

27 April 2018

Director of National Parks and Wildlife
GPO Box 1751
Hobart TAS 7001

Submission re Draft Frenchmans Cap Recreation Zone Plan 2018

The Tasmanian National Parks Association (TNPA) understands that this and other Recreation Zone (RZ) plans are prepared under the provisions of the statutory Tasmanian Wilderness World Heritage Area Management Plan 2016 (TWWHAMP) and, while therefore subsidiary to it, are intended to provide the detail “to guide site management”. Hence the TNPA welcomes the opportunity to provide this representation on the draft Frenchmans Cap Recreation Zone Plan 2018, this welcome is qualified because we feel this opportunity is both belated and limited.

We further understand that, notwithstanding media reporting of the Premier and Minister for Parks’ statements when the draft plan was launched on 11th April, the area is not being rezoned, and the provisions of the TWWHAMP already provide for commercial activity in recreation zones.

We are concerned that the draft Recreation Zone Plan does not acknowledge the existence of at least one proposed commercial operation (to establish standing camps) despite it being at the stage of “lease/license under negotiation” (see below). Neither does the draft RZ plan provide the detail expected on the nature or location of commercial activities. Precedent suggests that public comment on the Reserve Activity Assessment (RAA) for the proposed standing camps or other commercial operations is unlikely so, despite this opportunity to make a representation on the draft plan, appropriate stakeholder scrutiny of the commercial development of public assets is unlikely.

Furthermore, we are also disappointed in the level of development that has already occurred at Frenchmans Cap, undertaken by the Parks and Wildlife Service (PWS) itself, without any opportunity for meaningful public scrutiny or input to date.

Recreation Zones, recreational opportunities and wilderness

While the TWWHAMP provides for a relatively high level of development of public infrastructure and a range of commercial uses in RZs (including helicopter access) that doesn’t mean they have to be provided. Furthermore, the TWWHAMP also notes any such infrastructure should be “site appropriate”. The TWWHA contains only a small number of RZs containing overnight bushwalking opportunities. The TNPA considers it desirable that they continue to offer a range of recreational opportunities from the more developed (like the Overland Track) to the wilder end of the spectrum (like the South Coast Track), and that this is reflected in the level of infrastructure and commercial development. To this end, we feel the level of development of the Frenchmans Cap area should not exceed the current level.

The Frenchmans Cap RZ is mostly surrounded by a large Wilderness Zone (WZ), much of which is high quality wilderness (note this is not the same thing). Activities within the RZ, and particularly aerial activities associated with it, can and will have an impact on the wild character of the surrounding country. Potential impacts on wilderness values of any activities (by PWS or proposed commercial operations) should always be considered, as per the TWWHAMP (p. 177). The draft RZ plan does not mention this anywhere and this should be rectified in the final document.

This is particularly relevant to aerial access. Commercial helicopter flights into and over the area should not be permitted, and management flights minimised (see below).

Consultation with stakeholders

In June 2014 a range of recreational stakeholders, including the TNPA, were advised that a Recreation Zone plan for Frenchmans Cap was being prepared and we were invited to submit preliminary ideas regarding its content, but were advised a later formal public comment period which would follow release of a draft document. The TNPA supported this approach as providing a forum for a wide-ranging debate to develop a longer term vision for the Frenchmans Cap area in which the rationale for preferred options was clearly articulated.

The 2014 draft TWWHA Management Plan, released in early 2015, reaffirmed that a Recreation Zone plan for Frenchmans Cap, an area of “intense usage”, was being prepared “in response to (the) track upgrade funded by philanthropy and the need to replace aging infrastructure”.

In mid-2016 there was a limited and totally unsatisfactory opportunity to comment on the proposed new hut at Lake Tahune via the West Coast Council’s Development Application (DA) process.

The draft RZ plan has only now been released, almost four years after its need being foreshadowed, to describe a virtual *fait accompli* as far as the development of public infrastructure in the interim is concerned.

This has been extremely disappointing for those stakeholders like ourselves expecting the foreshadowed opportunity for meaningful input into the development of a long-term vision for the management of the iconic Frenchmans Cap area.

Track works and the level of development

The draft plan states that “the challenging nature of the walking experience will be maintained“ (p. 4) and the TNPA supports this objective. Track works since 2008 funded by Dick Smith’s donations to the Wildcare Gift Fund have constituted a major upgrade rather than merely the repair and stabilisation of long-standing problems on this backcountry track; i.e. substantial sections of the Frenchmans Cap track are now arguably a higher grade than the specified PWS track class T2 (although we acknowledge this can be an almost inevitable consequence of track works in western Tasmania).

Despite 10 years of funding assistance from Dick Smith, the works prescribed by the 2008 Track Management Plan are still incomplete. These include places that are likely to be further impacted by the more than doubling of use since the upgraded track sections were opened in 2013 (e.g. Frenchmans Cap summit and region beyond Lk Tahune, Irenabyss track), if this is not occurring already.

The TNPA has previously (Oct 2017) noted concerns about the standard of the works already undertaken at Frenchmans Cap (and elsewhere) and subsequent clean-up. We understand some areas have now been tidied but it seems likely that impacts will remain for some time.

The TNPA was enthusiastic about the idea of replacing the Lake Tahune Hut with a small and energy-efficient structure when the idea was first mooted 2014, a concept that had been floated at the time of other hut replacements over some 30 years but never implemented. We are therefore particularly disappointed not to have had the opportunity for meaningful input on at the design stage. The representation on the DA to the West Coast Council (see above) was no substitute.

The recently opened Lake Tahune Hut is not the sort of facility we consider appropriate for that setting. Notwithstanding the structure itself, facilities like electric lighting, heating and charging (especially fed by a mini-hydro scheme) are inappropriate in a backcountry setting like Frenchmans Cap, especially without some debate about appropriate service standards for public huts on higher grade tracks like the Overland Track. An unfortunate precedent has been set.

We are also concerned about the overall level of development either built or proposed at both Lakes Tahune and Vera. The draft plan presents no linkage between visitation, defined acceptable impacts and the scale of facilities being proposed (or already built) yet it notes that a booking system and implied cap on visitor numbers may be required in future (see below). The appropriate approach would have been to define the environmental carrying capacity based on impacts deemed acceptable, describe the appropriate social constraints based on the Visitor Experience Statement or similar, and then plan infrastructure accordingly. The opportunity to do this over the last ten years has been squandered, but the final RZ plan should at least try to make amends as much as possible.

Commercial use

The draft RZ plan notes that several licensed camping-based commercial guided walks operate on the Frenchmans Cap track each season. The draft plan then notes (p.34) that *“any further commercial proposals will be subject to the normal assessment and approvals processes and would only proceed provided they received all the necessary State and Commonwealth approvals”*. This is an inadequate statement relating to a very controversial issue in the current political climate, particularly given the well-articulated concerns of the TNPA and others regarding the inadequacy and lack of transparency of the aforesaid assessment and approval processes, with a number of recent examples.

There is an extant proposal from the Tasmanian Walking Company to construct and operate “permanent” standing camps (i.e. defacto commercial huts or lodges) at Frenchmans Cap for which a lease/licence is under negotiation (according to the Co-Ordinator General’s website). There is no mention of this anywhere in the draft plan. This is a crucial omission because there is no point in having a plan which leaves out one of the most contentious developments being considered.

Where are the proposed locations for such permanent camps and how does their development fit with the public infrastructure and the overall recreational experience? Is Lake Tahune a potential location for a commercial “permanent camp” and, if so, what will be the final overall development footprint at this iconic highland site? Given a development is proposed, answers to these and other questions are what would be expected in a RZ plan for the area.

The Frenchmans Cap area is geographically and environmentally challenged when it comes to potential sites for additional infrastructure; we argue there is almost nowhere additional huts (lodges) can be built without major impacts on this precious area.

Helicopter access

The plan correctly states “the inappropriate use of helicopters in the Frenchmans Cap area, by management or other permitted users, has the potential to impact on the recreational

experience of walkers” (p.25), yet on page 36 the states: “Commercial helicopter use will be regulated through licensing agreements granted by the Minister”, yet nowhere in the Draft Plan is there any mention of commercial helicopter use.

We are aware the TWWHAMP allows for the commercial licensing of helicopter access to RZs, but helicopter access to remoter parts of the TWWHA is and has been a controversial topic. Commercial helicopter flights and access would not be in keeping with the draft plan’s Visitor Experience Statement.

The TNPA considers commercial helicopter activities are inappropriate in an area as relatively small as the Frenchmans Cap RZ, especially given the high level of visitor use already acknowledged in the draft plan, and there are the broader impacts on wilderness to consider also (see previously).

It is certainly not sufficient or appropriate for considerations regarding commercial helicopter access to be undertaken under the cloak of a licensing agreement. The final plan should ideally preclude any commercial helicopter use in the Frenchmans Cap RZ, but must at least spell out a transparent pathway for its consideration.

Visitor use and need for limits

The draft plan notes a dramatic increase in visitor numbers since 2013, and forecasts that they will exceed 2000/annum soon. The need for a cap on visitor numbers to sensitive and iconic destinations within the TWWHA has been evident for several years, indeed the need at places like Frenchmans Cap was forecast more than two decades ago.

Environmental impacts of this increased use are already apparent. There is no other place in Tasmania like Frenchmans Cap, with its dramatic wild setting and feeling of remoteness despite relative ease of access. This can only be maintained with a cap on numbers of visitors to Frenchmans Cap. It would also have been useful to provide a clear context for the provision of infrastructure like huts, toilets and campsites. Hence, a serious discussion about use rationing options in the draft plan would have been welcome but it is merely noted as a possibility on page 25:

“If walker numbers keep increasing, issues with hut overcrowding and increased site impacts may become more likely. PWS will monitor numbers and in the event that the carrying capacity of the track and its supporting infrastructure start to become exceeded, consideration may be given to introducing a seasonal booking system, in consultation with stakeholder groups, to regulate numbers and protect the experience and the environment.”

What exactly is the carrying capacity, and on what criteria is it based? This is a crucial issue and fundamental to every other aspect of the draft plan. Carrying capacity is a somewhat outmoded concept, a more modern management concept being that of Limits of Acceptable Change (LAC). Nevertheless, in either case, the concept must be explicitly based on real environmental and social parameters (especially as the draft plan makes much of such values in its introductory sections). In order to provide a clear and justifiable basis for management, it is essential the final Frenchmans Cap RZ plan clearly spell these out and note how they will be studied and monitored.

The draft plan further states that (p.25) *“in the event that the carrying capacity of the track and its supporting infrastructure are exceeded, consideration may be given to introducing a seasonal booking system.”* This is all very well, but a booking system, which may regulate use patterns, is not the same as placing meaningful limits on the number of visitors.

We argue that increased site impacts won’t just become more likely, they are already occurring. In our view, the long term “carrying capacity” may already have been exceeded. Regardless, it is poor management to wait for a foreseeable problem to develop.

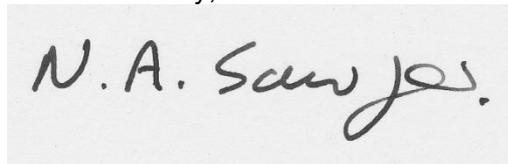
Management should be pro-active and to that end some kind of booking or permit system for Frenchmans Cap should be introduced immediately, with numbers limits based on both real environmental and social criteria.

If a booking system at Frenchmans Cap involves a fee, as on the Overland Track, the funds raised should certainly be invested in management of the area (p.25), but we consider the raising of such funds a secondary issue to the need to limit use-related impacts.

The draft plan presents no recent data on the characteristics of visitors to Frenchmans Cap, and in particular since the acknowledged dramatic increase subsequent to the 2013 opening of the upgraded new track (p.16), but on page 25 blithely states that no change in walker composition is expected. This is poor and blinkered management at best. It is crucial to actually find out, and then use the data; it may have a major influence on infrastructure design and education strategies, particularly in the context of a foreshadowed booking system.

If the final RZ plan is to truly be a document to guide management of the sensitive and iconic Frenchmans Cap area for at least the next 10 years (p. 5), and achieve the respect and support of stakeholders in order to do so effectively, then there is significant work to do. Additional information and systems are required to facilitate the adaptive management approach the draft plan presents on pages 37-40.

Yours sincerely,

A handwritten signature in black ink on a light grey background. The signature reads "N. A. Sawyer" in a cursive, slightly slanted script.

Nicholas Sawyer
President, TNPA