

18th July 2013

Peter Mooney
General Manager
Parks & Wildlife Service
GPO Box 1751
Hobart TAS 7001



Dear Peter,

Re: Walls of Jerusalem National Park Draft Recreational Zone Plan 2013

Please find below the Tasmanian National Parks Association (TNPA) submission on the Walls of Jerusalem National Park Draft Recreational Zone Plan 2013 (WoJRZP). Apart from serious reservations concerning the proposed establishment of a hardened campsite in the vicinity of Dixons Kingdom and the feasibility of the proposed multi-day circuit walk, the TNPA is generally supportive of the recommendations of this plan. TNPA's specific comments on certain issues are outlined below.

Introductory Comment

National parks are the only land tenure which accords priority to nature and with this in mind the TNPA strongly argues that the all activities and management measures within national parks must be ecologically sustainable. As a former member of the Bushwalking and Track Review Panel (convened by the Tasmanian Parks and Wildlife Service (PWS) and consisting of a range of stakeholder groups) it was agreed that there are limits of acceptable change for human activities in parks and when these limits are breached management action is essential to limit and where necessary reverse any negative impacts. The draft WoJRZP clearly describes the impacts which have resulted from the increases in visitor numbers to the Walls of Jerusalem National Park (WoJNP) over the past decade. This region has been recognised for a number of important world heritage values and the protection of these values is a paramount management priority. For example, PWS has monitored an increase in campfires in the WofJNP which directly threaten these values. Given this situation the TNPA supports measures to control these impacts and where necessary walker numbers. As the Visitor Experience Statement remarks, "The Walls of Jerusalem is a majestic place in the heart of an alpine wilderness" – let us keep it that way.

Fire risk to Pencil Pine forests – Track Rangers

As indicated in section 4 of draft WoJRZP, the most important natural value of the area is the stands of large pencil pines with grassy understory which occur in the vicinity of Dixons Kingdom and the Central Walls area. These are the finest examples of such forests anywhere so their preservation must be the overriding imperative of any plan of management for the area.

The greatest threat to this ecosystem is fire. In an area heavily used for recreation, the most likely ignition source is recreational use. Illegal campfires pose the greatest threat, but cigarettes and spilled stove fuel can also start fires. Tree cutting and breakage for firewood for illegal fires is also a potential threat. The most alarming information in the draft WoJRZP is the increase in campfires since track rangers last worked in the area in 2004 (pages 21-22). This is strong evidence that a visible management presence reduces the frequency of campfires and the associated risk of escape.

Given the acknowledged increase in threats to the natural values within the WoJNP in recent years the TNPA supports the recommended visitor management strategy to increase the presence of track rangers in the area as a matter of urgency. Indeed, the TNPA sees this as a high priority issue which must be addressed as soon-as-possible. The presence of track rangers would increase the likelihood of a fire being reported immediately, should one occur, and would also help promote the Leave No Trace principles and educate users about responsible protocols when camping in high value wilderness areas. TNPA considers that uniformed Rangers or Track Rangers (with authority to impose fines for breaches such as lighting campfires) are required, but acknowledges that a volunteer presence coordinated by PWS (as suggested by PWS at briefing on 1 July) would be better than nothing. TNPA is also concerned by comments by PWS staff (at briefing on 1 July) which suggested that funding of a Track Ranger position was dependent on receipt of external funding – this position is sufficiently important that it should be funded from the routine operational budget. In addition, PWS clearly needs to revive the lapsed, but very successful Minimum Impact Bushwalking educational program.

Expansion of hardened campsite at Wild Dog Creek

The TNPA supports this proposal.

No camping in the Central Walls area

The TNPA supports this proposal.

Proposed multi-day circuit walk (Wild Dog Creek – Dixons Kingdom – Lake Ball – Lake Adelaide)

- The proposed multi-day circuit walk currently includes two additional hardened campsites and is not viable without at least one, but the draft WoJRZP has not established that appropriate sites exist for any additional hardened campsites.
- TNPA does not consider that two additional hardened campsites (Dixons Kingdom and Lake Adelaide) are necessary. The distance from Wild Dog Creek campsite to Dixons Kingdom is only about 3 km (via an easy, high standard track) and Dixons Kingdom to Lake Adelaide is only about 4 km (which will also be an easy, high standard track once the Dixons Kingdom to Lake Ball upgrade is completed).
- TNPA is very doubtful that any appropriate site can be identified in the vicinity of Dixons Kingdom – refer to detailed comments below (PWS has not proposed any specific location for the Dixons Kingdom campsite and difficulties of finding a suitable location were acknowledged at briefing on 1 July).
- PWS should identify potential site(s) for additional hardened campsite(s) required for the proposed multi-day circuit walk and undertake a rigorous assessment, including seeking further public comment on the assessment of the preferred site(s).

- If PWS cannot identify an acceptable site for an additional hardened campsite, the multi-day circuit walk proposal must be abandoned.

Proposed Dixons Kingdom hardened campsite

The TNPA acknowledges that the area is already a popular campsite. However, the TNPA does not accept that a hardened campsite in this vicinity is essential – refer comments above regarding the proposed multi-day circuit walk.

The draft WoJRZP correctly identifies the grassy pencil pine forests as the most important natural value of this area and the most extensive of these lies between Damascus Gate and Dixons Kingdom. It is also acknowledged that visitors camping in this area are impacting on the heritage values of Dixons Kingdom hut. The establishment of a hardened campsite within this ecosystem would therefore be contrary to the draft WoJRZP's stated priority to protect the extremely high conservation values of this area. Camping should be totally excluded from this ecosystem.

Dixons Kingdom is arguably the most attractive campsite in the Recreation Zone. It already receives similar use to Wild Dog Creek (advice from PWS at briefing on 1 July) and closure of the remaining campsites in the Central Walls (supported by TNPA) is likely to displace additional walkers to this location. i.e. once hardened, it is likely to become the most popular campsite in the Recreation Zone. i.e. a particularly large hardened campsite will be required. The TNPA believes that such an increase in usage in this area would only exacerbate the threats to the natural and heritage values of this area.

The TNPA is not aware of any suitable location for a large hardened campsite in the vicinity of Dixons Kingdom that does not impact upon the grassy pencil pine forest or other high conservation value ecosystems in the vicinity, to say nothing of its visibility from the surrounding peaks.

Dixons Kingdom to Lake Ball track

The TNPA agrees that this corridor has already suffered substantial trampling damage. The TNPA supports appropriate hardening and reclassification. The resulting circuit walk already receives significant use and its promotion (following hardening) may slightly reduce impacts in the Central Walls if it encourages some walkers to undertake a circuit via Lake Adelaide rather than spending additional time in the Central Walls. Consideration needs to be given to the potentially high visual impact of a hardened track in this area.

On a more general note regarding tracks, several walkers who have visited the WoJNP (and elsewhere) have stated that in wet and frosty conditions the hardened board-walks often become very slippery to walk on resulting in them instead walking on the ground adjacent to the board-walk. This not only results in damage to the natural ground cover adjacent to the tracks (and negates the management measure of installing the hardened track) but also poses a safety issue to walkers. The PWS needs to look at solutions to this problem as it may be that the chicken wire sometimes used over the boards is not sufficient to provide a less slippery surface. A coating of a dark grainy tar-like substance may be needed and would also help avoid the visibility issues often associated with the laying of board walks in certain areas.

Group booking system

Given the acknowledged environmental and social impacts of large groups, the TNPA supports, in principle, the immediate introduction of a “booking system for large groups”. This is assumed to mean that all groups of 7 or more (school/outdoor education, commercial, walking club or private) may only camp within the recreation zone at designated group campsites (currently only at Wild Dog Creek) which must be booked in advance. However, PWS must clarify this. This could be a “win-win” situation if a booking guaranteed the availability of a campsite capable of accommodating the entire group.

Investigation of universal booking system

The TNPA considers that the booking system for the popular Overland Track has worked reasonably well and has been accepted by most walkers (especially from overseas where such systems are more common). TNPA would first like to see how the group booking system (together with the other management measures to be introduced) helps alleviate the present problems in the WofJNP before seeing a booking system considered for all walkers. If limits are needed to curb ongoing non-sustainable impacts then the TNPA would consider the need for a more broadly based booking system in the longer term.

Points to be considered if a universal booking system is to be introduced include:

- A booking system will be far more challenging to implement for an area like the Walls with multiple entry points and many possible itineraries than for the “linear” Overland Track;
- The scope of the booking system (see above comments). Will it be for camping anywhere in the recreation zone or will it be a booking system for individual designated campsites?
- Booking systems in one area may lead to walkers being displaced to other areas with flow-on consequences requiring more management over time; and
- Group walks are usually planned well in advance (sometimes by several months) so a requirement to make a booking for such groups should not pose too much of a problem. On the other hand, small groups (1-4) often undertake walks at short notice so a booking system may be far more problematic for them.

Commercial operations – group size

The draft WoJRZP acknowledges that group sizes of up to 22 walkers have been registered in the area. This is almost double the recommended group size for T1 and T2 tracks. Given that large groups of walkers are acknowledged as causing a disproportionate level of adverse impacts (both ecologically and socially) the TNPA supports management measures to monitor and where necessary limit both the size of groups and the number of large groups in the WofJNP.

At the briefing on 1 July PWS staff acknowledged that the group size limits for particular track classes (as defined in the World Heritage Area Walking Track Management Strategy) may not have been made clear to commercial operators, which may have resulted in commercial groups using T3 and T4 Tracks and Routes with group sizes in excess of the eight recommended in the Track Classification Scheme. There is no excuse for this and commercial operators should be advised immediately that size limits will be enforced during the 2013-14 walking season and there-after. The TNPA also expects that the group

size limits will be strictly enforced for non-commercial groups (e.g. school groups). TNPA would accept an exception being made to permit groups of 13 using the Dixons Kingdom to Lake Ball T4 until this is upgraded to T2 standard. However, an annual limit on the number of such groups needs to be put in place. Indeed, given the increasing publicity of the WoJNP in such publication as Lonely Planet and the concomitant increase in demand by commercial and other groups to visit the area the identification of this limit and its management needs to be undertaken as a matter of urgency.

Logbook data

It was apparent from discussion at the briefing on 1 July that collection and analysis of walker logbook data has not been a priority in recent years – there have been occasions when the main car-park logbook has not been replaced until long after it was completely full and the remote area logbooks appear to have been abandoned. It is acknowledged that track counters provide more reliable numbers than logbooks, and that collation of logbook data is very time consuming, but both are needed to provide the best possible understanding of walker numbers and activity. Collection and analysis of logbook data must continue if future management decisions are to be made on the basis of knowledge of walker behaviour rather than speculation.

The TNPA is happy to provide more background on these issues should you require. If you do require more information please don't hesitate to contact us.

Yours sincerely,



Dr Robert Campbell

President

Tasmanian National Parks Association.