



Commentary on Management of the Walls of Jerusalem

26 January 2020



The [Walls of Jerusalem National Park Recreation Zone Plan](#) (RZP) 2013 is a plan which is subsidiary to the statutory management plan for the World Heritage Area. Its role is to provide greater detail on the management of “the Walls”. It commences with a Visitor Experience Statement which includes the objective of:

- preserving its wild character; and
- maintaining the self-reliant visitor experience;

by careful planning including:

- managing visitor numbers; and
- sensitive and strategic location of infrastructure.

This approach is strongly supported by the TNPA.

On 20 January 2020 the PWS called for public comment on a Reserve Activity Assessment (RAA) for a four-year project to upgrade campsites and improve walking tracks within the Walls of Jerusalem National Park. It involves an expansion of the main campsite at Wild Dog Creek, development of a new campsite at Dixons Kingdom, and tracks associated with the latter as well as in Jaffa Vale. This is the final planning step prior to the construction of these proposals.

The TNPA's main concern is that the RAA implements only selected components of the package of related recommendations of the RZP – all infrastructure based – while PWS shows no sign of acknowledging or addressing the crucial other component – managing visitor numbers.

The 2013 RZP does not explicitly note the need for direct management of visitor numbers (probably for reasons related to political sensitivity) but it does foreshadow a booking system for large groups. To our knowledge, even this has not been effectively implemented.

By way of background – the Overland Track situation

Annual walker numbers on the Overland Track are around 8000 per year, a year-round average of 22 departures per day. While this is well within the capacity (environmental and social) of any of the main overnight stopping points along the track, the reason why a numbers limit was implemented fifteen years ago was because (obviously) visitor numbers are not evenly distributed throughout the year – the critical determinant of most environmental or social problems is the number of walkers simultaneously in any one location. Some starting dates such as Boxing Day, Good Friday or those coinciding with school holidays were particularly popular. For example, the Overland Track Recreation Zone Plan noted that, on one night prior to the introduction of the numbers limit, 123 walkers had been recorded at Waterfall Valley by the hut wardens. Besides being far removed from a 'wilderness experience' for the individuals involved, this is when the greatest environmental damage occurs; walkers who miss out on an established campsite pitch their tent wherever they can, regardless of the sensitivity of the vegetation, and are forced to relieve themselves nearby when the queues for the toilets get too long. It was recognised that providing hut space or tent sites for 123 people at Waterfall Valley would be:

- a) Totally incompatible with the natural values of the area and the 'wild' experience of walking the Overland Track; and
- b) It would only be a temporary solution because, sooner or later, even more people would want to stay simultaneously at Waterfall Valley.

Hence the decision was made to upgrade the infrastructure to provide adequate capacity for 47 persons per night (the limit of 60 includes provision for a commercial Cradle Mountain Huts' group comprising up to 13 clients and guides who do not use the public hut or campsites) and limit daily departures using a bookable permit system to ensure that this number was not exceeded. This approach has worked well since its introduction in 2005.

Visitation and impacts at the Walls of Jerusalem

Exactly the same argument applies to the Walls of Jerusalem, yet unfortunately there is no sign of any serious consideration of managing visitor numbers. The RAA provides no data on current or anticipated visitor numbers; it is not even apparent how the proposed toilet capacity or number of tent platforms to be provided at each location was determined. Anecdotal evidence tells of such a serious shortage of campsites at Wild Dog Creek during Christmas 2019 and into early 2020 that even the number of additional tent platforms proposed in the RAA would not have been anywhere near sufficient. Without some form of active control of visitor numbers the aim of protecting sites from increasing visitor environmental impacts cannot be achieved in the long-term.

Control of visitor numbers should be a high priority at sites such as the Walls with a major current overuse problem (Frenchmans Cap is the other obvious priority) but the downsides cannot be ignored – besides being expensive and potentially controversial to introduce and operate, numbers restrictions at one site will inevitably displace some of the excluded walkers to other locations, which may in turn become overcrowded – eventually replicating the problem elsewhere. Proposals for a much broader and more strategic approach to controlling overnight walker numbers across the TWWHA were [floated in the 1990s](#) but ultimately failed to gain widespread support.

Walls of Jerusalem RAA

Despite this failure to address the key issue of managing visitor numbers in the Walls of Jerusalem, the RAA contains some proposals that merit strong support:

- The mature pencil pine forest around Dixons Kingdom is one of the most important examples of relic Gondwanan vegetation in the TWWHA and is extremely sensitive to fire as well as trampling impacts. The banning of camping in this location is long overdue. Ideally consideration should have been given to removing camping even further from the main pencil pine forest than the proposed location around 300m south-east of Dixons Kingdom but the long history of camping in this area suggests that total removal would be unenforceable.
- The route down Jaffa Vale from Dixons Kingdom to Lake Ball currently comprises multiple braided ‘tracks’ through sensitive vegetation; its consolidation into a single constructed track is long overdue (it was first proposed in 1994).

Unfortunately the proposed constructed tracks and campsites will both further impact on the naturalness of the area, but the alternatives are further environmental degradation or a numbers limit so small that it would amount to a ban on usage. But it is somewhat disappointing that the extensive use of fibre-reinforced plastic (FRP) decking is proposed. Even treated pine can ultimately look better and less artificial, as the extensive aged planking in the Central Walls area attests, and the excellent rock work (both in terms of construction quality and appearance) on the track down from Damascus Gate shows what might be achieved if this option was seriously considered.

The TNPA also supports the provision of some additional tent platforms at Wild Dog Creek campsite but (as explained above) would have expected to see some justification for the number to be provided and some indication of measures to ensure that demand does not further increase in the near future.

The 2013 RZP noted the intention to reclassify the Dixons Kingdom – Lake Ball – Lake Adelaide – Trappers Hut track to consistent class T2 (currently parts are T3 and T4; see [LINK](#)), and promote accordingly, based on the recognition that the circuit was already being used by substantial numbers of visitors (20% of all visitors in 2012, and recent anecdotal evidence indicates this proportion has increased), including commercial groups, and that environmental problems were developing. This is presumably the rationale for the proposed relocation and upgrading of the campsite at Lake Adelaide. But also required to implement this properly is considerable track work to ensure that the condition of the track matches its new classification and can cope with substantially increased numbers; the RAA makes no mention of this.

Part of the rationale now for developing this higher class circuit may be to provide additional options for commercial operators, whether tent-based or hut-based. One proposal under the current Expressions of Interest process for tourism opportunities in Tasmania's parks, which postdates the 2013 RZP and so was not provided for therein, is for a hut-based commercial walk in the Walls. TNPA considers the development of a hut-based commercial walk in the area inappropriate in any case, but is particularly concerned if the track developments proposed in the RAA are aimed at facilitating it without stating such.