

The Use of Soft Systems Methodology (SSM) In Evaluating the Cross-Regional Tourism Management of Coban Sewu (Tumpak Sewu), East Java: Problems and Solutions

Purwoto^{1*}, Agus Sholahuddin², Praptining Sukowati³

Doktoral Ilmu Sosial, Program Pascasarjana, Universitas Merdeka Malang, Indonesia

Corresponding Author: Purwoto mr.phoer70@gmail.com

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ABSTRACT

Coban Sewu is a prime destination located between Malang and Lumajang Regencies, but it still faces various cross-regional governance issues such as ticket dualism, differing service standards, and conflicts of interest between Village-Owned Enterprises (BUMDes) and the community. This study uses Soft Systems Methodology (SSM) to identify the problem structure and formulate a more integrated management model. Through in-depth interviews, observations, and document analysis, this study constructs a rich picture, CATWOE, and a conceptual model, comparing them with real-world conditions. Key findings indicate that the root of the problem lies in the absence of a formal coordination mechanism, weak communication between actors, and inconsistent policy orientations. This study proposes a solution model in the form of an integrated ticket system, the establishment of a joint management board, and the harmonization of cross-regional regulations. These results confirm that SSM is effective in developing policy recommendations for managing complex tourism destinations.

INTRODUCTION

Soft Systems Methodology (SSM) is an analytical approach developed to understand complex, adaptive, and unstructured social problems. This approach is rooted in the tradition of soft systems thinking introduced by Checkland in response to the limitations of the hard systems approach in addressing problematic situations involving people, values, and social interactions (Checkland, 1981; Checkland & Scholes, 1990). Wilson (1990) emphasized that the main characteristic of SSM lies in its ability to accommodate diverse perceptions and interests within a system, making it relevant for analyzing public policy implementation, which is fraught with actor dynamics and uncertainty. In the contemporary context, various studies have shown that SSM is an effective tool for understanding how policies are implemented and what factors influence their success in complex social systems (Gregory, 2020; Bell & Morse, 2021).

The tourism sector is a sector that is highly dependent on the effectiveness of policy implementation, coordination between actors, and the ability of local governments to respond to the social and economic dynamics of the community (Holloway, 2001; Bhatia, 2002). Managing natural destinations such as Coban Sewu requires alignment between formal policies and implementation on the ground, as the success of a destination is determined not only by its natural beauty but also by the quality of governance, regulations, services, and community support (Okpolo & Okpolo, 2002; UNWTO, 2020). Coban Sewu, which is part of the Ampelgading District in Malang Regency and directly borders Lumajang Regency, faces various challenges in implementing its management policies. Ticket dualism, differences in service standards, the dynamic relationship between BUMDes and the community, and the lack of synchronization of authority between regions are indicators of the gap between formulated policies and the reality of implementation on the ground.

Recent literature on tourism governance studies show that policy implementation in cross-border destinations is highly vulnerable to role fragmentation, weak communication, and suboptimal support between actors (Bramwell & Lane, 2020; Dredge & Jamal, 2021). This is reflected in Coban Sewu, where the implementation of tourism management policies often faces structural and non-structural obstacles. In addition to policy implementation itself, the success of a destination is also highly determined by supporting factors such as institutional capacity, community participation, resource availability, infrastructure, and regulatory support (Graci, 2022; Prayogo, 2023). The Coban Sewu case study demonstrates that when policy implementation is not supported by adequate coordination, the potential for conflict, duplication of roles, and ineffective public services easily arise.

The application of SSM in this research is relevant because this methodology is able to map how policies are implemented by various actors and how supporting factors operate within the tourism social system. Through tools such as *rich picture*, CATWOE, and *conceptual model* SSM enables analysis that goes beyond simply describing policies and understanding the relationships, tensions, and coordination mechanisms that influence their implementation (Letcher et al., 2020; Aziz et al., 2022). Thus, SSM not only helps illustrate the structure of the

problem but also identifies supporting factors that need to be strengthened to improve the effectiveness of Coban Sewu management policies in Ampelgading District, Malang Regency.

Based on this thinking, this research specifically aims to: (1) describe and analyze the implementation of the Coban Sewu tourism management policy in Ampelgading District, Malang Regency, (2) describe and analyze the supporting factors for the implementation of the Coban Sewu tourism management policy, (3) describe and analyze the inhibiting factors for the implementation of the Coban Sewu tourism management policy. Through the SSM approach, this research is expected to provide a holistic understanding of how tourism policies are translated into concrete actions, what factors drive their success, and how the social systems surrounding the destination contribute to the effectiveness of regional tourism governance.

LITERATURE REVIEW

Coban Sewu, or Tumpak Sewu, is a leading natural tourist destination in East Java, offering a spectacular waterfall panorama with a semicircular formation. Located on the border between Malang and Lumajang Regencies, managing this destination requires cross-administrative coordination and aligned policy implementation between regions. Administratively, Coban Sewu is located within Ampelgading District, specifically Sidorenggo Village, the focus of this research. This makes Ampelgading a crucial area for implementing tourism management policies and a social laboratory for interactions between the government, the community, village-owned enterprises (BUMDes), and other stakeholders.

The development of nature tourism in Indonesia demonstrates increasing tourist interest in adventure-based and ecotourism destinations (UNWTO, 2020). Coban Sewu is a prime example of a destination that has gained popularity through social media, creating economic opportunities for the local community. However, as Okpolo & Okpolo (2002) point out, nature tourism potential cannot develop optimally without effective governance and appropriate policy implementation. This is particularly relevant in Ampelgading, where the implementation of tourism management policies must address challenges related to coordination, human resource capacity, infrastructure conditions, and community social dynamics.

Referring to Moleong's (2008) view that problems in qualitative research must be based on a clear focus, the focus of this research is directed at three main aspects. First, Implementation of Coban Sewu tourism management policy in Ampelgading District, which is analyzed through five indicators:

- 1) Commitment of Malang Regency Government;
- 2) Human Resources;
- 3) Facilities and infrastructure;
- 4) Cross-Sector Synergy; and
- 5) Social conflict.

These five indicators represent key components in the successful implementation of regional tourism policies, as emphasized by Bramwell & Lane

(2020) and Dredge & Jamal (2021) that destination governance requires political commitment, institutional capacity, resource support, and harmonization between actors.

Second, this research also focuses on supporting factors for policy implementation, which includes institutional support, community participation, the availability of local resources, the continuity of government programs, and the socio-cultural conditions of the community. In line with Graci (2022) and Prayogo (2023), the successful implementation of tourism policies is highly dependent on stable and consistent supporting factors, including good relations between local governments and implementing communities at the village level.

Third, this study examines factors inhibiting policy implementation, such as limited infrastructure, varying service standards, uneven human resource capacity, conflicts of interest between local actors, overlapping authority, and poor cross-sectoral coordination. Previous research has shown that cross-border destinations often face these obstacles due to differences in policy orientation and capacity between regions (Espiner et al., 2020; Jamal & Camargo, 2022).

The research setting for Coban Sewu in Ampelgading also includes infrastructure and accessibility aspects. The route to the tourist site is relatively easy to reach, but requires improvements in supporting facilities, such as parking areas, evacuation routes, lighting, information boards, and tourist safety facilities. The condition of this infrastructure is a crucial part of policy implementation because it influences tourist perceptions and the quality of the travel experience, as emphasized by Holloway (2001) that complete infrastructure is one of the main requirements for a destination's success.

Overall, this research setting reflects a complex social system, where the effectiveness of policy implementation depends on the interaction between the capacity of the government, the community, village-owned enterprises (BUMDes), tourism groups (Pokdarwis), infrastructure conditions, and the socio-economic dynamics of the region. Therefore, this study uses SSM to comprehensively map problematic situations and understand how policies are implemented, as well as the supporting and inhibiting factors that influence their implementation in the field.

METHODOLOGY

The problematic situation in the management of Coban Sewu tourism shows the character *unstructured problem situation*, a condition characterized by unclear roles, objectives, coordination flows, and distribution of authority among stakeholders. According to Checkland (1981), an unstructured situation arises when there is no single definition of the problem, no formal system binding actors, and overlapping interests without a clear alignment mechanism. This condition is evident in the dynamics of the Coban Sewu tourism management in Ampelgading District, Malang Regency.

Although Coban Sewu is administratively located within Malang Regency, based on Home Affairs Ministerial Regulation No. 86 of 2013, access to the main waterfall is also being developed by Lumajang Regency through Sidomulyo Village. This geographical situation has led to a dual management system, with

two entrances, two ticketing systems, and two narratives of destination ownership. The Head of Sidorenggo Village, Malang, emphasized,

"The waterfall is in the Malang area, but access from Lumajang remains open. Visitors think it's theirs." Meanwhile, the Head of Sidomulyo Village, Lumajang, stated, "Our visitors still have to pay again because they pass through Malang. This is a frequent complaint." This dualism demonstrates the absence of a cross-district coordination system, resulting in policy fragmentation, differing service standards, and inconsistent tourist experiences. This conflict of authority is at the root of various policy implementation problems, including low formal commitment between regions, weak policy communication, and the absence of a shared institutional structure.

At the local level, the Malang side is still managed individually by a landowner, Mr. Rohim, who holds a NIB and OSS but has not yet been integrated into the village or district institutional systems. The Sidorenggo Village Head stated that the village

"never involved and did not receive any contribution from tourism management." On the other hand, Lumajang manages Tumpak Sewu through the Sidomulyo Village-Owned Enterprise (BUMDes) in a more structured manner, with community training, facility development, and digital promotion. This difference in institutional levels widens the gap in service quality and reinforces perceptions of inequality between regions.

SMEs are also experiencing an unstructured situation. A food stall owner from Lumajang said that they "often overlooked and have never received government training or support." Meanwhile, homestay owners complain that tourism routes are directed more toward Malang, leaving them economically disadvantaged. This unequal access and development demonstrates the government's weak capacity to create cross-sector synergy and support equitable distribution of economic benefits.

Tourist perspectives also shed light on the problem. Local and international tourists complained about slippery access, unsafe infrastructure, and a lack of information signs. Foreign tourists expressed the need for multilingual signs and more adequate supporting facilities. This indicates that the implementation of policies related to tourism infrastructure and services has not been effective.

On the regulatory side, a conflict arose between the management and the East Java Provincial Water Resources Agency (SDA) regarding violations of river boundary use. Official warning letters indicated that some tourism activities violated water resources and spatial planning regulations. This illustrates overlapping sectoral regulations and weak cross-agency oversight.

Overall, the problematic situation at Coban Sewu reflects a messy problem involving multiple actors with differing interests, the absence of a formal cross-district forum, unclear operational boundaries, weak human resource capacity, development disparities, and poor technical and administrative coordination. These conditions provide an important basis for implementing SSM to comprehensively map the root causes of the problem before developing feasible and desirable systemic changes.

RESEARCH RESULT AND DISCUSSION

To comprehensively describe the dynamics of problems in the management of Coban Sewu tourism, a compilation was carried out. rich picture which

visualizes the relationships between actors, interest flows, policy tensions, and the distribution of impacts at three levels: micro, meso, and macro. In accordance with Checkland (1981), rich picture used as a tool to express problematic situations in their entirety before entering the analytical stage through CATWOE and conceptual models.

The following figure illustrates how Coban Sewu management is influenced by interactions between the central government/regulator, local governments, boundary authorities, tourism entrepreneurs, local communities, and tourists. The relationships depicted reflect the flow of policies, permits, regulations, investments, social conflicts, and economic impacts that occur within the cross-district destination management system.

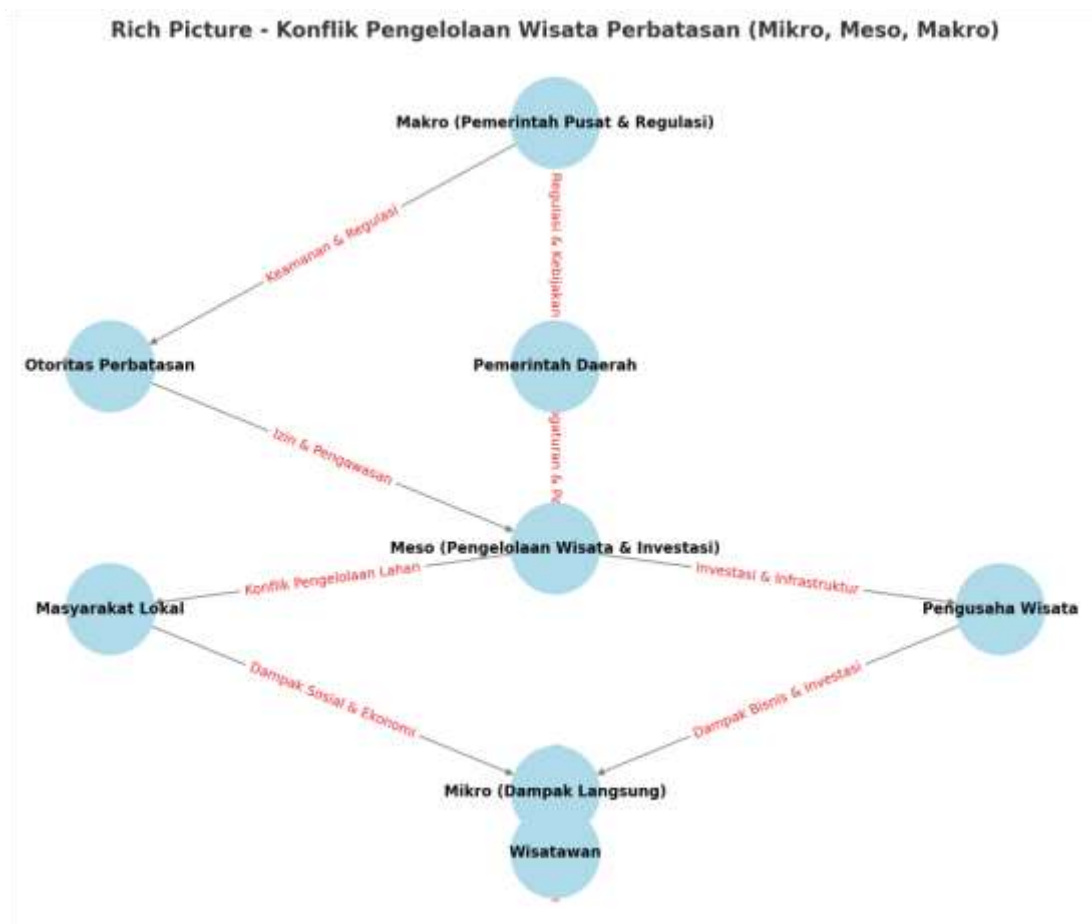


Figure 1: Rich Picture of Border Tourism Management Conflicts (Micro, Meso, Macro)

Rich picture above shows that at the level macro, the central government plays a role through regulations, national tourism policies, and water resource regulations. These regulations are passed down to the local government, which then translates into tourism management policies at the local level. However, this vertical relationship has not run smoothly, as evidenced by the overlapping authority between central regulations, provincial policies, and regional implementation.

The relationship between local governments, village-owned enterprises (BUMDes) tourism operators, and local communities demonstrates the complexity of decision-making. Local governments have the authority to issue permits, conduct supervision, and establish management standards. However, in practice, there are differences in capacity and approach between Malang Regency and Lumajang Regency, leading to fragmented planning and policy implementation. Relations between tourism entrepreneurs and local governments tend to be based on permit and investment transactions, while relationships with local communities are more direct and often give rise to land conflicts, distribution of economic benefits, and social tensions.

At the level micro Tourists are directly impacted by the entire chain of relationships, such as price differences, inconsistent service quality, limited facilities, and even safety issues on tourist routes. These impacts reflect policy inconsistencies and weak coordination across districts. Therefore, rich picture. This confirms that the management problems of Coban Sewu do not stand alone, but are the result of accumulated interactions between actors at various system levels, from policy to field impacts.

Root Definition

Root Definitions. In addressing complex and unstructured tourism destination governance issues, such as in the case of Coban Sewu, an analytical framework is required that can formulate a system that is functional yet contextual. The third stage is the preparation Root Definition, aims to describe a purposeful activity system, namely a system that is intentionally designed to achieve a specific goal in the real world. Root definition is not just a technical description, but rather a social construction that considers various actor perspectives, change goals, and external constraints that affect the system. One important stage is compiling a root definition (root definition) of the system that is considered relevant to solving complex problems that are unstructured. Root definition describes a system of activities that has a purpose (purposeful activity system), seen from a certain point of view, and analyzed using the CATWOE approach, which is an acronym for:

1. *Customers*
2. *Actors*
3. *Transformation*
4. *Weltanschauung (pandangan dunia)*
5. *Owner*
6. *Environmental Constraints*

CATWOE helps formulate and delimit the system to be studied, as well as balance various stakeholder perspectives. The following are the results of identifying CATWOE elements in the case of Coban Sewu tourist destination management:

Tabel 1 CATWOE

Role	Explanation	Description
Customers	They are directly impacted by the quality and effectiveness of destination management.	Domestic and foreign tourists Local communities around Coban Sewu (Malang and Lumajang Regencies) MSMEs that depend on tourism activities Regional governments that obtain PAD from the tourism sector.
Actors	These actors have a role in implementing policies and managing the area technically and operationally.	Malang Regency Tourism Office Lumajang Regency Tourism Office Department of Public Works and Environment Local communities and tourism actors
Transformation	This transformation is the essence of the desired systemic solution.	From: Fragmented tourism management system and inter-regional conflicts Become: An integrated management system based on cross-regional collaboration that is sustainable and benefits all parties.
Weltanschauung	This view justifies why an integrated system is needed and worth developing.	Cross-regional tourism management requires policy synergy and collaboration models to create environmental, economic, and social sustainability. Tourism is not only a source of income, but also an instrument for integrated regional development and nature conservation.
Owner	The party who has the authority to initiate changes or stop the system.	Ministry of Home Affairs East Java Provincial PUSDA Office East Java Provincial Tourism Office
Environmental Constraints	These factors constrain the system design and must be	Regional boundary regulations and implementation of Home

	taken into account in the conceptual model.	Affairs Ministerial Regulation No. 86 of 2013 Regional budget limitations Differences in development vision and priorities between districts Socio-cultural sensitivity of local communities to the issue of "territorial claims"
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Source: Processed by Researchers (2025)

By arranging the CATWOE elements in the framework *Root Definition*, it can be concluded that the Coban Sewu tourism management system requires multi-actor and cross-regional collaboration-based interventions, with the aim of transforming fragmented management conditions into an integrated, legal, and sustainable system. This analysis shows that various stakeholders have roles and interests that influence each other in the system, ranging from customers such as the community and tourists, to technical implementing actors, authoritative owners, and external environmental influences such as regulations and fiscal limitations. The preparation of Root Definition through the CATWOE approach allows for system mapping that focuses not only on structure, but also on values, worldviews, and power relations that operate within it.

Conceptual Models

In the fourth stage of SSM, the preparation of *conceptual model* which represents the minimum set of activities required for the system to achieve the desired transformation. The conceptual model is not a description of actual conditions, but rather an idealized representation of the desired system, structured based on the root definition and CATWOE elements. This model serves as a tool for mapping the relationships between actors, functional flows, and institutional roles required for the integrated implementation of Coban Sewu tourism management policies.

In the context of managing a cross-regional destination like Coban Sewu, a conceptual model needs to accommodate the complexity of governance involving multiple levels of government and local actors. Therefore, the conceptual model developed includes three main system layers: macro level, meso level, And micro level, each of which has strategic and operational functions.

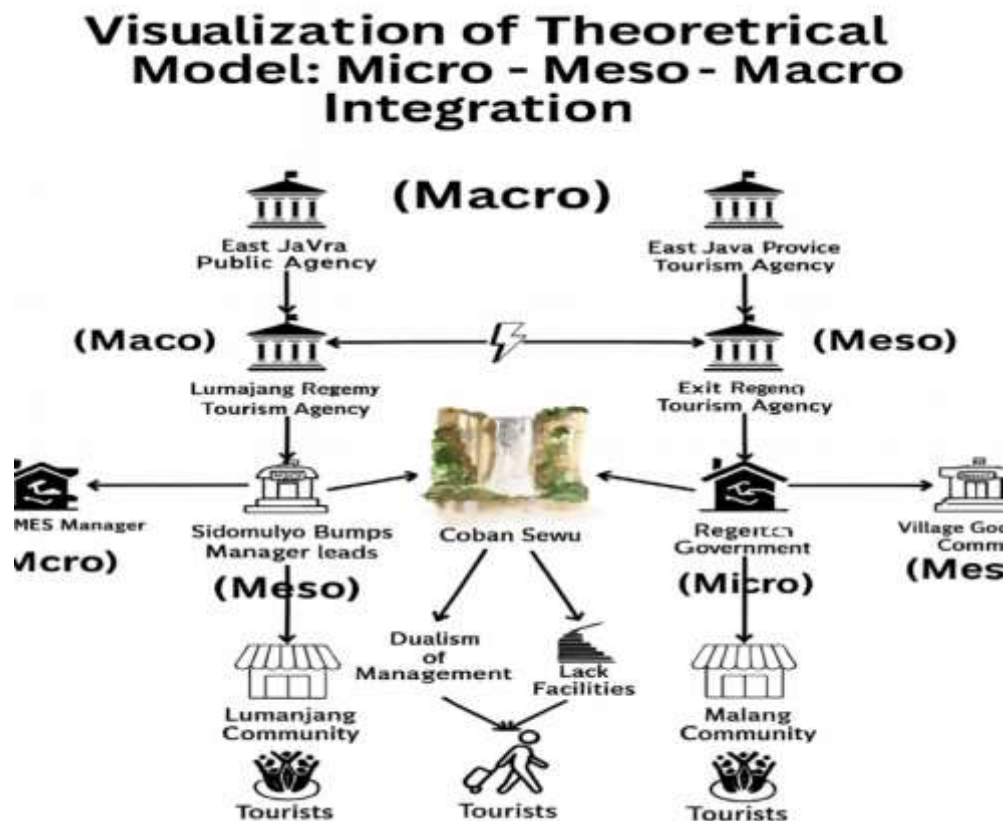


Figure 2. Visualization of the Conceptual Model of Micro - Meso - Macro Integration

Source: Processed by Researchers (2025)

In level macro, the management of Coban Sewu tourism is influenced by government institutions with strategic authority in formulating regulations and policies, such as the Ministry of Home Affairs, the East Java Provincial Public Works and Water Resources Agency (PUSDA), and the East Java Provincial Tourism Agency. These institutions are responsible for formulating regulations on water resources, spatial planning, and tourism, including harmonizing policies between districts, facilitating cross-regional coordination, and establishing technical and safety standards for tourism that serve as references for implementers at the regional level.

In level meat the implementing role is played by the Tourism Offices of Malang and Lumajang Regencies, as well as the Sidorenggo and Sidomulyo Village governments, which translate macro policies into programs, standard operating procedures (SOPs), facility management, field supervision, and business development. It is also at this level that tensions between districts are evident, particularly regarding dual management practices, tourist access, and the distribution of economic benefits.

Meanwhile, at the level micro, operational management of the destination is carried out by local managers such as Rohim managers on the Malang side and BUMDes Sidomulyo on the Lumajang side, as well as MSMEs and village communities who interact directly with tourists. These micro actors are

responsible for visitor services, route and facility management, tourism economic activities, and maintaining tourist security and comfort. It is at this level that various crucial issues such as minimal facilities, service inequality, and dualism in management are most clearly manifested, thus reflecting how coordination between the macro, meso, and micro levels is crucial for the integration of the overall Coban Sewu management system.

Comparison With Real-World

A comparison of the conceptual model and real-world conditions shows that the actual Coban Sewu management system is still far from the ideal model based on cross-regional collaboration. The ideal system emphasizes integrated, legally binding, accountable governance, and the involvement of all stakeholders at the macro, meso, and micro levels. However, field findings indicate that management practices remain fragmented, informal, and dependent on the interests of each district and individual actor.

In Malang, tourism management remains dominated by individual actors who manage tourism access from private land without a clear institutional structure. Claims of NIB and OSS are not accompanied by accountability, reporting, or contributions to the village government. This situation raises transparency issues, gaps in participation, and legal vulnerabilities due to the lack of separation between land ownership and tourism operator functions. The Sidorenggo Village Head emphasized that managers never coordinate with and contribute to the village, demonstrating the distance from inclusive and participatory governance practices.

In contrast, in Lumajang, the Sidomulyo Village-Owned Enterprise (BUMDes) has demonstrated improved institutional development through the establishment of a tourism unit, community training, and facility development. However, this system remains far from achieving the ideal model due to the lack of formal coordination with Malang Regency. Duality of entrance gates, differing tariffs, and competing branding of Coban Sewu and Tumpak Sewu indicate that the two regencies are developing this destination without a collaborative framework, resulting in inconsistent tourist experiences and an unequal distribution of economic benefits.

Administrative boundary conflicts exacerbate the gap between ideal and actual systems. Although official documents place Coban Sewu within Malang, on-the-ground practices indicate claims and management activities are being carried out by Lumajang. This situation creates uncertainty over authority, licensing obstacles, and duplication of policies. Provincial intervention through a 2024 inter-agency meeting demonstrates that this issue has escalated to a macro level and requires stronger structural coordination. The second warning letter from the East Java Water Resources Agency to the management also revealed violations of river boundary utilization and weak synchronization between tourism management and environmental regulations.

Another gap lies in infrastructure and services. Access from Lumajang is relatively better and more organized than from the Malang side, which still relies on village roads and limited facilities. This disparity impacts tourist perceptions,

visitor flow, and potential local revenue. Furthermore, community involvement on the Malang side is still minimal, particularly for MSMEs and residents who lack the space to participate or receive proportional economic benefits. This contradicts the principles of cross-border collaboration, which require shared capacity, shared motivation, and equitable distribution of benefits.

Overall, the comparison results show that the management of Coban Sewu is in a good situation. *messy problem* characterized by dualistic management, conflicting authority, regulatory violations, development inequality, and low community participation. Despite positive initiatives such as strengthening village-owned enterprise (BUMDes) institutions and provincial government involvement, the gap between actual conditions and the ideal model remains significant. Transformation toward an ideal system requires reconciling administrative boundaries, establishing a joint management forum, integrating cross-sectoral regulations, and improving the quality of management at the local level.

Define Feasible and Desirable Changes

The sixth stage in Soft Systems Methodology is a crucial phase that identifies changes that are not only systemically ideal (*desirable*), but also worthy of being applied in the existing social, regulatory and political context (*feasible*). The formulated changes must take into account environmental limitations, actor readiness, and the interests of policy makers, so that the system transformation can move from the actual fragmentary condition to a more legal, inclusive, and collaborative governance.

Interview results revealed the need for change desired by the community and the government. The Sidorenggo Village Head emphasized weak participation and benefit distribution:

"This village only serves as a route and provider of routes, but is never consulted or receives any contribution from the tourism." This statement demonstrates that transparency, fair distribution of revenues, and village involvement are urgent needs. Meanwhile, the Malang Regency Tourism Office highlighted institutional barriers: "We cannot fully organize it because there is no agreement between districts, and there is no binding institutional form." This shows that cross-regional coordination is a key element that must be strengthened.

Based on the comparison between the ideal system and the field reality, several changes were assessed. *desirable* at a time *feasible* is:

1. Formation *Joint Management Body (Joint Management Body)* between Malang and Lumajang Regencies as cross-border legal institutions with operational mandates;
2. Integration of OSS permits and tourism permits in one integrated cross-district system to avoid legal fragmentation;
3. Compilation *profit sharing scheme* which is fair for the affected villages in the two administrative areas;
4. Determination *forbidden zones* and *active tourist zones* in accordance with the regulations on water resources and the boundaries of the Glidik River;

5. Active involvement of BUMDes, MSMEs, and community groups in the official system through training, data collection, and provision of suitable business space; and
6. Formation of a permanent coordination forum between district, provincial, Bakorwil, and village agencies to ensure the sustainability of cross-jurisdictional dialogue.

This change was reinforced by the results of the March 15, 2024, Coordination Meeting, which recommended the establishment of Regional Development Cooperation (KSPD), the remapping of tourism business permits in accordance with KBLI 93221, and the correction of river area utilization violations. Institutionally, this demonstrates that the space for change is now open: regional and provincial governments have recognized the need for collaborative mechanisms and legal harmonization.

With the urgent need for change identified, the Coban Sewu management system is now entering a transformation phase, transforming conceptual designs into concrete actions. The changes formulated at this stage are not merely recommendations, but rather the foundation for developing a more operational, realistic, and sustainable implementation strategy.

Take Action

Level *take action* this is the final part of the SSM methodology, which aims to translate the results of the actual system analysis and conceptual model into adaptive and contextual action recommendations. Based on research findings regarding the implementation of the Coban Sewu tourism management policy in Ampelgading District, corrective actions are aimed at strengthening five key indicators in policy implementation.

Research shows that the Malang Regency government's commitment needs to be strengthened through the establishment of formal management institutions and cross-regional coordination mechanisms. The current management system remains individualistic and lacks adequate institutional legitimacy, impacting the effectiveness of oversight, planning, and synchronization policies with other districts. Therefore, actions that need to be taken include strengthening institutional commitment through formal policies, role affirmation, and alignment of authority between regional governments.

From the aspect Human Resources the study found that the capacity of tourism managers and actors remains limited, particularly in destination management, tourism services, and regulatory understanding. This situation hinders the implementation of tourism service and safety standards. Therefore, necessary measures include improving human resource competency through training, certification, and ongoing mentoring involving district and provincial government agencies and other technical institutions.

On the indicator facilities and infrastructure the study identified disparities in access and facilities on the Malang and Lumajang sides. Basic facilities such as tourist trails, information boards, parking areas, and safety measures do not meet the minimum standards for high-risk natural destinations. Corrective measures are aimed at gradually improving infrastructure, providing safety facilities, and

structuring the tourist area to comply with spatial and environmental regulations.

From the sidecross-sector synergy the study found that coordination between regional agencies, between districts, and between the government and the community has been ineffective. The absence of a permanent forum, joint standard operating procedures (SOPs), and formal communication mechanisms has resulted in policies between the two regions operating independently. Actions that must be taken include establishing a cross-sector coordination forum, developing integrated standard operating procedures (SOPs), and facilitating mediation and collaboration by the provincial government, as the authority holding the cross-regional authority.

On the indicator social conflict the study found that dualistic management, overlapping administrative authority, and differing tariffs are sources of social tension at the local level. These conditions impact tourist perceptions and the fairness of benefit distribution between villages. Therefore, necessary actions include developing a fair revenue-sharing scheme, restructuring the roles of local actors, and establishing a conflict resolution mechanism based on inter-regional agreements.

Overall, the corrective actions formulated at this stage reflect research findings that demonstrate the need for a transformation of Coban Sewu governance toward a more legal, structured, and collaborative system. This transformation can only be achieved if the government, community, and local managers work within a harmonious policy framework, with strong regulatory and institutional support at the district and provincial levels.

CONCLUSIONS

This study shows that the implementation of Coban Sewu tourism management policies in Ampelgading District, Malang Regency, takes place within a complex and tense cross-regional governance context. Generally, management is in a situation of dual authority between Malang Regency and Lumajang Regency, triggered by a mismatch between administrative boundaries (Minister of Home Affairs Regulation No. 86/2013) and the ecological realities and socio-economic practices on the ground. This condition has an impact on differences in retribution schemes, infrastructure quality, promotional patterns, and management narratives in the two regencies that manage the same tourist attraction.

Judging from policy implementation indicators, the Malang Regency Government's commitment has not been fully realized in the form of formal institutions and a collaborative legal framework. The absence of a joint management body and cross-district coordination forum means that regulatory, oversight, and role allocation functions are carried out partially and sectorally. In terms of human resources, the main problem is not simply a shortage of personnel, but also weak adaptive, collaborative, and institutional capacity. Social learning across actors has not been institutionalized, while the community's moral motivation to preserve nature is not accompanied by substantive participation in decision-making.

In terms of facilities and infrastructure, there are disparities between Malang and Lumajang, both in terms of accessibility, basic facilities, and service standards. While information technology and social media have played a significant role in promoting Coban Sewu, they have not yet been utilized in an integrated manner for the electronic ticketing system, *one gate system*, as well as collaboration-based visit data management. In terms of cross-sector synergy, the relationship between regional government actors, villages, BUMDes, Pokdarwis, business actors, and the provincial government is characterized by *role gap* and unequal power relations. Local communities bear social and ecological costs that are not always commensurate with the economic benefits gained, thus reducing trust and a sense of ownership in the destination.

The emerging social conflicts are multidimensional, encompassing inter-district authority conflicts, unequal distribution of benefits, and the marginalization of villages as the primary gateways. The absence of specific cross-border regulations and weak vertical-provincial coordination mechanisms have led to reactive and incidental management. Therefore, the sustainability of Coban Sewu management depends heavily on a transformation from a sectoral model to collaborative governance based on law, justice, and participation. The establishment of a joint cross-district management body with a clear legal basis, a single-entry retribution system, and uniform service standards are key agendas generated by this research.

The supporting factors for Coban Sewu's management policy primarily rely on the extraordinary strength of natural resources, social capital in the form of community and MSME participation, and the provincial government's initial commitment to facilitate cross-regional coordination. Conversely, the inhibiting factors are structural and institutional: jurisdictional conflicts, sectoral egos, the absence of a shared institution, gaps in human resource capacity, and the absence of a specific policy for managing border destinations. These findings confirm that the primary problem is not merely operational technicalities, but rather a collaborative governance crisis.

Theoretically, this study enriches the application of public policy theory, *stakeholder theory*, *social exchange theory*, and the framework *collaborative tourism governance*. In the context of border tourism destinations, administrative conflicts have been shown to impact not only legality but also change organizational work patterns, actor perceptions, and institutional learning capacity. Practically, the research findings can serve as a reference for local governments, village-owned enterprises (BUMDes), tourism groups (Pokdarwis), and other stakeholders in developing systemic diagnoses, establishing cross-district coordination forums, and strengthening human resource capacity based on *ecological citizenship*, as well as designing a more resilient, inclusive, and sustainable community-based tourism management model.

RECOMMENDATIONS

This study recommends strengthening Coban Sewu tourism governance through six strategic steps. *First*, it requires formation Joint Management Body (*Joint Management Body*) between Malang Regency and Lumajang Regency

through Governor's Regulation or inter-regional cooperation, to ensure coordination, service standards, transparency of levies, and conflict resolution can run effectively. *Second*, needs to be implemented one-door retribution system with a fair benefit sharing scheme, so that double tickets can be eliminated and legal certainty for tourists and business actors increased. *Third*, increasing human resource capacity must be a priority through risk management training, guide certification, service digitalization, and strengthening Pokdarwis and BUMDes as community-based learning organizations. *Fourth*, arrangement integrated infrastructure it is necessary to standardize tourist routes, safety, accessibility, basic facilities, and electronic ticketing systems across districts. *Fifth*, strengthening cross-sector synergy must be facilitated through regular coordination forums involving provincial, district, and village governments, business actors, and the community, along with the development of collaborative SOPs. *Sixth*, social conflict resolution mechanisms through formal mediation forums, conflict resolution protocols, alignment of tourism narratives, and benefit sharing based on spatial justice.

The implementation of these recommendations is expected to have institutional impacts in the form of legal and integrated collaborative governance; economic impacts in the form of increased PAD and village income; social impacts in the form of strengthened community cohesion and sense of ownership; tourism impacts through improved service standards; and ecological impacts through more sustainable protection of waterfall areas.

ADVANCED RESEARCH

This research has several limitations that should be noted as context for interpreting the findings. First, the use of a single case study approach to Coban Sewu tourism management allows for in-depth analysis, but limits the generalizability of the findings to other border destinations with different characteristics. Second, the research represents conditions up to 2025, so policy dynamics, changes in regional leadership, or new regulations may influence the relevance of the findings in the future. Third, the research focus is limited to aspects of policy implementation, social conflict, and governance, thus excluding environmental analysis, economic feasibility studies, or more in-depth anthropological studies. Fourth, limited access to informal, undocumented data is a typical challenge of qualitative research, although this has been minimized through triangulation of data sources and field observations..

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