

10 February 2020

Walls of Jerusalem Project Manager
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Dear Sir/Madam,

**Walls of Jerusalem Recreation Zone Plan Implementation Project –
comment on RAA #3537 and related issues**

The Tasmanian National Parks Association (TNPA) welcomes the opportunity to comment on Reserve Activity Assessment (RAA) 3537 for proposed public walker infrastructure in the Walls of Jerusalem area.

Summary of key points

The TNPA is supportive of some aspects of this RAA (see below) but is concerned that the RAA implements only selected components of the package of related recommendations contained in the RZP – all infrastructure based – while PWS shows no sign of acknowledging or addressing the crucial other component of recreation management – managing visitor numbers.

The RZP was finalised in 2013 based on information from the 2011-12 walking season. i.e. the RAA, to be implemented over four years from 2020, is based on information already eight years out-of-date. It acknowledges that visitation had increased 48% by 2017-18 compared to 2012-13, and TNPA notes that it is now almost certainly substantially higher.

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. Without some form of active control of visitor numbers at peak periods the aims of preserving the area's wild character for visitors and protecting the area from increasing visitor environmental impacts cannot be achieved in the long-term.

A detailed and up-to-date analysis of all usage data (user characteristics, itineraries, group sizes, etc) is required to ascertain if the infrastructure proposals in the RZP are still relevant and justifiable, or if a different approach is required. In addition, a survey of a representative sample of walkers would provide information on walkers' motivations and preferences which could inform the strategies proposed in the RZP and might suggest possibilities for achieving better outcomes through education and information, as well as inform any infrastructure provision, or even render some unnecessary.

Introduction

We are aware that some stakeholders apparently received specific notification of this opportunity on or around 21 January, but not the TNPA. TNPA is a community group with a long-standing interest in Tasmanian park management issues and we have received targeted notification of RAAs and been invited to comment on a number of previous occasions. It is therefore disappointing not to have been alerted to the call for comment on this important RAA. This suggests your Communication Plan (p. 20) has been deficient and we hope, given that the RAA relates to the Walls of Jerusalem Recreation Zone Plan, that the many interested parties and stakeholders who provided input into the development of that plan in 2013 have been invited to comment on this RAA.

Overview and overuse

The 2013 Walls of Jerusalem National Park Recreation Zone Plan (RZP), a subsidiary plan to the statutory management plan for the World Heritage Area, has a stated role 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.

The TNPA supports the ‘project outcomes’ (p. 15) but considers these are unlikely to be achieved with just the actions proposed in the RAA. The RAA notes the alarming statistic (p. 9) that visitation to the Walls of Jerusalem had increased 48% by 2017-18 compared to 2012-13, to around 7000 annually. It is now almost certainly even more. Such increases are not sustainable and the proposed infrastructure is not a long-term solution to the resulting problems. We are also alarmed that there has apparently been no up-to-date analysis of use data to better understand current visitor’s motivations and itineraries on which to base the major investment and construction of infrastructure that the RAA proposes (see later comments on ‘visitor data and analysis’).

RAA 3537 describes 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 would implement only some recommendations of the RZP. This is acknowledged by the RAA, which notes various other management recommendations of the RZP are outside the scope of the RAA (p.69).

TNPA strongly disagrees. It is not possible to fully consider the infrastructure proposals in the RAA without some insight into planning for or commitment to the other RZP recommendations. We see no reason why the RAA could not include some descriptive detail

regarding the status of these other measures, proposed timeline for their implementation etc, especially given it is more than six years since the RZP was finalised.

The TNPA's overall 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 of recreation management – managing visitor numbers.

The 2013 RZP does not explicitly note the need for direct management of visitor numbers either but it does foreshadow a booking system for all larger groups (7 or more walkers). To our knowledge, even this has not been effectively implemented. The potential need for a universal booking system to regulate walker numbers was noted in our 2013 submission to the RZP.

The RAA contains 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.

Implementation of the Recreation Zone Plan

As noted above, the RAA's selective implementation of the RZP is disappointing, particularly given there is no commitment to implement all the related components of the RZP. The TNPA was generally pleased with the 2013 RZP's package of recommendations although we did express reservations about the proposed construction of a major hardened campsite at Dixons Kingdom and the feasibility of the proposed Dixons–Ball–Adelaide circuit walk, proposals which form the core of the RAA.

Nevertheless, despite the above concerns and the failure to address the key issue of managing visitor numbers in the Walls of Jerusalem, the RAA contains proposals that merit support.

Visitor data and analysis

The visitation data reported in the RAA is based solely on absolute numbers and is presumably based on track counter data. Such data hides the complexities of user itineraries, routes which are highly relevant in an area with the geography of the Walls of Jerusalem, and an understanding of such should be crucial to the design, capacity and location of walker infrastructure, especially camping sites.

We don't doubt that visitation to the Walls of Jerusalem has and is increasing substantially, and this is supported by anecdotal reports and observations, but its nature cannot be determined from a mere comparison of annual figures, and the basic (and still partial) analysis attempted in the RZP is now clearly out-of-date.

A detailed and up-to-date analysis of user motivations and preferences (determined via a properly-designed representative survey) and all usage data (both counter numbers and logbook analysis of intentions etc) is required to ascertain if the infrastructure proposals in

the RZP are still relevant and justifiable, or if a different approach is required. Questions (some of these would require a survey of a representative sample of walkers, not just further analysis of existing data) with highly relevant answers might include:

- What is the current proportion of day vs overnight visitors and what are their respective itineraries and trip durations? Are trail runners an increasing component?
- How are changes in information availability (both from PWS and social media) influencing visitation?
- Why do walkers choose to camp at Dixons Kingdom vs Wild Dog Creek? If due to a shortage of campsites at Wild Dog Creek then expanding Wild Dog still more and encouraging or compelling walkers to stop there may be preferable to a new developed campsite at Dixons Kingdom. Or is a preference for the less developed site at Dixons Kingdom relevant? Wild Dog and Dixons currently provide different Recreational Opportunity Spectrum experiences but this will change if Dixons is substantially developed.
- Dixons Kingdom is arguably a more spectacular location than Wild Dog Creek, and the proposed new Dixons campsite perhaps more so (having more extensive views). Will this encourage still more relative use and so alter the use balance between the Wild Dog and Dixons campsites?
- Dixons is perhaps better located if walkers are continuing on to the Lake Ball – Adelaide circuit, but what are the current number and nature of walkers doing this and can that be influenced?

Wild Dog Creek campsite

The establishment of the Wild Dog Creek campsite in 2003 has proven successful at reducing camping use and stabilising camping impacts elsewhere (e.g. Solomons Jewels and within the Central Walls area), although some sites in these areas are still a long way from recovering (indicative of the low resilience to trampling impacts of the alpine environment).

We have both observed and heard anecdotal reports of crowding and overflow issues at Wild Dog Creek and so support the provision of some additional tent platforms there. However, we 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.

Last year World Expeditions received government approval to construct a ‘puffer pod’ shelter for their clients at the Wild Dog Creek campsite. We would therefore expect to have seen how it was to be incorporated into the clusters of existing and proposed camping platforms at Wild Dog Creek, both physically and operationally, described in the RAA. However, it is silent on the issue, a serious omission. Is the “puffer pod” to be erected on the proposed new group platforms? If so, does this mean it will be available for non-commercial group use, or by other company’s groups, or would this be another example of privatisation of park facilities?

Dixons Kingdom campsite

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. It is also acknowledged that visitors camping in this area are impacting on the heritage values of Dixons Kingdom hut. 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 we acknowledge that the long history of camping in this area suggests that total removal would be unenforceable.

The 2013 RZP did not identify a specific site for the proposed new campsite at Dixons Kingdom and the RAA provides only limited detail on how it was chosen. More detail on this crucial decision would be welcome.

We understand Dixons Kingdom already receives camping use at times similar to Wild Dog Creek. The construction of platforms is inevitably likely to attract more users, and the closure of the remaining campsites in the Central Walls (an overdue move supported by TNPA) may displace additional walkers to this location; i.e. once hardened, it could well become the most popular campsite in the Recreation Zone. The proposed 13 platforms (and toilet) comprises a large campsite and seems to fill all the available openings but, without some control on use, or regulation of overall numbers, it seems inevitable that even this will be insufficient (just like at Wild Dog Creek). As noted for Wild Dog Creek campsite, we 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.

We note that walkers will be directed to a creek eastwards for their water supply but are concerned no mention is made of other measures to discourage informal wandering and trampling in the vicinity of the nearby tarn surroundings. This tarn is surrounded by extremely trampling-sensitive vegetation (as acknowledged by the RAA's appendix A) and so educational and infrastructure measures to prevent impacts are crucial and should be outlined.

Lake Adelaide campsite

Relocation of camping away from the immediate shoreline of Lake Adelaide is supported but we trust the sites which will then be closed also includes that on the northeast corner of the lake (pictures in the RZP, p. 21) as well as the stated northern shore.

Given no site hardening is proposed at this stage, it is good to see the need for monitoring (and potential future hardening) noted but it is unclear why new LAC criteria need to be developed when the RZP indicates a past monitoring system exists.

Walking tracks

As stated in our 2013 RZP submission, the TNPA agrees that the route down Jaffa Vale from Dixons Kingdom to Lake Ball has already suffered substantial trampling damage, comprising multiple braided 'tracks' through sensitive vegetation, and we support appropriate hardening and reclassification. Its consolidation into a single constructed track is long overdue (we note it was first proposed in 1994). While constrained by the need to access the proposed new campsite south of Dixons Kingdom, the route chosen seems logical and it is pleasing that it utilises existing impacted ground in many places.

We have commented above regarding the proposed extensive use of FRP and noted planking may be better. But 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 more seriously considered. The RAA acknowledges the value of this technique by proposing the recycling of existing stonework for use on the access track to the proposed new Dixons Kingdom campsite. Regarding this latter point, it seems particularly unnecessary to

deconstruct rockwork which has stood the test of time on a route which we feel is unlikely to be able to be effectively closed. We are confident that, with appropriate field care and hygiene measures, and experienced track workers, new rock could be sourced, more extensively used and excellent long-term results can be achieved. There are both old and new (e.g. Mt Ossa track) examples in most TWWHA national parks.

We noted during a recent visit to the Walls of Jerusalem area that the proposed track route has been extensively marked by flagging tape, presumably a result of the route survey. However it is clear that walkers are, unsurprisingly, following the tapes and so concentrating new impacts in some less-trampled areas. Hence, we trust that construction of the new track will be a high priority once the project commences.

Problems including braiding, widening and lake shore trampling occur on the main access track between Trappers Hut and Wild Dog Creek. Most such problems have resulted from a lack of maintenance or works over a long period. Given the scale and investment proposed in the RAA, it is disappointing to not see these problems either noted or proposed to be addressed. Similar concerns apply to sections of the existing track north of Lake Ball and the Junction Lake Track north of Lake Adelaide (see below).

Proposed circuit walk

The 2013 RZP noted the intention to reclassify the Dixons Kingdom – Lake Ball – Lake Adelaide – Trappers Hut track to consistent class T2, 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, according to the RZP, and recent anecdotal evidence indicates this proportion has increased as have the total visitor numbers), including commercial groups. This is presumably the rationale for the proposed relocation and upgrading of the campsite at Lake Adelaide. But also required to implement the RZP 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 little mention of this. In particular, the section between the end of the proposed new track down Jaffa Vale and the western end of Lake Ball, nor parts of the Junction Lake track, are in any way compatible with a T2 classification or the promotion and usage this implies. The RZP acknowledges this but the RAA merely notes such extensive and expensive track works vaguely as a “potential future project” (p. 70).

We are also concerned part of the unstated rationale 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.

Construction materials

The constructed tracks and campsites proposed in the RAA will both further impact on the naturalness of the area, but we acknowledge 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 a track surface, as the extensive aged planking in the Central Walls area attests. And we have reservations about the use of FRP for camping platforms in terms of both user comfort and wear on tent floors. Another unanswered question regarding the use of FRP regards its performance vs treated pine when burnt in a wildfire, and any subsequent clean-up issues.

The RAA's justification for the extensive use of FRP all relate to potentially better outcomes (p.37-38). While important to managers, issues of user comfort or visual considerations are likely to be of more concern to visitors and should also be assessed.

Visual impacts

Given the scale of the project, particularly the proposed Dixons Kingdom campsite, one would hope adequate consideration had been given to the potentially high visual impact of a hardened tracks, tent platforms and toilets from various viewpoints. The RAA states (p. 58) that a visual impacts assessment was undertaken by PWS and included in the natural values assessment report prepared by a consultant but this report (Appendix A) contains only a single paragraph essentially just saying there won't be a problem. The RAA itself contains slightly more text on the subject but again dismisses any problem and merely recommends subdued colouring. This level of analysis of an issue likely to be evident and of concern to many users is inadequate, deserves to be taken more seriously and should be better assessed and addressed by design and siting changes where necessary.

Wilderness

Unlike some other RAAs we have reviewed, it is pleasing to note a meaningful attempt has been made to characterise the impact of the proposals on wilderness quality (p. 59-62), within the limitations of the measurement technique. The RAA concludes that the proposals will have some negative impact on wilderness quality. We agree that, in the circumstances and at these sites in the Recreation Zone, this is acceptable given the potential amelioration of other impacts. But, this outcome is not assured unless other components of the RZP recommendations are implemented and visitor numbers are controlled such that still-further infrastructure is not required.

Monitoring

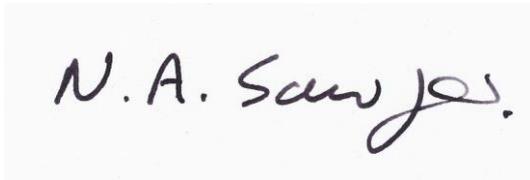
The RZP notes that monitoring is essential for evaluation of management effectiveness. The RAA notes 'rehabilitation monitoring' will be undertaken for five years (p.70). Neither sites nor techniques are noted. This is far too short a period to observe recovery of damaged sites in an alpine setting, and the implication is the monitoring relates only to weeds. Past recreation impact monitoring is described in the RZP, and which the TWWHA Management Plan (p. 131 & 140) commits to continuing.

The monitoring of physical impacts and recovery is one thing but it is equally important to monitor user behaviour (perhaps more so in this context as understanding use may focus infrastructure planning to the extent that its impact is reduced). And this does not just encompass the user and stakeholder 'satisfaction survey' proposed by the RAA (p.70) two years after construction. Also required is a detailed and ongoing program of data collection and analysis that addresses and answers the sorts of questions posed in our introductory comments of this submission regarding usage.

In conclusion

The TNPA supports the immediate expansion of campsite and toilet facilities at Wild Dog Creek and the consolidation of the tracks in Jaffa Vale but recommends that all other proposals in the RAA (including any campsite construction at Dixons Kingdom) be reviewed following a detailed and up-to-date analysis of usage data and a walker survey. This needs to be accompanied by consideration of options for active control of visitor numbers at peak periods.

Yours sincerely,

A rectangular box containing a handwritten signature in black ink that reads "N. A. Sawyer." The signature is written in a cursive style.

Nicholas Sawyer

President, TNPA