Snowy Mountains Iconic Walks Project, Kosciuszko National Park: Aboriginal cultural heritage assessment. Addendum June 2019

By
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Report to NSW National Parks and Wildlife Service
Jindabyne

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Frontispiece: Photo: Snowy River looking north

Executive Summary

National Parks and Wildlife Service (NPWS) received substantial funding to develop an 'iconic' walking track system connecting ski resorts and other areas in Kosciuszko National Park. This will provide a constructed track of approximately 45 kilometres in length comprising 20-25 kms of new track and upgrading or realigning approximately 20 kilometres of existing tracks. Options for the track alignment are still under consideration with the final route to be determined pending relevant cultural and natural heritage assessments. The proposed development is predominantly in the alpine and subalpine zones, with some sections descending into and along the Snowy and Thredbo river valleys.

No previously recorded Aboriginal sites are on any of the alignment options, but several are located in the general vicinity. Areas of cultural significance associated with natural features are also known to occur.

The original ACHA was conducted in 2017 and resulted in the recording of a single stone artefact scatter at the Mount Guthrie saddle (Feary & Niemoeller, 2017). Ground visibility was generally poor for new sections of the proposed walking track and the majority of the alignment was assessed as having low archaeological potential. A new section of the proposed walking track on the Thredbo River west of Bullocks Flat had medium potential for subsurface cultural deposits and a methodology for test excavations was subsequently prepared.

Following completion of the Aboriginal cultural heritage assessment in 2017, NPWS realigned two sections of the proposed route for environmental reasons and to improve the viewing amenity for walkers. The realignments are between Charlottes Pass and Guthega and between Perisher ski resort and Bullocks Ski Tube. The latter is an alternative to an alignment for which test pitting was proposed on the northern side of the Thredbo River (Feary, 2019). These were surveyed for Aboriginal sites but none were identified and the realignments were assessed as having low archaeological potential, while noting the very poor exposure and visibility.

In April 2019, NPWS made further amendments to the concept plan for Snowy Iconic Walks. These included adjustments to the two alignments discussed above, removal of the Guthega to Perisher section, and insertion of a new section from Charlotte Pass to Perisher (via Porcupine Rocks) section to replace it. A desk top assessment concluded that surveys of the adjustments were not warranted, but that the new walking track from Charlotte Pass to Perisher had some potential for containing small artefact scatters and moth pestles, associated with bogong moth harvesting. Due to the arrival of the 2019 winter, field survey for this new walk has been postponed until Spring of 2019.

The report recommends that no further archaeological investigations are required, but has presented a mitigation process in case artefacts are encountered during track construction. Monitoring is recommended during initial stages of construction of the section of the Perisher to Bullocks Flat walk along the Thredbo River to test predictive models and find objects, not previously visible due to vegetation cover. To facilitate collection and/or movement of any artefacts found during monitoring it is recommended that OEH issue an AHIP over the relevant section of track, to be identified as an area of archaeological sensitivity in the AHIP.

The same process could apply to the new track between Charlotte Pass and perisher, pending the outcome of the archaeological survey planned for Spring 2019.

Registered Aboriginal Parties for Snowy Iconic Walks project were informed of the proposed realignments in January 2019. They will be sent this report for comment.

Definitions & Acronyms used in report

ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIP	Aboriginal Heritage Impact Permit
asl	above sea level
BP	Before Present
EP&A Act	NSW *Environmental Planning and Assessment Act 1979*
KNP	Kosciuszko National Park
LGA	Local Government Area
LALC	Local Aboriginal Land Council
NP	National Park
NP&W Act	NSW *National Parks and Wildlife Act 1974*
NPWS	National Parks and Wildlife Service
OEH	NSW Office of Environment & Heritage
RAP	Registered Aboriginal Party
REF	Review of Environmental Factors
Study area	the area identified by the AHIMS search
Subject area	the area to be directly affected by the proposal. That is, the footprint of the proposal.

Table of Contents

Figures

1. Introduction and background

This report is an addendum to the Aboriginal cultural heritage assessment report (ACHAR) - *Snowy Mountains Iconic Walk Project. Aboriginal cultural heritage assessment*, prepared by Sue Feary and Gerard Niemoeller (2017) and should be read in conjunction with it. The initial assessment was undertaken in respect of proposals by National Parks and Wildlife Service (NPWS) of the NSW Office of Environment and Heritage (OEH) to develop a walking track to connect ski resort and other areas in Kosciuszko National Park. Called the Snowies Iconic Walk it is described thus;

> *The Snowies Iconic Walk project proposes a world class, multi-day trek across the alpine roof of Australia, in Kosciuszko National Park.*
> *Featuring remote days and comfortable nights, the 44 kilometre walk will extend existing walks across the park's spectacular alpine area to link the resorts of Thredbo, Charlotte Pass, Guthega, Perisher and Lake Crackenback. The walk will also cross over the summit of Mount Kosciuszko.*
> *The walk has great potential to become a landmark 'must-do' experience for both domestic and international tourist markets.*[1]

The original ACHA was conducted in 2017 and resulted in the recording of a single stone artefact scatter at the Mount Guthrie saddle (Feary & Niemoeller, 2017). Ground visibility was generally poor for new sections of the proposed walking track and the majority of the alignment was assessed as having low archaeological potential. A new section of the proposed walking track on the Thredbo River west of Bullocks Flat had medium potential for subsurface cultural deposits and a methodology for test excavations was subsequently prepared for NPWS by Sue Feary.

Since completion of the Aboriginal cultural heritage assessment in 2017, NPWS realigned two sections of the proposed route for environmental reasons and to improve the viewing amenity for walkers. The realignments are between Charlottes Pass and Guthega and between Perisher ski resort and Bullocks Ski Tube. The latter is an alternative to an alignment for which test pitting was proposed on the northern side of the Thredbo River (Feary, 2019). No Aboriginal sites have been previously recorded on or near the two realignments.

In April 2019, NPWS made further amendments to the concept plan for Snowy Iconic Walks. These included adjustments to the two alignments discussed above, removal of the Guthega to Perisher section, and insertion of a new section from Charlotte Pass to Perisher (via Porcupine Rocks) section to replace it. Figure 1 shows all alignments assessed in this report; alignments assessed in 2017, the realignments assessed in February 2019 and the final alignments as at June 2019.

This report describes the fieldwork conducted in respect of the two realignments and provides recommendations arising from the results of the fieldwork and associated analysis. It also provides a desktop analysis and advice in respect of the later adjustments to realignments. Due to the arrival of the 2019 winter, field survey for the new section of walk between Charlottes Pass and Perisher has been postponed until Spring of 2019.

This report should be read in conjunction with the original ACHAR.

[1] www.environment.nsw.gov.au

Figure 1: Aerial photos showing all alignments of the Snowy Iconic walks. Orange – realignments surveyed in February 2019, blue - alignment assessed in ACHA 2017, Green – proposed realignments as at June 2019).

1.1. Objectives of this assessment

The objective of this Aboriginal heritage assessment is to establish whether or not construction of the two realignments (including their adjustments) will result in harm to Aboriginal objects or places of cultural significance to Aboriginal people. A major goal of the assessment is to find ways to avoid any recorded sites, by realigning the track where feasible. Where poor ground visibility impedes detection of Aboriginal objects, the likelihood of objects being present will be predicted.

The assessment will advise on the need or otherwise for additional archaeological investigation, including for the new section of track between Charlottes Pass and Perisher Ski Resort.

It will advise on whether objects will be harmed and an Aboriginal Heritage Impact Permit (AHIP) is required, for any or all sections of the proposed walk with associated conditions as appropriate

1.2. Personnel

Fieldwork, analysis and report preparation has been by consultant archaeologists Sue Feary and Gerard Niemoeller with valuable assistance and logistical support from Magnolia Sutcliffe from NPWS. Ronnie Thomas from Bega Local Aboriginal Land Council participated in field survey. Anthony Evans and Tim Greville from NPWS participated in Day 2 field survey. NPWS Ranger Janelle Herlihy participated in field survey of the Thredbo River section of the realignment from Perisher Valley to Bullocks Flat on Day 2.

2. Aboriginal consultation

- On 25th January 2019 RAPs received an update on the project, advising of the two realignments and the cancellation of the test pitting programme (Appendix 1).
- This report, together with a cover note summarising the progress of project will be sent to RAPs for a 28 day comment period.

3. Proposed developments and environmental and cultural contexts

The new alignments are predominately located on the slopes of the Snowy and Thredbo River valleys, in the alpine and subalpine zones of the Australian Alps. The new section of track between Charlottes Pass and Perisher Ski resort traverses high mountain plateaux between the Snowy and Thredbo River valleys (Figure 2).

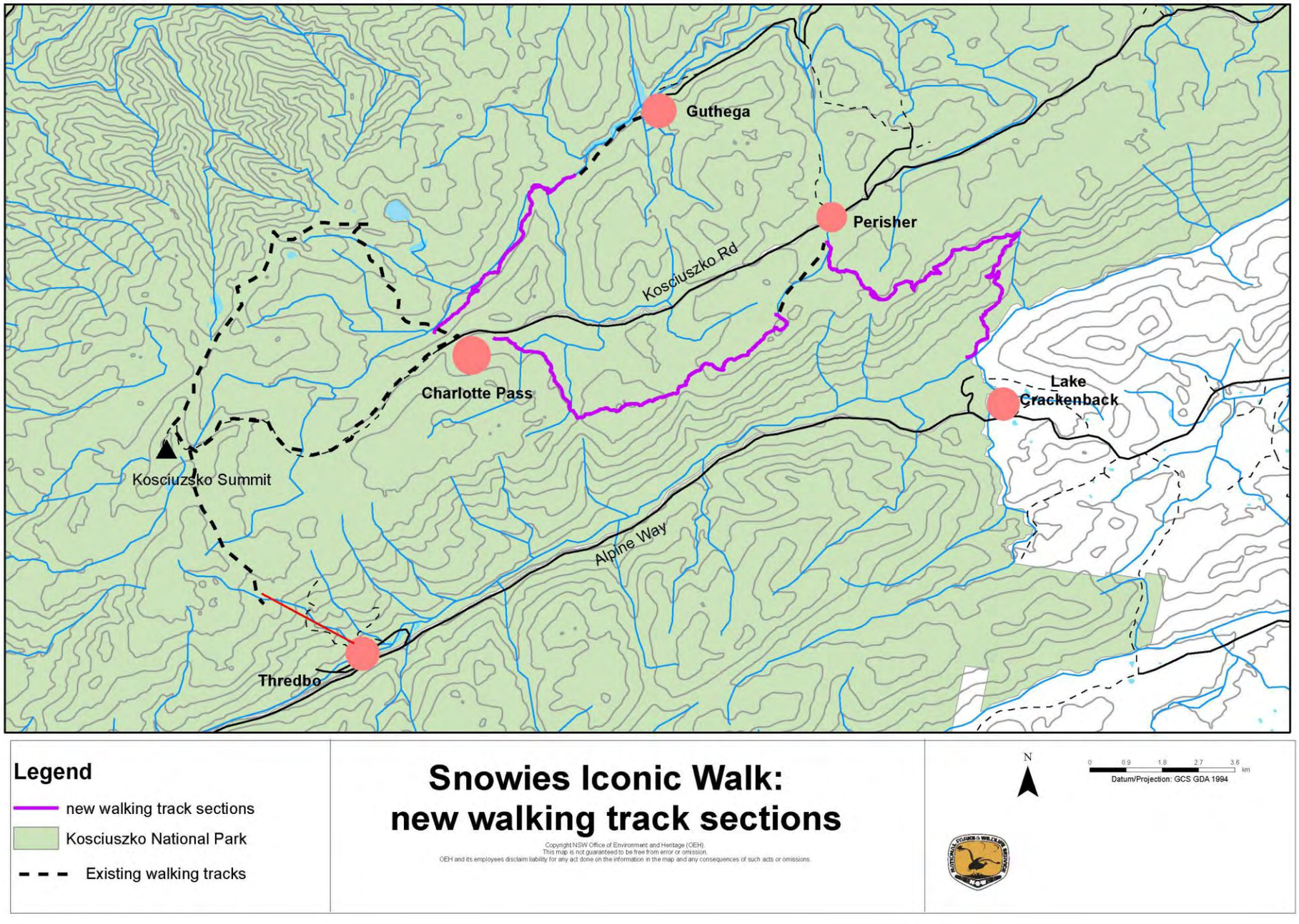

Figure 2: New and realigned walking track sections (purple lines)

3.1. Perisher to Bullocks Flat

This track commences at the Perisher water reservoir and traverses the Prussian Flat plateau (Figure 3) before descending steeply down the slope to flatter ground where it meets the Thredbo River before turning south, crossing the existing Lower Thredbo valley shared track and following the river to the ski tube bridge. The reason for the section along the Thredbo River is to separate walkers from cyclists.

The overall route is north of the previous alignment, shown in red in Figure 4, but traverses essentially the same landforms.

Figure 3: Field survey team on Prussian Plateau, scoping the day's walk

No Aboriginal sites have been previously recorded on the realignment, and it is further away than the original route from site 61-3-0014, at Lubra Rocks, which is potentially a place of cultural value for Aboriginal women. Sites 61-3-0150 (BF1) and 61-3-0151 (BF2) are small scatters of stone artefacts recorded during the Aboriginal cultural heritage assessment for the Lower Thredbo valley track (Feary & Niemoeller, 2015) (Figure 5). The track was re-routed to avoid both these sites, but they are now close to the proposed route for the Snowies iconic walk.

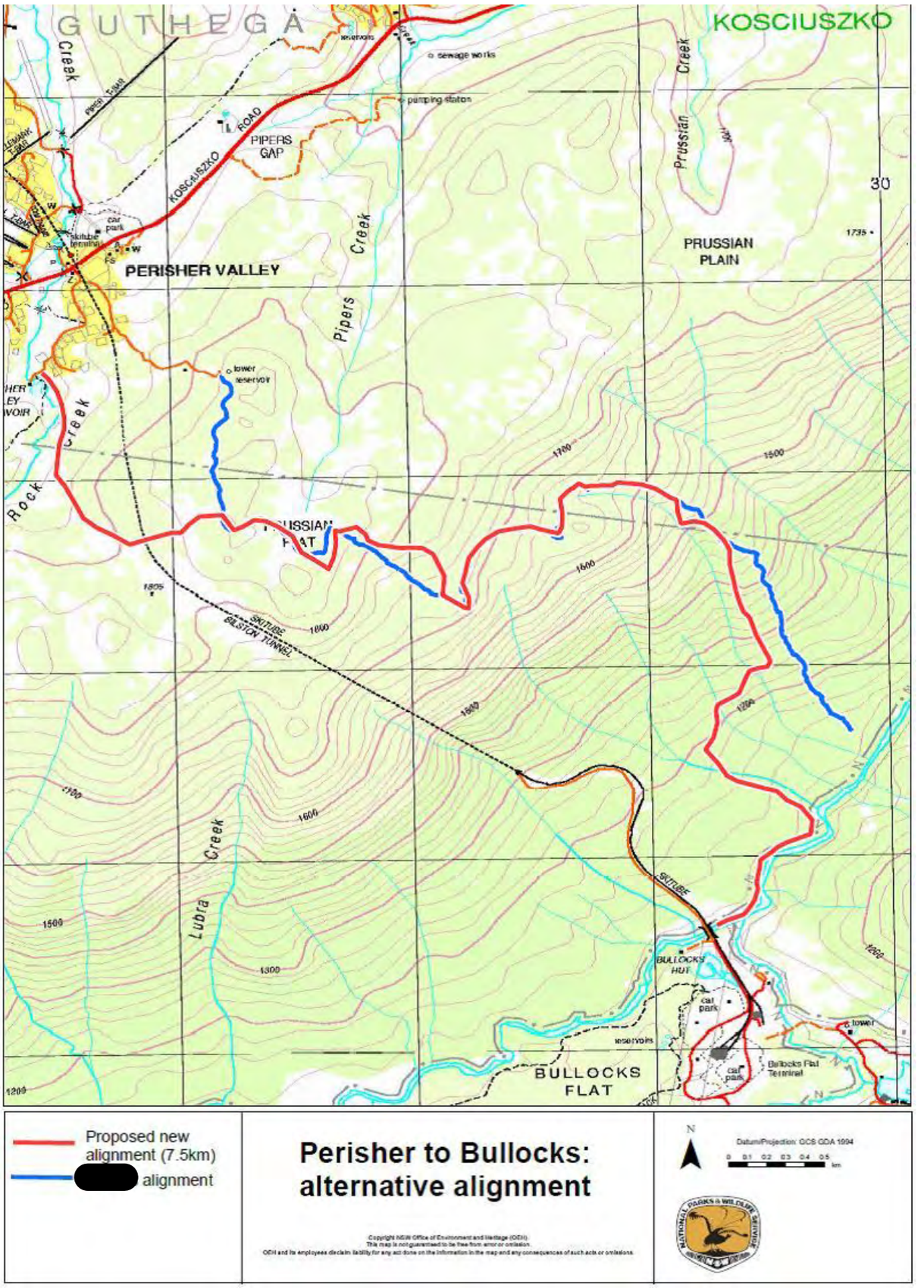

Figure 4: walking track options between Perisher and Bullocks Flat. The red line is the new realignment.

Figure 5: aerial photo showing location of sites recorded on the LTVT. Source: Feary and Niemoeller (2017)

3.2. Charlottes Pass to Illawong Hut

Located entirely within the Main Range Sub-Alpine landscape, the new alignment traverses the lower slopes and river flats on the eastern side of the Snowy River valley at 1680 m asl (Figure 6). Figure 7 shows the realignment as an orange line (Option A). It is lower than Option B, shown in blue in Figure 7, which was surveyed in 2017.

Figure 6: Lower slopes of Snowy River valley

The realignment commences at the existing Main Range walk, just east of the river crossing and heads north for approximately 6 kms to join the existing Illawong walk at Illawong Hut. The 1.6 km long section south of Illawong Hut was surveyed in 2017 and no Aboriginal sites were found. The elevated flat land at the junction of Spencers Creek and the Snowy River has the highest potential for a low density artefact scatter but none were found during the previous survey.

The realignment has overall low archaeological potential as it is generally on a side slope. Where it descends to river flats, the land is flat, but boggy and poorly drained.

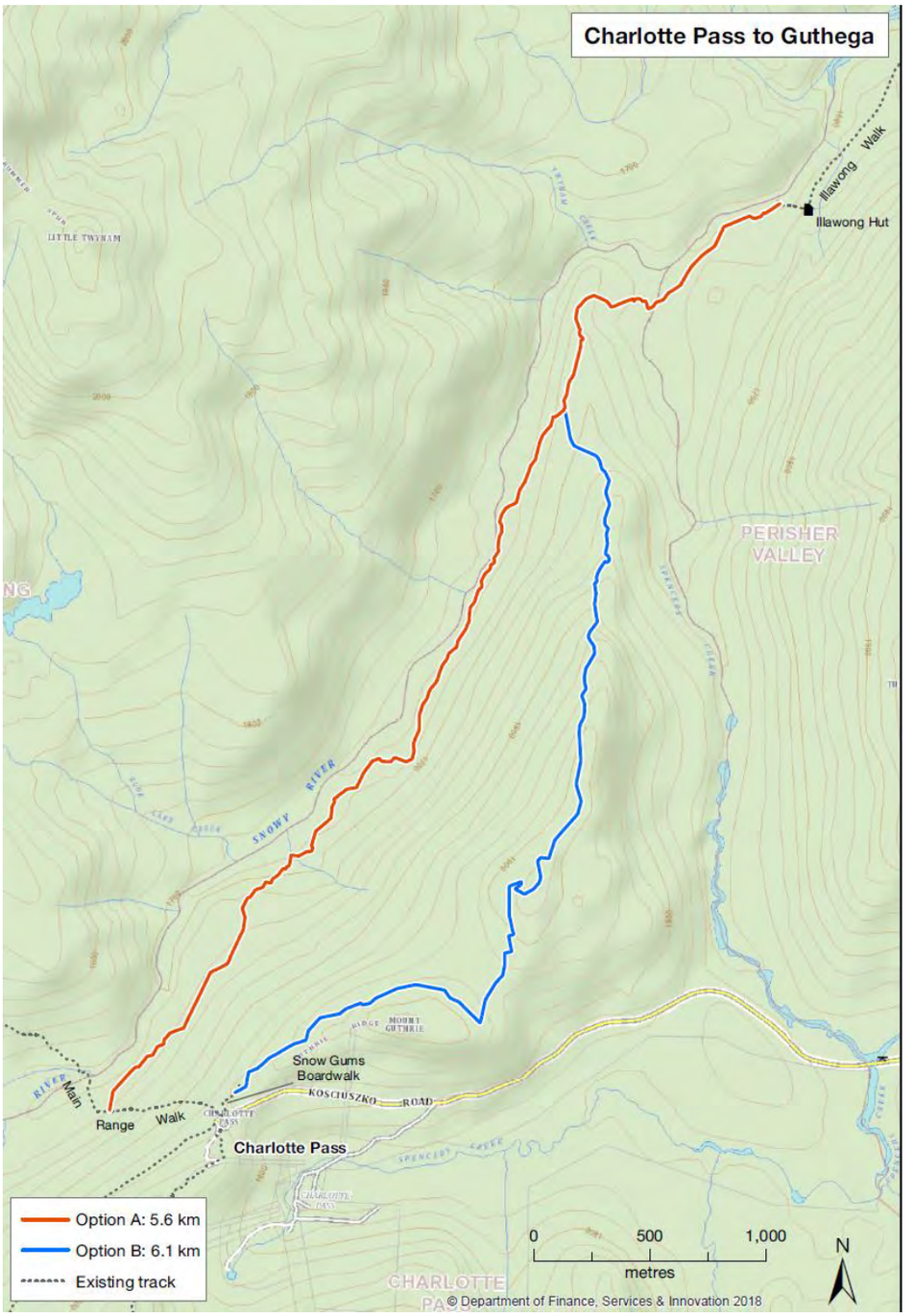

Figure 7: Realignment of walk between Charlottes Pass to Guthega

3.3. Proposed adjustments to realignments

Slight alignment changes to the **Charlotte Pass – Guthega section** are proposed, as shown in Figure 8. The adjustments generally move the track away from flatter areas (Figure 9) to the base of the slope.

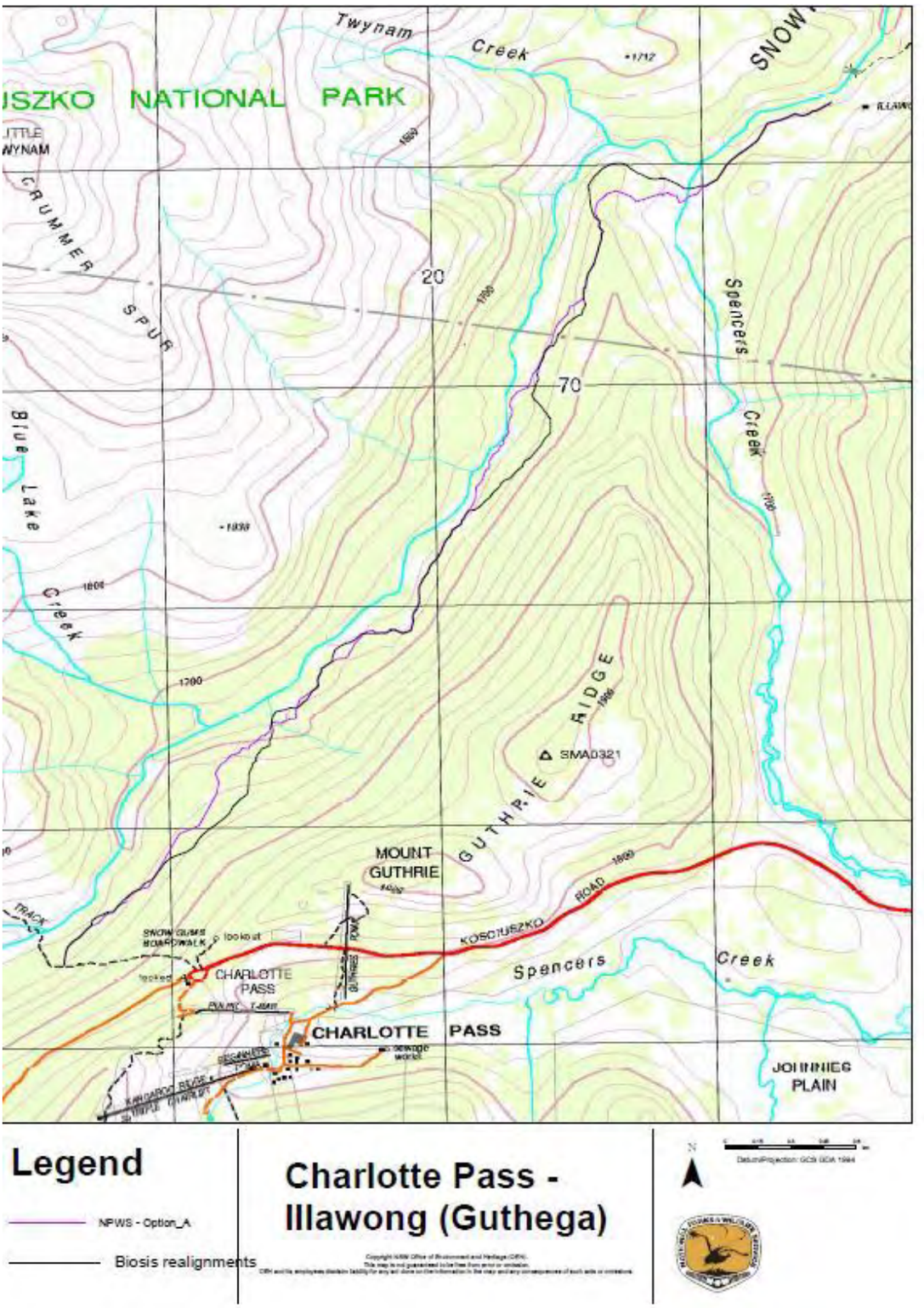

Figure 8: Topographic map showing adjustments to realignment (black line)

Figure 9: Snowy River flats – generally poorly drained and subject to flooding from spring snow melt

The track has been moved closer to the river at the junction of Snowy River and Spencers Creek which contains rocky knolls at the base of a toe slope.

Proposed adjustments to the **Perisher to Bullocks Flat** are shown in Figure 10. The adjustments take the route further north but essentially traverse the same landforms as the previous alignments (shown in orange in Figure 10). The exception is the short deviation to a rocky knoll on the upper slopes of the valley.

Figure 10: Topographic map showing adjustments to Perisher to Bullocks Flat alignment (dotted lines)

Feary S. and Niemoeller G. 2019. Snowy Iconic Walks, Kosciuszko National Park. Aboriginal cultural heritage assessment. Addendum June 2019

3.4. New walking track from Charlotte Pass to Perisher (via Porcupine Rocks)

This proposed walking track will replace an earlier proposal for a walk between Guthega and Perisher, which was investigated for the 2017 assessment ((Feary & Niemoeller, 2017). The new route is approximately 9 kms long and connects with an existing track between Porcupine Rocks and Perisher (Figure 11). It traverses the flat topped plateaux of the Main Range. There are no recorded Aboriginal sites, and it is likely that it has never been systematically surveyed for Aboriginal sites. Artefact scatters are known to occur in the Perisher Ski report lease area (see Barber in Feary and Niemoeller 2017).

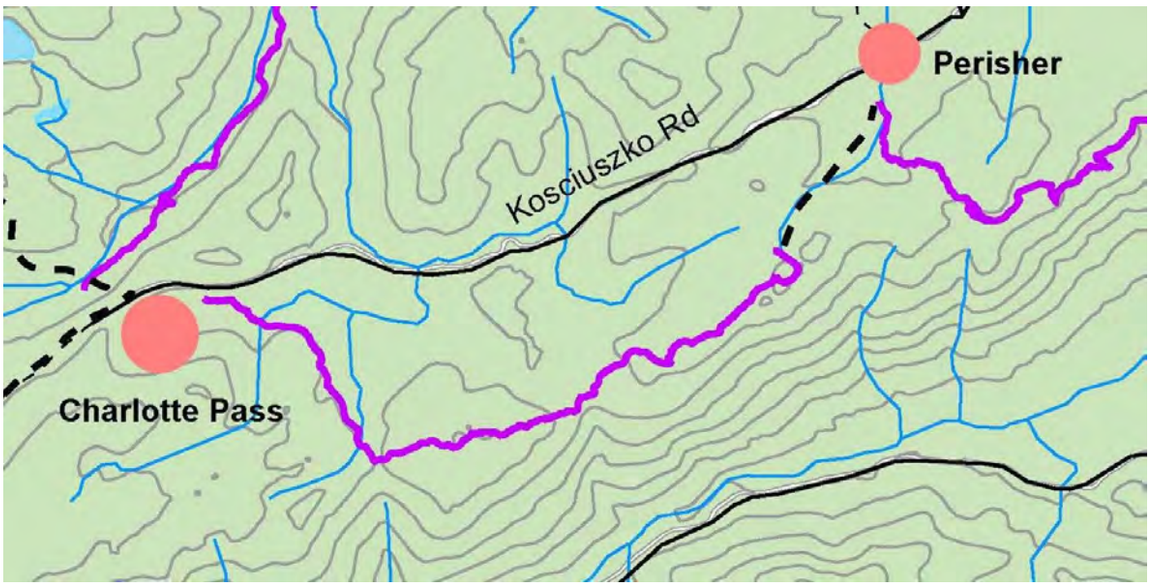

Figure 11: Topographic map showing proposed new alignment from Charlotte Pass to Perisher (purple line)

4. Archaeological investigations

The archaeological investigation for this report has two components; one component is field investigation for the two realignments, which took place on 6 and 7 February 2019, and the other is a desktop assessment of subsequent adjustments to the two alignments and of a proposed new walking track from Charlotte Pass to Perisher.

4.1. Predictions for field survey

A predictive model was developed for the 2017 survey which is applicable to the realignments. However, based on the results of surveys for the original assessment, the archaeological potential is considered to be low to very low for both realignments. The areas of highest potential in the overall low potential landscape are the elevated flat terraces adjacent to the Snowy River where they are above the flood zone and well drained and the northern embankments and lower slopes of the Thredbo River.

Based on the results of archaeological investigations within the Perisher ski resort it is possible that small artefact scatters may be present in sheltered and well drained areas across the Prussian Flat plateau.

4.2. Field survey

4.2.1. Methodology

The methodology adopted for survey of the new alignments was the same as that used for the 2017 survey, i.e. it was determined by the nature of the terrain, the weather and the small scale of the development and was in accordance with the Code. It should be noted that the complete absence of archaeological visibility for the majority of both realignments has meant that the purpose of the field survey was not solely to find and record objects but also to field check the predictive model. On the few occasions that bare ground was present due to wombats or an uprooted tree, this was carefully inspected.

Owing to the rugged nature of the terrain and presence of very thick vegetation it was not always possible to stay on the alignment, instead the transect was kept as close as possible to the alignment. Where feasible, people fanned out to cover the 20 metre wide development corridor.

Field survey occurred on 6-7 February 2019. Overall, visibility was so limited by ground vegetation that field survey can only be described as ineffective for the vast majority of the route. All bare ground was carefully inspected for artefacts and all mature trees were checked for any scarring.

4.3. Results of field survey

The field investigations identified no Aboriginal objects and concluded that the very poor ground visibility of both alignments made field survey unproductive. It was also concluded that both realignments had low to very low archaeological potential.

4.3.1. Perisher to Bullocks Flat

The realignment was surveyed in two sections – from Perisher to the existing Lower Thredbo valley track and from the Ski Tube bridge north and west to connect with the existing LTVT.

Perisher to LTVT

The proposed realignment was surveyed between 1120m and 1820m above sea level (Figure 19). Approximately 50% of the new proposed track is located within the Main Range Sub-Alpine landscape between Perisher and top of the Thredbo Valley, before descending steeply through the Main Range Montane landscape and levelling out along the Thredbo River within the Jindabyne Plains landscapes. The track atop the range traverses undulating variable sub-alpine and landscapes and vegetation consisting of slopes, cross slopes, gullies and saddles of generally between 0-15 degrees. Flat even ground, within this section either atop hills or in gullies and saddles along this section represented approximately 5%. The descent along the track into the Thredbo Valley consisted of steep angles (generally >20%), cross slopes and gullies, with only very minor flat even ground (<1%).

Bullocks Flat to LTVT

The section along the Thredbo River to the Ski Tube bridge parallels the existing LTVT track but is downslope from it, traversing river flats/terraces (Figure 12), foot slopes (Figure 13) and cross slopes of spurs and gullies. Exposure and visibility along this section of the track was also very low (<1%), due to thick grass cover and a thick shrub layer. The last 100 metres of the new track could not be surveyed due to impenetrable *Bossiaea foliosa* heathland (Figure 14). The survey team turned west at a drainage line and walked up the slope to meet with the existing LTVT track. This latter section of the transect traversed terrain identical to that of the proposed track.

Figure 12: Terraces of Thredbo River

Figure 13: Lower slopes above Thredbo River

Figure 14: Vegetation on proposed alignment just prior to turning west

Figure 15 shows the surveyed transect for the lower section of the proposed realignment. Site 61-3-0150 is close to the alignment, having been avoided by the LTVT. It was not found during the survey, which is not surprising as it is described in the site card as a single quartz flake in a small exposure.

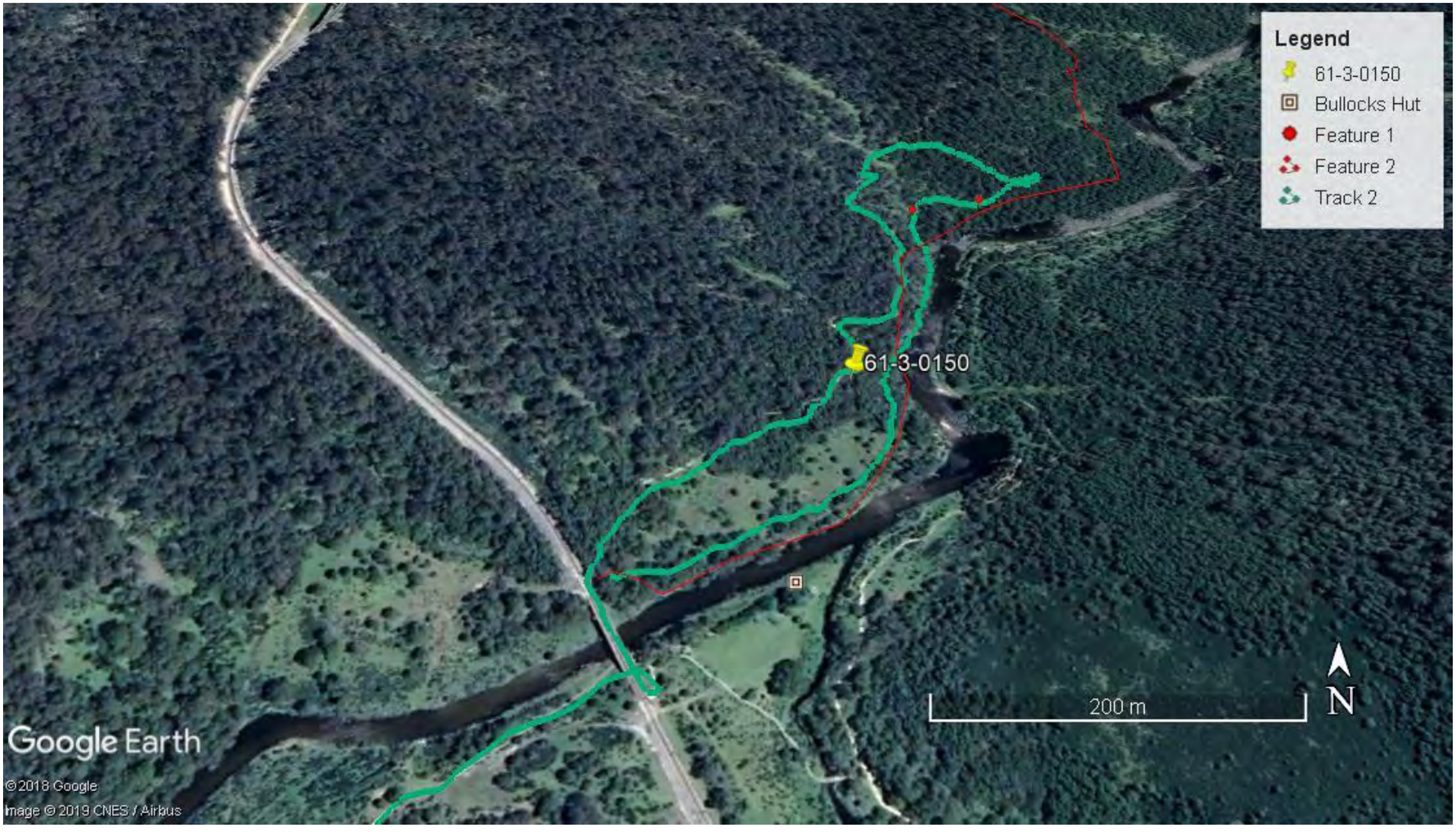

Figure 15: Surveyed transect for lower section of Perisher to Bullocks Flat realignment

4.3.2. Charlotte Pass to Illawong Hut

The entire route was walked on 6 February 2019 by archaeologists Sue Feary and Gerard Niemoeller, with Magnolia Sutcliffe from NPWS and Ronnie Thomas from Bega LALC. The route largely parallels the Snowy River, crossing river flats and terraces and lower foot slopes of the Snowy River Valley.

The ground surface of the river flats was hummocky and waterlogged and is prone to flooding from spring snow melt and therefore has low potential for Aboriginal sites. The thick grasses and herb fields covering the flats and terraces provided no archaeological visibility or exposure (Figure 16).

Figure 16: River flats and terraces of Snowy River.

The river flats contain patches of *Microseris scapigera*, or daisy yam, which has a tuber highly prized by pre-contact Aboriginal people, and was potentially a dietary staple (Bowdler 1981).

On the lower slopes, thick heathland totally obscured the ground (Figure 17) with occasional bare patches containing natural quartz (Figure 18).

Figure 17: Realignment from Charlotte Pass to Illawong Hut, showing thick heath layer

Figure 18: Example of a small exposure with natural quartz amongst heath.

The lower slopes were cut by a small drainage line and the major valley of Spencers Creek. Rocky outcrops of granite were common on flatter areas of the slope (Figure 19). When the track moved up the slope it entered snow gum woodland with a thick grassy understorey (Figure 20). Where slopes flattened out well above the river were identified as areas of highest archaeological potential in a low potential landscape and were carefully examined, given the limitation of visibility and exposure.

Figure 19: Example of a granite outcrop

Figure 20: upslope snow gum grassy woodland

With reference to Figure 7, the route was surveyed only where it deviated from the previous alignment, shown in blue in Figure 7. The alignment from the junction to Illawong Hut was surveyed during the 2017 assessment during which no Aboriginal objects were found.

No Aboriginal objects were found during the field survey, which was expected given the combination of low potential and poor ground visibility and exposure.

4.4. Desk top assessment of adjustments to alignments

Following adjustments to the two realignments by NPWS (see Figures 8 and 10), a desk top assessment of the potential of the adjustments to impact Aboriginal objects was conducted. This was based on the results of previous surveys, the landform character, and knowledge of the Aboriginal occupation history of the area. It concluded that potential was low to very low for the entirety of both realignments. The adjustments occur within landforms that have been surveyed for archaeological sites on more than occasion that have adequately characterised the potential of the landforms to contain Aboriginal sites. Realignment of the first section of the Charlotte Pass to Bullocks Flat walk to below the plateau has actually reduced archaeological potential.

Even taking into account factors of poor exposure and visibility, it can be said with a high degree of certainty that the nature of the landforms , such as steep slopes and factors such as flooding, together with the harsh nature of the environment overall, precludes potential for Aboriginal objects to be present . It is likely that Aboriginal movement and occupation patterns were framed by activities around bogong moth collecting, for which Jo Flood's predictive models may be helpful (Flood, 1973).

4.5. New walking track from Charlotte Pass to Perisher

As discussed in Section 3.4 this is a new walking track which has not been subjected to an archaeological assessment. A review of the literature for the 2017 assessment identified that artefact scatters were present within the Perisher ski resort area (Barber (2015) in Feary and Niemoeller, 2017) and also around Charlotte Pass associated with the Mount Stillwell walking track (Feary, 2009).

There is some potential for low density artefact scatters to be present in sheltered areas and/or along natural routes for human movement on the plateau in the alpine zone. Possible 'moth pestles' and isolated quartz artefacts have been found at similar altitudes elsewhere on the Main Range (Flood, 1973). It is likely that poor exposure and visibility will be as limiting as with the other walking tracks and the results of the survey will not give certainty as to the presence or absence of objects. Nevertheless, a systematic archaeological survey should be undertaken as soon as weather permits. This will enable identification of any sections of the track with archaeological potential for surface artefacts. It is also possible that places of cultural significance may exist, and this will be addressed during the Aboriginal consultation process.

6. Significance assessment

6.1. Criteria

The ICOMOS Burra Charter provides the framework for cultural significance assessment using the key criteria of **social, aesthetic, scientific** and **historic** values (ICOMOS 2000). The OEH assessment guidelines also provide some direction on how to apply these criteria in the context of an ACHAR report (OEH, 2011).

Significance assessment relates to physical objects, places, and features of the natural/cultural environment associated with intangible values.

Social value: generally, all evidence of pre-contact Aboriginal presence is significant to Aboriginal people even it is not visible at the time of a particular field inspection.

Many coastal and tablelands Aboriginal groups particularly Ngarigo people have a strong and renewed interest in their history of the use and occupation of the high country, hence the formation of the Southern Aboriginal Working Group for input into management of the Aboriginal heritage of Kosciuszko National Park. Any sites recorded in the high country, affirming presence of the ancestors, are likely to have very high social value. Several of the registered Aboriginal parties referred to their historic family connections with the Snowy Mountains. Narratives of bogong moth feasts have also generated considerable interest in the non-Aboriginal population.

Scientific (archaeological) value*:* this refers to the capacity of the evidence to contribute to current understanding of Aboriginal pre-contact history of the region, - '*the timely and specific research questions'* of the time, expressed in terms of rarity, representativeness or educational value (Sullivan & Bowdler, 1984). Sites generally need to be undisturbed with high levels of stratigraphic integrity. Several excavated sites in the Perisher Valley area were considered to have high archaeological significance, although artefact densities were very low and the artefacts had no unusual features (Barber, 2015).

No archaeological evidence has been found and overall, the walking tracks have been assessed as having low archaeological potential for containing sites in a surface context. This extends also to a subsurface context, due to the shallow and highly erodible nature of granite gravels that characterise the montane, subalpine and alpine zones. With the exception of colluvial and alluvial activity in river valleys there is an absence of geomorphological processes to facilitate development of stratified sites with 'conservation value', as determined by the OEH Code of practice for assessing archaeological sites (DECCW, 2010). Previous excavations in the lower Thredbo valley did not find any Aboriginal sites (Niemoeller, 2011) . As stated in 2017 report, archaeological test pitting is unwarranted and likely to be unproductive.

Historic: the ethno historic records indicate that Aboriginal people continued to access the high country to gather bogong moths after white settlement (Flood, 1980). It is also possible that Aboriginal men worked as stockmen on grazing leases and on farms in the high country. Some of the mountain peaks such as Dicky Coopers Bogong are named after Aboriginal people. Some Aboriginal people who expressed interest in this project wrote about their family ties and cultural connections to the high country generally which suggests there is historic significance

associated with the high country by people who currently live far away. Aboriginal people who lived on Aboriginal reserves at Delegate and Brungle [Tumut] may have information of historic associations.

Aesthetic: NA

6.2. Statement of cultural significance

No Aboriginal objects were recorded during this assessment. It is known that Aboriginal people from the tablelands and coast have strong traditional and historical connections with the high country which reflect social significance.

7. Assessing harm

7.1. Avoiding harm

The general premise of track construction in Kosciuszko National Park is to avoid harm to Aboriginal object by realigning the track away from the objects where this is possible.

7.2. Mitigating harm

Recent experience from an archaeological assessment of the lower Thredbo valley shared path has demonstrated that in some places, low ground visibility during the time of survey means that stone artefacts may not be detected but become exposed due to ground disturbance once works commence (Feary & Niemoeller, 2015).

Although the vast majority of the new sections of the Snowies iconic walking track have low potential, previous test excavations in the Perisher Valley demonstrate that there is some likelihood for objects to be present on spurlines and ridges at high altitude, albeit in low densities (Barber, 2015) . It is possible that objects will be present on the new walking track between **Charlotte Pass and Perisher,** which were not identified due to poor visibility. Archaeological proposed for Spring 2019 will inform decisions regarding archaeological potential and associated management options.

Based on the results of previous surveys in the lower Thredbo valley, there is also some possibility that surface artefacts may be present on the bottom section of the walking track from **Perisher to Bullocks Flat**, where it parallels the Thredbo River, in the vicinity of 61-3-0150. If additional objects are present these will be above the flood zone on flat knolls or spurs. Figure 21 shows the 700 m long section of track where monitoring could be conducted, which includes the location of 61-3- 0150. The issue of an AHIP for harm to 61-3-0150 will also allow for movement of any objects out of harm's way within the 700 metre 'sensitive area'.

Figure 21: Aerial photo showing section of Perisher to Bullocks track recommended for partial monitoring during initial stages of track construction

Monitoring should be carried out by a suitably qualified or experienced person during the initial vegetation clearing/slashing operations. If Aboriginal objects are encountered, the following process is to be followed:-

- Stop work at the location.
- Record site and determine boundaries as far as possible, with most sites likely to be less than 10 artefacts at the most.
- Identify a buffer around the site, at least 10 metres in radius and if feasible, realign the track to **avoid** the site as defined by the buffer zone.
- If avoidance is not feasible, move the artefacts to a suitable undisturbed place nearby and complete an AHIMS site card to record the new location.[2] Alternatively the artefacts could be **collected** and given to the relevant RAP pursuant to a Care Agreement.

NOTE: These mitigation procedures would need endorsement from RAPs.

In some instances, leaving the objects *in situ* on the track would be a preferred option, as placing soil, gravel or pavers over the artefacts may cause less harm than moving them from their environmental context. In this instance, placing material on top of the artefacts will enhance their protection and could be conducted under the OEH Conservation Works Protocol i.e. will not require an AHIP. Artefacts **should not** be moved where an elevated walkway is to be installed. Supporting posts should be positioned to avoid any objects.

[2] This would be made possible by issuing an AHIP for movement/collection of objects within an area identified as a 'sensitive area' in the AHIP.

7.3. Harm cannot be avoided

It is possible that harm to site 61-3-0150 and a surrounding 'sensitive area' cannot be avoided and an AHIP will be required to harm objects and also to move them off the track.

8. Potential conservation outcomes

Avoidance of any sites recorded during monitoring is a conservation outcome.

It is relevant to note that the walking track, including the two realignments has a constrained development footprint and will cause considerably less damage than previous and current activities, for example, installation of ski resort infrastructure and services and activities such as slope grooming.

9. Recommendations

1. It is recommended that no further archaeological investigation of the overall project is required as the archaeological footprint has been adequately understood, notwithstanding the limitations of poor ground visibility.

2. It is recommended that an AHIP is issued for a 700 metre section of the Bullocks Flat section of the realignment in the vicinity of site 61-3-0150 to allow for movement and/or harm to any objects found during the monitoring programme as described in 7.2.

3. Further investigation through a due diligence process is recommended if there are to be significant deviations from the current development corridor.

4. This report should be further modified to include the results of field survey for the new walking track from Charlotte Pass to Perisher once field survey and assessment has been completed. If objects are found and cannot be avoided, they should be included in the AHIP by way of a variation.

5. It is recommended that this report is presented to the Kosciuszko National Park Aboriginal Working Group and circulated to Registered Aboriginal Parties for comment and feedback.

10. References

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Appendix 1: Aboriginal consultation for realignments

List of RAPs compiled by NPWS for Snowies Iconic walks ACHA

Stakeholder
Bega Local Aboriginal Land Council
Biamanga
Witheld
Cullendulla
David Dixon
Ninde Ngujarn Ngarigo Monero Aboriginal Corporation (Doris Paton)
Ginninderra Aboriginal Corporation
Goobah
Gulaga
Didge Ngunawal Clan
Muragadi Heritage Indigenous Corporation
Murramarang
Gunjeewong Cultural Aboriginal Corporation
Murra Bidgee Mullangari Aboriginal Corporation
Ramsay Freeman – Snowy Mountains Indigenous Elders
Iris White
Sharon Stewart
Eden Local Aboriginal Lands Council (ELALC)

From: Sue Feary [mailto:suefeary@hotkey.net.au]
Sent: Friday, 25 January 2019 12:04 PM
To: RAPs
Subject: Snowy Iconic Walks Aboriginal cultural heritage assessment - update on project

Dear RAPs, attached please find an update on this project.
Cheers
Sue

Sue Feary (BSc, BA (Hons) Archaeology, PhD (ANU))
Director
Conservation & Heritage Planning & Management
53 Saumarez St, Vincentia, NSW 2540
Australia
Ph: + 61 2 4441 5996 Mob: + 61 428 342 758
e. suefeary@hotkey.net.au
ABN: 68 866 296 524
President, Australian Forest History Society Inc.
www.foresthistory.org.au
Member Indigenous Working Group, Forest Stewardship Council (Australia).

Attachment:

SNOWY ICONIC WALKS – UPDATE ON ABORIGINAL CULTURAL HERITAGE ASSESSMENT PROCESS

Background

Southern Ranges Branch of National Parks and Wildlife Service (NPWS) have received substantial funding to develop an 'iconic' walking track to connect ski resorts and other areas in Kosciuszko National Park. This will provide a constructed track of approximately 45 kilometres in length comprising 20-25 kms of new track and upgrading or realigning approximately 20 kilometres of existing tracks.

Field survey - Aboriginal consultation

In 2017 an Aboriginal cultural heritage assessment (ACHA) for the proposed walk was carried out by archaeologists Sue Feary and Gerard Niemoeller, and one small artefact scatter was found (Feary & Niemoeller, 2017).
Aboriginal consultation was conducted in accordance with OEH Aboriginal consultation requirements and 18 groups/individuals registered an interest in being consulted.
The draft ACHAR was sent to all registered parties for comment and feedback on 10 August 2017, for responses within a 28 day period. Three responses were received, all endorsing the recommendations of the report. Additionally the Bega LALC requested that any artefacts should be left on country and the Didge Ngunawal Clan requested that artefacts be given back to local tribes and/or used for educational purposes. Bega LALC also pointed out that the intangible cultural values of the mountain landscape are always a consideration, even if they not articulated in a written report.

Proposed test pitting

On the advice of the office of Environment and Heritage (OEH) the report recommended test excavations of 1300 metres of proposed new track roughly parallel to the north bank Thredbo River west of the ski tube pedestrian bridge. This section of track was on the proposed route of the walking track between Perisher Valley and Bullocks Flat.
In 2018 NPWS engaged archaeologist Sue Feary to develop a test pitting methodology for the Thredbo River section of the Snowy iconic walks project. A draft methodology was prepared in accordance with the OEH Code of practice for archaeological investigations (DECCW, 2010a).
The draft methodology was circulated to the previously registered for the 18 RAPs on 9th September 2018 by email or post for a period of 28 days as required by OEH's Aboriginal consultation requirements (DECCW, 2010b).
There was a one response and the draft methodology was finalised with no changes.

Proposed realignments

In late 2018 NPWS identified the need to realign two sections of the proposed routes for the Snowy Iconic Walks. One of the realignments is for the section from Perisher Valley to Bullocks Flat, which included the section of track to be test pitted. As the proposed walk will no longer be affecting this area of high archaeological potential, test pitting is no longer required and will not be conducted.
The realignment shown in Figure 1 (Option A) is on landforms of low to very low archaeological potential and it is unlikely that test excavations are warranted along the route. Figure 1 shows the original and new alignments and the area previously identified for test pitting.

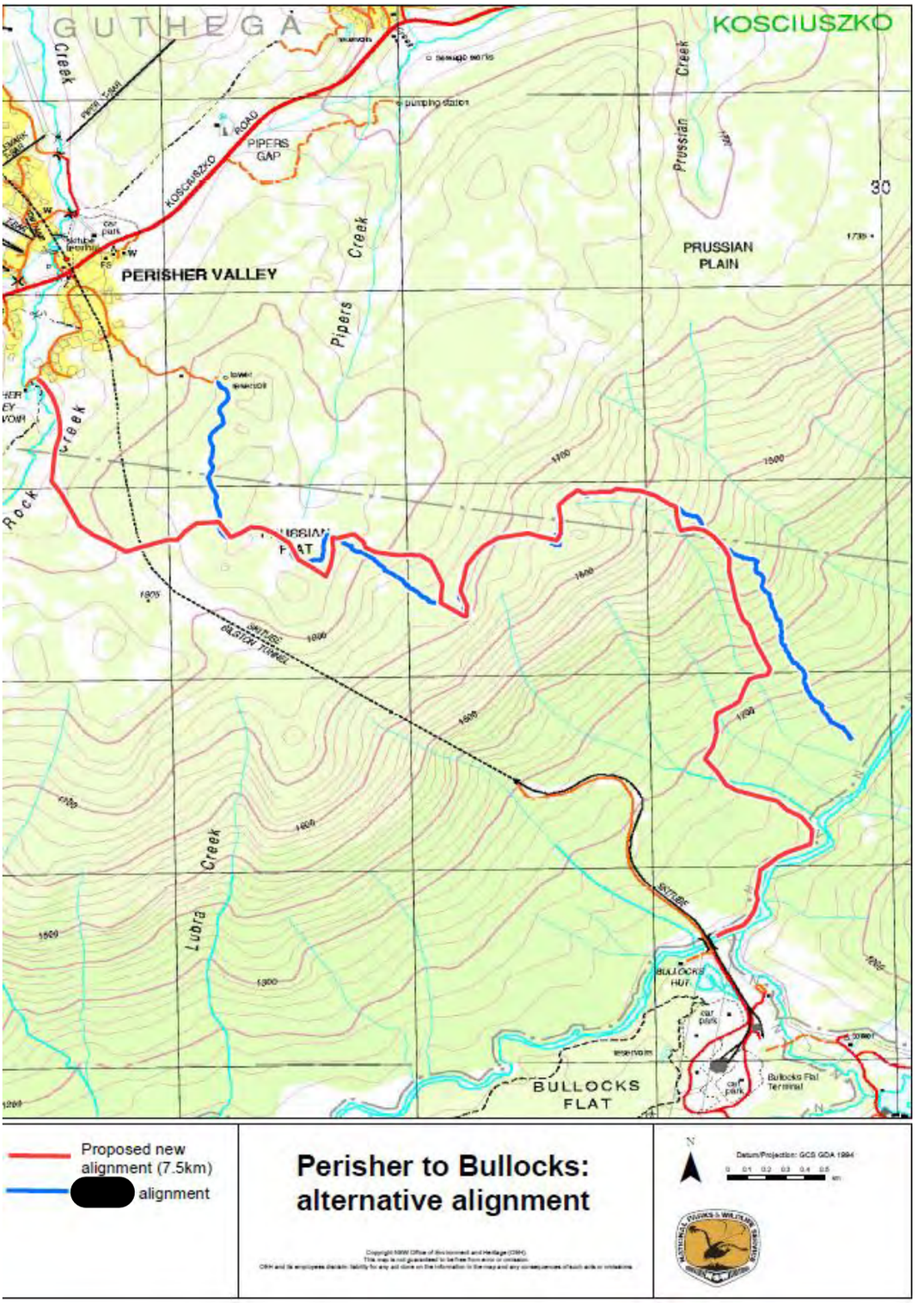

Figure 1: proposed realignment from Perisher to Bullocks Flat [orange]. Previously surveyed route (blue) and area identified for test pitting [red].

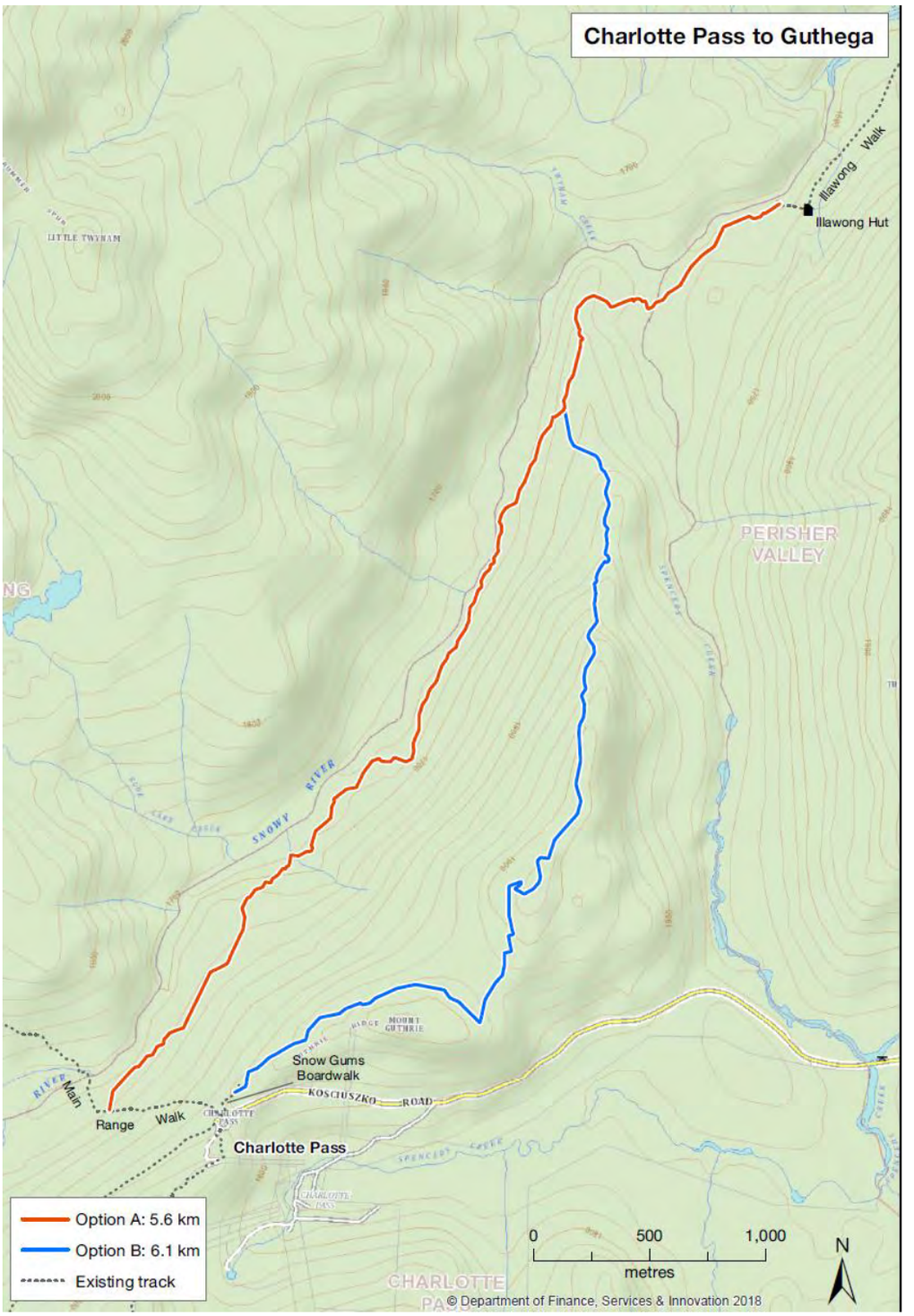

Figure 2: Charlottes Pass to Guthega section showing Option B [already surveyed] and Option A [to be surveyed]

Updating the ACHAR

Consultant archaeologists Gerard Niemoeller and Sue Feary will be surveying the two realignments in the near future and the existing ACHAR will be updated to incorporate the results of the survey and any associated changes to the recommendations. The draft updated report will be circulated to RAPs for comment prior to its finalisation. Please contact me by email suefeary@hotkey.net.au or 0428342758 if you have any queries.