

## AMCNP Management Plan – draft

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### General Overview

1) The introductory section should cover more comprehensively, albeit briefly, topics relevant to the history, geology, flora/fauna of this NP. In addition to the pre-European history (Maori legend and kaitiaki) and the colonial history leading to formation of AMCNP, there needs to be more on outdoor recreation in the park. AMCNP is a special place and the continuing centre for high climbing in NZ, the foundation for international mountaineering exploits and formative of our NZ outdoors character in many ways.

2) Visitors should be encouraged to move about the NP mainly under their own power (walking, cycling). To this end AMCNP required more tracks and marked routes.

3) Aircraft noise - this is the biggie as DOC have made no effort to justify the proposed numbers of landings. There is a reasonable expectation by all visitors to NPs that they can enjoy the park in peace and quiet. This clearly will not be the case especially for the Village, Tasman Valley and surrounding ridges. The Tranquility tool may yield useful data over time but any findings have been pre-empted by the largesse provided to aircraft operators in this draft Plan.

4) Excessive aircraft movements merely for sightseeing should be discouraged. DOC should have an active policy on this that includes changing relevant legislation to better protect the airspace over national parks below say 3000m.

5) Aircraft landings to further outdoors pursuits should be closely regulated but not discouraged, except for heli-skiing (helicopters essentially doing circuits on the glaciers). Heli-skiing should be phased out in AMCNP and moved to other areas.

6) The milestones in the draft plan are underwhelming and show a lack of ambition to improve, rather than just manage, the experiences for the ever increasing numbers of visitors. Recreational opportunities should receive a much stronger focus. In particular mountaineering, ski-touring and related alpine pursuits need more explicit attention given their long history in the park and the internationally outstanding opportunities.

7) AMCNP does not generally lend itself to the DOC concept of place. The Park must be considered as a whole. Place may be useful for some specific management purposes. Section 2 should concentrate on the management priorities and milestones for each Place based on current practical needs and future vision. Most of the historical and other background information should be moved to the Section 1 overview.

### Specific Comments

**1.1.1, p22** The section beginning as follows should be made more accurate and balanced:

“The highest peak in New Zealand, Aoraki/Mount Cook, and his surrounding peaks have always drawn mountaineers and explorers from all over both New Zealand and the world  
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Suggest:

“The highest peak in New Zealand, Aoraki/Mount Cook, and his surrounding peaks have drawn visitors from all over New Zealand and the world, for the challenge and beauty of their landscape.

\*\* Julius van Haast text \*\*\*

Since that early colonial time, Aoraki/Mount Cook has been the centre point to attracted increasing numbers of visitors ranging from sightseers to dedicated mountaineers. Many great ----- “ *{leave out the ‘also’}*”

**Map 2, p26** An important map putting AMCNP in context with other conservation lands. But the park boundary is not very obvious and the captioning is confusing – suggest changing the infill for AMCNP to pink, taking ‘boundary’ out of the caption and captioning the yellow infill as ‘Other national parks’.

**1.2.3 Recreational values, p42** This section lacks historical background and context. Consequently it is light-weight and appears to undervalue the recreational aspects that are the major attraction for visitors to the park beyond superficial sightseeing. As these aspects are also those that tend to put most pressure on park resources and conservation values, they need more careful backgrounding and analysis as a prelude to revising the management policies and operational plans for specific Places. The current management plan for AMCNP (2004) contains good sections on Park Heritage and on Recreational and Tourism values that are still very relevant. These cover a broad range of activities including climbing/ mountaineering. Some cultural and historical info is introduced for each Place in Section 2. But most of this will be better reassembled into cogent wholes in Section 1. It is strongly recommended that an expanded section in the new draft includes a more inclusive historical context and a more in-depth analysis of trends in recreational goals/preferences for visitors. As well as how recreation might be accommodated within AMCNP in the future, the alternatives should be briefly covered for activities that are less consistent with National Park values e.g. shift heli-skiing to conservation areas outside AMCNP. Remember:

*Toitu he kainga; whatungarongaro he tangata ... (People are transient, but the land endures) Maori proverb*

*What a privilege to know the profound stillness and peace of the land .... Jill Tremain (climber)*

**1.2.3, p42** The wording for the 2<sup>nd</sup> sentence should be made more inclusive with a separation of the currently more contentious aerial access, especially heli-, that is not strictly an essential component of any of the pursuits. Suggest:

“These include opportunities for day walks, tramping, climbing, biking, botanising & birdwatching, camping, boating and scenic flights. Air access into the higher alpine and glacial environments can assist more adventurous pursuits such as mountaineering, hunting and skiing.”

**1.2.3, p42** Paragraph beginning “Aoraki also provides ....”. This very out of place here and should be relegated to last in this section.

**1.2.3, p43** Paragraph beginning: “Aircraft access into Aoraki/Mount Cook National Park has been well established for many years and at times has been much busier than it is today....” Really, were there times when the glaciers/snow fields had many more overflights or landings than at present? What are the stats? - including no. flights, no. passengers, % helicopters. Are we just referring to aircraft landings at the airport?

**1.2.3, p47** Last sentence and Map 5. Who decided the 'desirable' tranquillity outcomes? Based on what criteria? This needed to be clarified and have: Map 5a – current soundscape based on DOC research; Map 5b – soundscape to be worked towards in the future.

**1.2.3 Policies, p48** These fudge the role and relevance of commercial development and concessionaires to on-going management of AMCNP and developing visitor experiences appropriate to a World Heritage and alpine National Park.

Is 2 solely DOC's role? The "in addition to those provided by concessionaires" strongly implies a secondary role i.e. that 2 is actually subservient to 3 and 4. These policies are likely to lead to the tail wagging the dog with commercial developments benefiting concessionaires taking precedence over less highly organised support for independent travellers e.g. heli-flights versus better marked walking routes and suitable huts.

This dichotomy is also reflected in Milestone 8 (p52) where high quality visitor experiences is a value-laden term. OK there may be large numbers of tourists prepared to pay high \$ to thoroughly enjoy heli-pursuits. But simple demand and profit should not be driving policies for AMCNP.

**1.2.4 Conservation partnerships, p51.** Getting more community involvement is largely very beneficial. However, conservation of our indigenous biodiversity, not of game animals, is DOC's mandate. This Plan and DOC must make clear that eradication of all mammalian pest species is the long-term goal for AMCNP. This includes deer, pigs and thar. Partnerships with hunting groups have largely been ineffective at managing, let alone eliminating these damaging pests e.g. the current debacle with thar. Policy 7 for hunting concessions has this conflict where conservation takes on a meaning that may be unsatisfactory for the alpine environment.

**1.3.3 Aircraft, p62-66** The policies applying to the Orange zone (landings on a permitted basis) are opaque despite the Plan acknowledging that disturbance of tranquillity levels is a serious concern in AMCNP. Map 7.1 and the plan for Haupapa Place (section 2.3) indicate almost all this zone and approximately 40% of the Park projected area will be allocated to very large numbers of virtually unregulated heli-ski landings (meaning helicopters with ski pads?). The majority of these flights are presumed to originate from/to Mt Cook airport or nearby locations down valley but flights from the West Coast may also be involved. There is no indication of what rationale/criteria were used by DOC to make these proposals and whether this is an increase in the currently allocated area for landings. Certainly it is a very large increase over the area originally allocated in the current Plan (2004). Furthermore there is no indication of landings allocated to fixed wing ski-planes, and no analysis/justification for the proposals in Section 2 for the maximum permitted numbers of landings on per day and per year basis. Acceptable tranquillity level is highly subjective, despite being able to measure actual noise levels. The regular roar of choppers overhead might be tolerable to bustling tour groups or skiers intent on their downhill progress but less so to independent visitors such as cross-country skiers more interested in the hard-earned peace of their surroundings.

Policy 12 p66). "If monitoring shows: ..... " These provisos as to limiting or encouraging landings rely on 'desired tranquillity levels'. The plan has few indicators as how such levels would be measured, assessed and interpreted. FMC acknowledges these are not straightforward issues. The pressures from concessionaires and many visitors may be for more flights and DOC can only control landings, not overflights. But the Plan must be more open and direct on the processes and decision-making for this important issue.

**1.3.17 Wild & Game animals, p77-78** As discussed above, AMCNP must be managed to protect indigenous biota as far as possible. Wild animals are a severe threat to this and also encourage erosion in the very fragile alpine environment. A target of zero for that is mentioned here (without much indication of how this might be achieved). Similarly the Plan should provide aspirational limits for deer and chamois as transparently negotiated with the Game Animal Council.

**1.3.18 Milestones for recreation, p79** These are exceedingly tepid with all of the 7 allocated to refuse/human waste removal and monitoring of aircraft activity/tranquillity levels. Both important issues but they should be covered elsewhere. Some recreational outcomes are included by Place in Section 2 but a far-sighted, ambitious overview is required here that supports the touted 'integrated management'. This section betrays a lack of interest and foresight in recreational goals from the team that prepared the draft Plan. There must be some milestones here for projects that improve and diversify recreational opportunities in AMCNP. These are sorely needed to cope with the tourist influx and to counteract the over-reliance on aircraft. More tracks for day walks. More mountain bike trails. One or two more huts that can take the pressure off Mueller Hut for overnight trips. Hooker Hut is mentioned elsewhere. Why not here? Timelines for improvements or replacements for the high alpine huts. Further bridges (3-4 wire) and innovations e.g. via ferrata for moraine walls, to overcome impediments to valley travel from glacial recession.

## **Section 2: Places**

The geographic Places are largely artificial management constructs. The introductory Recreation sub-sections are incomplete in their summaries of the wide range of opportunities in each Place. Particularly lacking is the high peak climbing which could be summarised via the huts in each Place. These are each strategically placed as a base for particular climbing routes. Reference should be given to the NZAC Aoraki Tai Poutini mountaineering guide book by Rob Frost (NZAC, 4<sup>th</sup> edition, 2018). As well as Copland Pass, there are other challenging tramping routes over alpine passes e.g. Barron Saddle to Landsborough Valley. The Historical contexts are also lacking, particularly for recreation, and often artificial in the separation into Places. This recreation and historical information should be put in Section 1 as expanded and more comprehensive overviews.

**2.1 Nohoaka Place – Milestones, p111** This section concentrates on the issues relating to managing the Village and associated infrastructure to cope with increasing visitor numbers. This is important and the coverage of these issues and the level of detail seem appropriate. The following comments apply to recreation aspects.

Parking. Measures to control vehicles such as Park & Ride should not disadvantage independent travellers, particularly those on extended tramping or climbing trips in high, remote areas of the park. Due to uncertainties of weather, their timetables will be unpredictable and transport/parking systems will need to be able to cope with variations in arrival time and exit times both at the village and at road-ends. This flexibility will also need to apply to bookings for campsites and accommodation (integrated with NZAC lodge requirements).

Other milestones directly addressing recreation are lacking. Again this seems to be an oversight and lack of imagination. Even in the restricted semi-urban Nohoaka Place there needs to be careful consideration of all recreational opportunities. Some of these may not directly involve moving in the outdoors. Short-term visitors, especially in bad weather, would benefit from enhanced Visitor Centre experiences such as informative displays, videos, viewing platforms etc. Foot- and cycle-traffic in and around the village needs careful planning with tasteful implementation/improvement of a network of paths that link to the other Places.

**2.2 Aroarokaehe Place p116** Hooker and Mueller valleys are key destinations for short- and medium-term visitors to the Park, and for access to important high climbing and tramping areas.

The Historic values sub-section has a paragraph on Kai Tahu guiding with an excellent anecdote. But it is a bit out of place here and would be better in an expanded sub-section in Section 1 on Historical aspects for all of AMCNP.

2.2.2 (p118) It is acknowledged that aircraft access to huts above the Hooker and Mueller valleys, as with the Tasman, has become more popular. A more self-reliant approach should be encouraged by all and this Plan could assist with some specific projects to improve routes through moraine areas. Perhaps this is what is meant by: *“Designing and managing tracks and facilities to preserve a high level of tranquillity by minimising the impact of anthropocentric noise levels on people visiting and recreating in the Hooker valley”*. This needs rewording to be more explicit as to the proposed measures and how they will work. It should also be incorporated into the Outcomes, Policies and Milestone for this place.

Bylaws (p124). 12) The booking arrangements for popular Mueller hut are probably inevitable and should be largely workable, although the uncertainties of weather mean some leeway in enforcement of rules will be required. Visitors should be required to carry sleeping mats so floor space can be utilised in emergency situations. This NZ backcountry etiquette should be promoted to all visitors. Enforcing no camping within 500m of the Copland Track will be unworkable.

13) A limit of 2 consecutive nights in high huts is completely impractical and will be ignored by the NZ climbing/tramping community who can be expected to follow NZ backcountry etiquette. It may work as an expedient to discourage inexperienced visitors from using these huts but there are implications for safety.

Recreation milestone (p125) This is a rather feeble list for such an important topic for visitors. The only substantial one is the relocation of Hooker Hut – building a new, larger one should have been done years ago. More new tracks should be established than the patsy one in 5 years, even if only day walks. Monitoring of use is a separate issue – see patsy milestone 2. DOC has already established that several popular tracks are overused. As discussed above, improved routes through moraines would increase foot access to more remote areas, increase recreational opportunities, and reduce aircraft movements and enhance safety. Work will be required each season to keep them viable but this will be very worthwhile.

**2.3 Haupapa Place, p125** The Historical and Recreational values sections are both underdone and, as for the other Places, much of this information should be in Section 1 overview.

Perhaps the most telling sentence is: *“Aircraft activity is, and always has been, high within the Haupapa Place ....”* (p128). I not believe that tangata whenua or colonial tourists had the benefits of air travel or the consequent disturbances of tranquillity! The main purpose of this section appears to be for establishing and promoting very high levels of helicopter movement in the Tasman Valley with largely unrestricted landings especially on the glacier for heli-skiing. There is no attempt at a needs analysis, cost/benefits, impacts or justification. Just take it or leave it. It is barely credible that any analysis of noise levels, objective or subjective, could conclude other than tranquillity will be severely disturbed through the whole valley including Nohoaka Place, and probably further. The overall impression is that the iconic Tasman Glacier and environs is a sacrificial lamb to the promotion of tourism within AMCNP.

The maps here and elsewhere on aircraft access zones by Place are confusing (no code for pale yellow areas) and misleading as the zones often go beyond the arbitrary Place boundaries. For example Map 17 (Haupapa) does seem to correspond to Map 7.1 (whole Park heli-ski zones).

The Recreational values sub-section (p128) again strongly promotes air assisted activities and overstates the case that this is both inevitable and without alternatives in some cases. It makes no attempt at foresight to find ways to decrease the reliance on helicopter travel. An obvious means to reduce demand would be to impose larger fees/taxes on concessionaires.

The paragraph tracks (p131) is good but should put stronger emphasis on the need for additional tracks.

Engagement values (p131). This is weasel worded but FMC supports the sentiment for more spread of the tourism load to areas outside AMCNP.

The listed Outcomes are diverse but do not generally represent much stretch to better accommodate increasing visitor numbers except for increased aircraft access. The effect of this on tranquillity levels is acknowledged (p133) but there are no recommendations for ameliorating or even managing this.

The Policies on Aircraft (7 and 8, p134) are extreme in relation to the numbers of permitted landings per day. There is no limit for heli-skiing – presumably one concessionaire can operate as many helicopters as needed to fill demand. The Plan makes no attempt to justify these numbers.

Milestones for Recreation (p135). As for other Places, these is a short and rather feeble list (8 years to establish walking access around Tasman Lake outlet). They do not represent a concerted effort to offer a wider range of experiences to the increasing number of Park visitors that do not involve aircraft.

### **Pae Tata Place**

The challenging nature of the terrain in the Murchison Valley mean that this is the least visited area in AMCNP. Under Historic values it would be worthwhile to include at least one account of early colonial exploration and achievement in the Murchison Valley e.g. early ascents of Malte Brun.

Recreation. Some marked routes could be formed to diversify and expand the range of visitor experiences without significantly affecting the wild nature of this Place. Increased helicopter access (p139, p141) is a narrow view of the opportunities. Access across the Tasman River should be a priority (it is first in Outcomes, p142 but does not appear in Milestones, p143).

The Policies for Aircraft (p143) enable large numbers of flights/landings on Murchison Glacier and Liebig Dome (effectively 2 – 4 per daylight hour). Again there is no analysis of needs/demand but concessionaires will undoubtedly promote use to reach these limits sooner rather than later. The unlimited heli-skiing limit is in conflict with the glacier limit of 35 landings per day.

Milestones – the sole milestone for Recreation of investigating a booking system for Liebig Hut is entirely inadequate. The Plan has made other suggestions that need action/milestones.

## **2.5 Pae Tawhiti place**

Although the upper Godley Valley is remote, it is a prime destination for dedicated trampers, climbers and hunters.

Historic values could usefully record early colonial explorations and climbs in the Godley.

This Place could be developed and promoted to reduce the visitor load in the rest of AMCNP (another hut or two, transport options). There are good opportunities for alpine valley tramping. High passes offer more demanding backcountry adventures to local peaks (DArchaic; Mt Acland) or into the Murchison.