

30th January 2016

Falls To Hotham Alpine Crossing 2016 Draft Master Plan Submission by the Victorian National Parks Association

‘The most important thing of an eco-lodge is that it is not the most important thing.’

Hector Ceballos-Lascurian, who in 1983 coined the term ‘ecotourism’.
Quoted in Victoria’s Nature-based Tourism Strategy, 2008.

The Victorian National Parks Association is Victoria’s leading non-government organisation dedicated to protection of Victoria’s biodiversity. Our mission: “Victoria is a place with a diverse and healthy natural environment protected, respected and enjoyed by all.”

Summary

While we enthusiastically encourage broad community access to our national parks and reserves, and acknowledge the significant and growing role our parks play in supporting regional tourism, we do not believe the draft *Master Plan for the Falls to Hotham Alpine Crossing* (FHAC) proposal has sufficient merit to proceed.

It will not improve the health of Victoria’s Alpine National Park, nor will it significantly advance the health of the community, indeed it may do the opposite. And we do not believe it is the best way to serve regional tourism.

We are opposed because:

1. The plan ignores key recommendations of *Victoria’s Nature-based Tourism Strategy 2008-2012*.
2. It is an environmentally unsound proposal.
3. It is the wrong way to allocate scarce park funding
4. The draft plan appears to have been developed to achieve a pre-determined outcome.
5. We do not believe any new buildings in the Alpine National Park are justified.
6. The alpine region is an unsafe environment for unprepared walkers.
7. The plan unnecessarily favours one demographic over another.
8. ‘Information’ in the draft plan is often unsupported, wrong or contradictory.
9. Mount Feathertop must be protected from development
10. There are better options.

A discussion of the route

Various options for the route already exist, of course, and we support the initial part of the recommended route over Heathy Spur (though work needs to be done to better protect peatlands on that section). However we are concerned that alternatives expressed on p. 42

re-awaken the fraught 'Around the Lake' track idea, which we have always strongly opposed primarily because it unnecessarily opens access to a highly sensitive area of the park around Rocky Knobs. (It's also a very unattractive walk when the water in Rocky Valley Dam is released.)

We are surprised that the existing short cut option via the Pretty Valley Road isn't even considered for those with less time.

We are very opposed to the path up Diamantina Spur. While it remains an option for the adventurous, it is unsuitable for the proposed 'comfort in nature' visitor the draft plan aims at: it is very steep, and can potentially lead ill-equipped hikers into dangerous weather (see point 6/ below).

In more detail:

1/ The plan ignores key recommendations of *Victoria's Nature-based Tourism Strategy 2008-2012*

While *Victoria's Nature-based Tourism Strategy* (NBTS) is now beyond its notional use-by date, it remains relevant to this issue as an alpine walk was initially proposed by the strategy. It was never, however, the main thrust of the strategy.

On page 5 of the NBTS, the 'Context' is set for the whole strategy. It makes some important points that have not been addressed. Among them:

- Victoria has a *"lack of a unique brand to position Victoria in a competitive market place"*. Rather than seeking to define Victoria's unique brand, this trail (and the Grampians Peak Trail etc) have sought to emulate high profile adventure walks elsewhere – but with inferior products due to Victoria's low mountains and fragmented natural areas.
We believe Victoria should be marketed as the ideal destination for day walks, all of which can be experienced from a great range of B & Bs, wineries etc across the state.
- The current Master Plan sets up serviced huts on the Diamantina Spur which will inevitably need to be serviced regularly by (carbon intensive) helicopter! As the NBTS points out:
"... visitors are now seeking experiences that are actively reducing their impacts on climate change and the size of their carbon footprint. Nature-based tourism, in particular, can and must play a significant role in addressing climate change."
That important point is stressed again on pages 12 and 45 of the NBTS.
- Also, understandably, the strategy insists that *"the integrity of the natural environment, including biodiversity, must be maintained and sustained"*. There has been no environmental assessment sought for this proposal. (See point 2/ below.)

On pages 7 and 8, the 'key directions' for the NBTS are set out.

- Direction 2 includes the directive to develop "a sustainable nature-based tourism protocol with peak conservation groups". This important process has not occurred, leading to an inevitable lack of social license for the plan.

On page 29, the NBTS describes the 'Comfort in Nature' tourism type, the one the FHAC proposal claims to be aimed at attracting. However, the NBTS points out that *"these participants will undertake activities for shorter durations, many lack the skills to undertake the activities without a guide...etc"*. The proposed long and strenuous FHAC walk does not sit easily with that understanding of the demographic. (See point 7/ below.)

Again, our strong recommendation is that Victoria can most usefully be marketed as the ideal place for multiple day walks in a great range of environments.

2/ It is an environmentally unsound proposal

There has been no environmental impact assessment made.

- Our advice, from leading alpine ecologists, is that any infrastructure that involves the disturbance of earth will result in weed invasion. There have been a number of studies and reports outlining that dilemma, and the extent to which it particularly applies to the alpine region. That means that any such planned disturbance would have to be seriously justified, and would normally only happen in a national park when it served to actually avoid or minimize disturbance already happening. We can see no justification for any buildings proposed in the park, and certainly not for 31 buildings.
- The fact that a preliminary 'desk top study' has been performed is quite inadequate. Desk top studies only show locations of rare/threatened species if earlier studies have been undertaken in that area, and much of the data is old. The study would not have identified the weed issue or other threatening processes, or taken account of climate impacts.
We note also that the National Parks Act does not simply ask for threatened species to be protected, but for all of the park's natural values to be given protection.
- Plans for '*revegetation to increase visual buffer*' at Cope Hut, Tawonga Huts and Federation Hut campsites have no environmental credibility. They will, presumably attempt to transform areas of snow grass plain or open heathland into heathy woodland, or...? That is plainly ecologically unsound.
- The draft plan assumes Parks Victoria will be exempt from bushfire protection regulations requiring clearing around the proposed buildings, however we are not at all sure why that exemption should be considered guaranteed. Clearly, any clearing around the sites would have a considerable ecological impact.

3/ It is the wrong way to allocate scarce park funding

Even if this project had merit, it should not be considered a park management priority.

- Most walking tracks and visitor facilities in the Alpine National Park, and indeed in parks across Victoria, are in poor condition. Many tracks are eroded and signage is broken or non-existent.
- All parks have serious weed and pest animal management problems. The issues of controlling feral horses and deer in the Alpine National Park, for example, should be the overwhelming priority for the park's managers.
- Climate change is already affecting our parks, and these effects will increase, yet Parks Victoria appears to have no clear strategy to address these impacts.
- Parks Victoria appears to have no clear strategy to increase park visitation for those most in need of the experience: the underprivileged; Indigenous people; those in need of a healthy lifestyle etc. Ample research shows programs aimed at such groups can greatly increase the health, wealth and wellbeing of the broad community. (See 7/ below.)
- Park rangers are few and far between, and rarely found in the Alpine National Park or other parks across Victoria. That should change. On page 35 of the NBTS, it notes: "*The delivery of passive and guided interpretation by Parks Victoria rangers is also*

critical, particularly for international visitors. There are currently limited opportunities for visitors to engage with Parks Victoria rangers...”

There is a long history in Victoria of establishing various nature-based tourism initiatives, but then allowing them to fall into disrepair through lack of maintenance.

- Excellent tourist trails such as Gippsland’s Bataluk (Aboriginal) Cultural Trail, the Major Mitchell Trail etc have not been given ongoing funding or support, and have subsequently fallen into disrepair.
- Park visitor information centres across Victoria have either been closed (the Orbost Rainforest Centre, Point Nepean NP, Organ Pipes NP, Barmah NP) or greatly diminished (Alpine NP, Mount Buffalo NP, Grampians NP, Wilsons Promontory NP etc).
- Mount Buffalo Chalet has been out of operation for a long time. It is hard to understand why the FHAC has preference over the sorely needed rehabilitation of Mount Buffalo National Park’s chalet.

Victoria should demonstrate that it has the capacity and willingness to maintain visitor infrastructure and services before it embarks on another grand plan.

4/ The plan appears to have been developed to achieve a pre-determined outcome.

The draft has been developed in the absence of any rigorous environmental effects analysis, business plan, cost benefit analysis or cultural heritage plan (including any assessment of Aboriginal heritage impacts).

While the plan is clearly driven by a perceived need to improve tourism in the region, there is no evidence of any objective process to find the best way to address local tourism issues.

For example:

- One of the major tourism issues facing the alpine region is the large number of unoccupied beds in the lodges and hotels of the Falls Creek and Hotham Alpine Resorts over summer. Alpine resort summer occupancy can be as low as 20%. Falls Creek is currently concentrating on high altitude sports training facilities to try to improve that situation, and we support that initiative.
Another sensible option would be to develop and promote a series of day walks from each of the resorts, encouraging the ‘comfort in nature’ market to spend a week at a resort, with options for a different adventure experience in the Alpine National Park every day.
- While the draft proposes accommodating school groups with facilities such as communal shelters at campgrounds, there is no evidence that existing school/group activity enterprises in the region have been consulted. The Howmans Gap Alpine Centre near Falls creek, Dinner Plain’s Alpine School and the Mittagundi Outdoor Education Centre are all well-equipped to fulfill their roles. To our knowledge they have no need of constructed facilities, such as communal shelters, in the park between Falls Creek and Hotham.
- The Buffalo Chalet has now been out of service for many years. It is hard to understand why Parks Victoria would be putting new infrastructure into the alpine region, while existing infrastructure deteriorates. Mount Buffalo National Park probably has the best selection of short and longer day walks in the state.

As far as we are aware, this proposal has never been assessed against other sensible options encouraging tourism in the region, let alone the rest of the state.

5 / We do not believe any new buildings in the Alpine National Park are justified.

Proposing 31 new buildings in the Alpine National Park is, frankly, irresponsible. We do not believe there is a need for any at all. (We assume this is not an ambit claim, allowing Parks Victoria to settle for, say, half the number after an anticipated protest.)

- When the park was proclaimed, the decision was made to exclude the alpine resorts from the park boundary so development would be contained within the resort area. This 'Master Plan' subverts that intention, setting a precedent that opens the park to ongoing development impacts. (In Kosciuszko NP, the resorts were included within the park boundary, resulting in ongoing planning conflicts.)
- There are already large numbers of empty beds over the summer period in both the Falls Creek and Hotham Alpine Resorts. This strategy does not solve that problem. It would be far more useful to promote a series of day walks from each of the resorts.
- The extensive suite of community shelters are not needed and quite inappropriate. The example given of a shelter on the Larapinta Trail, illustrated on p. 61, is not located at a remote camp ground, but at the Ormiston trailhead, along with a bus parking area and campervan accommodation. Shelters of that nature would be very intrusive in a remote area.
- The notion that the proposed 31 buildings will be 'demountable' is a bit of a cop-out clause – they are clearly intended to remain in the park.

6/ The alpine region is an unsafe environment for unprepared walkers.

For many years now, standard advice to walkers in the Alpine National Park is that they should be self-sufficient with their own accommodation, food and appropriate clothing, and should not rely on the existing huts for shelter. In the past, ill-equipped people have died up there when the weather turned bad, which it can do quite suddenly at any time of year. White-outs, accompanied by freezing horizontal snow and/or sleet, make it extremely difficult for the most experienced hiker to find shelter.

This applies anywhere on the high plains, but particularly to the steep climb up the Diamantina Spur, where exhausted walkers can be faced with extreme weather quite different to that in the valley below, even in mid-summer.

7/ The plan unnecessarily favours one demographic over another.

While we can understand the push from the tourism industry to increase regional spending, we find the intention (made very clear by the graph on p. 87) to displace self-sufficient walkers and replace them with a notionally higher-spending group of visitors somewhat prejudiced. As expressed in the draft plan, it is unnecessarily offensive to a large group of tourists as well as local Victorians.

According to Parks Victoria's own figures, our parks already contribute greatly to local tourism (\$1.02 billion annually); however the contribution to 'avoided health costs' is far less (\$180 million).

It would seem from those figures that there is considerable room to increase the latter (ie 'avoided health costs') contribution to the economy by setting up a program that would encourage more young people, more people from different cultural/language groups, more disadvantaged people, more people from Aboriginal communities etc to enjoy our parks.

This would be consistent with Parks Victoria's motto: *Healthy Parks, Healthy People*.

Our investigation of the research into the health benefits (psychological, physical and social) arising from greater access to natural areas is that that potential is largely untapped. The long-term contribution to the economy from a more healthy and socially strong community can be considerable indeed.

There are a number of unfortunate aspects of the draft in this regard, including:

- The plan claims that the walk will be maintained by volunteers, but makes no acknowledgement that the walkers it is aiming to displace belong to the demographic that already volunteers in parks, including in the Alpine National Park. That was not acknowledged in the draft, which appears to discredit this group of people as non-contributors. Displaced walkers are unlikely to volunteer to maintain these tracks.
- The plan makes it clear that commercial tour operators will have preference over self-sufficient hikers, but doesn't establish the likely percentage of bookings that will be available to the general public. If the walk proves to be very viable to tour operators (the aim of the project), opportunities for independent walkers would be greatly diminished.
We believe high-end tourism to the area can be increased without displacing independent walkers (see point 10/ below).

8/ 'Information' in the draft plan is often unsupported, wrong or contradictory.

There are many instances in the plan where unsupported, wrong or contradictory information bring the draft's integrity into question:

- The figures on potential economic benefits to the region are enthusiastically large but highly questionable, given that no rigorous economic analysis has been undertaken. (We note that similar proposals for commercially operated huts for the Grampians Peaks Trail did not generate any expressions of interest from tour operators.)
- The claim is made (p. 60) that the cabins will '*take advantage of vistas where possible*', yet (p. 33) the assurance is given that '*the trail and associated infrastructure are not visible from other locations in the landscape*'. Both claims can't be true! Parks Victoria has an obligation to protect the integrity of the park's landscape.
- Claims for best practice environmental management ring somewhat hollow in the absence of an EES (see 2/ above).
- There are a number of inaccurate environmental statements in the draft:
 - Corroboree Frogs do not exist in Victoria and the Baw Baw Frog is not in the ANP, yet both are cited as species that will be given special protection consideration by the walk.
 - The claim that ecosystems at lower altitudes take longer to recover from fire than those at higher altitudes is wrong. A substantial report commissioned by Parks Victoria after the 2003 fire says quite the opposite.

9/ Mount Feathertop must be protected from development.

Unlike Canada's Rocky Mountains, New Zealand's South Island, South West Tasmania and most other places that attract significant ecotourism traffic, Victoria is very short of large, relatively free-standing mountains. Indeed Feathertop is the only substantial one we have. The mountain has a couple of small huts on its western face (both in place before the Alpine National Park was proclaimed), but the eastern side, which faces many view points from the national park and also from the Hotham Alpine Resort, remains unencumbered.

Putting a series of huts (serviced by helicopter!) on Feathertop's Diamantina Spur is unnecessary, irresponsible and shows a lack of respect for the values the park was reserved for.

10/ There are better options.

As mentioned a number of times above, we believe Victoria should promote a great multitude of day walks across many landscape types as its more-or-less unchallenged place in the tourism market.

- Trying to copy the attributes of other places leaves us failing by comparison. (The proposed FHAC wouldn't even compete against a similar alpine walk, should it ever be proposed, for Kosciuszko NP across the border.)
- Promotion of day walks in Victoria's parks, which are for the most part easily accessible from B&Bs and other accommodation, would be beneficial to tourism right across the state.
 - It would require significant investment in repairing walking tracks and signage, but that is core business for Parks Victoria anyway, and is sorely needed.
 - It could greatly increase the summer occupancy of the alpine resorts.
 - It would be a unique marketing position for Victorian tourism.
 - It would enable growth of the 'comfort seeker' market without disadvantaging any other demographic.
 - It would be consistent with encouraging the broad community to be engaged in both the use and protection of our parks.

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We would appreciate any opportunity to discuss these issues further.



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