to be the protection of our relationship/ heritage values between people and country regardless of whether you are Aboriginal or of European descent. There is no mention as to how the allocation of resources or budget is determined by the NPWS.

Chapter 3: Connections between People and Parks

Issues/Opportunities

- What are the demographics of visitors to these parks? Not all are listed in this Draft POM.
- As mentioned many times previously in this submission it is not only the Aboriginal people that “the transfer of traditional knowledge continues” and that “there is considerable interest in retaining links with country and culture”. There are more others users that also have the same ethos. Access For All maintain a sound working relationship with aboriginals and have conversed on numerous occasions with aboriginal elders belonging to the coastal tribes, they too are in agreement that “white fella” tradition is of as much importance as their own. The draft plan gives the reader the impression that the NPWS is trying to make us all “feel good” that they have extensively consulted with the Aboriginal community without giving detail on the numbers involved and how it compares to the rest of the population that have some “connection” with the parks in the region.
- Points listed under Issues/Opportunities mainly relate mainly to Aboriginal items. The amount of funding for research, documentation and maintenance of our cultural heritage items appears to be inequitable and does not seem to reflect current and future park usage.
- Canberra was mentioned as the example of an urban population but Access For All have evidence from a survey conducted over a Easter week-end in Bendethra that there are as many people from Sydney who visit the region because access to their “traditional” areas had been closed either through wilderness declaration or declaration of nature reserves.
- The issue as to whether or not to allow revegetation to continue or maintain what is already cleared should be a priority **before** this Draft POM is accepted. The strategy of “no action” as identified in the region Cultural Heritage Management Strategy 2003-2008 is obviously the preferred strategy by the NPWS as little has been observed or discussed publicly about this issue by the NPWS according to input received from Access For All members and other user organisations.
- **This draft plan should not be ratified until a conservation plan that assesses both the natural and cultural values of user groups is completed.**
- Not only should heritage places/trails be identified, recorded and assessed they should be **maintained** by the NPWS, not burnt as the homestead that once stood in Bendethra was.
- Under “Guidelines/Actions”, it should be noted that the historical importance of many bridle tracks in the region is at risk of being lost unless funding for research is provided and **education within the NPWS on preservation techniques of bridle tracks** is undertaken.

Chapter 4: Knowing and Looking after the Parks

Section 4.1 (The Creation of the Landscape)

Background

Best practice guidelines and principles, maintenance standards and priorities are all positive attributes to a well managed park. However these all need to be developed in conjunction with all user groups/persons, not just a chosen few, as some have a more valuable recollection of past successes and failures than some present park authorities or environmental lobbyist. These guidelines, principles, standards and priorities should be in place **before** this draft plan is implemented.

Issues/Opportunities

- Existing “dreaming” and bridle tracks are part of the landscape within the escarpment and should be acknowledged as part of its creation.
- **A consultation process should include mediation, with an independent mediator if it is evident that decisions cannot be made between NPWS and user groups.** A consultation process should occur before the closure of tracks. It is not a ‘right of passage’ for the NPWS to close access to which ever they alone decide to close.
- Map 8 i.e. site of operational quarries was not included in this present Draft POM.

Sections 4.2 (Native Plants) and 4.3 (Native Animals)

Issues/Opportunities

- When referencing ATLAS records the limited sightings of endangered species appears to have occurred near fire or logging trails. How will National Parks be able to monitor endangered species in the wilderness areas which by the present Draft POM may well have no access trails?
- The growing threat of introduced pests such as feral dogs, foxes and weeds (e.g. fire weed, broom, serrated tussock) does not appear to warrant any urgency of being curtailing or eradicated by the NPWS within the parks, let alone any wilderness areas. Contrary to the draft, weeds are a problem in this forest type and were not spread by past grazing alone, birds are also well documented as efficient weed spreaders. Consistent grazing of this escarpment area was ceased in the 1980’s and can no longer be blamed as the primary cause of weeds throughout the park. Past history of the NPWS lack of conviction and being unable to work with property owners to prevent infestation of pest and weeds is well documented e.g. the present draft (Draft 3) of the Wild Dog Management Plan has been at an impasse for nearly twelve months because of the majority of committee members refusing to sign it off.
- Having well maintained, and used, bridle and fire trails would assist the service in monitoring and managing these pests. The public using these trails should be encouraged to report sightings – many park users may have GPS devices so that positions may be used as accurate information for NPWS rangers. This use of community resources would also be a cost effective management tool for the NPWS.

- **Preservation of our Native Grasses is not mentioned in the Draft POM nor is there any recovery plans mentioned for them within the parks.**
- **The Threatened Species Conservation Act 1995 should be reviewed by a wider community group as it encourages some species over another.**
- Point number 10 under issues/opportunities should include human intervention or non-intervention i.e. fires as well as climatic variations also affect evolution and shifts in species' ranges.
- Guideline 4.2.5 should read minimising disturbances of rare vegetation ecosystems, old growth and areas of concentration of rare plants through, for example, ensuring that there are no roads or trails traversing these areas **unless a identified trail already transverses them.**
- Bendethra has been stated as being important culturally however little is mentioned within the plan of the maintenance programme that will be required for facilities, weeds and revegetation.
- A thorough investigation into the increasing wombat population and the devastation they are creating throughout the escarpment area & its waterways is not mentioned within this Draft POM.

Section 4.4 (Water, Rivers and Wilderness)

Issues/Opportunities

Access for All and its members are of the opinion that this Draft POM should not be ratified until wilderness assessment and declarations are revisited and changed through a transparent process of extensive community education and consultation.

Access for All members have found it alarming to read in this Draft POM that a new wilderness nomination has been submitted to the Minister in July 2005 and that the "nomination will be assessed following the completion of a review of the Service's wilderness assessment procedures". This nomination confirms that

- **This Draft POM is already invalid.**
- **It also enhances the ever widening differences/lack of communication and conflict between NPWS and the community/user groups it is suppose to serve. There is no mention as to what area this nomination affects and who the nominee is.**
- **This nomination assessment should not even be considered let alone proceed within the NPWS until extensive community education and consultation is undertaken.**
- **The NPWS wilderness assessment procedures are not explained and should be transparent to the public.**
- The current National Parks and wilderness areas covered by this Draft POM may protect large tracts of suitable water catchment areas for later use and it is the NPWS's duty to represent and include all sections of the community and user groups when decisions are to be made. It is also clear to many members of the public that the future planning of our water supplies has been very short sighted indeed. At some point in time, for example, it is likely that the lack of readily available fresh water for Sydney and rural towns may lead to serious investigations to utilize new rivers, such as the Deua / Moruya and/or the Tuross Rivers for additional sources of water.
- Access For All would like the NPWS to clarify in this plan which watercourses are of natural origin and which are man made.

- Guideline and action 4.4.5 should read “Continue to contribute to the development and implementation of relevant catchments actions and targets in consultation with relevant stakeholders”.

4.5 Introduced Animal and Plants

Issues/Opportunities

- Wild dogs section mentions plans under Pest Control Order 2. These plans **have not been completed** for the Escarpment Parks as stated in the Draft POM they are still being “negotiated” with community stakeholders.
- The weeds section fails to mention pine trees and fire weed as noxious weeds within the park areas.
- Point 4.5.1 in guidelines and actions should include local community assistance with review and updates of Regional Pest Management Strategies. Access For All assists NPWS with their pest species management and control programme.

Section 4.6 (Fire)

Issues/Opportunities

- **The highest priority is to be given to hazard reduction throughout the South East Escarpment area. This has not been given serious consideration throughout the plan.**
- All the area covered by the Draft POM could be destroyed by fire in a single extreme event. Climatic changes are increasing the risk of serious, widespread bushfires. Bushfires could well be considered the greatest threat to all aspects (life, property, fauna, cultural heritage, flora, fauna etc.) of the Far South Coast Escarpment Park. In this section of the Draft POM, it notes that some 52,000 hectares of Deua and Monga National Parks were burnt in the summers of 2001/02 and 2002/03. This is about 40% of the declared wilderness area, or 22% of the total area in the POM.
- Access For All would like to mention that in the two official inquiries into the 2002-03 bushfires (“A Nation Charred” & a joint select government committee held a parliamentary state enquiry) the total area of the National Parks in the Draft POM amounted to only 8.1%. To put this in perspective the Victoria (1,324,000 hectares), NSW (1,465,000 hectares) and the ACT (160,000 hectares) contributed to a total area of approximately 172km x 172km burnt compared to 49km x 49km of the area destroyed in this Draft POM by the 2002-03 bushfires. The consequences and recommendations of the 1939 Victorian bushfire inquiry and the 2002-03 bushfires official inquiry appear to have gone unheeded by the NPWS. The NPWS Fire Manual still has not been updated nor does it make any reference to recommendations etc. from state inquiries in this draft POM.
- Fire Management Zones are a token term; the ability of the service to either prevent or contain an extreme fire event is beyond their capacity and sometimes the capacity of a Section 44. The strategy of “the construction of fire management trails and roads” is not what is being observed by Access For All members. Many report closures of the fire trails and roads in the areas under consideration. There is no evidence in the Draft POM of a detailed map of the fire trails to be constructed. Existing fire trails have not been maintained in some sections of the escarpment, closure of random selection of other trails

poses the question of “Is maintenance being done to reduce the risk of public liability or Fire Management?”

- Competent communications are essential in emergency situations, tower observers should be trained operators. Satellite or infrared detection may assist but only as a tool for areas affected not for early detection or surveillance.
- The location of some additional manned fire towers in view of some of the more popular 4WD trails could be used as location for emergencies such as helipads, ambulance pickup points, emergency supplies for fire fighters etc. There are only three fire towers in the escarpment region. With fire towers located over large distances, it is difficult to quickly and accurately locate a fire.
- A universal UHF channel used throughout the entire park would also be useful to users throughout the park. The channel number could be placed at access points to the more remote areas (such as the popular Bendethera campsites). This would also help up/down traffic on the steep hills locate safer passing locations, notify other travellers of oncoming motor bikes etc.
- “Management Trail Only” throughout the escarpment is also noted by Access For All members as trails that will either be eventually closed or would pose a degree of risk if suddenly used for fire fighting purposes because of lack of maintenance by the NPWS. The NPWS should be proactive with State Forest Authority, neighbouring owners and other user groups to assist with management of trails; this should be acknowledged and recommended in this Draft POM. An example of public and NPWS cooperation would be the Belimba fire trail being opened as a publicly access 4WD road. It is in good condition and is strategically placed for protecting a wilderness area. Note that the main eastern access to Bendethera has been retained and an arbitrary gap in the wilderness area seems to have been created to permit this. Given this precedent, there should have been the foresight to do the same for the additional Woila-Deua wilderness areas were added. It appears to separate a previously declared wilderness area from a more recently added area but because the maps in the Draft POM are of poor quality it is difficult to comment further.
- Private Property - Users of the escarpment may not be aware of private property within the escarpment until they are either forbidden access by a locked gate or informed by owners that they are to continue on their way without stopping. “Private Road/No Through Road/Public Access Only” signage should be implemented in strategic locations and information on these properties should be included in this Draft POM.
- Significant historical bridle tracks, often clearly marked either visually or on topo maps, continue to be desecrated by dozers creating “access fire management trails” under NPWS instructions. Appropriate fire management plans of where “fire management trails” are to be constructed should be made available to Access For All members and other user groups and included in this Draft. These tracks will be lost if NPWS continue to fail in taking responsibility of maintaining our heritage. The NPWS should inform neighbouring state forest of where these trails exist.
- Wilderness areas are also increasingly at risk of habitat destruction because of an extreme fire event caused by excessive fuel loads not being adequately prevented or controlled by NPWS. Access For All members accept the role fires play in varying magnitude and timing on fuel reduction and regeneration of the bush. What is not acceptable is for the NPWS to continue on unaccountable for the consequences of not allocating additional resources, as recommended by our Commonwealth government inquires, so that the risks of extreme fire events remain uncontrolled and threatening to life, animal species, property vegetation, cultural heritage. Locking up areas so as the fuel loads can increase is illogical and not environmentally sound.

- Fire Management is based on appropriate Risk Assessment procedures. The findings of all the bushfire inquiries strongly recommend that this risk management process should involve all stakeholders including the public, for whom the service manages these parks and wilderness areas, and neighbouring State Forest Authorities. Research by Access For All has indicated that the public have a sense of ownership of the South East Escarpment Areas, and so they shouldthey do! They should be extensively consulted with and encouraged to report high fuel loads etc. The reduction in risk of extreme fire events and the exurbanite cost to our community during one of these fire events requires urgent planning with communities and funding accountability by the NPWS **before** the event.
- Such increased funding would seem insignificant compared to the costs of fighting an extreme fire event. The COAG report stated that for 2002/03 fires in NSW, the use of aircraft reached a peak of “103 aircraft (80 per cent of them rotary) were deployed across the state in support of the suppression effort.” If one adds the ground force as well, then the cost is enormous.
- Very little media coverage was given to the fact that some 52,000 hectares were burnt in the Monga and Deua National Parks (and presumably some wilderness areas). The Draft POM glosses over this and it is difficult to locate a map showing the burnt areas. It is understood that this fire burnt for a month or more. If it was fought, one can imagine the costs involved.
- Valuable research has again been documented from the 2002/03 fires yet there is no mention of updating the NPWS Fire Manual (2005) or adopting recommendations from inquiries in this Draft POM. Why should the community bear such huge costs¹ when the initial risks could be reduced by an increase in funding – properly directed to where it is most needed? There is no comment in this Draft POM on NPWS capabilities to fight these fires. History and media repeatedly informs us that without doubt the NPWS is reliant on assistance from volunteers and other services to fight major fires and because of NPWS lack of financial accountability Section 44’s are becoming the norm not the exception.

Access For All members suggest that before this Draft POM be adopted the NPWS ask themselves “What is the cost of a fire getting out of control to us as tax payers and owners of the NPWS compared with a well maintained and implemented fire prevention management plan? And do the decision/policy makers within the NPWS really care about the cost/effect of extreme fire events on communities and tax payers

Chapter 5 Visitor Use and Enjoyment of the Parks

It is agreed that the South East Escarpment area offers wide ranges of attractions and recreational opportunities. A balanced approach to manage the extensive usage of the parks and wilderness areas is required. This requires co-operation between the NPWS and user groups. This is acknowledged in some areas of the Draft POM but not extensively enough.

¹ Volunteer’s time, loss of income, employer’s loss of income and business, insurance costs, operational costs and so on – items referred to in the COAG report for example.

Issues/Opportunities

- Access For All acknowledges the NPWS have recently provided facilities and signage in the Monga National Park – particularly near the Waratah walk, Penance Grove and the upper end of the Corn Trail. This has certainly been welcomed, however it is not the only area and more areas need to be prioritized as “high”. Consultation with user groups will establish which high priority areas are required where.
- Because of NPWS allowing increasing numbers of Wilderness Areas and Nature Reserves park users are being forced into using less sites causing “over use” of sites. Bendethra camping areas are an excellent example of this concern for Access For All members. The surrounding camping areas and 4WD/trail bikes/fire trails need far more “presence” by Rangers particularly in the peak periods of Christmas, Easter and long weekends and not just during normal 9 – 5 hours. Active patrolling would give Rangers a chance to observe camping behaviour, enable closer contact with park users, provide opportunities for community education, supply pre-cut firewood to selected fire pits etc.
- Section 5.1.2 of guidelines and actions is the **wrong** action according to Access For All members. Areas to be discouraged for recreational use should be in consultation with all user groups not just those mentioned & decided upon by the NPWS only.
- Section 5.1.4 and Section 5.1.5 guidelines and actions should both include with consultation of all user groups.

Section 5.2 Camping and Picnicking

Issues/opportunities

- A capacity of forty sites is available in Bendethra. Access For All members would like to know how the NPWS determine the number of sites, does it mean that the NPWS are incapable of managing more sites (by building more facilities etc)? If these sites are full are other users locked out? The Draft POM does not elaborate in detail plans on how assessments will be attended or how decisions will be made as to where or how many campers are allowed to camp at one site.
- It is again reinforced by Access For All members that there is a need for the NPWS to increase the number of and provide cost-effective management of camping areas within this Draft POM. Bendethra is an example often quoted throughout this draft, the pressure on this area is created by increasing numbers of wilderness areas, users are being forced into fewer areas to camp. Consultation with user groups on how this could be achieved would be an effective management strategy by the NPWS.
- Provision for camping in Monga National Park does need to be addressed by the NPWS. So too does the need for a horse camp at Monga as many rider groups commence their journey along the Corn Trail from the same “unofficial” camp site. There is one only designated horse camp within the whole of the South East Escarpment area. A total area of 252,444 hectares!
- Maps A10 and A11 are of poor quality & detail
- Regular monitoring of condition of campsites, ground cover etc. could also be monitored/maintained by user groups. Yet another cost effective management strategy for the NPWS.

Section 5.4 Driving

Issues/Opportunities

- Some earlier comments were made about 4WD/Fire Trails earlier as they related to fire management issues. It was thought that the Belimba FT should remain as a public access.
- It should be noted that with the aging population, many semi and retired people have purchased 4WD vehicles in order to visit parks and wilderness areas. Many could be considered as disadvantaged in the sense that they may no longer have the ability to be a self-reliant walker but otherwise should have the ability to experience wilderness environments. The north and south (including Belimba FT) “loops” in Bendethra provide perhaps the best (general) 4WD experience in the state. Access For All suggest that these 4WD clubs & enthusiast assist in the management of park facilities also.
- Access For All members agree that National Parks are no place for “hard core” off road driving or trail bike riding and that there should be heavy penalties for inappropriate or inconsiderate behaviour. However, the NPWS should acknowledge, and have included within their budget, funding for on-going maintenance costs of recreational used roads not just specific fire-trails.
- “Off-road” in the Glossary is misleading. Is this on a fire trail or unsealed road?
- There is no signage on fire trails etc as to distances before entering wilderness, native reserves or dead ends within the South East Escarpment areas.

Section 5.5 Cycling

Issues/Opportunities

- Adverse interaction between cyclists & other users can be avoided by the NPWS giving direction on right of way to the relevant users on particular types of tracks/trails.
- Guideline and action 5.52 regarding the Corn Trail should read due to “potential risks” to walkers and horse riders instead of “conflict”.

Section 5.6 Horse Riding

Issues/Opportunities

- **Access For All members request that a submission date for this Draft POM be extended until an appropriate Horse Riding Code of Conduct be developed in consultation with horse riders and the present “Recreational Horse Riding Policy” document be returned to the public for broader community comment before it is ratified.**
- Horse riders within Access For All are perplexed that this draft mentions recommendations had come from “assessments”. Assessments made by who and when? A desired outcome would be for users to travel through parks on horseback on the recreational road network and on management trails and bridle tracks outside **and inside** wilderness areas.
- The Draft POM acknowledges the importance of the numerous historical bridle tracks in the region. It is felt that there is insufficient public knowledge available about these tracks (with the possible exception of the Corn Trail)and that the NPWS should not only educate the public but also themselves about their heritage value and with user contribution be creative with how these trails can be maintained.
- It is known that the NPWS has produced a Policy on “Recreational Horse Riding” but repeated efforts by Access For All have recently failed. Apparently it is being ratified. How can this happen without extensive user consultation? How can this Draft POM

submission be completed effectively without Access For All members being aware as to the content of this Policy and what effect it may have on their recreational activity? While other parks have a Horse Riding Code of Conduct this Draft POM has no mention of one and nor should it as there has not been one developed for the South East Escarpment Parks at this stage.

- **A distinct definition should be given regarding types of trails/tracks within the South East Escarpment Draft POM. NPWS should acknowledge that many of the tracks/trails, which are used by bushwalkers & other user groups, are originally bridle tracks not walking tracks. This being the case horses should have right of way and education given to other users that this is the case. Many historical bridle tracks have been worn only one horse wide on steep terrain, it is dangerous for horse & rider travelling on these routes to deviate off the track if other users are of the opinion that they have right of way also.**
- Guideline and action 5.6.1 should read “allow horse riding on the recreational road network and on management trails and bridle tracks **within corridors** of wilderness areas”, not “outside wilderness areas”. Ever increasing wilderness declarations are cutting through historic bridle tracks and trails preventing traditional users from accessing their heritage and ancestral right of way from one destination to another.
- Access For All members consider Guideline 5.6.3 as offensive to horse riding persons and families whose ancestors travelled extensively to and from the tablelands to the coast. Again these designated walking tracks (which most were bridle tracks) are not indicated within the Draft POM except for the Zig Zag Bridle Track. There were many more bridle tracks developed throughout the escarpment long before they were called “walking tracks” by the NPWS and it is this type of ignorance by the NPWS which initiates what it is labelling “potential conflict” about right of way amongst users.
- Guideline 5.6.6. This Draft POM should include Access For All members and other user groups are lenient toward a user pays system for camps whether they be horse or 4WD camps, however, further consultation with user groups would be expected before its implementation and new/improved facilities would be made available for users **at the time** the system was commenced.

Chapter 6 Talking about and Understanding the Parks

6.1 Background

Access for All would expect that the NPWS heed what has been written in 6.1. That is:

People (users) of the area are passionate about the South East Escarpment area and have a desire to actively participate in and contribute to park management. This being researched and documented by their Regional Planner should indicate to the NPWS that the draft Community Relations Strategy (2004-2009) should become a ‘real’ document and be implemented immediately. This would assist the Draft POM’s strategies, outcomes and responsibilities relating to information and interpretation, environmental and conservation education, media, neighbour relations, interagency and stakeholder relations, volunteers, nature-based tourism and commercial recreation to be accurate and submissions from user groups will then be well informed and valuable tools toward the development of a Plan of Management for our South East Escarpment Areas as a legal document.

Issues/Opportunities

- Active community involvement in planning, development and implementation of park management activities example should include horse riding groups also if particular user groups are to be named.
- The re-establishment of the remote weather station at Bendethera which would transmit hourly readings to the Bureau of Meteorology and be readily available to 4WD users could assist with road safety within the park.

6.2 Authorised Uses and Management Operations

- Access to inholdings should reflect present legislation.
- Guideline 6.2.15 is welcomed by Access For All members and would like this section expanded to include 4WD and other users to assist with joint management of roads also.

6.3 Research and Monitoring

- Monitoring & Research programmes are to be seen as equitable and transparent. These programmes should not be “mostly” focused on plants and animals. Access For All and other user groups should be advised on how, when and why if more research is going into one area of the escarpment at the expense of another. This Draft POM should have these programmes identified specifically within this document.
- Action Guideline 6.3.6 should read that European heritage is included along side Aboriginal heritage in the priority areas for research. Descendents of early European families along with Aboriginal communities should be involved in the design and implementation of research relating to their heritage.
- There is concern within Access For All members that research activities are conducted by a select few and there is bias within the NPWS as to who conducts the research. This selection process needs to be transparent and affected user groups consulted during the selection process.

Chapter 7 Implementation

- This chapter gives priorities to collated action items identified in the POM. Access For All members are of the impression that overall the implementation of this draft plan is possible, however the **highest** priorities in need are:
 1. Accountability of the NPWS for its guidelines and actions with in this plan. Since the service has been entrusted with the management of these community assets, it would be appropriate that the annual works programs be a matter of public record. They are, more than anything else, the evidence and public accountability of the service to the tax payers.
 2. Providing research into the social and economic impact of this draft POM on communities within the South East Escarpment area. This has not been extensively researched enough by the NPWS Regional Planner.
 3. The NPWS developing and implementing an effective & efficient Fire Management Strategy.
 4. A transparent review of submissions involved with this draft.
 5. That the NPWS prioritise more acknowledgment to past pioneering families & document historical bridle tracks throughout the escarpment area.

References

- Referencing as mentioned in the opening paragraph of this submission is not adequate.
- There has been an obvious oversight not to refer to the major inquiries into fires that were published prior to this Draft POM.
- The National Parks Fire Management Manual has no mention of the 2002-03 bushfire inquiries.
- Access For All provided a detailed submission on the previous draft of the South East Escarpment area, there has been no mention of this in references, when Access For All asked for this submission to be returned the NPWS was unable to find it.

Appendix

- Map A9, it is difficult to distinguish areas gazetted in 2001 to 2006.
- On Maps A10 and A11, the six declared wilderness areas should be labelled. There are several trails not included.
- Maps A10 and A11 provide little detail as to boundaries between park, state forest, wilderness, private property.

Summary

The committee of Access For All have completed this submission with the understanding that the NPWS will read its content and consider the opinions of Access For All members meaningful and constructive. It is of the committee's opinion that their comments have been documented accurately regarding information included within this submission.

The highest priority in this Draft Plan of Management is that extreme bushfires are a major threat to the parks and wilderness areas and urgent priority is given to reducing fuel loads, maintaining access trails and that the NPWS take heed of recommendations made from inquiries throughout the States from previous extreme fire events.

We request that further submissions/reviews for more wilderness areas be ceased and the Wilderness Act be reviewed.

It is an expectation that the NPWS will include and educate larger numbers of user groups in their decision making processes and show accountability for their actions.

A flaw with this plan is the NPWS itself and its negligence to complete some of its own documentation making this draft plan for the South East Escarpment ineffective immediately, for example, no Conservation Management Plan, no Community Relations Strategy, no Recreational Horse Riding Policy, no evidence of a Horse Riding Code of Conduct. Most documents appear to be in draft only.

As the distribution of this Draft Plan of Management was not widely advertised and communities not educated on the submission process Access For All request that the date for submissions be extended so NPWS can get itself in order and communities will have time to be better informed of the draft and its implications.

References

1. COAG Report: National Inquiry on Bushfire Mitigation and Management, March 2004
2. NSW NPWS, Far South Coast Monitoring Strategy, 2004
3. NSW NPWS, Draft Community Relations Strategy 2004-2009
4. ACCESS FOR ALL research data "October in Bendethra Petition" 1999
5. NSW NPWS Fire Management Manual 2005
6. Dept of Environment and Conservation (NSW) NPWS Recreational Horse Riding Policy 1989