



NSW NATIONAL PARKS & WILDLIFE SERVICE

Review of Environmental Factors Submission Report

**Snowies Iconic Walk
Kosciuszko National Park**



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Cover photo: Thredbo to Mount Kosciuszko walking track, Kosciuszko National Park. Elinor Sheargold/DPIE

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Review of Submissions

Review of submissions received during public exhibition.

Project name

Snowies Iconic Walk

Proponent

NSW National Parks and Wildlife Service (NPWS)

Reserve name

Kosciuszko National Park

Region/area

Southern Ranges Branch/Alpine Queanbeyan Area

Background

The Review of Environmental Factors (REF) for the above proposal was placed on public exhibition from 2 August to 2 September 2019. The document was available for viewing at the following locations: Jindabyne NPWS Visitor Centre, Tumut NPWS Visitor Centre and Queanbeyan NPWS Office. Posters announcing the public exhibition were displayed at the same locations.

An advertisement detailing the public exhibition of the final REF was placed in the Monaro Post (local paper) during early August 2019

Notification of the REF public exhibition period was sent to 245 stakeholders.

No copies of the REF were directly forwarded to the stakeholders.

Methodology for analysis

The following guidelines were adhered to in analysing the submissions:

- All submissions were registered and numbered.
- Identical copies of letters by the same author were treated as one letter.
- Multiple letters from the one address under different names were treated as separate letters.
- Identical letters under different names were classified as 'form letters' if there were more than five in number.
- The schedule of issues below has been separated into issues against the proposal and issues in support of the proposal. All issues raised in the personal letters have been identified.
- Issues raised in the submissions from stakeholder associations and government authorities are identified separately.

- Issues raised in form letters are identified separately.
- Submissions were received and included in the review up to 2 September 2019.

Results

The Manager, Anthony Evans received fourteen submissions in total. Of these, six made objections to the proposal, four supported it, and five were inconclusive related to the proposal.

Details of individuals and organisations that have made written submissions

Table 1 below summarises the names and contact details of individuals and organisations that have made written submissions to NPWS in relation to the Snowies Iconic Walk proposal.

Table 1 Record of personal details of individuals and organisations who have made a written submission (personal details removed)

Sub. #	Name of individual or organisation	Address	Phone and/or email	Date received	Acknowledgement letter sent	Confidentiality requested? (yes/no)
1	Steve Samuels – Monaro Acclimatisation Society Inc			04/08/2019	Yes	No
2	Sonia Bennett			09/08/2019	Yes	No
3	Tony Manes			09/08/2019	Yes	No
4	John Blyth			09/08/2019	Yes	No
5	Richard Fawdry			09/08/2019	Yes	No
6	Dr Graeme L Worboys – Fenner School of Environment and Society, ANU			29/08/2019	Yes	No
7	Frank Zipfinger- The Ski Lodges Organisation of Perisher, Smiggins and Guthega			30/08/2019	Yes	No
8	Alison Ramsay			30/08/2019	Yes	No
9	Lorraine Cairnes			31/08/2019	Yes	No
10	David Parris			31/08/2019	Yes	No
11	WJ Euston			1/09/2019	Yes	No
12	Gill Fowler– Illawong Ski Tourers			02/09/2019	Yes	No
13	Ian Pulsford- Protected Area and Linking Landscape Specialist			02/9/2019	Yes	No
14	Gary Dunnett – National Parks Association of NSW			02/09/2019	Yes	No

Issues raised in submissions

Table 2 below provides a summary of submission issues, as well as any recommendations included.

Table 2 Issues raised in submissions in support of (+) and objecting to (-) the proposal

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
+	Increase tourism	Two (#1, #11)	The proposal will extend access across the park, and allow more people to experience the variety of flora and terrain. It addresses the need for a high calibre non-winter tourism experience that will boost summer visitation, and provide health benefits for people experiencing the high country.
+	Appropriate avoidance and mitigation strategies for impacts of the proposal	One (#10, #11)	<p>Flora and fauna assessment Appropriate car parking is required, especially at Charlotte Pass and Guthega, which can experience overcrowding during holiday periods.</p> <p>Aboriginal cultural heritage assessment The recommendation that no further archaeological assessments are required is supported.</p>
-	Degradation of park's natural values/National Environmental Significance	Six (#6, #9, #3, #13, #14, #12)	<p>The inherent value of natural and undeveloped areas Part of the walk traverses an area of relative isolation in comparison with other more highly managed and promoted areas of the park. The proposed track is not of minimal impact infrastructure, will impact on the natural landscape values of the park. Use of steel walkway will have negative aesthetic implications. The recreational experience in an outstanding natural environment which is currently available, and for which national parks are set aside, is a rare value, and will be seriously impacted by the proposal.</p> <p>Affect glacial values/landscape The Main Range Management Unit as defined in the Plan of Management (PoM) protects the very limited extent of the Pleistocene and Holocene glaciation, which is Australia's most important glaciated landscape. The Charlotte Pass to Guthega Track route intersects this management unit area, which is the subject of contemporary glaciation research debate, and has been subject to ongoing alpine area glaciation research. This alpine area preserves key evidence of geomorphic processes associated with the land mainland glaciations.</p> <p>National environmental significance The Charlottes Pass to Guthega section of the proposal will impact Australia's largest area of undisturbed natural alpine landscape, including an area of outstanding scientific and aesthetic significance. The small area of the Snowy River downstream from the Lakes Walk crossing to the Guthega Dam is the last remaining natural section of</p>

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
-	Impacts to threatened biota, communities and environmentally sensitive areas	Six (#4, #6,#9, #11, #12, #14)	<p>river in the alpine area. This is the last of the undisturbed easterly facing natural valleys of the Kosciuszko alpine area.</p> <p>Effect on threatened biota and environmentally sensitive areas The overriding purpose of national parks should be to protect the environment and preserve core wilderness values and biodiversity. The proposed development will impact on threatened species and ecological communities, affect habitat connectivity, ecosystems and ecosystem processes. In particular, the Charlotte’s Pass to Guthega and Ramshead Range routes will traverse highly sensitive alpine environments. The construction impacts and the permanent formed constructed paths are alien to this natural landscape. The tracks proposed will involve a major linear intrusion through a particularly sensitive and rare environment. The science clearly shows that such impacts will take at least decades to recover. Impacts associated with ongoing human disturbance through construction, walking traffic, camping, maintenance and amenity servicing use cannot be deemed not to have a significant impact.</p>
-	Degradation of social values provided by the park	Four (#3, #12, #14, #9)	<p>The social values of natural and undeveloped areas Construction impacts will degrade an area where recreational experience in a natural environment should be paramount. The proposal will undermine the community’s opportunity for recreation in a natural undeveloped environment. The current isolation of some parts of the walk is exactly why it is visited by some people. The proposal is likely to encourage more visitors and thus compromise the isolation, detracting from the ‘wilderness’ experience. Visitors must be able to enter and appreciate this area on its own terms, and interpretation of values should occur only on the perimeter of the management unit.</p>
-	Legality – conflict with Kosciuszko National Park Plan of Management	Three (#6, #9, #14)	<p>Inconsistency with current PoM The assertion that the proposed works would ‘have minimal impacts on the conservation of nature, objects, places or features of cultural value, or public appreciation of nature and cultural heritage’ is contradicted by the REF’s acknowledgement that ‘The proposal does not entirely align with the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena, or the maintenance of natural landscapes’. The proposal is inconsistent with the intent of the 2006 statutory Plan of Management. The Kosciusko National Park PoM 2006 requires the</p>

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
			<p>avoidance of any adverse impacts on undisturbed natural alpine landscape, including the glacial features and endangered alpine species habitats. The inconsistencies of the proposal with the PoM would vigorously oppose any amendment that enabled significant impacts within undisturbed natural alpine landscape of the national park.</p> <p>Inappropriate proposed amendment of PoM</p> <p>The inconsistencies of the proposal with the PoM would not be resolved by the recently exhibited amendment.</p> <p>The outstanding values of Kosciuszko National Park have been thoroughly researched and articulated in the existing PoM. These values have not changed and clearly must remain as the foundation for the park’s management. The piecemeal approach to amending the PoM for the park will cumulatively add to the degrading impacts on the park’s values and contradict the PoM.</p>
-	Legality – conflict with <i>National Parks and Wildlife Act 1974</i>	One (#14)	<p>The proposal is inconsistent with the broader objects of the <i>National Parks and Wildlife Act 1974</i> (NPW Act) and the principles of ecologically sustainable development (ESD). The impacts from the proposal are contrary to the objects of the NPW Act and ESD principles, including Sections 1(a) and 30 of the NPW Act and the ‘conservation of biological diversity and ecological integrity’ respectively.</p>
-	National Heritage Listing	Two (#6, #9)	<p>Kosciuszko National Park (KNP) is listed on Australia’s National Heritage List.</p>
-	Inconsistency with historical protection planning	Two (#6, #13)	<p>The proposal ignores the long and tortuous history of NPWS and government planning decisions that have ensured that no significant new tourism developments are constructed in undisturbed habitats in this precious alpine area and valley. These hard-fought intergenerational management decisions were based on sound scientific evidence which is thoroughly documented in the plans of management over the last 50 years, and in a trove of scientific publications.</p> <p>In the case of the Charlotte to Guthega section, which passes through the Main Range Management Unit as defined in the PoM, the proposal will introduce significant levels of environmental impact in an area that successive PoMs and strategic planning documents have recognised as of exceptional significance and highly vulnerable to any form of anthropogenic disturbance.</p>

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
-	Funding procedure	One (#9)	The funding, \$17 million, has already been offered by the NSW Government, without examination of the environmental impacts and community consultation.
-	Camping	Five (#6, #12, #14,)	<p>The Plan of Management states ‘In order to protect the natural character and values of the Main Range Management Unit, do not provide formal camping facilities and designated campsites.’ The potential campsite located at the end of Guthrie’s Ridge on the Charlotte Pass to Guthega section cannot be constructed without an amendment to the Kosciuszko Plan of Management.</p> <p>Formal camping is not appropriate in the environmentally sensitive area of the Charlotte’s Pass to Guthega trail. A campsite is not aligned with the objectives of the walk to connect five resorts, accommodation and services at Thredbo, Charlotte Pass, Guthega, Perisher and Lake Crackenback.</p> <p>The proposed campsite at the foot of Guthrie’s Ridge is within the Main Range Management Unit and will involve substantial disturbance in an area where such impacts are prohibited under the PoM. In addition, it is only 6-7 km walk from Illawong to Charlotte Pass.</p>
-	Waste management	Two (#4, #12)	Litter and toilet waste are major concerns. The REF considers the waste matter and toilet facilities for construction workers but has not considered the impact of bushwalkers in questions 2, 5 and 6.
-	Inappropriate reliance on post-approval site assessments	One (#14)	The proposed mitigation through the conduct of ‘pre-disturbance checks for threatened species by an ecologist’ suggests an inappropriate reliance on post-approval site assessment.
-	Inappropriate investment in the national park	Two (#2, #6)	<p>The money would be better spent on:</p> <ul style="list-style-type: none"> • finalising restoration of the Kosciuszko Road to a walking track from Rawson Pass to Charlotte Pass • clean up of the Kunama Hut debris that is polluting Club Lake Creek • clean up of the old garbage tip below the Chalet • clean up of the remnants of the 1964 Alpine Way to the Chalet cableway.
-	Justification for development	One (#9)	The documentation gives a justification for these proposals as that it ‘Meets the warrants of a Tourism Australia’s Great Walks Program’. The ‘warrant’ of another organisation should never be the reason for a major degrading intrusion into a national heritage listed national park.
-	Inappropriate grading of the walking track	One (#12)	The aim of the proposal is to create a Grade 3 walking track according to the Australian Walking Tracks Grading System that specifies

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
			<p>acceptable track widths, surface, grade and directional markers. Facilities are generally not provided along Grade 3 walking tracks and users require no bushwalking experience and only a minimum level of specialised skills to use them. Illawong Ski Tourers (IST) do not believe a Grade 3 system is required because:</p> <ul style="list-style-type: none"> • people embarking on a walk in the alpine area should have some bushwalking experience and be prepared for extreme weather events • a Grade 3 walk does not create a ‘wilderness’ experience • an impact corridor of 2.8-3.5 metres for construction and maintenance is unnecessary • this is not minimal impact infrastructure. <p>Illawong walk is not currently Grade 3.</p>
-	Inadequate assessment of impacts/inadequacies of REF	Two (# 6, #14)	<ul style="list-style-type: none"> • Aspects of the assessment of environmental impacts in the REF does not adequately assess the potential impacts. • P31 ‘Ancillary activities’ includes a reference to ‘roads’ and ‘infrastructure’, neither of which are described or assessed in the REF. • The issue of the proposed track dissecting natural lands of national heritage status and national significance was not considered by the REF. • Illawong Ski Tourers (IST) has been listed as a stakeholder in the REF, however, there is no consideration of the potential impacts the Iconic Walking Track will have on Illawong Lodge or IST.
-	Safety of steel mesh	1 (#10)	Use of steel walkway should be minimised given the safety concerns due to lightning strike.
-	Use of trails by mountain bikes	2 (#8, #11)	Perisher to the Thredbo River is likely to be used by mountain bikes due to its steep downhill grades and links to other cycle tracks such as in Lake Crackenback and the Thredbo Valley Trail.
-	Erosion	1 (#8)	Even if only used by walkers it will be very hard to stop erosion, especially after heavy rain and snow melts. Water will be channelled by the track and then go straight downhill where the track takes a bend.
-	Perisher to the Thredbo River track	1 (#8)	This is section of track not a valuable part of the proposed walk as most people will want to stay on the Main Range and not have a very long (3+ hours at each end of the walk) car shuffle. The length of the car shuffle will mean that most people will not walk the section to Thredbo River but finish in Perisher.

(+) or (-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
-	Impacts to Illawong Lodge and IST	1 (#12)	<p>Impacts to social values, water supply, fire safety and privacy for members and friends of Illawong Lodge.</p> <p>Legality – conflict with Kosciuszko National Park Plan of Management</p> <ul style="list-style-type: none"> • Modify the proposed route to avoid all impacts on the natural alpine landscapes as described in the Kosciuszko National Park Plan of Management. • If the current proposal continues, acknowledge that there will be a significant environmental impact and proceed to an Environmental Impact Statement in accordance with the Environmental Planning and Assessment Act. <p>Camping It is recommended that the campsite be deleted from the proposal.</p> <p>Waste Management Toilet facilities be installed at the Guthega Trailhead.</p> <p>Safety of steel mesh A safer option may be EnviroTREAD.</p> <p>Perisher to Thredbo River track I suggest the money proposed for this part of the walk would be better spent on providing a loop walk on top of the range to obviate the need for any car shuffling. As an alternative to a track from Perisher to the Thredbo River, I believe there should be consideration given to a walking track between Guthega and Perisher.</p> <p>Impacts to Illawong Lodge and IST</p> <ul style="list-style-type: none"> • Where the proposed track will join the existing track 'the Illawong Walk' is incorrect. The walking tracks are incorrectly marked around the lodge. There is a footpad to the lodge, however, the Illawong Walk continues to the suspension bridge, which the proposed Iconic Walk would join. • IST request that any proposed track is routed to avoid a track directly to Illawong Lodge, as the lodge is paid accommodation and does not have facilities for bushwalkers. • The actions from the draft walking track strategy should be included in the scope of this REF. These actions include rerouting a section of the walk near the lodge to allow greater views of the Snowy River, and consideration of erosion control closer to Guthega.
Recommendations in submissions	Various specific recommendations		

(+)	or	(-)	Issues raised	No. of submissions which raise this issue	Specific comments/submission details (where appropriate)
					<ul style="list-style-type: none"> • IST request that setbacks to Illawong Lodge are provided by rerouting of the Illawong Walk as identified in the Walking Tracks Strategy, and this is included in the scope of Section 1 in this REF. • IST requests a camping exclusion zone is applied around the hut to protect its social values, water supply, fire safety and privacy for members and friends. • IST request that Illawong Lodge and the tracks to the lodge are removed from all Iconic Walking Track Maps, figures in this REF (e.g. Figure 3.6) and any promotional flyers to avoid unintentional direction of traffic toward Illawong Lodge. This includes the existing footpad to the lodge, off the 'Illawong Walk' which continues to the suspension bridge, and the non-existent track (a bush regeneration area) from the lodge to the bridge.

Summary of number of submissions supporting or objecting to the proposal

Table 3 below indicates the number of submissions supporting or objecting to the proposal and what proportion of responses were in multiple form letters.

Table 3 Summary of submissions supporting or objecting to proposal

	Support	Objection	Inconclusive***
Personal submissions	One (#8)	Three (#6, #9, #13)	Five (#2, #3, #4, #5, #11)
Submissions from organisations	Three (#10, #7, #1)	Two (#12, #14)	0
Form letters	0	0	0
Total supporting, objecting or inconclusive	4	5	5
Total submissions	4	5	5

Five submissions were received that did not clearly state support or objection regarding the proposal. These have been deemed 'inconclusive'.

Summary

Issues raised in submissions from organisations

Submissions were received from five organisations: Monaro Acclimatisation Society Inc, SLOPES, Sydney Ski Club, National Parks Association of NSW, and Illawong Ski Tourers Inc The advice and comments from these organisations are as follows:

- Monaro Acclimatisation Society Inc is pleased to support the proposal.
- SLOPES is keenly interested in the proposal and is generally supportive.
- Sydney Ski Club (SSC) supports the proposal and the potential boost to summer tourism it will provide. SSC is concerned about inadequate parking at Charlottes Pass and Guthega.
- National Parks Association of NSW (NPA) considers aspects of the proposal as inconsistent with the Kosciuszko Plan of Management 2006 (PoM), and the environmental assessments in the REF inadequate. NPA recommends either a) modification of the route to avoid all impacts on values identified in the PoM, or b) if continued as stated, to acknowledge a significant impact and proceed with an Environmental Impact Statement (EIS) in accordance with the Environmental Planning and Assessment Act. There is no basis or argument presented as to why the project triggers an EIS and the submission does not provide any factual basis regarding analysis/rebuttal of threatened species and communities assessments presented in the REF and supporting studies.
- Illawong Ski Tourers Inc considers aspects of the proposal as inconsistent with the PoM, and is concerned that the proposal will damage the environmental and social values of the area and their club's interests in the local area.

Issues raised in form letters supporting the proposal

No form letters were received.

Issues raised in form letters objecting to the proposal

No form letters were received.

Summary of proponent's response

Table 4 below provides an outline of NPWS responses to the key objections raised in the five submissions that do not support the proposal.

Table 4 Proponent response to submissions objecting to the proposal

Issues raised by objectors	Detail	Proponent's response (NPWS)
Degradation of park's natural values/National Environmental Significance	<p>The inherent value of natural and undeveloped areas Part of the walk traverses an area of relative isolation in comparison with other more highly managed and promoted areas of the park. The proposed track is not of minimal impact infrastructure, will impact on the natural landscape values of the park. Use of steel walkway will have negative aesthetic implications.</p> <p>The recreational experience in an outstanding natural environment which is currently available, and for which national parks are set aside, is a rare value, and will be seriously impacted by the proposal.</p> <p>Affect glacial values/landscape The Main Range Management Unit as defined in the Plan of Management (PoM) protects the very limited extent of the Pleistocene and Holocene glaciation, which is Australia's most important glaciated landscape. The Charlotte Pass to Guthega Track route intersects this management unit area, which is the subject of contemporary glaciation research debate, and has been subject to ongoing alpine area glaciation research. This alpine area preserves key evidence of geomorphic processes associated with the land mainland glaciations.</p> <p>National Environmental Significance The Charlottes Pass to Guthega section of the proposal will impact Australia's largest area of undisturbed natural alpine landscape, including an area of outstanding scientific and aesthetic significance. The small area of the Snowy River downstream from the Lakes Walk crossing to the Guthega Dam is the last remaining natural section of river in the alpine area. This is the last of the easterly facing natural valleys of the Kosciuszko alpine area.</p>	<p>The track has been scoped and designed to have minimal impact. Extensive environmental and cultural heritage assessment of multiple alignments over a number of years has allowed NPWS to decide on final routes. The alignments have also been scoped by NPWS and by a professional track designer/builder, whose design elements have been incorporated into the construction documentation. NPWS also draws on recent experience of successful track building techniques and track surfacing in the Main Range area to reduce environmental impacts. The final width of the new track surfaces (500mm for rock and gravel and 800mm for elevated walkway) is to ensure minimal environmental impact while still being comfortable for walkers. Steel mesh elevated structure are being used judiciously and will be built as low to the ground as possible to reduce negative aesthetic impacts. Viewscape modelling is also being undertaken by NPWS to ensure negative aesthetic impacts are minimised.</p> <p>The significance of the Pleistocene and Holocene glaciation period in the Main Range area, which possibly extends along the Snowy River between Charlotte Pass and Guthega is noted. The direct on-ground impact of the track on the glacial remnants are likely to be very low. 'Glacial and Periglacial Features' is one of the values under the Australian Alps National Heritage Listing. This value, along with the other values making up the National Heritage Listing will be assessed via a Significant Impact Self-Assessment, which will form a part of the referral to the Department of Environment and Energy under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act).</p>
Impacts to threatened biota, communities and	<p>Effect on threatened biota and environmentally sensitive areas</p>	<p>Significant effort has been invested in finding an alignment with the least amount of impact, particularly on threatened biota and environmentally sensitive areas. This work started in May 2017</p>

Issues raised by objectors	Detail	Proponent's response (NPWS)
environmentally sensitive areas	<p>The overriding purpose of national parks should be to protect the environment and preserve core wilderness values and biodiversity.</p> <p>The proposed development will impact on threatened species and ecological communities, affect habitat connectivity, ecosystems and ecosystem processes. In particular, Charlotte's Pass to Guthega and Ramshead Range routes will traverse highly sensitive alpine environments. The construction impacts and the permanent formed constructed paths are alien to this natural landscape. The tracks proposed will involve a major linear intrusion through a particularly sensitive and rare environment. The science clearly shows that such impacts will take at least decades to recover.</p> <p>Impacts associated with ongoing human disturbance through construction, walking traffic, camping, maintenance and amenity servicing use cannot be deemed not to have a significant impact.</p>	<p>and includes the 'Environmental Scoping Assessment', detailed 'Flora and Fauna Assessment and Test of Significance Report' and 'Options Analysis: Biodiversity Impacts on Mount Perisher' undertaken by ecologists prior to the REF. These field investigations and reports have ensured the REF has very strong field-based evidence of impacts and how they are being minimised.</p> <p>Proposed new track alignments and track construction methods minimise the effects on threatened biota and environmentally sensitive areas by avoiding important habitat features, using minimal excavation and vegetation removal techniques (e.g. steel mesh), reducing the width of track surface to a minimum for walker comfort and strict controls on methodology for and during track construction.</p> <p>The two campgrounds have now been removed from the current proposal and this will further reduce the impacts on habitats and natural values.</p> <p>The project is being referred to the Commonwealth under the EPBC Act to assess the level of impacts under national legislation. If the impacts are deemed significant and the project is a controlled action the proposal will be reviewed in light of approvals under the EPBC Act.</p>
Degradation of social values provided by the park	<p>The social values of natural and undeveloped areas</p> <p>Construction impacts will degrade an area where recreational experience in a natural environment should be paramount. The proposal will undermine the community's opportunity for recreation in a natural undeveloped environment. The current isolation of some parts of the walk is exactly why it is visited by some people. The proposal is likely to encourage more visitors and thus compromise the isolation, detracting from the 'wilderness' experience.</p> <p>Visitors must be able to enter and appreciate this area on its own terms, and interpretation of values should occur only on the perimeter of the management unit.</p>	<p>It is envisaged that the proposal will increase the recreation potential of the area quite significantly. The area where the proposed track alignment will go currently has very low summer visitation due to the inaccessibility of the area. However, the proposed walking track will allow people to enjoy these alpine and sub-alpine areas when they previously couldn't. The definition of an individual person's 'wilderness experience' varied significantly. Studies by Tracey Dickson in 2005 (citation below) showed that a very high percentage of people believed that they are having a 'wilderness experience' when ascending Mount Kosciuszko on a busy walking track during Easter, which is a very busy time of the year.</p> <p>Dickson, Tracey. Mt Kosciuszko: Wilderness Expectations and Experiences in a Non-wilderness Area [online]. Australasian Parks and Leisure, Vol. 10, No. 3, Spring 2007: 25-29</p>

Issues raised by objectors	Detail	Proponent's response (NPWS)
Legality – conflict with KPOM	<p>Inconsistency with current PoM The assertion that the proposed works would ‘have minimal impacts on the conservation of nature, objects, places or features of cultural value, or public appreciation of nature and cultural heritage’ is contradicted by the REF’s acknowledgement that ‘The proposal does not entirely align with the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena, or the maintenance of natural landscapes.’ The proposal is inconsistent with the intent of the 2006 statutory Plan of Management. The Kosciuszko National Park PoM 2006 requires the avoidance of any adverse impacts on undisturbed natural alpine landscape, including the glacial features and endangered alpine species habitats. The inconsistencies of the proposal with the PoM would vigorously oppose any amendment that enabled significant impacts within undisturbed natural alpine landscape of the national park.</p> <p>Inappropriate proposed amendment of PoM The inconsistencies of the proposal with the PoM would not be resolved by the recently exhibited amendment. The outstanding values of Kosciuszko National Park have been thoroughly researched and articulated in the existing PoM. These values have not changed, and clearly must remain as the foundation for the park’s management. The piecemeal approach to amending the PoM for the park will cumulatively add to the degrading impacts on the park’s values and therefore are directly against the PoM.</p>	<p>The proposed amendment to the Kosciuszko National Park Plan of Management (2006) will allow construction of new walking tracks in the Main Range Management Unit provided they are supported by a Strategic Plan. These proposed amendments are awaiting approval by the Hon Matt Kean MP, Minister for Environment and Energy. Amendments went on public exhibition early in 2019 and submissions were collated and reviewed. As part of the PoM Amendment process, the proposed amendments were endorsed by both the Regional Advisory Committee and state-wide NPWS Advisory Council. The REF cannot be determined and therefore construction cannot commence, until the Minister has approved the PoM amendments.</p>
Legality – conflict with <i>National Parks and Wildlife Act 1974</i>	<p>The proposal is inconsistent with the broader objects of the <i>National Parks and Wildlife Act 1974</i> (NPW Act) and the principles of ecologically sustainable development (ESD). The impacts from the proposal are contrary to the objects of the NPW Act and ESD principles, including Sections 1(a) and 30 of the NPW Act and the ‘conservation of biological diversity and ecological integrity’ respectively.</p>	<p>In addition to the ‘conservation of nature, (...) objects, places or features (including biological diversity) of cultural value within the landscape’ (NPW Act 1974), one of the objectives is also ‘fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation’ (NPW Act 1974). The proposed walking track will allow the public to access, understand and appreciate the unique beauty of sub-alpine landscapes. Through detailed, in-</p>

Issues raised by objectors	Detail	Proponent's response (NPWS)
National Heritage Listing	KNP is listed on Australia's National Heritage List.	depth environmental scoping studies, flora and fauna surveys, route selection and track design, the impacts on natural values have been kept to a minimum.
Inconsistency with historical protection planning	The proposal ignores the long and tortuous history of NPWS and government planning decisions that have ensured that no significant new tourism developments are constructed in undisturbed habitats in this precious alpine area and valley. These hard-fought intergenerational management decisions were based on sound scientific evidence which is thoroughly documented in the plans of management over the last 50 years, and in a trove of scientific publications. In the case of the Charlotte to Guthega section, which passes through the Main Range Management Unit as defined in the PoM, the proposal will introduce significant levels of environmental impact in an area that successive PoMs and strategic planning documents have recognised as of exceptional significance and highly vulnerable to any form of anthropogenic disturbance.	While the REF assesses the proposed project against the National Heritage Listing criteria and determines that there will be no impact on the values that KNP was listed for, NPWS have since engaged a consultant to complete a more comprehensive report on any impacts to National Heritage Listing directly related to Kosciuszko NP and new walking track construction. This report will accompany the EPBC referral to the Commonwealth.
Funding procedure	The funding, \$17 million, has already been offered by the NSW Government, without examination of the environmental impacts and community consultation.	NPWS staff are aware of development proposals in and around the Main Range over the past decades. These include dams for hydroelectricity generation, ski resorts, road upgrades and car parks. The construction of an appropriately designed walking track does not compare with such proposals in terms of scale and magnitude of impact. The walking track proposal has considered all aspects related to threatened species and communities, and will encourage the people of New South Wales and Australia to enjoy and appreciate the unique landscape in an environmentally sustainable manner. Amendments to the Kosciuszko National Park Plan of Management (2006) would allow construction of the track in the Main Range Management Unit and extensive environmental assessment has occurred to keep impacts to a minimum.
Camping	The Plan of Management states 'In order to protect the natural character and values of the Main Range Management Unit, do not provide formal camping facilities and designated campsites.' The potential campsite located at the end of Guthrie's Ridge on the Charlotte Pass to Guthega section cannot be constructed without an amendment to the Kosciuszko Plan of Management.	No response required.
		While the PoM amendments would allow minor infrastructure for camp sites along the proposed alignments, NPWS has decided to remove the proposed campsites from the REF to further reduce impacts. Further assessment of the need for such campsites and alternative locations will be conducted as part of the overall project.

Issues raised by objectors	Detail	Proponent's response (NPWS)
	<p>Formal camping is not appropriate in the environmentally sensitive area of the Charlotte's Pass to Guthega trail. A campsite is not aligned with the objectives of the walk to connect five resorts, accommodation and services at Thredbo, Charlotte Pass, Guthega, Perisher and Lake Crackenback.</p> <p>The proposed campsite at the foot of Guthrie's Ridge is within the Main Range Management Unit and will involve substantial disturbance in an area where such impacts are prohibited under the PoM. In addition, it is only 6-7 km walk from Illawong to Charlotte Pass.</p>	
Waste management	Litter and toilet waste are major concerns. The REF considers the waste matter and toilet facilities for construction workers but has not considered the impact of bushwalkers in questions 2, 5 and 6.	The feasibility and location of toilet facilities are being investigated for the track head at Guthega (near the existing Illawong Track carpark) and near the Porcupine Track head at Perisher. There are existing toilets at Charlotte Pass, Bullocks Flat and Rawson Pass. Construction of a new toilet at Seamans Hut commenced in early 2019 and will be completed in early 2020.
Inappropriate reliance on post-approval site assessments	The proposed mitigation through the conduct of 'pre-disturbance checks for threatened species by an ecologist' suggests an inappropriate reliance on post-approval site assessment.	Extensive environmental assessment by ecologists as outlined in the 'Environmental Scoping Assessment' and 'Flora and Fauna and Test of Significance Report' by Biosis provide evidence that NPWS is not relying on post-approval site assessments. The proposed micro-siting and checks prior to construction only add to the mitigation steps already taken and are standard practice for projects in environmentally sensitive areas.
Inappropriate investment in the national park	<p>Money would be better spent on:</p> <ul style="list-style-type: none"> • finalising restoration of the Kosciuszko Road to a walking track from Rawson Pass to Charlotte Pass • clean up of the Kunama Hut debris that is polluting Club Lake Creek • clean up of the old garbage tip below the Chalet • clean up of the remnants of the 1964 Alpine Way to the Chalet cableway. 	<ul style="list-style-type: none"> • Funding sources other than the Regional Growth – Environment and Tourism Fund have recently been committed to rehabilitating and narrowing the Summit Road from Charlotte Pass to Rawson Pass. Works will occur over the next 3-4 years. • Kunama Hut debris polluting Club Lake Creek were removed a number of years ago. • NPWS will investigate the feasibility of clean up of old garbage tip outside of Charlotte Pass ahead of track

Issues raised by objectors	Detail	Proponent's response (NPWS)
Justification for development	<p>The documentation gives a justification for this proposal as that it 'Meets the warrants of a Tourism Australia's Great Walks Program'. The 'warrant' of another organisation should never be the reason for a major degrading intrusion into a National Heritage listed national park.</p>	<p>construction in this area and will liaise with Charlotte Pass Resort.</p> <ul style="list-style-type: none"> • Much of the remains of the old chairlift to Charlotte Pass has already been removed. What was left behind was primarily for historic heritage reasons. <p>NPWS is committed to rehabilitating/restoring appropriate areas on park as part of addressing impacts of walking track construction. The draft Impact Mitigation Framework commits funding from the project budget for this activity. Further consultation will occur with Department of Planning, Industry and Environment specialists to identify appropriate methods and areas for rehabilitation.</p> <p>'Great Walks of Australia' is a marketing initiative by Tourism Australia which promotes some of Australia's most renowned multi-day walks as 'high end' tourism products. The initiative is defined by a set of criteria which can be used as a benchmark and applied to walks.</p>
Inappropriate grading of the walking track	<p>The aim of the proposal is to create a Grade 3 walking track according to the Australian Walking Tracks Grading System that specifies acceptable track widths, surface, grade and directional markers. Facilities are generally not provided along Grade 3 walking tracks and users require no bushwalking experience and only a minimum level of specialised skills to use them. IST do not believe a Grade 3 system is required because:</p> <ul style="list-style-type: none"> • People embarking on a walk in the alpine area should have some bushwalking experience and be prepared for extreme weather events. • A Grade 3 walk does not create a 'wilderness' experience. • An impact corridor of 2.8-3.5 metres for construction and maintenance is unnecessary. • This is not minimal impact infrastructure. <p>Illawong walk is not currently Grade 3.</p>	<p>The Business Case for the project identifies that a Grade 3 walking track will be constructed and will be suitable for most of the user market. The track generally conforms to a Grade 3 standard except that the width has been reduced to decrease the environmental impacts and there are some steeper sections down the escarpment between Perisher and Bullocks Flat.</p> <p>A Grade 3 track is considered the most appropriate for the safety and comfort for the number of walkers who are expected to use the track, as well as providing the most environmental protection against erosion and other factors.</p> <p>The impact corridor of 2.8-3.5 m is considered the minimum width required for construction even though the track widths will be either 500 mm-800 mm.</p> <p>The existing Illawong Track will be upgraded in coming years via a separate funding source and so will be closely aligned with a Grade 3 track.</p>

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Inadequate assessment of impacts/inadequacies of REF	<ul style="list-style-type: none"> Aspects of the assessment of environmental impacts in the REF does not adequately assess the potential impacts. P31 'Ancillary activities' includes a reference to 'roads' and 'infrastructure', neither of which are described or assessed in the REF. The issue of the proposed track dissecting natural lands of National Heritage status and national significance was not considered by the REF. Illawong Ski Tourers (IST) has been listed as a stakeholder in the REF, however there is no consideration of the potential impacts the Iconic Walking Track will have on Illawong Lodge or IST. 	Extensive environmental assessment leading up to the preparation of the REF and the 'Flora and Fauna Assessment and Test of Significance Report' adequately assess the impacts of the proposed project.
Safety of steel mesh	Use of steel walkway should be minimised given the safety concerns due to lightning strike.	Steel mesh provides least impact to vegetation and soils, particularly in wet, boggy areas. It may also reduce the movement of pest animals. However, it will only be used when necessary to reduce environmental impacts on sensitive areas/vegetation. In the design requirements for the steel mesh walkaway, the design must include methods for minimising lightning strike impacts.
Use of trails by mountain bikes	Perisher to the Thredbo River is likely to be used by mountain bikes due to its steep downhill grades and links to other cycle tracks such as in Lake Crackenback and the Thredbo Valley Trail.	NPWS recognise this as a potential issue and will ensure design features are built into the track to minimise this as much as possible. It is recognised that ongoing management will be required to ensure this illegal activity does not occur.
Erosion	Even if only used by walkers it will be very hard to stop erosion, especially after heavy rain and snow melts. Water will be channelled by the track and then go straight downhill where the track takes a bend.	Track design by a professional track designer/builder will reduce the likelihood of erosion. Track construction techniques and materials, such as steel mesh platform and rock pitching, will also help to address this issue.
Perisher to the Thredbo River track	This is section of track not a valuable part of the proposed walk as most people will want to stay on the Main Range and not have a very long (3+ hours at each end of the walk) car shuffle. The length of the car shuffle will mean that most people will not walk the section to Thredbo River but finish in Perisher.	The track is designed as a multi-day walk to go through a variety of landscapes and terrain. While not as spectacular as the higher elevation alpine and sub-alpine tracks, the section to Bullocks Flat will add value through a contrast to the other sections as well as spectacular views.
Impacts to Illawong Lodge and IST	Impacts to social values, water supply, fire safety and privacy for members and friends of Illawong Lodge.	Track is aligned to avoid the Illawong Hut. Existing walking track already leads walkers through this area. This is not a

Issues raised by objectors	Detail	Proponent's response (NPWS)
Increase tourism	The proposal will extend access across park, and allow more people to experience the variety of flora and terrain. It addresses the need for a high calibre non-winter tourism experience that will boost summer visitation, and provide health benefits for people experiencing the high country.	private hut and is available for the public to use for accommodation (if booked). This is in line with the objectives of the project.
Appropriate avoidance and mitigation strategies for impacts of the proposal	<p>Flora and fauna assessment Appropriate car parking is required, especially at Charlotte's Pass and Guthega, which can experience overcrowding during holiday periods.</p> <p>Aboriginal cultural heritage assessment The recommendation that no further archaeological assessments are required is supported.</p>	Car parking options are being investigated by NPWS in conjunction with Guthega, Charlotte Pass and NPWS Perisher team. Options for shuttle bus opportunities to reduce parking requirements are also being investigated.
Recommendations	<p>Legality – conflict with Kosciuszko National Park Plan of Management</p> <ul style="list-style-type: none"> • Modify the proposed route to avoid all impacts on the natural alpine landscapes as described in the Kosciuszko National Park Plan of Management • If the current proposal continues, acknowledge that there will be a significant environmental impact and proceed to an Environmental Impact Statement in accordance with the Environmental Planning and Assessment Act. <p>Camping It is recommended that the campsite be deleted from the proposal.</p> <p>Waste Management Toilet facilities be installed at the Guthega Trailhead.</p> <p>Safety of steel mesh Safer option may be EnviroTREAD.</p> <p>Perisher to Thredbo River track I suggest the money proposed for this part of the walk would be better spent on providing a loop walk on top of the range to obviate the need for any car shuffling. As an alternative to a track from Perisher to the Thredbo River, I believe there</p>	<p>The proposed routes have already been extensively reviewed and modified to avoid as much impact as possible on natural landscapes and cultural heritage.</p> <p>The REF and the 'Flora and Fauna Assessment and Test of Significance Report' determine that there will not be a significant impact and therefore an EIS is not required. A significant affect/impact on threatened species and ecological communities generally only arises if a project is likely to lead to the local extinction of threatened biota. Local extinctions are highly unlikely as a result of sensitively building a walking track through an intact landscape.</p> <p>Consultation with Department of Planning, Industry and Environment experts has not identified any inconsistencies with this conclusion.</p> <p>NPWS has liaised with the Commonwealth Department of Environment and Energy about project impacts. An EPBC Referral report will be submitted to the Commonwealth for their assessment.</p> <p>Both campsites are being removed from the proposal to further reduce impacts.</p> <p>Toilet facilities are currently being investigated by NPWS at Guthega and Porcupine (Perisher) track heads.</p>

Issues raised by objectors	Detail	Proponent's response (NPWS)
	<p>should be consideration given to a walking track between Guthega and Perisher.</p> <p>Impacts to Illawong Lodge and IST</p> <ul style="list-style-type: none"> • Where the proposed track will join the existing track 'the Illawong Walk' is incorrect. The walking tracks are incorrectly marked around the lodge. There is a footpad to the lodge, however, the Illawong Walk continues to the suspension bridge, which the proposed Iconic Walk would join. • IST request that any proposed track is routed to avoid a track directly to Illawong Lodge, as the lodge is paid accommodation and does not have facilities for bushwalkers. • The actions from the draft walking track strategy should be included in the scope of this REF. These actions include rerouting a section of the walk near the lodge to allow greater views of the Snowy River, and consideration of erosion control closer to Guthega. • IST request that setbacks to Illawong Lodge are provided by rerouting of the Illawong Walk as identified in the Walking Tracks Strategy, and this is included in the scope of Section 1 in this REF. • IST requests a camping exclusion zone is applied around the hut to protect its social values, water supply, fire safety and privacy for members and friends. • IST request that Illawong Lodge and the tracks to the lodge are removed from all Iconic Walking Track Maps, figures in this REF (e.g. Figure 3.6) and any promotional flyers to avoid unintentional direction of traffic toward Illawong Lodge. This includes the existing footpad to the lodge, off the 'Illawong Walk' which continues to the suspension bridge, and the non-existent track (a bush regeneration area) from the lodge to the bridge. 	<p>EnviroTREAD or other Fibreglass Reinforced Plastic options are not suitable for the alpine and sub-alpine environments which experience heavy snow loads. Steel mesh walkways are a proven long-term option in this environment.</p> <p>The alignment of the new track will be adjusted to join existing Illawong Track at an appropriate distance from Illawong Hut. Rerouting of a section of the track near the lodge was investigated by environmental consultant and deemed to have too much impact close to the Snowy River.</p> <p>Illawong is not a private hut and IST do not have exclusive use to the hut nor the area around the hut. The privacy of members and guests will be respected by ensuring the track is routed away from the hut, but the notion that the proposal will impact the enjoyment of the area by a select few is rejected.</p> <p>Measures will be investigated and implemented by NPWS to ensure water supply or other utilities are not impacted by the proposal.</p> <p>NPWS will liaise with IST regarding appropriate labelling of tracks in the area on future maps.</p>