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Tukituki Catchment Proposal
Environmental Protection Agency
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**Submission on the Tukituki Catchment Proposal: EPA reference numbers;
NSP 13/02. 002, NSP 13/02. 003, NSP 13/02. 018, NSP 13/02. 019**

For Consideration Under Section 5.3 of the Submission Document; Commenting on Specific Parts of the Tukituki Catchment Proposal.

1. I submit in relation to this proposal on behalf of the Hutt Valley Tramping Club (HVTC) that comprises some 300 members. Since its foundation in 1923, the HVTC has been continuously involved in the promotion and facilitation of tramping, mountaineering and other outdoor activities throughout New Zealand, as well as advocating for conservation values and the protection of rights of access to the mountains and backcountry. We were one of the founding members of the Federated Mountain Clubs of New Zealand that acts as our national advocacy body. Although HVTC is aware that FMC has also made a submission on this proposal, as one of the larger clubs in the lower North Island that regularly runs weekend club trips into the Ruahine Forest Park, we felt that it was important for our club to make its views, especially those concerning the preservation of access to the Makaroro River sector of the park, known to the board of enquiry.

2. Like FMC, HVTC's submission on this proposal is primarily concerned with the resource consents (Hawkes Bay Regional Council, Central Hawke's Bay and Hastings District Councils) lodged for the construction, operation and maintenance of the Makaroro Dam Structure on the Makaroro River at Wakarara. Our club's main concern is that the floodplain 'footprint' of the proposed reservoir will inundate an area of land (including roads, tracks, bridges and a river corridor) that is used to access an important part of the Eastern Ruahine Forest Park (identified as Zone 1 in the applicant's supporting documentation). As well as the obvious effects that the final structure and reservoir will have on access to the area, we are also concerned that the construction period (estimated to be 54 months duration) will also disrupt access to this area of the forest park. Access to other parts of the Ruahine Forest Park, particularly on its western side, has been diminished in recent years as a result of poor planning and land subdivision choices removing easements (e.g. Kawhatau Base), and HVTC is keen to ensure that this behaviour is not repeated if the current Tukituki proposal is granted approval.

3. Whilst HVTC is fully aware of the need to develop and create new opportunities within New Zealand's agriculture sector, and to provide infrastructure that helps to make this industry more resilient to natural hazards such as drought, we believe that any permanent loss

of environmental or recreational assets is unacceptable. We welcome the mitigation effects that the applicant proposes as compensation in return for approving the scheme and its associated infrastructure. We strongly urge that these mitigation measures are fully endorsed as mandatory requirements of the scheme and not be treated as optional extras or be diminished in their extent. If built, the applicant and users of the scheme will benefit economically for a considerable time and it is only right that they contribute in return to reinstate those amenities and opportunities that the scheme would destroy.

4. HVTC endorses FMC's comments concerning specific documents that discuss access issues in the applicant's supporting material. They are reiterated below for the purposes of clarity:

5. Ruataniwha Water Storage Scheme Recreation Assessment – Opus (May 2013a)

Page 5 – Noted disruption during construction: Managing the disruption of access to the forest park during the construction phase should involve more than just signage and a public communications programme as noted in this report. Management should also involve the specification and provision of the alternatives given to mitigate the disruption. The 54 month construction period is considerable and it is unreasonable to expect that park users should just hold back until construction is completed and then wait for access reinstatement sometime after that. That type of behaviour would be unacceptable in a city environment (e.g. a road is blocked for the same time while construction work occurs with no alternative provided) and the mere fact that a lesser number of recreationalists will be affected should not justify the lack of temporary alternatives being provided during the construction period. An acceptable alternative, if temporary mitigation cannot be found, would be to build the final access alternatives proposed before construction commences and have them operating from the very beginning of the process.

6. *Page 41, Table 4.0 – Potential new activities by activity/type (tramping/hiking):* HVTC agrees with the comments presented by Opus that post filling of the reservoir, there may be provision to improve access provided that agreement can be secured from the adjoining landowners. The fact that agreement may need to be sought implies that the outcome is by no means certain and this is of cause for concern. The access identified is important to trampers, hunters and other recreational users of the area because of the wider areas beyond the Makaroro River catchment that the initial access point provides. If land for the dam, reservoir and footprint can be purchased as part of the proposed scheme, then HVTC requests that the recreational access corridor land is also included in with this package so that the access to the park is secured. HVTC requests that securing the access corridor is not treated as a possible negotiated afterthought once the dam and reservoir are completed and then only if the adjoining landowner(s) is (are) willing to negotiate favourably.

7. As noted in the FMC submission, two areas of access are needed. One access route is needed to the riverbed above the lake from Wakarara Road on the river's south bank. There also needs to be a practical route linking the river bed above the proposed lake to the Yeomans Track and the track up the ridge towards Parks Peak. The link to these last two would need to be along a route that enables practical access around the bluff on the north bank of the river and through the adjoining pine forest. Such access should be legally designated, preferably as a legal, but unformed, road and follow a route that is practical to follow on foot. Without this secure access there will be significant impacts on recreation and then we would be opposed to the granting of consent.

8. Page 44, Table 5.0 – Mitigation of Activity by Type: HVTC endorses the sentiments set out in this table for mitigating access for tramping, hunting, fishing and mountain biking. As discussed above, the mitigating measures should be mandatory and not viewed as aspirational or optional. Furthermore, we also endorse the mitigation measures proposed for the possible loss of day visit and camping facilities. HVTC members travel some distance to reach this area – typically on a Friday night – and we will often camp at the existing, informal, Wakarara road-end campsite before commencing our activities early on the following morning.

9. Pages 56, and 69 – Appendix One – Record of Stakeholder Consultation: Comments from Heretaunga Tramping Club: HVTC notes FMC’s comments in its submission concerning Opus’ consultation with the Heretaunga Tramping Club. We request as one of several other, larger, lower-North Island clubs that access this section of the eastern Ruahine Forest Park, that the board is mindful of taking our club’s activities within the area into consideration when assessing the report, so that visitor numbers are not underestimated. Our club may make between two to four visits to this region per year (we typically cycle through various access points in each of the conservation areas in the lower half of the North Island, each weekend) with between 10 to 20 participants per tramping trip, depending on the trip destination. In addition, the growing popularity of mountain biking as an activity within our club means that more attention by our members will be focused on this area in the future, given the mountain biking opportunities that some of the tracks in this area afford.

10. Pages 63, and 64 – Appendix One – Record of Stakeholder Consultation: Comments from the Department of Conservation: HVTC also fully endorses these comments – They provide a good summary of the current situation and would serve as a good starting point for any mitigating measures.

11. Ruataniwha Water Storage Scheme (K6) – Proposed Mitigation and Offset Approach (HBRIC, May 2013f)

The summary of the impacts on recreation are given at the top of page 17 of this document, as well as the project names outlined to mitigate them. Specific comments on the two mitigating projects of interest to HVTC are discussed below.

12. Project A: Ruataniwha Reservoir Restoration Buffer and Catchment Enhancement Zone: HVTC supports the five primary objectives of this project, but especially endorses objective four which we view as crucial to preserving access beyond the reservoir ‘footprint’ and into the Ruahine Forest Park. The bullet-pointed items in Section 3.1.2 (Proposed Delivery Mechanisms) that we view as essential are:

- Funding for the creation of walking/cycling tracks around the reservoir where landowners are amenable
- Construction of an access track around the top-end of the reservoir, linking to existing DOC tracks in the Ruahine Forest Park via Makaroro Road.

The access track to the top end of the reservoir should be a mandatory mitigation measure and if possible (for reasons discussed above) it should be constructed before dam construction commences to allow for seamless access to the park rather than risking disruption to access during the 54 month construction period.

13. In addition, and in support of FMC’s sentiments, HVTC would request that a track that gives access down to the river bed itself, and that is above the high water level of the reservoir

floodplain, is constructed if the new proposed access track does not allow for this. The reason we make this request is because parts of the upper Makaroro River are bounded by steep escarpments and a new access track may not take this into account. It is sometimes crucial for tramping parties to access the riverbed as, under safe flow, it provides quick and ready access to areas further up the catchment that a designated track does not. In addition, parties travelling down river from elsewhere within the park may need a track to give access up from the river bed and onto any upper river terrace where the access track and road end are located. The other bullet pointed items noted under the delivery mechanisms are acknowledged and welcome.

14. Project C: Ruataniwha Threatened Species Habitat Enhancement: HVTC fully supports the sentiments of this scheme, especially the objective to initiate a predator trapping programme to enhance the biodiversity values of indigenous forest areas within the upper Makaroro River catchment. This objective is complementary to our recreational aspirations as the majority of our members appreciate undertaking trips in healthy forest that is diverse in its flora and fauna because they enhance the overall recreational experience and enjoyment of the trip. Although Project C is admirable and noble in its aspirations, we note its reliance on the completion of the access components of Project A in order for it to become a reality. For this reason, we urge that the access components of Project A are given top priority in order that the objectives of Project C that occur in the Upper Makaroro catchment can be realised and not remain as aspirational only.

15. Finally, the issues and opportunities raised by the Department of Conservation and supplied in Appendix Two in this report (p 41) are also endorsed by HVTC and should be factored into any of the access and environmental considerations discussed above, as appropriate.

For Consideration Under Section 6.0 of the Submission Document; Proposal Decision Sought. HVTC supports 'grant subject to amended conditions.'

HVTC would only support the approval of this project subject to the mitigating measures discussed under Section 5.3 of our submission being made mandatory and not simply aspirational. They are:

- Retention or improvement of legally secure public access to the Upper Makaroro Catchment and the current tracks in the Ruahine Forest Park that currently exist in the vicinity of the reservoir's floodplain 'footprint'
- Reinstatement of camping facilities to replace the campsite at Wakarara that will become inundated when the reservoir is filled
- Construction of the alternative access to occur before dam and reservoir construction commences (rather than after or during) so that access is not disrupted or restricted during the 54 month construction period
- That all access ways created are formalized, either as legal roads or easements (HVTC would prefer formalization as a legal road)
- Provision of legally secure public access down to the Upper Makaroro riverbed above the high water level mark of the reservoir if the originally proposed alternative access does not allow for this so that trampers, anglers and hunters can easily access the riverbed
- Road access to the northern side of the reservoir (e.g. via the dam itself – road along dam crest) to be open to the public once dam construction is complete

- Biodiversity objectives, as outlined in Project C above, for the Upper Makaroro catchment to be implemented.

Yours sincerely

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