



National Parks Association of the ACT Inc.  
1960-2010  
*50 years of conservation, nature protection and education*

Regional Operations Coordinator,  
NPWS  
PO Box 733 Queanbeyan,  
NSW 2621  
Dear Sir/Madam,

### **Proposed Amendments to the Kosciuszko National Park Plan of Management**

The National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with a fifty year history of working to protect our natural environment through an active outings and workparty program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs. The NPA ACT has a particular interest in how National Parks and Conservation Reserves are managed and in the impact of recreation on the conservation values of those parks and reserves.

Normally, the NPA ACT would welcome the opportunity to comment on an environmental issue. However, in respect to “Proposed Amendments to the Kosciuszko National Park Plan of Management” document the NPA ACT is disappointed to be placed in the position of having to comment on these amendments. The NPA ACT believes there is no justification for the extension of horse riding access to wilderness areas in Kosciuszko National Park (KNP). The NPA ACT sees the proposed amendments as a further erosion of the environmental values of wilderness.

Horse riding is already allowed in almost 50% of KNP and extensive infrastructure and facilities have been provided to accommodate that activity. The proposal of a trial horse riding in wilderness areas fails to take into account the damage already occurring in the areas that are currently used by horse-riders and the proposed trial has the potential to provide additional pressure on wilderness areas already subject to damage from feral horses. (refer to the recent Worboys and Pulsford report).

### **General Comments**

- Horse riding in wilderness areas is entirely inappropriate and unnecessary for which a requirement is not established. The NPA ACT does not consider that there is a need for improved horse riding opportunities, particularly where the improvements increase usage of huts and other heritage and historic sites for visits or camping and assist the spread of weeds like St Johns Wort along trails. Unfortunately, whilst the majority of

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horse riders abide by the Australian Alps Horse riding Code, a minority do not, and their damage is significant.

Observations over many decades has shown that horse riding in KNP has increased the damage to creek beds, huts sites, camping areas and to trees and contributes to the spread of weeds. Not all riders 'keep their horses 50m away from the hut', nor 'take the water to the horse' nor keep their group small. One hut has had its veranda post pulled out by a tethered horse, some riders lead horses to the nearby stream destroying streamside vegetation (see photos below), temporary yards are established in inappropriate sites damaging vegetation and commercial groups can number up to 30. The fire scars of these commercial groups can be up to 4 metres diameter.(photo) and many campsites adjacent to yards have up to 40 separate fire scars of around a metre diameter; Wares yards is one of these.

### **Specific comments on the proposed amendments to the Plan of Management:**

**Route option 1** involves a trial of horse riding in wilderness areas in the north, south and east of KNP to facilitate access to the wilderness sections of the 'Snowy Mountains Heritage Trail'. The Snowy Mountains Heritage Trail is a proposal by local horse riders for an iconic trail that loops around and through the park and through adjacent state forests and other tenures.

The extent of this option is particularly concerning as it involves four separate wilderness areas which would seem excessive for a trial. The extent of this option is contra to a conservative approach as it impacts such an extensive area. The NPA ACT is particularly concerned if this and the other options are being driven by the proposed Snowy Mountains Heritage Trail. It is understood that the key proponents for the Heritage Trail are commercial entities which will host large groups, possibly accompanied by pack horses. Such usage by commercial groups is against the core principles of wilderness areas and would erode their values. To support such access, infrastructure will need to be built from already stretched NPWS resources and such infrastructure will further undermine the wilderness values. Attached is a photograph of damage done in KNP by a commercial group.

Another concern is the temptation for riders to deviate from the defined route on the Barry fire trail up to Teddy's hut at the headwaters of the Thredbo River. This is already occurring as illegal horse riders have been seen in this area and the trail is likely to increase that temptation.

**Option 2** involves a trial of horse riding in wilderness in the south of KNP, which would form part of the southern wilderness component of the Snowy Mountains Heritage Trail. The Cascades and Tin Mine areas, covered by this option, are extremely damaged by feral horses (which needs to be attended to immediately), but these areas contain few weeds. Introducing

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horse riders into these areas is certainly to provide the opportunity to create weed infestations and further issues for the future.

**Option 3** involves a trial of horse riding in wilderness in the north of KNP, which takes in the northern wilderness component of the Snowy Mountains Heritage Trail. This option has potentially the least impact on the environment but special endeavours would need to be made to exclude and protect the habitat of the endangered Northern Corroboree Frog

### Monitoring:

It has been stated that a “monitoring framework has been developed to apply to the wilderness pilot to ensure there are no unacceptable impacts on park values.” The NPA ACT would be concerned about the practicality of introducing monitoring particularly in option 1 where a huge area of land is involved.

There is no base-line data from which to undertake appropriate scientific and statistically valid data collections. The situation will be aggravated and contaminated by the existence and damage by feral horses, making the task even more difficult for staff or independent monitors.

Support is given to contracting of monitoring to independent well-recognised and accepted scientists, such as Profs. Richard Kingsford, Catherine Pickering and Michael Dunlop.

### Photos;



*Streambank damage, Ghost Gully yards*

*Photo Graham Scully, May 2012*



*Streambank damage Old yards*

*Photo, Graham Scully, May 2012*

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*Commercial group camp Old yards, May 2012*

*Photo, Di Thompson*

Should you require any further information please do not hesitate to contact me on 0410 875 731 or via the NPA ACT email.

Yours sincerely

Rod Griffiths  
President  
28 July 2013