



## National Parks Association of the ACT Inc.

*conservation education protection*

### **Submission from the National Parks Association of the ACT Inc (NPA ACT) on the proposed Parks Victoria project Falls to Hotham Alpine Crossing.**

#### **Background**

The National Parks Association of the ACT Inc. (NPA ACT) was established in 1960 and has over 400 members and over 5,000 followers on Facebook. Members work to protect and promote National Parks in the ACT and surrounding regions. NPA ACT activities include bushwalking, work parties and environmental advocacy.

The interest of the NPA ACT in supporting the protection and management of national parks extends beyond the borders of the ACT. The NPA ACT is a member of the National Parks Australia Council (NPAC). Formed in 1975, NPAC is a national body of members of National Park Associations across Australia. The objective of all these organisations is to support the protection and management of national parks and reserves in the States and Territories.

The bushwalking and ski touring activities of NPA ACT members extend well beyond the borders of the ACT. Members have walked extensively not only in NSW, but also Tasmania, the Northern Territory, overseas, and relevant to this submission, in Victoria and the alpine region. A number of members have walked the full 650km of the Australian Alps Walking Track, still one of the most outstanding long-distance walks in Australia.

NPA ACT has a number of concerns about this proposal. We are an organisation that strongly supports increasing awareness and understanding of our national parks through encouraging more community members to explore these areas and have access to our national parks. We are keen to share our knowledge with new members, and introduce them to the natural, cultural and Indigenous heritage values of our national parks and why they need to be protected and managed for current and future users. We have a good and positive relationship with ACT Parks, and support them with research projects, interpretation activities and advocacy on their behalf with the ACT Government.

However, access to and engagement with national parks should be on the basis that it is safe for all users, that it takes into account existing users, and that it does not have a significant impact of the natural, cultural and Indigenous values for which the park was declared. Our concerns are on the basis that this proposal does not meet these criteria, as outlined below.

## **Safe for all users**

The proposal to encourage walkers unfamiliar with alpine areas to walk up to Mt Feathertop along Diamantina Spur would have to involve an element of risk. The proposal must involve significant works on the current track for this to be made safe and accessible for a wide range of users. NPA ACT members who are familiar with this track have said it would currently only be recommended for experienced walkers.

The proposed route will result in walkers spending up to three days in remote alpine areas with limited access if they decide the walk is too difficult or the weather too cold or damp. This contrasts to decisions being made by NSW NPWS to reroute walkers away from the Main Range to a more accessible and safe walking area that goes via Guthega Village.

Will walkers be given information that they cannot easily access an exit route after they leave Tawonga Huts? The area from Tawonga Huts to the bottom of Diamantina Spur can be very exposed, even in summer, and there is then a steep climb until they reach the Knobs area. Will walkers be required to sign a declaration that they understand the risks involved? Will it be a case of buyer beware and that walkers do it at their own risk and Parks Victoria will not be liable for any injuries or other unforeseen consequences?

The Tasmanian Parks and Wildlife Service built the Three Capes Track to reduce the pressure on the Overland Track, to protect the natural and cultural values of the area and to improve the Visitor experience. However, the alternative walk they built was in a coastal area, with ready access, if need be, in case of emergency and safer weather conditions for inexperienced walkers.

There are already significant accommodation hubs in the Victorian alpine regions which could provide safe overnight walking experiences in this outstanding alpine region, without a proposal that will have significant environmental impacts of this current proposal.

## **Environmental impacts**

The summary of the project states that

*... it will reduce the environmental impacts by keeping walkers on the track and off sensitive vegetation areas. The new longer route will avoid new facilities from being established within a designated 'remote and natural area' of the national park, which the current route passes through. Tent platforms and low impact small huts that blend in with the environment will also minimise the impact of visitors.*

It is difficult to understand that a proposal that will result in

- Four new overnight accommodation hubs – each with up to nine catered huts for 2-3 people / 36 (2-4 person) huts
- 31 rentable tent platforms
- Four large communal shelters
- A stand-alone 50-person hut for group gathering and cooking
- Huts for tourism operators and communal toilets.
- Nine other structures including toilets, solar panels and picnic tables and access paths

Will have minimal environmental impact on this fragile alpine environment. Expanding the area around Cope Hut for example to include the above structures will change the visuals of an area accessible in summer and on skis in winter from an area around a historic hut to an area with a number of buildings and structures.

The preliminary assessment indicate that the Falls to Hotham Alpine Crossings infrastructure will result in the damage and potential removal of 45 hectares (including 30+ hectares for the four accommodation nodes alone) of native vegetation and habitat within the National Park. Within the proposed widened route of the track there are three threatened species of plants. Within the camping and hut nodes, there are fifty-seven threatened plants, animals and insects. There are also stands of increasingly rare and long-unburnt Snow Gums. The environmental impact will be far beyond minimal with these constructions.

Over thirty years ago the Tasmanian Parks and Wildlife Service approved the construction of huts for commercial use along the Overland Track and has continued to upgrade and in some cases relocate huts for public use on the Overland Track with improved facilities including heating and toilets and tent platforms. Now available through a permit system in summer, these huts provide safety and shelter without having a significant negative impact on the walker experience and visual beauty of the area.

Has Parks Victoria considered providing facilities similar to the Overland Track for this Crossing to be available by a permit system in summer? A calculation of the number of people being at each site if the proposed facilities are provided would be:

- 4 people @ 4 accommodation huts - 16 people
- 31 tent platforms @ 2 people per tent – 62 people
- Huts for tourism operators – no numbers – estimate of 20 people

This tallies to 98 people at each site – and does not include independent walkers! It is difficult to gauge how this many people and the supporting infrastructure would not have an impact on the natural and cultural values on the site.

This leads to another issue, concern about the lack of EPBC assessment and approval

## EPBC assessment and approval

The area proposed for development under this proposal is part of the Australian Government National Heritage Listed Australian Alps. This listing acknowledges the outstanding landscape value of the Australian alpine region, and that the area is home to unique cold climate adapted plants and animals.

The development proposed at the four areas, and the upgrading and construction tracks to suit inexperienced walkers, will have a significant impact on the natural values of this area.

Under the EPBC Act, in order to conserve and protect the values of a National Heritage place any action that:

*... has, will have or is likely to have a significant impact on those values may be referred to the Australian Government Minister for the Environment (the Minister) for assessment*

The **Landscape and Visual Impact Preliminary Assessment** prepared for Parks Victoria in May 2022 page 5 states that:

*... the introduction of proposed infrastructure associated with overnight node accommodation for the Falls to Hotham Alpine Crossing will have no significant impact on the National Heritage Values, on the basis that:*

- *No National Heritage values are lost.*
- *No National Heritage values are degraded or damaged, and*
- *No National Heritage values are notably altered, modified, obscured or diminished.*

It is difficult to understand how this conclusion has been reached. There is going to be significant visual and environment impact on the area through construction of huts, accommodation, shelters, toilet facilities and upgraded walking tracks. The significant increase in the number of walkers to the area will impact of the fragile alpine flora and fauna. There will be physical damage and alterations at all sites, and the visual impact will be significant.

NPA ACT will be writing to the Australian Government Minister for the Environment requesting that all elements of this project be assessed for the impact it will have on the National Heritage Listing of the Australian Alps.

## **Impact on existing users**

The NPA ACT is concerned about the impact of this proposal on the Australian Alps Walking Track, both for through walkers and the many walkers who undertake sections of the walk. This concern is reinforced in the lack of consideration by the consultants who undertook the Landscape and Visual Impact Preliminary Assessment of existing facilities and the AAWT which is adjacent to and includes sections of the AAWT.

Concern about the impact on the AAWT is enhanced by the fact that it was the then Federation of Victorian Walking Clubs that was the driving force behind the establishing of the AAWT, to link the alpine areas across the three states of Victoria, NSW and the ACT. The cooperation across the three states, and including the Australian Government Director of National Parks, has resulted in a world-class long-distance walking track.

The NPA ACT has concerns about the previously mentioned **Landscape and Visual Impact Preliminary Assessment** and the lack of reference in this report to the AAWT, and gaps in the maps included in this report.

**The map on page 12 of this report has inaccurate and missing information as follows:**

- Dibbins Hut has always been by the Kiewa River, not up a ridge as indicated here.
- When we walked from Hotham to Falls Creek in January 2019 there were three tent platforms and a toilet just upstream from Dibbins Hut by the Kiewa River. They are not included in this map – have they been removed?
- So, if these facilities are still there why are they not included as Existing Toilets/Shelter?
- Why is there no reference to the campsite and shelter at Derrick Hut?

Other maps imitate this inaccurate and missing information. If this report is going to be an accurate and comprehensive Visual and Landscape Assessment, then surely all the facilities in the area should be included.

This raises a concern as to whether the consultants did a ground truthing of the area for this report, or whether it was just done as a desk top study? It would seem inappropriate and inaccurate to do a Visual Assessment of this Nationally Listed Heritage Area without an onground survey.

This lack of reference to the AAWT also raises concerns about the accuracy of numbers of walkers around the Cope Hut area, as this area is also used by AAWT walkers. If there is insufficient space around Cope Hut, will it result in increased environment and visitor impact on surrounding areas, including the Scout Chalet and Wallace's Hut? Has this been considered in the planning?

And what will be the impact on the heritage listed Cope Hut of the significant increase in visitor numbers in and around the Hut? What restrictions will be put in place to ensure the long-term protection of the Hut?

What will be the impact on overnight walkers from Falls Creek who currently camp around Cope Hut and Tawonga Huts? Will there be restrictions placed on their usage of these area and preference given to walkers doing the Falls Creek to Mt Hotham walk?

There are also concerns about the conclusion of the report. It has assessed the visual impact of the structures being built from a number of surrounding areas, but not at the actual sites. To have a significant increase in buildings, tent sites and visitor numbers around Cope Hut and the Federation Hut site at Feathertop is going to have significant impact on the visitor experience of other walkers (on Feathertop) and day visitors (either walking or by car) at Cope Hut. The visual and impacts are not just from a distance, they are at the actual sites themselves, and this should have been included as part of the assessment.

### **Summary**

The NPA ACT support increased and improved access for walkers to the Victorian alpine region, but not in the proposal outlined in the Falls to Hotham Crossing. The current proposal is likely to have a significant negative impact on the natural and cultural values of this National Heritage Listed Area.

There are safety concerns, particularly in the proposed route up Diamantina Spur. There are concerns inadequate consideration has been given to existing users, including AAWT walkers. The NPA ACT recommends a more in-depth assessment on the environmental and visual impact and the impact on current day and overnight walkers using the area.

The NPA ACT will also be requesting the Australian Government Minister for the Environment that an independent assessment of the impact of this proposal on the National Heritage Values of the Australian Alps region be undertaken.

The NPA ACT would be willing to be involved in further consultations on this proposal.

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