



Walls of Jerusalem National Park



Recreation Zone Plan
Implementation Project

RAA3537

June 2020

Published by: Parks and Wildlife Service

Department of Primary Industries, Parks, Water and Environment

GPO Box 1751

Hobart TAS 7001

Cite as: Parks and Wildlife Service 2020, Environmental Assessment Report for Reserve Activity Assessment 3537 Walls of Jerusalem National Park Recreation Zone Plan Implementation Project, Department of Primary Industries, Parks, Water and Environment, Hobart.

ISBN:

© State of Tasmania 2020

Department of Primary Industries, Parks, Water and Environment

Environmental Assessment Report

Proponent	PWS Operations Branch Northern Region
Proposal	Walls of Jerusalem Recreation Zone Plan Implementation Project
Location	Walls of Jerusalem National Park, Tasmanian Wilderness World Heritage Area
RAA No.	3537
Document ID.	Environmental Assessment Report – Walls of Jerusalem Recreation Zone Plan Implementation – April 2020
Assessment type	Class 3 PWS Landscapes Division
Related initiatives	Walls of Jerusalem Recreation Zone Plan 2013
Contact	Tasmania Parks and Wildlife Service GPO Box 1751 Hobart Tasmania 7001 1300 TASPARKS (1300 827 727) www.parks.tas.gov.au

Acronyms

AHT	Aboriginal Heritage Tasmania
CEMP	Construction Environmental Management Plan
DPIPWE	Department of Primary Industries, Parks, Water and Environment
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EAR	Environmental Assessment Report (this report)
EOI	Expressions of Interest
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
FRP	Fibreglass Reinforced Plastic
JRA	Job Risk Analysis
MP	Management Plan
NC Act	<i>Nature Conservation Act 2002</i>
NCH	Natural and Cultural Heritage Division, DPIPWE
NP	National Park
NPRM Act	<i>National Parks and Reserves Management Act 2002</i>
OUV	Outstanding Universal Value
PCAB	Policy and Conservation Advice Branch (PCAB), NCH Division, DPIPWE
PWS	Tasmania Parks and Wildlife Service
RAA	Reserve Activity Assessment
RZP	Recreation Zone Plan
TNVC	Threatened Native Vegetation Communities
TSP Act	<i>Threatened Species Protection Act 1995</i>
TWWHA	Tasmanian Wilderness World Heritage Area
UDP	Unanticipated Discovery Plan
WOJ	Walls of Jerusalem

Contents

Report Summary	2
1. Assessment Process	3
2. Statutory Assessment and Policy Requirements.....	4
3. The proposal	5
Proponent.....	5
Objective of the proposal	5
Proposal summary.....	5
4. Need for the proposal and alternatives	7
5. Public and Agency consultation	8
6. Evaluation of environmental impacts.....	9
Issue 1: Flora, fauna and threatened communities.....	9
Issue 2: Cultural Heritage	12
Issue 3: Visual impacts	13
Issue 4: Wilderness Values.....	16
Other issues	18
1. Non-infrastructure commitments in the WOJ RZP	18
2. Tourism EOI proposals and cumulative impacts	19
3. Use of Fibreglass Reinforced Plastic.....	19
7. Statement of reasons	21
Statement of Reasons	21
Assessment criteria	21
8. Decision	23
9. Appendices	24
Appendix 1 – PWS Commitments.....	24
Appendix 2 – Public submissions.....	27
Appendix 3 – Analysis of public submissions.....	49

Report Summary

This report completes the environmental assessment of the Walls of Jerusalem (WoJ) Recreation Zone Plan (RZP) Implementation Project proposed by the Tasmania Parks and Wildlife Service (PWS).

The proposal will implement actions outlined in the *Walls of Jerusalem National Park Recreation Zone Plan 2013*. A \$1 million investment has been allocated as part of a \$10 million combined State and Australian Government budget allocation for the Tasmanian Wilderness World Heritage Area (TWWHA). The proposal implements the infrastructure recommendations from the WOJ RZP over a three-year period, including the formal designation of three major campsites and accompanying track work.

The proposal involves a new group campsite at the existing Wild Dog Creek campsite with double tent platforms and a cooking area. The proposal also includes the construction of a new campsite at Dixons Kingdom and accompanying track works. New toilet facilities at Dixons Kingdom and north of Lake Adelaide are also intended. The proposal also involves walking track upgrades within Jaffa Vale, between Dixons Kingdom and Lake Ball.

This report has been prepared based on the draft Environmental Impact Assessment (EIA) (Reserve Activity Assessment [RAA] #3537), which includes agency advice, and public submissions. The recommendations from this report were incorporated into the final EIA (RAA #3537).

This report provides an evaluation of the EIA process for the proposal in accordance with PWS policy. The PWS, as the administering authority of the *National Parks and Reserves Management Act 2002* (NPRM Act), developed the proposal and coordinated the assessment process.

The assessment process is presented in section 1 of this report; section 2 describes the statutory requirements and principles underpinning the assessment; the proposal is described in section 3; section 4 reviews the need for the proposal and the design alternatives; section 5 summarises the public and agency consultation process, and the issues raised in that process; section 6 provides an evaluation of the issues; and section 7 the report conclusions.

Appendix 1 lists the commitments outlined in the final EIA; Appendix 2 lists the submitters and provides a copy of all public submissions received; and Appendix 3 is an analysis of issues raised in the submissions, and any changes made to the EIA.

This completed Environmental Assessment Report (EAR) finalises the assessment process.

1. Assessment Process

A draft EIA (RAA 3573) was released for public exhibition for a 24-day period from 17 January 2020. Assessment process milestones are summarised in Table 1.

Table 1: Milestones

Assessment Process Milestones	
2013	WoJ Recreation Zone Plan
2018	Proposal developed and funded
2018-19	Proposal design (4yr implementation plan) including specialist reports
2019	PWS environmental impact assessment
17 January 2020	Public consultation period commenced
10 February 2020	Public consultation period ended
June 2020	PWS environmental assessment completed

An application for a discretionary planning permit under the *Land Use Planning and Approvals Act 1993* (LUPAA) in relation to the proposal will be submitted to Meander Valley Council once this report has been finalised. A building permit will also be required for the toilet infrastructure.

No other local council permits are required to implement the proposal.

2. Statutory Assessment and Policy Requirements

Statutory Assessment and Policy Requirements

The *Nature Conservation Act 2002* (NC Act) is the regulatory mechanism in Tasmania through which land is proclaimed as a reserve. Schedule 1 of that Act sets out the purposes of reservation for the various classes of reserved land. For a national park, the purposes are the protection and maintenance of the natural and cultural values of the area while providing for ecologically sustainable recreation consistent with conserving those values. The key statutory framework for achieving that aim is the *National Parks and Reserves Management Act 2002* (NPRM Act).

Section 30 of the NPRM Act requires that the managing authority (the Director of National Parks and Wildlife [NPW]) ensures development and use within the TWWHA is in accordance with the *TWWHA Management Plan 2016* (TWWHA MP). The EIA documentation (in this case RAA 3537) is an assessment of the proposal and the degree to which it is in accordance with the requirements of the TWWHA MP and associated plans and policies. This includes the *WOJ RZP 2013*, which is prepared under the previous TWWHA MP 1999, and recognised by the current TWWHA MP. The EIA includes consideration of Australian and State Government legislative requirements.

As the proposal is within the WOJ National Park, and the activity does not involve a lease or licence, the Director of NPW, or their delegate, must make the decision as to whether or not the proposal is approved.

3. The proposal

Proponent

The proponent is the Northern Region, Operations Branch of the PWS, a division of the Department of Primary Industries, Parks, Water and Environment (DPIPWE).

Objective of the proposal

The EIA documents stated that the principle objective of the proposal is to improve the visitor experience and management of park visitors in the WOJ NP while protecting the natural and cultural values of the NP and the Outstanding Universal Value (OUV) of the TWWHA.

Proposal summary

The proposal is wholly within the WOJ NP.

This project will implement infrastructure recommendations within the WOJ RZP, including designation of two new campsites and extension of one campsite (refer Figure 1):

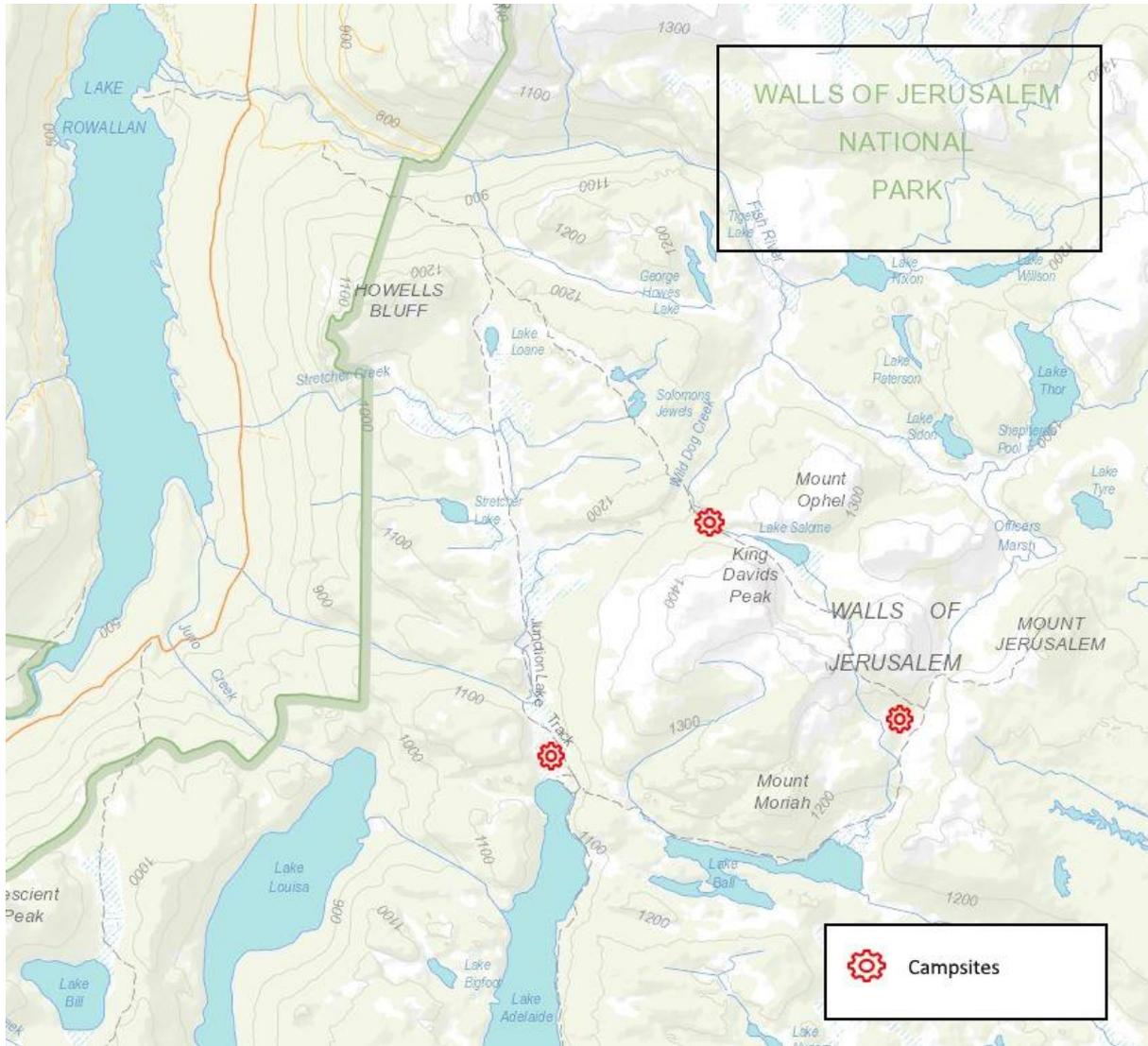
- Wild Dog Creek campsite - maintain existing campsite and create a new group area as an extension.
- Dixons Kingdom campsite - create new campsite with tent platforms and new toilet located 350m south west of current informal campsite. Current informal campsite will be closed, and temporary toilets removed after construction of new campsite. Access to the Dixons Kingdom campsite will be via a new 375 metre walking track which will be constructed from the existing main walking track to provide western access. A new 493 metre walking track (including 70 metre water point access) will be constructed from the east side of the new Dixons Kingdom campsite to Dixons Kingdom Hut and provide access to the Mount Jerusalem walking track.
- Lake Adelaide campsite - a new campsite with new toilet will be created 300m north of existing informal campsite on Lake Adelaide north shore. Existing informal campsite will be closed.

Visitors will be informed through interpretation signage, education and compliance regarding only camping within designated areas within the WOJ circuit walk.

The project also includes walking track upgrades and stabilisation of the existing track within Jaffa Vale between Dixons Kingdom and Lake Ball. The proposed works will better protect sites from increasing visitor environmental impacts. Walkers can be concentrated on hardstand designated overnight nodes and clearly identified tracks.

A detailed description of the proposal is provided in Section 1 of the EIA document.

Figure 1. Walls of Jerusalem National Park – Campsite locations



4. Need for the proposal and alternatives

The proposal is a \$1 million investment over four years to implement the recommendations of the WOJ NP RZP 2013.

This includes designating three major campsites at Wild Dog Creek, Dixons Kingdom and Lake Adelaide. Formalising the campsites at the three locations will concentrate camping to sites that can be managed with improved facilities to reduce environmental impacts on sensitive areas.

Alternative sites and design were considered, including (refer Table 2.4 EIA):

- Wild Dog Creek Campsite extension - various locations considered. Final site based on proximity to existing toilet and natural values and view field constraints.
- Dixons Kingdom Campsite location and toilet - various locations considered. Final site based on visual impacts, natural and cultural heritage values, and visitor experience. Toilet design to minimise impact on natural values.
- Dixons Kingdom access tracks - alternatives considered via specialist study (EIA Appendix B). Primary motivators avoiding and ameliorating impacts on threatened flora and vegetation communities.
- Jaffa Vale track - alternatives considered via specialist study. Chosen track based on minimising impact on natural and cultural values; utilising existing track; providing visitors with scenic walking opportunity.
- Lake Adelaide campsite and toilet - various alternative routes and infrastructure considered. Chosen track to follow well drained areas and Fibreglass Reinforced Plastic (FRP) over sensitive vegetation.
- Toilet systems - various designs considered. Full capture pod system chosen to minimise on-site impacts.
- Camping platforms - various products and designs considered. Feedback from visitors about difficulties with existing infrastructure also considered.

The proposed activities are considered the most suitable option to provide the best visitor experience while minimising impact on natural and cultural values of the NP and the OUV of the TWWHA.

5. Public and Agency consultation

A summary of public comments is in Appendix 3 of this report. Table 2 summarises the submission types.

Table 2: Summary of submissions by type

Type of submission	Number
Public individuals This includes all submissions not from an organisation	8
Commercial Operators	3
Community and Environmental Groups	2
TOTAL	13

Thirteen public comments were received by the advertised date - see Appendix 2 for copies. The issues identified included:

- Camping platforms – design and materials;
- Walking track – material selection;
- Commercial operators utilising NP;
- Use of outdated visitor use data to inform infrastructure capacity;
- Inadequacy of visual impact assessment;
- Lack of cumulative impact assessment with reference to EOI proposals;
- Inadequate management of visitor numbers; and
- Lack of commitment to non-infrastructure components of the WOJ RZP.

The draft EIA was referred to a number of government agencies/bodies with a possible interest in the proposal. The National Parks and Wildlife Advisory Council responded with advice.

The following branches within DPIPW provided submissions:

- Aboriginal Heritage Tasmania (AHT);
- Policy and Conservation Advice Branch (PCAB), Natural and Cultural Heritage NCH) Division; and
- Major Projects and Infrastructure (engineering advice).

Liaison with the Meander Valley Council has occurred throughout the design and assessment process. The council has advised that an application for a discretionary planning permit under the *Land Use Planning and Approvals Act 1993* (LUPAA) in relation to the proposal must be submitted once this report has been finalised. A building permit will also be required for the toilet infrastructure.

No other requirements for permits from the council were identified.

Feedback from the above referral bodies has been incorporated into the discussion of environmental issues in the next section, and was incorporated into the final EIA.

6. Evaluation of environmental impacts

The environmental assessment issues raised in the submissions and relevant to the proposal have been evaluated. Details of this evaluation, including the commitments made by the PWS for implementing the proposal, are discussed, including:

1. Flora, fauna and threatened communities.
2. Cultural heritage.
3. Visual impacts.
4. World Heritage Values.

Additional issues are also addressed in the following section.

Issue 1: Flora, fauna and threatened communities

Description of potential impacts
<p><u>Flora</u></p> <p>During construction, the total extent of vegetation impacted is approximately 3,000 square metres (0.3ha). The extent of the impact mostly related to branch and shrub removal for tracks, or shading from boardwalks, bridges, toilets and tent platforms.</p> <p>The EIA identified two threatened flora species (under the TSP Act) within the proposed development footprint, spreading daisy (<i>Brachyscome radicata</i>) and alpine violet (<i>Viola cunninghamii</i>). Both species were recorded near the proposed northern access track to the new Dixons Kingdom campsite. There is potential for both species to be impacted during the construction phase. The chosen route for the northern access track to Dixons Kingdom campsite largely avoids impact on threatened species. A spring flora survey will be carried out so that the track can be carefully located on-site to avoid these species and identify whether a permit to take is required. Worst case, this would only result in the destruction of few single plants. The NCH Division (DPIPWE) has indicated the impact would be acceptable.</p> <p>During the operational phase, potential impacts are minimal. Materials (such as FRP) and the final design have been chosen to minimise impact on threatened species and Threatened Native Vegetation Communities. Once the circuit track is promoted there is the potential for further degradation of the existing track from Lake Ball through to Trappers Hut. Photo-monitoring points have been established and will be ongoing. (Refer to EIA section 5 for more information).</p> <p>No weeds of significance or priority weeds (as classified under the <i>Weed Management Act 1999</i>) were recorded within 5 km of the study area. No non-native species were recorded in the activity area. No sign of <i>Phytophthora cinnamomi</i> (root rot fungus) or other disease was recorded in the activity area. The potential for the introduction of weed species or diseases during both the construction and operation phases of the project is minimal.</p>

Fauna

The natural values assessment (Appendix A EIA) observed signs of Tasmanian devil habitation and there was some suitable denning habitat observed near the proposed Dixons Kingdom track construction routes. It was concluded that it is unlikely that these will be impacted by the development.

During the construction and operational phases, the use of helicopters has the potential to impact on known Wedge-tailed Eagle nests if conducted in the eagle-breeding season (July to January inclusive).

Threatened Native Vegetation Communities (TNVC)

The natural values assessment estimated that 0.3 ha of vegetation listed as TNVC is likely to be impacted by the proposal due to clearing for construction. However, some of the losses are to be mitigated by rehabilitation of the areas of currently disturbed vegetation in inappropriately located informal tracks and camping sites that will be better regulated through the formalisation of these facilities.

Management measures proposed

The final EIA commitments include those listed in Appendix 1 of this report and summarised following:

- Commitment 1** Prepare and implement a Construction Environmental Management Plan (CEMP) including weed management and hygiene plan; erosion and sediment control; fuel and dangerous substances management.
- Commitment 2** Undertake a spring survey for threatened plants and minor re-siting of walking trail if required (Stage 2 works – Dixons Kingdom).
- Commitment 3** Obtain a permit under the TSP Act if required (subject to spring survey).
- Commitment 7** Limit vegetation clearance and construction footprint.
- Commitment 8** Use a helicopter flight path avoiding known raptor sites.
- Commitment 9** Implement a Fire Action Plan to minimise fire risk.
- Commitment 11** Use of FRP boards to protect sensitive vegetation communities.
- Commitment 12** Ensure imported rock material is weed/phytophthora free.
- Commitment 14** Avoid threatened vegetation communities and waterways at Dixons Kingdom.
- Commitment 16** Use of indigenous plants for rehabilitation.
- Commitment 17** Hygiene measures to prevent disease spread.
- Commitment 18** Post-construction weed and rehabilitation monitoring.
- Commitment 21** A follow-up eagle survey for active nests will be conducted in spring 2021 and the helicopter flight path amended as necessary to ensure all helicopters stay 1,000 m away from active nests.

Public and agency comment

Two representations were made in relation to potential impacts on flora, fauna and threatened communities. The representations raised concerns in relation to the

potential impact of the northern access track to Dixons Kingdom on the two threatened species.

The requirement for a spring survey for these species was emphasised, along with the need for a permit under the TSP Act to take or disturb these species, if individuals cannot be avoided.

Evaluation

With the implementation of Commitments outlined above, the residual risk to flora, fauna and TNVC is considered low.

The PWS has committed to implementing a comprehensive CEMP and chosen sites, building materials and methods to minimise impact on flora.

Contemporary building techniques and use of FRP decking should allow light penetration sufficient for the native vegetation to regenerate underneath decking. New foundation installation techniques are to be used to remove the need for digging and use of concrete.

Nevertheless, there is potential for environmental harm to occur if the management measures are not applied, particularly to the two threatened flora species near Dixons Kingdom. No work shall commence on the Dixons Kingdom site until the completion of spring surveys. A permit under the TSPA to take or disturb these species will be sought if individuals cannot be avoided.

Alternative sites were selected for Wild Dog Creek campsite extension, the Dixons Kingdom campsite and Lake Adelaide campsite in order to minimise impact on TNVC at these locations. Proposed track hardening at Jaffa Vale will reduce impact that multiple informal tracks are currently having on TNVC.

The potential for impact to threatened fauna species (devils and eagles) during construction or operation of the project is considered low.

The project will have minimal impacts on threatened communities. Impacts are avoided by micro-siting boardwalks and location of tent platforms and toilets away from sensitive or threatened vegetation communities.

The PWS has already committed to appropriate siting of the walking track at Dixons Kingdom and a helicopter flight path that stays 1000 m away from all known eagle nests. An eagle survey was carried out in spring 2019, and an additional condition will be applied that a follow-up eagle survey will be conducted in spring 2021 prior to the building season.

Conclusion

Implementation of the proposal, in accordance with the Commitments listed above, will result in some minor adverse impact on natural values. Overall, formalising tracks and providing camping facilities should result in a net benefit and lower risk for the protection of natural values. As a result, the management of the proposal's likely impact on flora, fauna and threatened communities would be in accordance with the TWWHA MP.

Issue 2: Cultural Heritage

Description of potential impacts
<p><u>Aboriginal heritage</u></p> <p>Cultural Heritage Management Australia (CHMA) undertook an Aboriginal heritage assessment of the activity as detailed in s4.5 of the EIA. The full Aboriginal Heritage Assessment was forwarded to Aboriginal Heritage Tasmania (AHT). It has not been released to the public due to the sensitive material it contains.</p> <p>A search carried out by CHMA found 16 sites listed on the Aboriginal Heritage Register located within an approximate 3 km radius of the project work areas, and two Aboriginal sites identified during the course of the field survey assessment.</p> <p>The majority of the registered Aboriginal sites are classified as either isolated artefacts (eight sites), or artefact scatters (five sites). There are also two recorded Aboriginal stone quarries in the area, and an ochre quarry.</p> <p>None of the 16 registered Aboriginal sites are within the designated footprints for the proposal.</p> <p>The field survey undertaken by the consultant identified an Aboriginal heritage site (a low-density artefact scatter comprising two stone artefacts) to the west of the preferred track alignment for the proposed Jaffa Vale walking track.</p> <p>Besides this site, no other Aboriginal sites or specific areas of elevated archaeological potential were identified during the field survey.</p> <p>Given the constraints in surface visibility, it cannot be stated with certainty that there are no undetected sites in the project area. However, the assessment stated that there was a low potential for undetected Aboriginal sites to be present.</p> <p>The assessment process for Aboriginal heritage impact was in accordance with the requirements of the <i>Aboriginal Heritage Standards and Procedures June 2018</i> (DPIPWE).</p> <p><u>Historic heritage</u></p> <p>Dixons Kingdom Hut is listed on the Tasmanian Heritage Register. The EIA states there will be a positive impact on the hut and surrounds with the removal of the temporary toilet and informal camping once the new Dixons Kingdom campsite and toilet are established.</p>
Management measures proposed
<p>The PWS has adopted the management recommendations proposed by the Aboriginal consultant to protect the Jaffa Vale Aboriginal site from any accidental impacts during the track construction process.</p> <p>In addition, the preferred route alignment for the northern track to the new Dixons Kingdom campsite will be adopted to prevent impact on a recorded artefact (AH 1629).</p> <p>Measures aimed at minimising the impact of the proposal on cultural heritage values include those listed in Appendix 1 of this report, and summarised following :</p> <p>Commitment 1 CEMP to address erosion and sediment control.</p> <p>Commitment 7 Vegetation clearance minimised, therefore potential disturbance of unknown sites minimised.</p>

<p>Commitment 10 Unanticipated Discovery Plan to be kept on-site, and construction personnel made aware of its implications.</p> <p>Commitment 13 Jaffa Vale management controls – site (AH 13654) will be noted on the works master plan, temporarily barricaded during construction, and works personnel made aware of its presence.</p>
<p>Public and agency comment</p>
<p>AHT has indicated that the recommendations in regard to Aboriginal heritage based on the CHMA report are acceptable in ensuring that the PWS meets its requirements under the <i>Aboriginal Heritage Act 1975</i>.</p> <p>Several public representations were made in relation to potential positive impact of removing the temporary toilet and informal camping around the heritage listed Dixons Kingdom Hut.</p>
<p>Evaluation</p>
<p>With the implementation of the Commitments outlined above, the residual risk to cultural heritage is considered low.</p> <p>There is, nevertheless, potential for environmental harm to occur if the management measures are not applied, particularly to the known Aboriginal site at Dixons Kingdom campsite. No work shall commence on this site until the site is barricaded (Commitment 13).</p>
<p>Conclusion</p>
<p>Implementation of the proposal in accordance with the Commitments outlined above (including the site-specific recommendation (Commitment 13) should not adversely impact known Aboriginal heritage values, and should have a positive impact on the heritage values listed at Dixons Kingdom.</p>

Issue 3: Visual impacts

<p>Description of potential impacts</p>
<p>The draft EIA concluded that there would be minor localised visual impacts during construction.</p> <p>During the operational phase there will be minor visual impacts from the installation of additional camping platforms and new toilet structures at Dixons Kingdom campsite and Lake Adelaide.</p> <p>The final EIA notes that the existing Wild Dog Creek site currently has bleached timber tent platforms which reflect brightly and are visible from King Davids Peak. The new platforms will be matt colours, with low reflection, and surrounded by existing vegetation, resulting in a minimal increase to the existing visual impact of the Wild Dog Creek campsite. Visitors travelling from Trappers Hut to Wild Dog Creek campsite, on the last approach hill, can currently see the existing level one tent platforms and the roof of the toilet structure. The new campsite extension will be hidden from view by topography.</p>

<p>The site for the camping infrastructure at Dixons Kingdom will be largely obscured by the scattered Pencil Pine canopy of approximately 10 to 12 m in height providing a visual barrier from the surrounding peaks (the Throne, the Wailing Wall and the Temple). The toilet at Dixons Kingdom has been deliberately sited amongst mature Pencil Pine to obscure the structure from surrounding elevated sites.</p> <p>There will be a net positive impact on the area surrounding the heritage listed Dixons Kingdom Hut with the removal of the temporary toilet and closure of the informal camp site.</p> <p>The Lake Adelaide toilet site location was chosen based on the surrounding vegetation being able to shelter the proposed campsite and provide a visual barrier hiding the proposed infrastructure. The toilet will not be visible from any elevated sites and is not likely to be visible from the existing Lake Adelaide track. Surrounding peaks above the proposed campsite do not have any track or route access, so there are no foreseeable visual issues from above.</p> <p>Both toilets are designed to blend or shadow in to their locations, and impacts of new facilities on aesthetic values are minimised using sympathetic building material selection, non-reflective materials, and muted bush tones.</p> <p>Moving the existing campsite 300 m north off the Lake Adelaide shoreline provides an improved visual experience for visitors at the lake shore and surrounding area.</p>
<p>Management measures proposed</p>
<p>In addition to the design and siting proposals discussed above, the visual assessment management measures to be implemented by the PWS include those listed in Appendix 1 of this report, and summarised following:</p> <p>Commitment 7 Vegetation clearance minimised, therefore potential disturbance of unknown sites minimised.</p> <p>Commitment 11 Use of materials, designs and paint colour codes that blend with the environment in all building works.</p> <p>Commitment 12 Use of existing rock material to blend/create continuity between old track and new track work.</p>
<p>Public and agency comment</p>
<p>Public comments included the inadequate assessment of visual impacts, particularly in relation to the establishment of the new Dixons Kingdom campsite.</p>
<p>Evaluation</p>
<p>The final EIA assesses the visual impact of the project by describing the existing situation, the wilderness setting, and potential impact of the proposal and mitigation of impacts. Visual impact assessment is included in the Natural Values Assessment (EIA Appendix A), including a discussion of viewfields.</p> <p>The TWWHA MP additional assessment criteria are addressed (EIA Appendix G) for potential visual impacts and mitigating measures.</p> <p>Amelioration of visual impacts is a prominent issue addressed throughout the design proposed.</p>

In response to the public comment about the adequacy of the visual assessment in the draft EIA, further information was developed. Additional information is provided in the final EIA, including:

- The project sites (Wild Dog Creek/Dixons Kingdom/Lake Adelaide) were the subject of site inspections and visual assessments from surrounding lookouts, to compare various alternative sites. Input was also provided from the cultural heritage survey work undertaken by the contractor. A landscape designer (EIA Appendices E and F) was also engaged to undertake on-site assessment of the proposed campsites, map tree locations, and to provide a design layout to minimise visual impact and include social values in designs. The design layout considered visual directions from the peaks, vegetation heights, and best placement options.
- The walking track consultant took into account environmental considerations, combined with the impact on cultural and visual impacts, when proposing route designs and chosen routes. The consultant report detailed options to minimise impact on the apparent naturalness of the site. This report also detailed the visual impact of existing tracks, noting that extensive treated pine planking exists on the nearby track to Mt Jerusalem.
- The PWS has adopted a design guide for track construction that establishes the highest natural character by maximising the use of natural and on-site materials and organic shapes, and minimising the use of straight lines and synthetic materials (consistent with environmental protection). The proposal was designed in accordance with this guideline (Tasmania Parks and Wildlife Service – Walking Track Management Strategy 2011 - 2020).
- The placement of the new Dixons Kingdom campsite relied on visual inspections undertaken from the Throne and the full length of the Wailing Wall. The proposed structures are low and well placed in the Pencil Pine forest, which creates a visual screen and hides the proposed structures from view. The Dixons Kingdom campsite will have minimal visual impact on the public view and landscape.
- Existing activities are a negative visual impact on the WOJ NP. Active deterioration is occurring on some unimproved track sections and campsites. The visual degradation of current camping sites at Lake Adelaide will be ameliorated once the new campsite is established, and camping at the current informal site prohibited. The removal of camping within the central Walls area, and from the area adjacent to the registered heritage site of Dixons Kingdom Hut, along with the removal of the temporary toilet, will improve natural visual quality at these sites. This can be achieved by imposing no-camping rules, education and, if necessary, enforcement.

A discussion on the proposal's visual impact is provided in the final EIA (refer s4.3).

Conclusion

Overall potential for visual impact is considered acceptable. New facilities, where possible, will be located adjacent to existing facilities. Topographical features and vegetation should screen some facilities, and the facility design, materials and colour should minimise visual impacts.

Issue 4: Wilderness Values

Description of potential impacts
<p>The EIA addressed the potential impact of the proposal on wilderness values in the TWWHA. Preserving wilderness values protects many of the criteria that contribute to the area's OUV. The EIA utilised a PWS Wilderness Quality Assessment (WQA) methodology to quantify Wilderness Quality (WQ) and assess the potential impacts of the proposal. The WQA defines WQ as the sum of four variables (EIA Table 4.2) Apparent Naturalness, Remoteness from Settlement, Time Remoteness and Biophysical Naturalness.</p> <p>It was concluded that:</p> <ul style="list-style-type: none"> • The campsite extension at Wild Dog Creek will have minimal impact on WQ due to the existing infrastructure at the site. • The new campsite infrastructure and accompanying track work at Dixons Kingdom will have an impact on WQ at the site, but conversely improve the WQ at the current campsite next to Dixons Kingdom Hut with the removal of the temporary toilet and camping at this site. • The erection of a toilet structure, and ongoing yearly servicing via helicopter, at Lake Adelaide, will have an impact on the WQ at this site. • Visual impacts (see Issue 3 above) will be relatively minor due to the strategic placement of all three campsites along with design features. • Potential visitor impacts from the noise and visual intrusion of helicopters will be concentrated in the construction period. Careful sorting and weighing of building materials will minimise the amount of helicopter lifts needed. Visitor's disruption should be limited to six days per construction year. The operational phase will result in a minimal increase in yearly servicing of toilet infrastructure, with the addition of a toilet at Lake Adelaide. The new toilet facility at Lake Adelaide has sufficient holding capacity to fit in with the pre-existing annual maintenance cleaning regime and pod emptying cycle for Dixons Kingdom and Wild Dog Creek.
Management measures proposed
<p>In addition to the design proposals discussed above, the wilderness management measures to be implemented by the PWS include the following that are particularly relevant to managing impacts on recreational experiences:</p> <p>Commitment 7 Vegetation clearance minimised, reducing potential disturbance.</p> <p>Commitment 8 Fly-neighbourly protocol will be followed, and helicopter flight paths will avoid extensive overfly of walking tracks.</p> <p>Commitment 11 Use of materials and paint colour codes that minimise visual intrusion of infrastructure, and building techniques and materials that protect natural and cultural heritage values.</p> <p>Commitment 14 Dixons Kingdom site management controls.</p> <p>Commitment 16 Rehabilitation using indigenous plants.</p>

Public and agency comment
<p>Two public submissions were made on the potential impacts on WQ. Both submissions supported the assessment of impact on wilderness values.</p> <p>One submission pointed to the potential impact on wilderness values from building a toilet and campground at Lake Adelaide, and raised concerns that this infrastructure will largely benefit commercial operators.</p>
Evaluation
<p>The project will have minimal impact on current WQ, while also providing environmental gains through the amelioration of existing visitor impacts. The WQA carried out by the PWS predicts minor changes to WQ scores from the proposed works, primarily around Lake Adelaide and Dixons Kingdom due to the provision of new toilet structures. In these two sites, several cells drop from the 14-16 WQ rating to the 12-14 rating, as they drop slightly below 14. The WQ scores are maintained above 13. The project will allow the majority of walkers to be concentrated on hardstand designated overnight nodes and clearly identified tracks. The project will not significantly impact on WQ outside the Recreation Zone as identified by the TWWHA MP.</p> <p>The project assists the PWS in meeting several Key Desired Outcomes identified in the TWWHA MP, namely:</p> <ul style="list-style-type: none"> • Protect cultural and natural values of the TWWHA. • Ensure walking track conditions are consistent with limits and prescriptions outlined in the PWS Walking Track Classification System. • Sustainable management of recreational walking throughout the TWWHA by monitoring tracks, campsites and users. • Support appropriate sustainable development that is based on TWWHA values. <p>The negative impact on WQ at the Lake Adelaide site is acknowledged in the final EIA. The project will also result in significant improvement in water quality (due to the management of current unhygienic toileting practices) and protection of the natural values of the site (including TNVC) with the subsequent management of existing visitor impacts at Lake Adelaide.</p>
Conclusion
<p>Impact on WQ is acceptable considering the improved infrastructure aims to minimise adverse visitor impacts on natural and cultural values.</p>

Other issues

The following issues, requiring additional explanatory material, were identified during the public submission process.

1. Non-infrastructure commitments in the WOJ RZP

Planning issues

Many of the planning issues raised in submissions, including management of visitor numbers in the WOJ NP, are to be addressed by the proposed update of the WOJ RZP. Planning and community consultation on the WOJ RZP revision are planned to commence in 2021.

The EIA is an environmental impact assessment process to assess the potential impacts of the proposed infrastructure project. The non-infrastructure recommendations outlined in the WOJ RZP can be addressed without the need for environmental impact assessment, including the following:

Track Ranger Presence

A 'Track Ranger' program implemented by the PWS includes a PWS funded part-time Ranger in the WOJ NP for up to 44 days for the 2019-20 summer period. The ranger was made available over the busy Christmas/New Year period, and key long weekends. The benefits from this program are acknowledged, and the PWS plans to continue it subject to annual funding availability.

Education campaign

Existing educational and interpretation materials are to be updated. Visitors will be better informed through interpretation signage, education materials and compliance information, including regarding camping within designated areas on the WOJ circuit walk.

Group management – campsite booking system

In accordance with recommendations by the WOJ RZP, group sizes over seven (tour operators, schools and walking groups) will be required to book group area sites within the three defined campsites (Wild Dog Creek, Dixons Kingdom and Lake Adelaide). The PWS is developing a booking system that will be trialled at Frenchmans Cap, and also utilised for the WOJ NP.

Currently, commercial tour operators (CTO) and schools are required to confirm dates, group size, and locations with the PWS to avoid crowding issues.

All current CTO agreements have conditions around the use of booking systems. Several CTO licence agreements are due for renewal in 2020-21. The renewals will incorporate the WOJ management commitments, and RZP implementation project outcomes.

TWWHA Tourism Masterplan 2020

The *Draft TWWHA Tourism Masterplan 2020* also prioritises the review of the WOJ RZP MP. It contends that the RZP review should consider the performance of the infrastructure components as outlined in this proposal, and the success of the non-infrastructure components of the RZP, in addition to exploring additional management options. The review should focus on the preservation of wilderness character in the WOJ NP and aim to protect both the area's high conservation values, and the visitor's experience.

2. Tourism EOI proposals and cumulative impacts

Several submissions pointed to a perceived failure of the EIA to address the cumulative impact of this project, combined with other proposals in the WOJ NP such as the tourism EOI proposals from World Expeditions and the Tasmanian Walking Company.

The EOI proposals are not addressed as this proposal is about managing infrastructure upgrades carried out by the PWS as part of the WOJ RZP. At the time of finalising the EIA, there were no other confirmed proposals for consideration in the WOJ NP. No other proposal has commenced environmental impact assessment to confirm the site, or design, nor that proposals are to proceed. The cumulative impact of the proposals cannot be considered at this stage.

Should tourism EOI proposals proceed to environmental impact assessment, the PWS will review a submitted EIA for assessment of cumulative impact under section 3.3.1 of the TWWHA MP, and the criteria for commercial tourism proposals in the TWWHA under section 6.8 of the TWWHA MP.

The EOI proposals would need to address cumulative impacts in the order that they occur. The update of the WOJ RZP will address cumulative impacts and capacity issues. Appendix 3 provides further detail on this issue.

3. Use of Fibreglass Reinforced Plastic

The use of FRP is proposed for the construction of both camping/cooking platforms and boardwalks.

Several submissions questioned the use of FRP, and one contended that FRP only met the needs of commercial operators. The submissions expressed a preference for the use of “natural products” such as rock or timber. Queries were also made about how FRP reacts to fire (as opposed to treated pine).

Various tread surfaces are proposed for the walking tracks. The construction techniques proposed include natural products, improved drainage areas, rock paving and FRP based on-site constraints (EIA Appendix B).

The PWS design guide for track construction establishes the highest natural character by maximising the use of natural and on-site materials, natural shapes and minimising the use of straight lines, only using synthetic materials consistent with environmental protection.

FRP is proposed for use in the boardwalks that require enhanced protection of natural and cultural heritage values. FRP walking track structures are only proposed to traverse sensitive poorly drained areas, including the Pencil Pine drip line. FRP sheeting will allow water to pass through to vegetation and roots below the structure. The use of FRP will reduce impacts to two TNVC, Highland Poa grassland, and Pencil Pine forest. This will assist the PWS in meeting obligations under the National *Alpine Sphagnum Bogs and Associated Fens Recovery Plan 2015*:

<http://www.environment.gov.au/system/files/resources/d38256d6-3e09-4906-a707-4659f0e42213/files/alpine-sphagnum-bogs-associated-fens-recovery-plan.pdf>.

The rationale behind the use of FRP includes options to minimise impact on the apparent naturalness of the site, and enhancing the visual impact of existing tracks (EIA s2.2 Infrastructure materials and design, s2.3 Alternatives and Considerations). Extensive treated pine planking already exists on the nearby track to Mt Jerusalem, and this is clearly visible from surrounding vantage points.

The boardwalk design, and materials used, were developed to minimise environmental impacts while increasing the asset life and reducing maintenance costs. The site’s extreme climatic conditions place a high demand on built structures – use of ‘natural

products' such as timber have maintenance/longevity issues. FRP is utilised to enhance the "user" experience for commercial operators.

Both treated pine and FRP boards would be compromised by bushfire, and both would be removed from the site and replaced.

7. Statement of reasons

This assessment has been based on the information provided in the EIA and incorporates specialist advice provided by DPIPWE scientific specialists and regulatory staff. This assessment has also addressed the issues raised in public submissions.

Statement of Reasons

The statement of reasons is a summary of assessment criteria relevant to the proposal and how the criteria were addressed.

Assessment criteria

Table 1.3 of EIA summarises relevant statutory and policy requirements. The proposal was designed and assessed under the following statutory and policy requirements:

NPRM Act requires that the Director of National Parks and Wildlife exercises their functions and powers in accordance with, and to implement, any applicable management plan – being the TWWHA MP 2016.

TWWHA Management Plan 2016:

- The proposal has been assessed according to a process as outlined in the TWWHA MP (Section 3.3). Appendix G and section 3.1.2 of the EIA address the additional assessment criteria and listed values.
- The land is zoned Recreation in the management plan. The proposal meets the stated aims of the Recreation Zone (s3.1.1.2 TWWHA MP).
- The management plan refers to the ***Walls of Jerusalem Recreation Zone Plan 2013***, and the proposed development is consistent with the actions recommended in the recreation zone plan that plan based on updated visitor information.
- The project assists the PWS in meeting several Key Desired Outcomes identified in the TWWHA MP, namely:
 - o Protect cultural and natural values of the TWWHA.
 - o Ensure walking track conditions are consistent with limits and prescriptions outlined in the PWS Walking Track Classification System. Section 3.1.4 and Appendix B of the EIA address this strategy and define appropriate track classes.
 - o Sustainable management of recreational walking throughout the TWWHA by monitoring tracks, campsites and users.
 - o Support appropriate sustainable development that is based on TWWHA values.

Reserves Standards Framework 2014 - was applied to assist in matching visitor skills and abilities to the level of infrastructure required to address visitor risk within the WOJ NP (section 3.1.4 of the EIA).

EPBCA - The assessment concludes that the project will not constitute an action that will have a significant impact on Matters of National Environmental Significance (MNES)

and, as such, does not require referral to the Australian Government for assessment under the EPBC Act.

Meander Valley Interim Planning Scheme 2013 - section 3.1.5 of the EIA addresses local council advice on Environmental Management Zone code provisions and Habitat Code provisions.

8. Decision

I am satisfied that:

1. The assessment was undertaken in accordance with assessment criteria in the TWWHA MP.
2. The proposal can be implemented in accordance with the Commitments stated in Appendix 1 of this report.
3. The proposal is acceptable because:
 - the OUV of the TWWHA would be maintained;
 - the environmental impact assessment under the identified assessment criteria demonstrates that the proposal would not cause significant adverse impacts;
 - the proposal supports the reserve management requirements of the *Tasmanian Wilderness World Heritage Area Management Plan 2016*; and
 - the proposal assists in conserving the identified world heritage values and other values of the Wall of Jerusalem National Park.



Jason Jacobi
General Manager
Parks and Wildlife Service

Date: 24 June 2020

[The EIA process is completed when this environmental assessment report is signed by the managing authority and provided to the PWS Regional Manager North]

9. Appendices

Appendix 1 – PWS Commitments

The proposal will be implemented as outlined in this environmental assessment report, including the specific Commitments following.

No.	Commitment	Project Phase
Pre-Construction Commitments		
1	A CEMP in accordance with PWS guidelines will be prepared prior to works by the successful contractor, and submitted to the PWS.	Pre-Construction
2	Minor re-siting of walking trails to avoid significant individual species prior to forward construction, including spring survey for threatened species.	Pre-Construction
3	A permit under the <i>Threatened Species Protection Act 1995</i> may be required to take or disturb the rare listed species <i>Brachyscome radicata</i> (spreading daisy) and <i>Viola cunninghamii</i> (alpine violet), subject to spring survey.	Pre-Construction
4	Project inductions for contractors will be delivered by PWS staff to ensure awareness of all safety risks and actions required to reduce risk.	Pre-Construction
5	An Emergency Response Plan will be developed, including: <ul style="list-style-type: none"> - Evacuation from a remote area in the event of injury, death or threatening circumstances. - Early warning systems for unstable weather, wildfires etc. - Emergency contact details. - Setup communication systems and process between remote parties and field centre. 	Pre-Construction and Construction
6	Job Risk Analysis (JRA) will be completed and signed by all project persons for compliance undertaking risk-based tasks.	Pre-Construction and Construction
Construction Commitments		
7	All vegetation clearance will be limited to the identified development footprint; construction equipment, laydown area and storage will be contained within the footprint.	Construction
8	All heli-slinging operations will be carried out in accordance with the DPIPWE <i>Safe Working Procedure – External slinging of loads from Helicopters</i> PR-054 Policy. A Communications Plan, including visitor safety during construction, will be approved prior to commencement of works.	Pre-construction and Construction

	Identified flight paths will avoid known raptor nesting sites and walking track locations. Pilots will be briefed accordingly.	
9	Contractors are to ensure operations are suspended immediately once the Forest Fire Danger Index reaches HIGH in accordance with the PWS Fire Action Plan. Suitable extinguishers held on-site for potential electrical or fuel fires.	Construction
10	Management of unanticipated discoveries of Aboriginal relics undertaken in accordance with the <i>Aboriginal Heritage Act 1975</i> and the Unanticipated Discovery Plan as prescribed by Aboriginal Heritage Tasmania.	Construction
11	Construction using FRP sheeting walking track structures within sensitive vegetation communities to reduce impacts; use of new foundation installation techniques utilising bolts; use of materials and paint colour codes that blend with the environment in all building works; use of gable roof on toilet structures to mimic roof shape of historic huts.	Construction
12	Existing rocks from paths due for rehabilitation will be utilised to construct new tracks. If any new rock materials are required, they will be sourced from recently certified phytosphthora and weed-free quarries, and be of a similar parent material to the existing environment.	Construction
13	Jaffa Vale Management controls: <ul style="list-style-type: none"> • The location of the Aboriginal site will be plotted onto the Works Masterplan, and a notation made that the site is not to be impacted. • During construction works, temporary high visibility barricading is to be erected around site boundaries, with a 3 m buffer applied. The barricading is to be removed on completion of works. • Construction contractors should be informed of the location of the site, and informed that the site is not to be impacted. 	Pre-construction and Construction
14	Dixons Kingdom management controls: <ul style="list-style-type: none"> • Water access point will be designated east of proposed campsite in a flowing drainage line. Appropriate signposting will be provided. • Water point access will be hardened to protect vegetation and drainage lines. • Contractors will be briefed about the location of the Creeping pine, and exclusion fencing will be installed for the duration of the works to avoid incursion. • All stockpiling of materials will occur on proposed tent sites, and equipment moved to storage units as soon as practicable. 	Pre-construction and Construction

Post Construction Commitments		
15	Final site clean-up to the satisfaction of the PWS.	Post-construction
16	Indigenous native plants used in rehabilitation process.	Post-construction
17	New interpretive signage will be placed at key locations to improve education around pest hygiene when walking in remote areas, and use of existing boot wash stations.	Operation
18	An annual post-construction weed and rehabilitation monitoring program will be implemented for a minimum of five years post-construction. At the completion of the five-year period, results will be reviewed and, if rehabilitation or weed control are not considered adequate, then the monitoring and control program will be extended. Monitoring program to include the whole of the circuit track.	Operation
19	The PWS will monitor toilet pod levels and usage, post group area construction at Wild Dog Creek, for ability to cope with increased visitor site capacity. If the current toilet system is not coping, then the PWS will investigate options to rectify.	Operation
20	All toilet facilities will be monitored and maintained for the life of the structures.	Operation
Additional commitments (Environmental Assessment Report)		
21	A follow-up eagle survey for active nests will be conducted in spring 2021, and the helicopter flight path will be amended accordingly to ensure all helicopters stay 1000 m away from active nests.	Pre-construction
22	The PWS will investigate the feasibility of providing a water tank attached to the new Dixons Kingdom toilet block to provide a water source for campers. The PWS has also undertaken to include ongoing monitoring of the potential degradation of the un-named tarn if the water supply stream dries up. If unacceptable damage is occurring, ameliorative measures will be undertaken.	Operation

Appendix 2 – Public submissions

Copies of the 13 submissions received are attached. Names of private individuals have been redacted for privacy reasons, unless express permission for publication was obtained from the individual.

No.	Name	Individual submission or company name
1	Private individual	Individual
2	Private individual	Individual
3	Nick Scham, GM	Trek Tours Australia
4	Mark Norek, Director	Life's an Adventure
5	Private individual	Individual
6	Nick Davis	Tasmanian Wilderness Guides Association Inc.
7	Private individual	Individual
8	Private individual	Individual
9	Nicholas Sawyer	Tasmanian National Parks Association
10	Clinton Garratt	TasTrekker
11	Private individual	Individual
12	Vica Bayley	Individual
13	Private individual	Individual

Submission 1: Private individual

Can you please ensure the platforms can be used by 1 and 2 person Macpac tents as your current wilddog platforms don't accommodate as the wire ties don't adjust and also tear the fabric, its not hard other states have simple platforms that are elastic or rope based that adjust all tents.

Secondly there ought to be platforms that have some privacy between sites and which are not amongst group sites which tend to be noisy. The current wild dog site we avoid as its unpleasant mosquito infested and noisy we prefer to walk for an hour further on for those reasons.

Thirdly please consider that people need to sleep on the platforms so make them without gaps or ridges

Forthly consider please a simple bench to sit on and pack gear the wilddog sites are very poor here

Fifthly consider the issue of shade!

Sixty have a look at the cape to cape we and kangaroo island sa national sites for how to build fire proof and simple kitchen shelters with a water tank we don't need taj mahal but it isnt rocket science to build platforms and a shelter area that meets basic needs of walkers with a couple of weather sides and a couple of benches

Submission 2: Private individual

Dear Parks,

I am writing to ask you please to not create another Freycinet National Park experience in the Walls of Jerusalem.

It is one of those last lightly developed places in Tasmania which we can access by foot, for the true purpose of getting away from it all, and getting back to ourselves, back to what matters.

I can appreciate the necessity to limit the impact of camping on the natural environment.

Could I please suggest keeping the current campsite arrangements of some hardened platforms in the most often accessed spots like Lake Adelaide, and Dixons Kingdom and leaving other areas for wild camping by parties who are sympathetic toward their impacts on the environment?

The Walls of Jerusalem would be wise not to be promoted as a drawcard destination in the state, but rather managed as a currently existing hideaway locatable by visitors who can read the many bushwalking guidebooks to find out details necessary for access and trip planning. I am sure that the more visitors lured to the area, just increases the workload of traffic management and human waste removal in the future?

I can see no benefit in allowing commercial walking parties into the Park in addition, there are enough venues in the state that they could be encouraged to use, and are more suited to coping with the high traffic and possible unintended trampling of vegetation which comes with non bush savvy clients?

Venues I could suggest for a walking company tour with scenery just as good, would be a circuit up Higgs Track, via Lady Lake, Lake Nameless and Lake Ironstone finishing either out the track toward Huntsmans Lake or down Western Creek Track.

I do hope you consider all submissions to this forum fairly, and take into account the concerns raised, the commercialisation and promotion of Tasmania is broad enough that visitors are flocking in droves. It is well known and has been topical over recent years, as evidenced in the below article, that many destinations both in Australia and overseas have suffered from the Instagram and "you should be here" culture.

<https://www.abc.net.au/news/2018-01-22/instagram-trophy-hunters-beating-destructive-path-in-tassie/9344444>

The Walls of Jerusalem does not need to become another statistic.

Submission 3: Trek Tours Australia

Hi WOJ team,

The WOJ are core to what we offer our guests in Tasmania.

The Wilderness World Heritage values that this unique natural and cultural environment embody, are central to our experiences offered here. This includes a more remote and natural (noise and visual pollution reduced) wilderness experience. Trek Tasmania have always endeavoured to consistently communicate with your team in regards to trends we have seen in the park. We will continue to do so. If there are any other ways you would like this to happen – please let us know.

After the implementation of the quota and booking system on the Overland Track in the early 2000s, we have observed a significant increase of usage and associated carrying capacity pressure on the WOJ area.

Here are some points for your consideration:

Have commercial operators contribute financially to maintaining new group infrastructure and conservation + user management systems; A per head / per night fee charged to operators on a monthly basis as a user levy to assist with operational costs for example. On this note, will the public users have increased NP user fees to feed back into the management of the new resources being built / managed?

Consult with current operators regarding the new booking system suggested for Wild Dog group campsites.

Enable same access usage benefits for licensed operators (i.e. lockable storage boxes at Wild Dog that is non-exclusive)

Strategic interpretation / warning signage in regards to open fires at all known campsites in the park

Toilet infrastructure that enables rotation of catchment systems to accommodate visitor growth

Toilets required here:

*Lake Ball (still seeing other commercial operators camping here)

*Lake Adelaide

*Lake Meston

*Lake Mrytle

We are keen to be further involved in any major stakeholder meetings to discussed how this project will affect our operation within the WOJ NP.

Submission 4: Life's an Adventure

28 January 2020 (via email)

For the record I am against the commercialising of any national Park. If this is for the use of walking companies I am against it full heartedly.

If this is however for independent walkers only then great. Keep up the good work.

29 January 2020 (via email)

As long as all commercial operators are allowed into the area and this is not something for the elite tour operators.

Submission 5: Private individual

Dear Madam/Sir,

As a keen bushwalker, I commend PWS for the interest in track and campsite upgrades in the unique Walls of Jerusalem National Park.

The extra platforms at Wild Dog Creek and a formal campsite at Dixons Kingdom, as proposed in this draft RAA, are most welcome. Current overcrowding at these locations is causing significant vegetation damage.

Repair of worn sections of current tracks is also needed. The addition of extra track marking poles between Damascus Gate and Herods Gate would also be welcome for reasons of safety when the track is obscured by snow. I'm disappointed to see no mention of such upgrades in the RAA.

I have serious concerns that the upgrades in this RAA appear to primarily cater for private, profit focused commercial interests at the cost of the wilderness values of the Tasmanian Wilderness World Heritage Area. It is these wilderness values that attract visitors, both local and international.

The development of a campsite at Lake Adelaide and the associated track upgrade from Lake Ball to Lake Adelaide will damage the wilderness values of the area, as demonstrated in Fig 4.2 and 4.3 in the RAA. It is important to note that these developments will indirectly lead to much greater damage associated with larger numbers of commercial walks thereby facilitated. Such damage is not considered in this RAA.

The RAA proposes developments that appear to be using public funds to construct high class tracks with a clear benefit for a private commercial operator(s). Normal independent bushwalkers do not require fibre-reinforced planking. The rock tracks in other parts of the Walls of Jerusalem are much more in keeping with the naturalness of the area and are quite suitable for bushwalkers with a range of abilities.

I am sorry that PWS is currently under pressure from political and commercial interests at the expense of protection of Tasmania's national parks and reserves. Those pressures must be very difficult for PWS staff who care deeply about the precious places they are tasked to protect.

Thank you for taking the time to consider this submission in this reserve activity assessment process.

Submission 6: Tasmanian Wilderness Guides Association Inc.

In regards to: Walls of Jerusalem Recreation Zone Plan RAA #3537

The *Tasmanian Wilderness Guides Association Inc* (TWGA), would like to formally submit our perspective, concerns and support on the proposed implementation of a Recreation Zone Plan that includes campsite extension and development in three key locations inside the Walls of Jerusalem National Park.

This submission has been based on data obtained through an online survey of TWGA members, comprising professional outdoor guides or former outdoor guides, many with years of experience in Tasmania's national parks and reserves, including the Walls of Jerusalem National Park specifically.

We formally support with comment:

- The extension of hardened campsites at Wild Dog Creek, Dixon's Kingdom and North Lake Adelaide as per the draft RAA #3537.
- The input or improvement of toilet facilities at Dixon's Kingdom and North Lake Adelaide as per RAA #3537.
- The designation and creation of a hardened trail between Dixon's Kingdom and Lake Ball to minimise the spread of foot traffic impacts on the Jaffa Vale vegetation.
- A ban on camping inside the Central Walls of Jerusalem area, which includes Lake Salome, Pool of Bethesda and Pool of Siloam areas – although we note there is some support from TWGA members to continue to allow camping in this area.

We make comment on the following:

- That the RAA has no plan for an enhanced toilet facility to match the campsite extension at Wild Dog Creek. The existing toilet facility is one that many of our members have seen at inappropriate hygiene standards, over-flowing for periods of time and unsuitable for the quantity of current users let alone a potential increase in visitation. We strongly recommend a duplicate facility at this site and more vigilance in maintaining a safe operating level and hygiene standards.
- That an increase in Parks & Wildlife Service (PWS) Ranger presence is not included inside the scope of this RAA – as we believe the two are importantly linked. The likelihood of increased visitation in the Recreation Zone through campsite improvement we believe requires an appropriate increase in PWS Ranger presence.
- That guides have been fulfilling some of the roles of Rangers over the years inside the Walls of Jerusalem National Park due to the lack of presence of PWS Rangers, including in busy periods. These roles have included public safety and public education.

Other concerns raised (including notes raised in the RAA as outside the scope of the RAA):

- The lack of PWS Ranger presence in the Walls of Jerusalem National Park will continue and is detrimental to the protection of the fragile ecosystem that exists due to the lack of promotion of Minimal Impact Bushwalking practices, public education and general behaviour policing. One guide with more than 50 trips into the Central Walls area can only remember 2-3 sightings of Rangers in total over those 50 trips.
- Lack of information on proper toileting practices when toilet facilities are unavailable.

- That facilities have been insufficient for some time and that this is a reactive step rather than proactive.
- That the rise in campfire scars is continuing inside all National Parks, including the Walls of Jerusalem – with insufficient policing of this crime.
- That commercial operators do not have a booking system to regulate the amount of potential operators utilising the National Park facilities at once. Not only does this create potential conflict between operators but also impacts on public users through over-crowding. The signage at the Wild Dog Creek commercial operator campsite does not appear sufficient to explain the usage rules of the campsites, nor does it seem to match operators' usage.
- That the implementation of a Permit System to regulate visitor numbers has not been considered concurrent with this RAA. With increased interest in self-guided hiking and camping National Parks, fragile areas like this have only two directions, a constant increase in infrastructure to meet visitation needs (which impacts the Park's values) or a limitation on visitor numbers during peak busy periods. While the RZP does make reference to an implementation of a Permit System for visitor control or reduction, the actions of the RAA will only significantly amplify the necessity for this measure.
- Significant concern from our members that the extension of these campsites will be used as justification for private development inside the Walls of Jerusalem National Park, which may have adverse impacts on the National Park's Outstanding Universal Values, wilderness values, public accessibility, public experience and competitive neutrality of existing operators.

Submission 7: Private individual

Dear Walls of Jerusalem Project Manager,

Submission in response to “Walls of Jerusalem Recreation Zone Plan Implementation Project”

I have been visiting The Walls area regularly since 2008 and support the proposed work at Wild Dog Creek, Dixons Kingdom, Jaffa Vale and Lake Adelaide.

A number of my trips have been during the peak periods and I have observed visitor loads that would I believe exceed the proposed infrastructure capacity.

I would like to see **additional commitments made in Section 7 of the RAA with regard to managing visitor numbers.**

A) The presence of a track ranger in two peak periods:

- i) Summer - Christmas to late January
- ii) Easter - school holidays.

The track ranger would be able to

- assess the visitor loads during these peak periods
- ensure designated campsites are utilized
- educate visitors during these periods
- ensure compliance with the no camping zone within the central Walls area.

B) A defined period of review and assessment of visitor numbers.

For example two years post completion specifically including the two known peak periods Christmas-mid Jan and Easter. Any proposals to manage visitor numbers should be made with input from the people who use the Park.

Thank you for the opportunity to have input.

Submission 8: Private individual

Introduction

The Executive Summary states (p.7) that this Project “proposes to implement the actions outlined in the Walls of Jerusalem National Park Recreation Zone Plan 2013.” However it implements only SOME of the outlined actions.

1.1 Project Overview states that “Current visitor numbers between Nov 2017 and Dec 2018 show an increase of 48% since 2012 to approximately 7000 people. Increased visitation has resulted in impacts on environmental and cultural heritage values. These increasing visitor numbers are causing conflicts over demand on campsite space.”(p.9)

No-one who has visited ‘The Walls’ at peak visitation times would argue with this, and in fact it was overcrowding at camping areas which was the prime catalyst for the 2013 Recreation Zone Plan (henceforth referred to as the WoJ RZ Plan 2013). The trouble is that this long-overdue response is not addressing the key problem, that of overcrowding.

3.1.2 Tasmanian Wilderness World Heritage Area (TWWHA)

KDO’s identified in the TWWHA Management Plan 2016 that are applicable to this Project include:

KDO 6.3 “A diverse and accessible range of quality visitor experiences that are consistent with the protection of values is provided in the TWWHA”

With no proposed limit on ever-increasing visitor numbers, not only will the natural and cultural values of the WoJ be compromised but the visitor experience also will be adversely impacted by overcrowding and “conflicts over demand on campsite space.”

Proposed infrastructure changes/upgrades

I support all of the proposed changes and upgrades, including: -

- Construction of tent platforms and toilets south east of Dixons Kingdom Hut (with accompanying track re-routes)
- A constructed camping area, with toilet, near, but not right on the shore of, Lake Adelaide
- A new hardened track along Jaffa Vale to Lake Ball
- Additional capacity (tent platforms) at Wild Dog Creek

However these measures will not solve the key problem of overcrowding at peak times.

At Freycinet, where there also have been no plans for limiting visitor numbers, the carpark, after being extended, soon was again at capacity at peak times. Likewise, with visitor numbers at the WoJ continuing to increase, at peak times the new camping areas will soon not cope with demand and problems will arise – for the environment and for visitors.

Fire risk

KDO 8.2 of the TWWHA Management Plan 2016, states: “Risk of bushfire ignition from visitors is reduced and illegal campfire occurrence is reduced or eliminated” (p.39)

But the Project has no measures for reducing this risk, other than creating new camping platforms so that in the short term visitors are less likely to camp in non-designated places where they might well light campfires (as happened the previous summer).

With the increasing incidence of uncontrollable wildfires ignited by dry lightning strikes, as happened not far from the WoJ in 2016 and in other areas of the TWWHA last summer, the risk of disastrous bushfires in the WoJ in future is very high. At present there is little opportunity for educating visitors about the risk of fire and the Project offers no solutions.

5.1 Outside Scope of this Project

This Project “proposes to implement the actions outlined in the WoJ Rec Zone Plan 2013” but it fails to do this because it does nothing to address ‘the elephant in the room’, which is ever-increasing visitor numbers.

The following points, which are ‘outside the scope’ are the very measures which will address this: -

- Track ranger presence (It was noted that after the winding back of the track ranger program, in about 2004, 'bad' behaviour, such as lighting campfires in the TWWHAA, began to increase)
- Education campaign – which goes hand in hand with track ranger presence
- Large group management, with the proposal that groups of 7 or more are required to book. The WoJ is very popular with school groups
- Web-based booking system (which is how most of us now book most of our holidays). For booking to be required (as is the case with the OLT and many major walks in other parts of the world), should an emergency arise, such as overdue walkers or a bushfire or extreme weather event, authorities know who is in the Park. On-line booking also provides an opportunity to inform intending visitors of conditions, safety information etc.

Of course some Tasmanian bushwalkers, claiming 'traditional rights', will complain loudly if any perceived restrictions are introduced – but times change and what has to be done has to be done as was the case with the introduction of the booking system on the OLT. In the end that has worked out best for everyone, and for the natural and cultural values of the National Park.

Without implementing the above four points, treated as 'Outside the Scope' this Project will not achieve what it claims to set out to do.

Submission 9:



10 February 2020

Walls of Jerusalem
Project Manager
woj@parks.tas.gov.au

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’).

The EIA 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 vales 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 site sin 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.

Submission 10: TasTrekker

Dear Walls of Jerusalem Project Manager,

Thank you for the opportunity to comment on the Walls of Jerusalem Recreation Zone Plan Implementation Project RAA.

On the whole I am very pleased this is happening. I strongly believe encouraging more visitors to complete the loop via Lakes Ball and Adelaide will take pressure off the central Walls area. I believe an official loop walk will discourage some of the informal loops being completed by visitors who currently leave the formal tracks to return via a different route.

I have been frustrated that camping has been “discouraged” at Dixons Kingdom yet toilets were erected as a temporary measure that has lasted several years. The new campsite between Damascus and Jaffa Vale will fix this problem and allow a proper, enforceable ban on camping in the historically and environmentally sensitive area around the hut. Hooray!

I have been to Dixons Kingdom a number of times in the past 30 years when the stream in that area has not been flowing. I am worried the proposed water access point for the new campsite is on an even smaller stream. I expect the nearby lake will become the backup water source and there should be monitoring to determine whether this happens and results in shore degradation. When the loop track idea was proposed in the 2013 RZP I pictured the Jaffa Vale campsite to be further down the valley where several streams come together and are more likely to be permanent. Please note that I think the proposed site is great and has many benefits over a site further down the valley (e.g. stunning views, environmentally robust, easy to back track and do side trips missed on the way in, possible to retrace steps to Wild Dog).

I understand the hardening of the route to Lake Ball is a priority to avoid further track degradation. However, I am worried this will direct much larger numbers of 4-day loop walkers onto the relatively difficult track along Lake Ball and down to Lake Adelaide. While I’m sure budget constraints relegate this to a “Potential Future Project” (RAA 5.3) I believe there should, at the very least, be an urgent assessment of potential environmental damage locations so photo monitoring can be put in place. I am especially worried about the wet area at the western end of Lake Ball. I think the easily damaged coral fern and sphagnum bogs in that area will be very susceptible to damage due to trampling and track braiding in wet conditions.

Most of the track from Lake Adelaide to Trappers Hut is on the wet, open, grassy plains. Again, I believe this is likely to get very braided as increased numbers of walkers do the loop. Again I believe monitoring sites should be identified between Lake Adelaide and Trappers Hut to determine how urgently the track should be upgraded. I believe a future alignment using the dry ground in the forest on the west side of the valley to avoid wet areas will be needed.

Section 4.8.2 deals with air traffic associated with construction. The map on page 68 is titled “Material drop site locations.” However, it shows lines which seem to indicate flight paths. The lines seem to follow the walking tracks which is contrary to what is contained in the text above the map. Flight paths perpendicular to the walking tracks are much more ‘neighbourly’. This could be achieved by heading south from the WOJ pad along the west side of Howells Bluff then via Stretcher Lake to Wild Dog or via the Juno Creek alignment to Lake Adelaide then north of Mount Moriah to Dixons. I do not believe flight paths would be significantly longer but safety and ‘neighbourliness’ would be greatly improved.

I would like to see Section 5.3 include future projects to build tent platforms and a pod toilet (instead of the side-shifter) at the Lake Adelaide site. I am quite certain there will be a significant increase in walkers doing the loop even without the Lake Ball to Trappers track upgrade. Once the track is upgraded (as per 5.3.2) numbers are likely to increase even further. I do not believe the grassy site and side shifter toilet will be adequate beyond the short term.

Once the Lake Ball to Trappers upgrade is complete I believe walkers should be encouraged to do the loop in a clockwise direction.

Thanks again for the opportunity for input.

TasTrekker

Submission 11: Private individual

Hi

As a visitor to the Walls of Jerusalem several times over the years since 1982 I would like to provide some feedback.

Campsite at Wild Dog Creek. I think the campsite is an excellent facility - well located, cleverly designed, expertly constructed and excellent functionality; eg. effective shelter for platforms.

Access to Dixon's Kingdom. I think the area up from the campsite at Wild Dog Creek should be day access only. I do not think people should camp at Dixon's Kingdom for example. It is such a special place and should be protected at all cost. I believe it is very important to have a ranger based in the Walls over the summer to guide the many visitors and to help protect the area.

I suggest it would be preferable to construct another campsite, located before entering the Walls proper, similar the one at Wild Dog Creek.

I am strongly opposed to any commercial developments in the Walls specifically and in World Heritage Areas in general, especially those involving luxury accommodation, helicopters etc.

I wish you well in looking after our Parks.

Submission 12: Private individual

Please accept this as a submission to the consultation over the Walls of Jerusalem (WOJ) track and tent platform proposal RAA, acknowledging that it is two days late. Please note that I have emailed both Jason Jacobi and Onee Gerrard of PWS (on 30 January 2020) with questions relating to the issues I raise below. Despite informing them that my questions were to inform a submission to the RAA, my email is yet to be answered. I have attached that email below.

My main concern with this RAA is its failure to address the cumulative impacts of other proposals in the WOJ National Park.

The Tasmanian Government's EOI process for new tourism developments has solicited numerous proposal for the WOJ National park.

Specifically, I note a proposal for 'puffer pods' at the Wild Dog Creek Campsite (see here)

The World Expeditions' proposal plans to construct a "Wilderness puffer pod" in the Wild Dog Creek area in the Walls of Jerusalem National Park, adjacent to the existing camping ground. It is unclear from this proposal if this is one 'pod' or several, including sleeping and communal 'pods'.

The brief states "*The World Expeditions' proposal plans to construct one "Wilderness puffer pod" in the Wild Dog Creek area in the Walls of Jerusalem National Park, adjacent to the existing camping ground.*"

I note that while detailed assessment of the PWS 'campsite extension' at wild Dog Creek is undertaken, including a wilderness, natural and cultural values assessment, there is zero mention of this campsite extension in the context of the World Expeditions proposal.

The RAA makes no mention of the 'puffer pods proposal', its proposed location of the likely cumulative impact of the two developments. Indeed, the RAA appears not to mention the notion of cumulative impacts, despite the requirement so the 2016 TWWHA Management Plan.

For example, the TWWHA Management Plan states:

"There may be circumstances where there are multiple proposals for a particular site or area, or where a proposal is put forward for an area where there is limited capacity for additional development should the proposal proceed. Under these circumstances an 'expressions of interest' process may be an appropriate mechanism to determine the most appropriate outcome and to manage cumulative impacts to the values and visitor experience of that area. This mechanism has become standard practice for PWS." (pg. 84)

and

"The plan prescribes criteria for the assessment of activities in the TWWHA to ensure the protection of World Heritage and other natural and cultural values of the TWWHA. The criteria ensure that indirect and cumulative impacts are considered in addition to social and economic impacts." (pg. 11)

Given the 'puffer pods' development is progressed such that lease and licence arrangements are 'under negotiation' ([see here](#)) it appears negligent and contrary to the TWWHA Management Plan that cumulative impacts of the combined proposals are not being assessed.

Please ensure that the RAA declares the preferred location for the 'puffer pods' and assesses the cumulative impacts of this and other EOI developments in the WOJ National Park.

Regards,

Vica Bayley

----- Forwarded message -----

From: **Vica Bayley**

Date: Thu, Jan 30, 2020 at 1:28 PM

Subject: Wild Dog Creek

To: Jason Jacobi

Dear Jason,

I note the Walls RAA for track and other infrastructure upgrades.

I will formally submit to that process but have some questions to ask so as to inform my submission.

- Can you please tell me exactly where World Expeditions "*plans to construct one "Wilderness puffer pod" in the Wild Dog Creek area in the Walls of Jerusalem National Park, adjacent to the existing camping ground?*([see here](#)) I note that this new private site is not referenced in the RAA nor indicated on the map (as per below).
- Will you assess the cumulative impact of several campground extensions at Wild Dog Creek (one as per the RAA, one as per the World Ex proposal)? If so, when and how do you propose to conduct this cumulative impact assessment as it is not currently a consideration of the PWS RAA?
- Have you commenced an RAA. or commenced working with World Ex on an RAA for its Wild Dog Creek proposal?
- If not, have you been informed as to the likely timeline for the commencement of that RAA assessment?

With many thanks,

Submission 13: Private individual

Hi I was up at the walls 10 days ago.

The whole track from Dixon's kingdom to lake Adelaide and trappers hut should be upgraded - this would provide a fantastic round trip walk and slightly reduce pressure on the rest of the area and reduce the danger of getting lost for people using the current confusing track.

Until such time as the track is upgraded the current track should be more clearly and consistently marked - even if only with bits a tape as exist in some places I have 50 years experience in the tas bush and got lost for an hour 20 minutes north of lake Adelaide. I was Following a clearly defined but wrong track for 15 minutes- the wrong track was well worn with many recent footprints. Once this false track frayed into many false leads it took me quite a while to decide to turn back - I had in fact decided to return to Dixon's kingdom - until I returned and found the proper track Given the condition of the false track it was clear many people had followed the same false path - the true path was obscured by vegetation overgrowth. I tried to divert people by laying dead branches across the wrong track - but as there are many fallen branches across the proper track this will probably have limited success.

Can I suggest you also redesign camping platforms so it is easy / possibly to pitch and tie down a normal tent. Nearly everybody had trouble - witness the rocks people had carried onto the platform - and would have lost their tents if the weather were bad. The current design with just one row of anchor points is well - Whatever their intentions the fact is they don't work for the clients that use them.

Otherwise everything was fantastic. Many thanks

Appendix 3 – Analysis of public submissions

Issue	EIA RAA section	Comments	PWS response	No.
Camping platforms – size, materials, privacy and provision of seat; kitchen shelter with water tank	s2.1, s2.2, s2.3	<ul style="list-style-type: none"> • Need for elastic or rope ties on platforms rather than wire. • No gaps or ridges in platforms. • Need for privacy between hardened campsites. 	<p>A number of options were considered before settling on the current design and location (refer s2.3 EIA) of campsites.</p> <p>Materials and design were chosen to minimise environmental and visual impacts, while increasing the asset life and reducing maintenance costs.</p> <p>The PWS has investigated products and construction techniques that will meet infrastructure goals, and provide an enhanced visitor experience, while also surviving the extreme climatic conditions of the WOJ NP. Use of FRP on camping platforms, and galvanised chain for tent ties, are commonly utilised in alpine conditions for these reasons. The use of ‘natural products’ such as timber has maintenance / longevity issues in such extreme environments.</p> <p>The PWS notes that the provision of a camping platform without gaps or ridges is impractical in winter conditions due to the potential accumulation of ice.</p> <p>The Dixons Kingdom campsite design layout (EIA Appendix E) provides separation between the</p>	1,13

Issue	EIA RAA section	Comments	PWS response	No.
		<ul style="list-style-type: none"> Request provision of seat and shade on camping platforms, and a kitchen shelter with water tank. 	<p>group campsite and the non-group area, with some platforms isolated both in distance and visually from other platforms. The design is a compromise between the need of some users for social isolation when camping, while also minimising the amount of infrastructure needed to service dispersed camping platforms.</p> <p>The project is implementing the actions outlined within the WOJ RZP which makes provision for hardened campsites. Any additional infrastructure considerations, such as the provision of kitchen shelters, would need to be part of a future planning process.</p>	
Walking tracks/camping platforms – use of FRP	s2.1.4 s2.2.2 s2.3 Appendix B	<ul style="list-style-type: none"> Prefer “natural products” such as rock or timber. Questions how FRP and pine react to fire. 	<p>The PWS adopts a design guide for track construction that establishes the highest natural character by maximising the use of natural and on-site materials and organic shapes, and minimising the use of straight lines and synthetic materials (consistent with environmental protection).</p> <p>The PWS proposes various tread surfaces and construction techniques based on the findings of the specialist report (EIA Appendix B), including natural, improved drainage areas, rock paving and FRP based on-site constraints.</p>	5,9

Issue	EIA RAA section	Comments	PWS response	No.
		<ul style="list-style-type: none"> Concerned that FRP use is motivated by meeting needs of commercial operators. 	<p>In the event of fire, both FRP and treated pine burn, and remnants must be removed from the NP before the structure is rebuilt.</p> <p>FRP is only utilised where required for the protection of natural and cultural heritage values and not for “user” experience reasons. Use of FRP will reduce impacts to Highland Poa grassland and Pencil Pine rainforest – two threatened native vegetation communities.</p>	
<p>Questions how toilet capacity and tent platforms numbers arrived at for Dixons Kingdom and Wild Dog Creek</p>	<p>s1.1, s2.1</p>	<p>Insufficient data on current or anticipated visitor numbers is provided.</p>	<p>The WOJ RZP makes extensive use of usage data and visitor characteristics and attitudes analysis to inform the recommendations of the RZP. The PWS continually monitors visitor user numbers based on a number of inputs, including track counters at the trailhead, toilet pod levels and usage at Wild Dog Creek and Dixons Kingdom, visitor feedback and Track Ranger reports.</p> <p>A number of options were considered, utilising the recent data, before settling on the current designs and location. Final decisions around tent platform numbers were based on Track Classification requirements for a T2 track, natural and cultural heritage site restrictions, and social needs of visitors.</p> <p>The PWS will monitor toilet pod levels and usage following construction of the group area at Wild Dog Creek to assess its capacity to cope with increased visitor site capacity. The full capture</p>	<p>9</p>

Issue	EIA RAA section	Comments	PWS response	No.
			system utilised by the PWS allows for expanded capacity, if required, by increasing the number of pods on-site or the frequency of emptying.	
Alternatives consideration for Dixons Kingdom campsite; water access issues	s2.1, s2.3	<ul style="list-style-type: none"> • Questions how the Dixons Kingdom campsite was chosen. • Questions the viability of the chosen water source at Dixons Kingdom 	<p>At the commencement of planning for the project, PWS staff had discussions with the National Parks and Wildlife Advisory Council regarding potential locations for the Dixons Kingdom campsite. Primary considerations were protecting the mature Pencil Pine forest and Dixons Kingdom historical hut. The current proposed campsite location (350 m SW of Dixons Hut) was chosen as an option due to well drained soils and its location out of the mature Pencil Pines.</p> <p>The PWS then undertook site inspections, including visual assessments from surrounding lookouts, to compare various sites. Input was also provided from the cultural heritage survey work undertaken by contractor. A landscape designer was also engaged to map tree locations to provide a design layout to minimise visual impact and include social values in design.</p> <p>Additional details on Dixons Kingdom campsite selection are provided in the final EIA.</p> <p>In investigating possible water sources, the PWS looked at a close unnamed tarn located SW of the proposed campsite. This water source option was dismissed due to potential contamination of the</p>	9, 10

Issue	EIA RAA section	Comments	PWS response	No.
			<p>tarn and the need to build walking track structures over sphagnum areas around the tarn.</p> <p>The water access point will be from a running drainage line east of the site. A clearly sign-posted single hardened access point to the stream will be established, designed so it doesn't create any obstruction to stream flow.</p> <p>For inclusion in the final EIA, the PWS will investigate the feasibility of providing a water tank attached to the new Dixons Kingdom toilet block to provide a water source for campers.</p> <p>The PWS has also undertaken to include ongoing monitoring of the potential degradation of the unnamed tarn if the water supply stream dries up. If unacceptable damage is occurring, ameliorative measures will be undertaken.</p>	
Support Wild Dog Creek campsite expansion	s2.1.1	Addresses overcrowding impacts on natural and cultural values and visitor experience.	Noted.	2,4,5,6,7,8,9,10,11
Support Dixons Kingdom campsite/toilet	s2.1.2, s2.1.3	Removal of campers from mature Pencil Pine forest and the surrounds of Dixons Kingdom Hut is supported.	Noted.	2,5,6,7,8, 10
Opposed to camping at Dixons Kingdom	s2.1.2,	Believes all camping should be at Wild Dog Creek, with only day access to central Walls and Dixons Kingdom.	This option would not meet the objectives of the proposal, namely, to implement the actions outlined within the WOJ RZP. Prohibition of camping beyond Wild Dog Creek would be	11

Issue	EIA RAA section	Comments	PWS response	No.
			contrary to the TWWHA MP, difficult to enforce, and would concentrate impacts at Wild Dog Creek to an unacceptable level.	
Support Lake Adelaide works	s2.1.5	Relocation of camping away from the immediate shoreline of Lake Adelaide supported.	Noted.	2,6,7,8,9,10
Support Jaffa Vale track works; additional track marking poles central Walls	s2.1.4	<ul style="list-style-type: none"> • Hardening and reclassification of existing track down Jaffa Vale supported to address existing damage from multiple braided tracks. • Extra track markers between Damascus Gate and Herods Gate requested for snow navigation. 	<p>Noted. Review need for track marking (including snow poles) throughout the Recreation Zone to manage visitor risk issues and bring T2 tracks up to standard.</p> <p>Noted as a future project. New track markers will be placed on the new Jaffa Vale track as per T2 standards to prevent future/further braiding issues.</p>	5,6,7,8,10
Improve/expand toilet at Wild Dog Creek	s2.1.1, s7	Concerns raised about the current condition/capacity of the Wild Dog Creek toilet.	The PWS will monitor toilet pod levels and usage following construction of the group area to assess its capacity to cope with increased visitor site capacity. If the current toilet system is not coping, then the PWS will investigate options to rectify (EIA s7 Commitment number 19).	6
Additional toilets – Lake Ball/Meston/Myrtle	s1.1.4, s2.1.5	<ul style="list-style-type: none"> • Submission proposes additional toilets be built at Lake Ball/Meston/Myrtle in addition to proposed toilet at Lake Adelaide. 	<p>Outside the scope of the EIA.</p> <p>Lake Meston and Lake Myrtle are within the Self Reliant Recreation (SRR) Zone under the</p>	3

Issue	EIA RAA section	Comments	PWS response	No.
		<ul style="list-style-type: none"> Current camping activity at Lake Ball, including by commercial operators, should cease due to potential impacts. 	<p>TWWHA MP. These sites are outside the scope of this project and the WOJ RZP.</p> <p>The SRR Zone sets broad management objectives within which the provision and management of visitor related services is considered. There is currently no intention of building additional toilet infrastructure within the WOJ SRR Zone.</p> <p>Once the project is completed, including new Dixons Kingdom campsite and toilets at Lake Adelaide, camping will be discouraged at Lake Ball. Ongoing monitoring of the track around Lake Ball from Jaffa Vale through to Lake Adelaide will also be undertaken.</p>	
Engagement		The TNPA should have been sent stakeholder notification of the EIA documents on public exhibition.	<p>Noted.</p> <p>The TNPA was included in the list of relevant stakeholders in the approved Communications Plan. Their omission from the 'Stakeholder Notification' was an oversight.</p> <p>Noted for future impact assessment processes.</p>	
Engagement		Commenting on the EIA is insufficient when the proposal is already decided. Engagement should be focused on planning phase.	<p>Engagement and consultation occurred when the WOJ RZP was being formulated in 2012-13.</p> <p>Extensive consultation will be carried out when a review of the WOJ RZP is undertaken by the PWS.</p>	

Issue	EIA RAA section	Comments	PWS response	No.
Outside scope of the EIA				
<p>Support Track Ranger program</p> <p>Support education and interpretation</p> <p>Support ban on camping in central Walls</p>	s5.1	<ul style="list-style-type: none"> • Contend the issues outlined in s5.1 of the EIA should be carried out and included in the current proposal. • Support for Track Ranger program. • Support educational campaign to address issues of campfires/best practice toileting/minimal impact bushwalking. • Support ban on camping in central Walls area once new campsites are established. 	<p>EIA is an Environmental Impact Assessment process. For this proposal, the PWS has undertaken an EIA on the potential impacts of the infrastructure projects outlined in the WOJ RZP.</p> <p>The PWS is carrying out the “non-infrastructure” recommendations outlined in the WOJ RZP, but they do not require an EIA. The final EIA (s5.1) contains a more comprehensive description of the work being undertaken by the PWS in this area.</p> <p>The PWS has conducted a ‘Track Ranger’ program over the 2019-20 summer period. A part-time Ranger has been based in the WOJ NP for up to 44 days, including the busy Christmas/New Year period and key long weekends. The PWS sees great benefit from this program and plans to continue it subject to funding.</p> <p>Existing educational and interpretation materials are being updated and will be installed and promoted as the project is carried out. Some of these are referenced in the EIA, including at new toilets, track heads and watering points.</p> <p>A ban on camping in the central Walls will be brought in and enforced once the campsite at Dixons Kingdom has been established.</p>	3,9,6,7,8,9,11

Issue	EIA RAA section	Comments	PWS response	No.
Group management	s5.1	Booking system for group campsites/commercial operators should be established, including equitable access for all operators.	A booking system for group campsites is currently being developed in consultation with stakeholders including schools, universities, bushwalking groups, clubs and commercial operators. The PWS hopes to trial the new system in the 2020-21 season.	3,6,8
Manage Visitor numbers – limit promotion; permit system; universal booking system	s5.1	<ul style="list-style-type: none"> • Limit promotion of the WOJ. • Develop a universal booking system for the WOJ, like that introduced for the Overland Track. 	<p>Largely outside the scope of the EIA. Identifying alternative sites for visitors and promotion issues will be informed by the TWWHA Tourism Masterplan.</p> <p>Management of visitor numbers is a complex issue and is best addressed by the PWS during the recreation and management planning process.</p> <p>The PWS notes that work will commence on updating the WOJ RZP in 2021, in preparation for renewal in 2023. The issue of a universal booking system for the WOJ NP will be explored through this process, with extensive stakeholder and public consultation.</p>	2,6,7,8,9

Comments on the EIA				
Cumulative impact - especially in relation to EOI proposals	EIA RAA and App G	Failure of the EIA to address cumulative impact of other proposals in the WOJ NP – specifically EOI proposals from World Expeditions and the Tasmanian Walking Company.	<p>The EOI proposals are not included in the EIA. At the time of finalising the EIA for works by the PWS in the WOJ, there were no other confirmed proposals for consideration at this location. The EIA addresses the proposed infrastructure works by the PWS.</p> <p>The PWS is not the proponent for the EOI proposals, and does not prepare the EIA. The PWS is the regulator and will review the EIA once submitted from a proponent (including an assessment of cumulative impact as per s3.3.1 of the TWWHA MP).</p>	12,9
Visual impacts	EIA RAA and App G	Questions the adequacy of the visual impact assessment.	The PWS has provided additional material in the final EIA to address the visual impact assessment of the project.	9
Support monitoring and future work on the Lake Ball – Trappers Hut section of track	s6, s5.3.2	Queries around potential impact on Lake Ball to Trappers Hut section of track, and suggests ongoing monitoring and action as required.	<p>Noted.</p> <p>The PWS highlights the need for future work on this section of track. Commitment to monitoring and future action is made by the PWS in the final EIA (s6 and s7).</p>	9,10,13
Helicopter flight path	s4.8.2 and fig 4.5	Suggests flight paths away from walking tracks and points out inconsistency between text in the EIA and Figure 4.5.	<p>Noted.</p> <p>The final EIA notes under management controls (s4.8.2) that “identified flight paths will avoid known raptor nesting sites and walking track locations” (<u>Commitment 8</u>).</p>	10

			Figure 4.5 identifies proposed material drop sites, but includes a line which can be misconstrued as a flight path. This has been amended in the final EIA.	
Visitor data and analysis - outdated usage data, queries if infrastructure justifiable	s1.1, s2	No data on current or anticipated visitor numbers. Questions how the infrastructure capacity and location decisions were made.	Decisions about infrastructure were based on current and future visitor projections, daily and seasonal loadings balanced by the need to protect the OUV of the Park. Updated data usage is incorporated in final EIA.	9
Commercial operators				
Prohibit commercialisation/ privatisation in NP	s5.1, s1.2, s3.3.1	Prohibit commercial operators from the park.	Outside the scope of the EIA. Commercial tourism is a legitimate use and meets the obligation of presentation under the TWWHA MP. The NPRM Act allows for commercial activities on reserved land.	2,4,5, 6,9,11
Levy on commercial operators	s3.3.1	Proposes user levy for commercial operators to support conservation/ infrastructure.	Outside the scope of the EIA. Not current PWS policy to administer a “per user” levy via commercial operators.	3
Lockable storage box at Wild Dog Creek		Provide equal access to lockable storage box at Wild Dog Creek for all commercial operators.	Outside the scope of the EIA. Two lockable cages at Wild Dog Creek. One used by the PWS, and one currently being utilised by commercial operator. The PWS will utilise both boxes for equipment storage commencing during the construction phase of the project.	3, 4

			There are no future plans to provide additional boxes.	
Impact on TWWHA; Wilderness values; impact of Lake Adelaide infrastructure	s2.1.5	Concern that building of a toilet at Lake Adelaide will have detrimental impact on wilderness values, and is solely for commercial operators.	<p>The proposed erection of a toilet at Lake Adelaide will have a minor detrimental impact on WQ at this site, but will also have clear environmental gains by ameliorating existing visitor impacts.</p> <p>The toilet has been sited to minimise visual impacts, and impacts on TNVC, whilst maximising use. It will be accompanied by the closure of the existing informal campsite on the northern shore of Lake Adelaide, which is having a detrimental impact on water quality and TNVC.</p> <p>One of the key management actions outlined in the WOJ RZP was the creation of a circuit loop for large groups and commercial operators. The WOJ NP currently has approximately 25 groups using the park, made up of approximately 11 school/college groups, and 14 commercial tour operators. Local bushwalking clubs and fishing groups are in addition to these numbers. The group camping infrastructure will service the needs of all of these groups, and will not be restricted to commercial operators.</p>	5,8,9

CONTACT DETAILS

Tasmania Parks and Wildlife Service

GPO Box 1751

Hobart, Tasmania, 7001

1300 TASPARKS (1300 827 727)

www.parks.tas.gov.au



DEPARTMENT OF PRIMARY INDUSTRIES, PARKS,
WATER AND ENVIRONMENT