Proposed Lower Gordon River Recreation Zone Plan
Backgrounder, May 2020

The Parks and Wildlife Service (PWS) recently released a Background Report on the lower Gordon River, a precursor to revising the 1998 Lower Gordon River Recreation Zone (LGRZ) plan for the area, as prescribed by the 2016 Tasmanian Wilderness World Heritage Area Management Plan. The Recreation Zone Plan is a non-statutory subsidiary plan to the 2016 Tasmanian Wilderness World Heritage Area (TWWHA) Management Plan. Its drafting is apparently linked to the development of the Tourism Master Plan for the TWWHA to ensure the two plans are aligned.

PWS is calling for public input by 22 June into the future management of the LGRZ, which extends over 40 km from the river’s Macquarie Harbour mouth upstream to its confluence with the Franklin River, and will then develop an “action focussed plan” for its future management. But it important to note this plan is a policy document that is not legally binding. The plan is intended to be “limited to the management of recreation, including tourism”.

https://parks.tas.gov.au/have-your-say/lower-gordon-river-recreation-zone-plan

The Background Report has been prepared “to provide a foundation of information” to inform stakeholders’ input to the Recreation Zone Plan but its content is somewhat deficient or selective regarding a number of issues.

Past use and impacts

The lower Gordon River was the scene of the battle that led to the creation of the TWWHA and its banks and rainforest catchment contain a significant component of the region’s natural values. The river also has a long history of exploitation, notably including the logging of Huon Pine from the
1820s to 1960s, the damming of its headwaters for hydro-electric development and commercial cruise boat activity. The latter two activities have significantly impacted the area’s natural values but the legacy of the former is not mentioned in the Background Report.

Bank erosion had become evident by the late 1970s but rampant commercial cruise boat use during the 1980s, using high-speed craft producing large wake waves, was almost disastrous for the lower Gordon River, causing rapid and major bank erosion. These boats traveled all the way upstream to Sir John Falls at this time, until commercial cruise boat traffic was finally restricted to the river downstream of the vicinity of Heritage Landing in 1989 as a response to the damage caused. The effects still linger, and perhaps will forever as the geomorphic processes responsible for bank development no longer operate, mostly thanks to the changed river flow regime associated with hydro-electric power generation upstream. While the visual scars have healed somewhat (at least when viewed from the river), some of the river’s banks, notably upstream of Limekiln Reach, remain metastable and still sensitive to disturbance by, for example, boat wakes.

The most recent DPIPWE Lower Gordon River Erosion Monitoring Report (2019; for 2018) notes that, in areas that have not been subject to commercial cruise boat traffic for almost 30 years, “the lower parts of sandy levee banks continue to erode and remain susceptible to wave wake erosion”, and that observations elsewhere “indicates active geomorphic process and confirms that some erosion remains attributable to these (cruise) vessels”.

The lower Gordon River arguably remains the centerpiece of TWWHA-associated tourism on Tasmania’s west coast but it is an uneasy relationship for the river. The imposition of speed limits, upstream access limits for commercial cruise boats, the Wash Rule and new associated commercial boat designs have all been effective but the legacy remains, and hopefully also a lesson learnt.

Regulation of boat use on the lower Gordon River and associated management policies were enshrined in the current Recreation Zone Plan in 1998. Some aspects of this plan are somewhat out-of-date, however it has served its purpose well and its core policy settings should not be altered.

The DPIPWE Monitoring Report (2019) concludes:

“Erosion due to vessel operations will only occur with exceedance of the wave power threshold above which sediment motion is initiated. In this context, zero geomorphic impact of boating on the river may be possible and potential management options should be considered when revising the Recreation Zone Plan for the River.”

Given past impacts and ongoing bank sensitivity, we argue that an extreme precautionary approach is desirable in considering any ongoing use of the river, and that new or additional uses should not be considered (see later). This includes managing private use.

The damming of the middle Gordon River (and associated flooding of Lake Pedder) in early 1970s changed the river’s seasonal flow regime and hence downstream geomorphic processes including those that constructed the lower river’s levee banks, and possibly predisposed them to later boat impacts. The changed flow regime also began the slow demise of the lower Gordon’s meromictic lakes. These chemically-stratified lakes, a globally-rare phenomenon, were once considered an important contributor to the area’s World Heritage values but their stratification has disappeared along with the seasonal flooding required to maintain them and reference to their existence and their unique micro-fauna has now disappeared from PWS documentation, including the LGGRZ Background Report. Flow regimes changed again in the early 2000, due to power generation associated with Basslink; while most of the lower Gordon River is an estuarine environment, the
additional impact (to those noted previously) of Basslink-associated flows on this part of the river is unknown and undocumented.

Initial activities associated with the proposed Gordon-below-Franklin dam in 1982 involved construction of Warners Landing (see below), a large cleared area for a construction village, and several kilometres of road. The remnants of the cleared roadline extends inland from Warners Landing to the former cleared site for the planned construction village, and beyond. Some active rehabilitation was undertaken here around 1990 but a significant cleared area remains. Given the area lies within a Wilderness Zone, further and final active rehabilitation is appropriate and desirable.

Values

The LGRRZ Background Report summarises a range of natural and cultural values attributed to the area and notes some as contributing to the area’s Outstanding Universal Value (OUV) in a World Heritage context. These are derived from assertions in the Australian government’s World Heritage nomination documents and the 2016 TWWHA Management Plan but not all of those listed or highlighted have been accepted, or even assessed, by UNESCO or ICOMOS as OUVs. While this is of limited concern or relevance for the management of the LGRRZ, given all natural and cultural values deserve and require protection, it does perpetuate the ongoing misunderstanding of the significance of certain values.

The LGRRZ is a corridor within which mechanized access is permitted under the TWWHA Management Plan (2016 TWWHAMP) but is surrounded by an extensive Wilderness Zone. The LGRRZ itself, although a Recreation Zone, has wilderness values (ibid, map, p.176). The Background Report’s references to wilderness and a wilderness experience are conflated and confused and arguably inconsistent with statements in the Management Plan; in particular, the Background Report’s assertion that “the temporal nature of motorized access and the limited infrastructure along the river maintains the high-quality of the wilderness setting and the experiences it affords” (p.22).

Such confusion will make it more difficult to maintain and manage wilderness values in the Gordon River region and elsewhere. In fact, travel by powered boat is not consistent with preserving, protecting and presenting the LGRRZ’s wilderness values. The 2016 TWWHAMP notes that the TWWHA’s wilderness values, (and thus arguably the wilderness experience of visitors), needs to be protected “...through the restriction of built infrastructure and mechanical access...” (2016 TWWHAMP, p 175).

Infrastructure

Major docking and viewing infrastructure for tourists exists at Heritage Landing (13 km from the river’s mouth near the limit of current commercial cruise boat traffic) and Sir John Falls (35 km upstream from the mouth). The scale of the Sir John Falls infrastructure dates from the brief era in the 1980s when this was the major cruise boat destination, before access limits were imposed following bank erosion. It is now used only for Franklin River rafter pickups, the occasional commercial seaplane and private boats; the scaling back of this infrastructure is desirable when opportunity permits (e.g. when major maintenance or replacement is required).

Opposite Sir John Falls is Warners Landing, constructed by the then-HEC in 1982 to offload dam construction machinery, this has become a de facto mooring point for private vessels like yachts. The
LGRNZ Background Report states this structure lies within the Wilderness Zone, odd considering its nature and riverbank location, let alone the aforementioned recreational use, but which conveniently means that the LGRNZ Plan need not consider its future. In addition to the desired further rehabilitation of inland clearing associated with Warners Landing, noted previously, a major consideration for PWS should also be the future maintenance responsibility of the landing structure itself, at least in light of the known recreational use, and ideally its potential removal.

The remnants of the former Sir John Falls hydro-electric scheme exploration camp are considered to have historic value and are currently being refurbished by PWS and associated volunteers. It is hoped the future use of this hut will be limited to public emergency shelter only.

Much nearer the river mouth, the Boom Camp site has a mixed history of use by piners and recreational fishermen, the latter still current. It has evolved into rather more of a mess of unplanned structures than the LGRNZ Background Report implies. We understand there is no formal lease over Boom Camp but use by the Gordon River Anglers continues as if there is, with public access outside the fishing season. Management responsibility for Boom Camp should be clarified and either a lease issued with the lessees taking full responsibility for maintenance (including the foreshadowed new toilet) or PWS should assume formal responsibility with the hut becoming a more basic shelter similar to Sir John Falls hut. Regardless, if this hut is to be retained it should retain public access and the scale and visual impact of on-site structures should be substantially reduced.

**Future use**

Three established commercial operators are licensed to undertake cruises on the Gordon River. This includes the two major Strahan-based cruise boat owners (World Heritage Cruises and Gordon River Cruises) whose large boats undertake daily or twice-daily trips to Heritage Landing, and are not permitted to travel much beyond this point. The third operator (West Coast Yacht Charters) is licensed to travel much further up river, including to Sir John Falls to pick up rafters. Additionally, Tasmanian Seaplanes are licensed to land at Sir John Falls.

Like all parks and reserves, the lower Gordon River is available for Expressions of Interest for Tourism Opportunities in National Parks and Reserves (the [Tasmanian government’s secretive and much-criticised EoI process](https://www.tas.gov.au/about/tasmanian-heritage-authority/expressions-of-interest)). There is one extant proposal, from one of the existing operators, World Heritage Cruises. Submitted in 2015, this proposal is at “license under negotiation” stage but details remain minimal, as per other projects elsewhere being assessed under the EoI process. What is known is that “The Lighthouse Project” would effectively comprise a low-wake, floating 40-bed luxury hotel that would operate throughout the LGRNZ, including upstream beyond the limit of current cruise boat traffic, shuttling up and down river and being serviced from Strahan by a new cruise boat. The 2016 TWWHA Management Plan’s prescriptions for a Recreation Zone allow for such an operation but this does not mean it should be permitted. Commercial license conditions can, if appropriately drafted and enforced, guide and limit the nature and extent of activity in certain areas and the LGRNZ Plan can and should provide policy clarity regarding what is permitted and where within the Recreation Zone.

While commercial licenses give some scope for regulation and enforcement, regulation of private boat use in order to minimize their impact is necessarily more difficult, particularly as there is no PWS management presence on the lower Gordon River much of the time. Private craft are currently subject to a blanket 5 knot speed limit on the river. The LGRNZ Background Report notes an anecdotal rise in the number and size of private vessels using the river. It is more than timely to
determine an approach to more consistently monitor and manage the impact of these on the sensitive upper reaches of the lower Gordon River.

Issues the proposed plan should address

The Lower Gordon River Recreation Zone Plan should:

- More explicitly acknowledge the environmental legacy of hydro-electric power development on the lower Gordon River, in particular the impact of changed flow regime.

- Clearly acknowledge the lower Gordon River bank’s continued sensitivity to any boat wash impacts, a legacy of erosion due to past cruise boat use.

- Acknowledge the loss of the former meromictic lakes.

- Acknowledge the imperative to protect the Gordon River’s flora and fauna and other natural values.

- Retain current boat access restrictions and adopt an extreme precautionary approach to future use proposals.

  “...If it had been normal practice in the early 1980s to apply the precautionary principle then serious degradation of the lower Gordon River may have been avoided...” (Lower Gordon River Erosion – history and lessons learned, no author, 2014).

- Disallow additional boat traffic in Zones 2 to 4. This should hence preclude consideration of the proposed commercial accommodation on the river (ie The Lighthouse Project).

- Address the issue of the increasing number and size of private boat use on the lower Gordon River.

- Provide for or prescribe better management existing infrastructure, particularly at Boom Camp where the existing infrastructure should be rationalised and simplified, and clear maintenance responsibility established.

- Provide for or prescribe the active rehabilitation of remaining impacts from past hydro-electric development activities, especially in the immediately-adjacent Wilderness Zone.