



**Subject: Please halt the Falls to Hotham Alpine Crossing (FHAC) development**

**Sent to the following parties on 09 December 2020**

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The Hon. Daniel Andrews (Premier) - [daniel.andrews@parliament.vic.gov.au](mailto:daniel.andrews@parliament.vic.gov.au)

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The Hon Sussan Ley MP - Minister for the Environment - [minister.ley@environment.gov.au](mailto:minister.ley@environment.gov.au)

The Hon. Lily D'Ambrosio - Minister for Energy, Environment and Climate Change - [lily.dambrosio@parliament.vic.gov.au](mailto:lily.dambrosio@parliament.vic.gov.au)

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And your local MP (you may need to google who that is)

<https://www.parliament.vic.gov.au/about/people-in-parliament/members-search/list-all-members>

Dear [NAME]

I write to ask you to halt all further development of the proposed walking track known as the Falls to Hotham Alpine Crossing (FHAC).

It has been a difficult year for many Victorians, with circumstances that have further illuminated our dependence on, and appreciation of nature in our lives. A recent opinion poll reinforced the importance of access to nature for Victorians and highlighted widespread support for the protection of Victoria's natural places, including the creation of new national parks. It is interesting that the Labour Government has endorsed and committed \$15M in initial funding toward the FHAC, bundled with other projects under the guise of post COVID regional support.

Victoria's Alpine National Park (ANP), with its powerful, spectacular, and distinctive landscape, has a special association with the Australian community because of the unique landscapes, naturalness, experience of remoteness and as one of the few opportunities for broad-scale outdoor recreation in Australia. The ANP is widely recognised by Australian's as the 'high country' and many community groups have a special association with the ANP for recreation, mental health, social and cultural reasons.

**My first objection** to the FHAC proposal refers to the **National Parks Act 1975 Preamble** which states; *WHEREAS it is in the public interest that certain Crown land characterised by its predominantly unspoilt landscape, and its flora, fauna or other features, should be reserved and preserved and protected permanently for the benefit of the public.* The ANP was gazetted on the National Heritage List in 2018 as part of the Australian Alps due to its unique natural environment. It



is the place of government to preserve and protect these natural environments for future generations, not turn them into commercial playgrounds, competing for the tourism dollar against other states and regions.

**My second objection** refers to the **NATIONAL PARKS ACT 1975 - SECT 21C: Protection of remote and natural areas**. I refer specifically to the Bundara–Cobungra Remote and Natural Area which is traversed on day two of the FHAC. It is stated on page 44 of the master plan that simple and subtle trail upgrades will take place along with elevated boardwalks and interpretive signs. I refer you to the act which states;

**S. 21C(2) amended by Nos 70/1998 s. 14(Sch. item 15), 19/2018 s. 175.**

- (2) Parks Victoria must ensure that, in a remote and natural area—
- (a) no new roads or tracks for vehicles are constructed; and
  - (b) existing roads or tracks for vehicles are not widened or upgraded in any way so that they can carry increased traffic or heavier vehicles; and
  - (c) no new structures are constructed; and
  - (d) no new facilities are installed; and
  - (e) no new works are carried out that will adversely affect the natural condition or appearance of the area.
- (3) In subsection (2) "works" includes, but is not limited to, any of the following—
- (a) excavation and earthworks;
  - (b) destruction, removal or lopping of vegetation.

**My third objection** is that the FHAC proposal is contrary to government (ALP) policy that *"It is still government policy that tourism development will be encouraged to be sited on private or other public land outside national parks"*. (Ministerial answer to question 848 asked by Clifford Hayes in October 2019). While the ALP Government policy does allow for selected private investment inside a national park under a lease of up to 21 years, the FHAC is a situation where a Government Committee is actively campaigning and planning to spend \$34M of public funds for a development that will then be opened for licences private operators. The private operators will benefit from the public expenditure and recreational walkers, who frequent this region, will be pushed out. I ask you to confirm that tourism development will be sited on private or other public land outside National Parks and National Heritage Listed sites.

**My fourth objection** is that the development is opposed by most stakeholders. Following a process of public consultation, there was overwhelming public rejection of the FHAC in its current form. Between 85 and 90% of the written submissions rejected the current FHAC proposal. The FHAC Master Plan should acknowledge and accept the community response. However, the official summary of the responses concluded that, "Overall there was a positive response to the plan and its potential positive impact to the region". This is untrue. This documentation has understated and misrepresented the level of public rejection in favour of potential tourism revenue derived from the lucrative inbound adventure tourism sector.

**My fifth objection** is that the effect of the FHAC as described in the Management Plan is in opposition to government (ALP) values around social equity. The current proposal will displace lower income walkers in favour of wealthier tourists. (Refer page 62 and 74 of the FHAC Master plan.) As far as possible, income should not determine access to Victorian National Parks and other reserves. The baseline should be that no action impedes access to reserves on the part of traditional low



budget travellers. Replacing affordable access with higher-priced access is a step away from social equity and fairness. In operational terms, existing basic camping sites should be preserved at their current locations.

**My sixth objection** is the likelihood that \$34M of taxpayer dollars will be wasted due to poor economic analysis in the Master Plan. This includes the projected walker numbers and the estimated benefits including multipliers. I ask you to commit to a publicly available Business Case that is open to public comment before further funds are committed.

**My seventh objection** is that the FHAC is a poor option for local business. The plan for “on mountain hut-based commercial accommodation” rather than “lodge with daily transport” model will be the least desirable option for local business at Falls Creek, Hotham, and Harrietville. Better models exist in the Great Ocean and Grampians scenarios. The route proposed by the Master Plan is likely to lead to a model that excludes local business from accommodation provision during the FHAC. There is substantial unused accommodation at the local tourist hubs in the non-snow season and using this would benefit local business far more than the proposal in the Master Plan. Both the Great Ocean and Grampians scenarios allow for a day visitor model utilising day transport to and from local accommodation. The current FHAC does not facilitate this. Feedback on a publicly available Business Case will demonstrate better opportunities for local business.

**My final concern** is that the FHAC as currently proposed will have a major detrimental environmental impact on sensitive areas within the Alpine National Park. This will include major earth works, excavation, construction, helicopter intrusion, increased traffic, removal of human waste, servicing, and maintenance of facilities. One thing the FHAC would have in common with the Three Capes development in Tasmania is the absolute destruction of wilderness. Construction of the Three Capes Track significantly degraded the wild character of Tasman National Park and the project has received substantial criticism from the public and conservation groups. The proposed FHAC development would destroy some of the highest-quality remote wilderness in Australia.

As custodians of our wilderness, you have been appointed to protect this powerful, spectacular, and distinctive landscape. Please halt the FHAC development before it is too late. We do not want or need commercial developments or an increase of cashed-up tourists in our remote wild.

What an impressive legacy for our country this would be.

Yours sincerely,

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