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**Submission: Draft Walking Tracks Strategy Kosciuszko Summit Precinct and Kosciuszko National Park Proposed Amendment to Plan of Management – Visitor Experience Improvements**

Thank you for the opportunity to make a submission on the *Draft Walking Tracks Strategy Kosciuszko Summit Precinct* ('the Strategy') and the *Kosciuszko National Park Proposed Amendment to Plan of Management – Visitor Experience Improvements* ('Proposed Amendment').

The National Parks Association of the ACT ('NPA ACT') is a community-based conservation organisation with more than fifty-eight years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

**DRAFT WALKING TRACKS STRATEGY**

The NPA ACT has an interest in the protection of the natural and cultural values of Kosciuszko National Park (KNP), as an important area of the Australian Alps that lies adjacent to Namadgi National Park. Our members are also regular visitors to KNP. We welcome this initiative, which aims to address the need to manage the increasingly high rates of visitation to the Summit Precinct.

The NPA ACT considers the following to be strengths of the Strategy:

- The inclusion of public works to protect fragile ecosystems from walking-related impacts (p 3), such as the realignment of the existing main range track away from very rare Windswept Feldmark areas (p 11);
- Recognition of the need to manage ongoing maintenance liabilities (eg pp 3,8);
- The emphasis on use of existing infrastructure and minimal creation of new infrastructure;
- Recognition of the incompatibility of mountain biking and walking on shared use tracks, as experience with the current Thredbo Valley River Track has demonstrated (pp 28-29); and
- Efforts to increase access of those with disability and mobility constraints to the Precinct, where feasible (p 27).

At the same time, we find the strategy unclear and lacking some important information in places. These include:

**Objectives and underlying principles of Strategy (pp 3-4)**

The inputs, outcomes and impacts are vague, incomplete, and potentially contradictory. For example, the Strategy states that it aims to protect fragile ecosystems and manage increasing numbers of visitors (conservation principle). This is juxtaposed against a desired outcome of increased visitation and enhanced economic benefits to the Snowy Mountains region (communities principle). The Strategy does not clearly explain how the promotion of more

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visitors to the Summit Precinct is going to resolve the reported problem of congestion at Rawson's Pass and Mt Kosciuszko.

Moreover, there is an assumption that the creation of an iconic Snowies walk is going to relieve congestion at Rawson's Pass and Mt Kosciuszko. What is the basis of this assumption, given that: a) the proposed walk will pass through these locations and b) many people visit KNP in order to walk to the top of Australia's highest mountain and may not wish to divert to another location such as Porcupine Rocks or undertake a multi-day walk to achieve this objective?

Although fostering education, awareness and respect for Aboriginal and European culture and heritage is stated as an underlying principle of the Strategy, this is not evident in the objectives nor is much said in the text about how this will be achieved.

While NPA ACT appreciates the pressures that most national parks in Australia are currently facing to generate revenue, the strategy appears to overemphasize the promotion of alpine tourism over conservation values – as indicated by the large budget being allocated to the construction and upgrade of walking tracks over other important needs like control of invasive species. Improved environmental outcomes rank last of six objectives for the proposed new track developments (p 22).

### **New developments (p 22-26)**

*Accommodation:* While the use of existing accommodation for the proposed multi-day walk is a positive feature of the Strategy, a lot of important information is missing from this section. While it is stated that people could camp along the route, little detail is provided about suitable sites along the way (eg options at Charlotte's Pass, etc). It is important that the walk caters to people from a range of socio-economic backgrounds, not only those who can afford paid accommodation for three nights.

The development of a campsite at Seaman's Hut will be the first such instance in the highly fragile landscape of the Main Range: will this set a precedent for other future developments? Additionally, we note that this will be a very wind-prone site.

*Following the proposed track:* We would note that it is difficult to follow the proposed new track developments as the map on p2 and figure on p 22 are too small for proper viewing or reading of the text. Figure 4 appears to have an error regarding the specific route to be followed on specific days (day 2 should read Crackenback to Guthega). It would be helpful to clearly differentiate between existing tracks and proposed new track development for the multi-day walk.

### **Other popular routes (pp 20-21)**

Some of the walks proposed for promotion, ie Bob's Ridge/Cascade Hut and Dead Horse Gap to Teddy's Hut, include passing through places that are heavily damaged by feral animals and where unpleasant encounters are possible – particularly with feral horses. How will this risk be managed?

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### **Shared use tracks and cycling (pp 28-29)**

While it is good that the conflict between walkers and mountain bikers is recognised in relation to future developments in the Summit Precinct, it is unfortunate that walkers will no longer have safe access to the Thredbo Valley Track – with priority to be given to cyclists. It is also uncertain from the information available whether walkers are able to easily utilise “alternative tracks that are for walking only, or management trails”. The attractiveness of the Snowies Iconic Walk would be enhanced if it was designed as a circular walk, which therefore requires solutions to safe and practical walker access between Bullocks Flat and Thredbo.

### **Commercial tour operators (p 31)**

This section of the Strategy is very weak and underdeveloped. The Strategy places a lot of emphasis on the potential for tourism development, especially for the new multiday walk, yet the role and interest of Commercial Tourism Operators (CTOs) has not been assessed. As an “essential component” of enabling the walk to obtain ‘Great Walk’ status, a cross-section of CTOs should have been consulted before – or as a part of – the development of the draft strategy. The economic viability of the new multiday walk needs to be tested, not simply based on an assumption of interest and some loosely described consultations to take place while building the ‘Snowies Iconic Walk.’ Otherwise, the taxpayer and OEH could be left carrying most or all the risk and cost associated building and maintaining the track and its associated services.

### **Monitoring and evaluation/risk management**

The entire Strategy would benefit from the development of a logical framework analysis that rigorously and systematically links inputs-outputs-outcomes-impacts. Most importantly, a logical framework analysis critically examines underlying assumptions, along with the resource base available for implementation. It includes key performance indicators to ensure that a Strategy is realistic and achievable. The lack of performance indicators, or any monitoring and evaluation strategy/plan is a critical gap in the draft Strategy.

In a related vein, references to risks (threats) and the means by which they will be managed are ad hoc and incomplete. For instance, there are laudable references to the importance of maintenance resources throughout the text. There is even direct mention made to a potential for conflict with other priorities for resources on p 8. However, there is no related action identified to ensure that this does not occur, such as the preservation of a certain percentage of the overall resources available for track construction/upgrading to ongoing operation and maintenance needs or the development of a specific preserved budget for this.

Another example would be the lack of attention given to invasive weed issues. The Strategy only makes occasional brief references to the risk of weed incursions. Under the Stilwell walk (p 14), the proposed action consists of: “As with all tracks monitor and manage weed incursions.” This does not sufficiently address the real risk of increased weed incursions and the need for measures to minimise this risk. If this Strategy is approved and implemented, there is a strong case for carrying out rehabilitation works at Charlotte Pass and engaging in dialogue with accommodation providers at Guthega and Charlotte Pass to identify suitable actions to better control weeds in their areas of responsibility.

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## **PROPOSED AMENDMENT TO PLAN OF MANAGEMENT**

The NPA ACT understands the purpose of the Proposed Amendment to primarily relate to: the development of an iconic Snowies walk on the Main Range; construction of the final stages of the shared use Thredbo Valley Track; and the adaptive re-use of the former Thredbo Ranger Station. As such, we assume that any amendments in support of the proposed new multi-day walk would not be finalised or approved until the Draft Walking Tracks Strategy has been approved, as this would be pre-emptive (i.e. Amendments 1 and 3). We also assume that the amendments would be aligned with the Draft Walking Tracks Strategy. At present, there is at least one inconsistency, as outlined below.

### **Amendment 2: Thredbo Valley Track (pp 3-4)**

The proposed amendment is “to enable completion of the Thredbo Valley Track, providing for mountain bike riding and walking ...”. The shared-use track is further described as “acclaimed” on p 2. The Draft Walking Tracks Strategy, on the other hand, acknowledges that there are parts of the track which are unsafe and uncomfortable for walkers (which has also been the experience of some of our members). It suggests that some sections of further track development not be developed for share use and that walkers be diverted from other sections for public safety reasons. Both the Strategy and the Proposed Amendment need to be clear regarding usage and safety measures/plans for riders vis-à-vis walkers. As previously noted in our comments on the Strategy, it is disappointing that the concerns and interests of walkers seem to take second place to those of cyclists, rather than a more considered approach to ‘shared usage.’

### **Amendment 3: Adaptive re-use of Thredbo Ranger Station (pp 4-8)**

As stated in our comments on the Strategy, the NPA ACT applauds the proposed use of existing infrastructure, to the extent possible. However, it is difficult to make informed comments on the “hard-roofed” accommodation that is intended to be provided at the former Thredbo Rangers Station as little detailed information is provided. There is no definition of the term “hard-roofed”. There is no indication of the permissible size and height of the proposed accommodation. There is no indication of whether structures for purposes other than accommodation will be allowed there. Nor is there any discussion on who will run it? This links back to our comments on the Strategy regarding the importance of upfront consultations with the private sector to inform the taxpayer of how much of the financial burden and risk that the OEH will be expected to bear as compared with commercial operators.

Given the lack of detail in regards to the proposed adaptive re-use, the NPA ACT is not able to support or object to this proposal and recommends that further consultation is required once more details of the proposal are available.

### **Amendment 4: Minor management and visitor improvements**

#### *Amendment 4.1 Yarrangobilly camping*

In respect to the proposed camping development at Yarrangobilly Caves, what measures will be put in place to ensure that this will not affect the quality of water entering the cave system? This was an issue when camping was previously allowed at Yarrangobilly Caves and should not be allowed to reoccur.

The other amendments related to trail resting and visitor safety (addition and removal of snow poles in key locations) seem sensible actions to protect the landscape and its visitors.

Should you require any further information regarding the NPA ACT’s feedback on the Strategy or Proposed Amendment, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

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Yours sincerely



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