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23 APR 2008

**SUBMISSION ON A RESOURCE CONSENT APPLICATION
SECTIONS 93(2) & 96 OF THE RESOURCE MANAGEMENT ACT 1991**



To: Buller District Council
C/- West Coast Regional Council
PO Box 66
Greymouth

Copy to: Meridian Energy Limited
PO Box 2454
Christchurch

APPLICANT: MERIDIAN ENERGY LTD

Closing date for submissions is Wednesday, 23 April 2008

Submitter Details

Name: New Zealand Recreational Canoeing Association
(full name)

Address: PO Box 284 Wellington
(full postal address)

Correspondence to be sent to the following name and address: (if different to above)
Robin Rutter-Baumann, PO Box 383, Rangiora

Phone No: 027 2096101

Fax No: 03 3132601

Email: nzrca@river.org.nz

I/we **support** the application numbers ticketed on the back of this form (tick one)
I/we **oppose** the application numbers ticketed on the back of this form

My/our submission is that: See attached submission
(state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

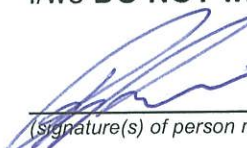
I/we seek the following decision from the Local Authority: _____
(give precise details)

That the application be decided in its entirety - see attached submission

Use the tick boxes to indicate the resource consent application(s) your submission concerns. Write a clear tick in the appropriate box(es).

I/we make my/our submission concerning **all** the consent applications listed below
My/our submission **only** concerns the consent applications ticked below

I/we **wish to be heard** in support of my/our submission.
I/we **DO NOT wish to be heard** and hereby make my/our submission in writing only.

 NRCA Communication officer 22/4/08
(Signature(s) of person making submission) (Date)

(If this is a joint submission by 2 or more individuals, each individual's signature is required)

I/we **have** served a copy of my/our submission on Meridian Energy Ltd as per Section 96(4) of the RMA

Consent list:

- RC07/180-A Land use activities associated with Dam, Staging Area & Associated Infrastructure
- RC07/180-B Land use activities associated with the Inundation Area
- RC07/180-C Land use activities associated with the Walking track
- RC07/180-D Land use activities associated with the Dam Access Road & Power Supply
- RC07/180-E Land use activities associated with Transmission Poles/Lines, Substation & Access Tracks
- RC07/180-F Land use activities associated with the Boat ramp/jetty
- RC07/180-G Land use activities associated with the Log Boom
- RC07/180-H Land use activities associated with the Use and Storage of Hazardous Substances



**SUBMISSION ON AN APPLICATION FOR RESOURCE MANAGEMENT
CONSENT UNDER SECTION 96 OF THE RESOURCE MANAGEMENT ACT 1991**

To: West Coast Regional Council and Buller District Council

Cc: Meridian Energy Limited

From: New Zealand Recreational Canoeing Association

Date: 22 April 2008

Re: RC07150 Mokihinui Hydro Power Scheme

Submitter Contact Details

Name of Party: New Zealand Recreational Canoeing Association (NZRCA)

Contact Name: Robin Rutter-Baumann, Communications Officer

Contact Phone: 027-2026101

Email Address: nzrca@rivers.org.nz

Postal Address: PO Box 284, Wellington, New Zealand

1. The NZRCA **opposes** the application by Meridian Energy Limited for the construction and of the Mokihinui Hydro Power Scheme as detailed in the resource consent applications numbered RC07150/1 – RC07150/26

2. **The particular aspects of the application this the NZRCA opposes are:**

The construction of the dam and consequent inundation of the Mokihinui River between Mokihinui Forks and the Welcome Creek road end.

3. **Our Submission:**

The New Zealand Recreational Canoeing Association makes the following submission in opposition to the application:

a) ***Details of Submitter***

The NZRCA is the national representative organisation of canoe clubs and recreational kayakers throughout New Zealand. The NZRCA is an incorporated society and is affiliated to the NZ Canoe Federation, which is in turn affiliated to the International Canoe Federation. The NZRCA has delegated authority to represent the NZ Canoe Federation on conservation/access issues.

b) Reasons for making submission

Our primary reasons for opposing the proposed hydroelectric scheme are:

- The Mokihinui River has high significance to kayakers and canoeists for both its whitewater recreational amenity values and its scenic values.
- The Mokihinui River is a wilderness river. It runs through unmodified forest and gorge environment.
- *As noted in the Assessment of Environmental Impact document "Whitewater kayaking and rafting are the most important activities in the gorge" and "The most significant effects of the proposal are the change to the rafting and white water opportunities in the catchment"*
- The proposed scheme will result in the loss of a section of river which is navigable by the majority of kayakers and canoeists, the type of which is not available elsewhere on the West Coast (i.e. there are no other rivers with a section of this class, length or beauty).
- As noted in the Assessment of Environmental Impact document, the proposed scheme will negatively impact upon the access to the upper section of the river which is highly prized by more experienced kayakers and canoeists and *"the need for alternative transport to the downstream end may diminish the use of this section"*.
- The applicant does not propose suitable mitigation for the removal of the white water setting in the mainstem of the river.
- The Assessment of Environmental Impact is incorrect in its assertion that *"The Mokihinui River between the Mokihinui Forks and the Welcome Creek road end is of no more than regional significance for recreation."*
- The West Coast is renowned nationally and internationally for its whitewater rivers. The Mokihinui plays a very important part of the "mix" of West Coast rivers.

Further details are given below:

Importance of the Mokihinui River:

- The Mokihinui River is included in the book "New Zealand Whitewater" authored by Graham Charles which is the pre-eminent reference for whitewater kayaking in NZ. This places the Mokihinui amongst the top 100 most prized rivers at the present time.
- The Department of Conservation ranks the Mokihinui River as the seventh most significant river for biodiversity. NIWA has identified the Mokihinui River as "nationally important for aquatic biodiversity values".
- www.newzealand.com - the government run official website for New Zealand has the following information regarding West Coast rivers on it's media page: "New Zealand's West Coast region is one of the world's top kayaking destinations. As the profile of the sport grows, more kayakers from around the

world are finding out about the scenic beauty of the West Coast's gorges and rivers.

Internationally recognised kayakers have been visiting the West Coast in increasing number since the early 1990s."

- The lower section on the mainstem involves a helicopter trip to The Forks, and an 18.5km three to five hour trip to the takeout near Seddonville. This section of river contains 10 kilometres of continuous, easily portaged, class 3 three whitewater rapid (up to class 4 at higher flows) set in a 14 kilometre long granite gorge of exceptional beauty.
- The ability to portage the rapids (even at higher flows) means that the river provides a significant development opportunity for kayakers and canoeists. Many other class 4 rivers do not offer the opportunity to inspect or easily portage the major rapids, so the presence of a class 4 rapid may limit the run to those capable of paddling consistently at that level.
- The unmodified forest and gorge environment through which the Mokihinui River flows results in an incomparable wilderness experience for a class 3 whitewater river. Rarely is such an experience able to be accessed by kayakers and canoeists of intermediate ability.
- The Mokihinui main stem gorge is therefore one of the few wilderness river trips within the scope of the vast majority of kayakers and canoeists who would be insufficiently skilled to paddle the more abundant class 4 high gradient wilderness rivers elsewhere in the South Island.

Loss of whitewater amenity on entire River:

- The lower Mokihinui River will be lost and proposal will result in lowered usage of the upper Mokihinui River (currently the North Branch is regularly kayaked and the South branch is yet to be fully explored).
- The North Branch of the Mokihinui is the only river on the West Coast with 10 kilometres of continuous class 4 "creeking" (tight technical rapids with relatively little water). In conjunction with the initial "big water" rapids of the lower section of the Mokihinui River the overall experience is one that is unique on the West Coast.
- Under the proposal, the dam on the Mokihinui would flood the granite gorge and valley most of the way back to Lake Perrine. This iconic run would be lost, replaced with a lake. The class 3 whitewater would be lost and the recreational opportunities would go with it.
- Kayaking and canoeing on the class 4 upper Mokihinui River would also be affected due to access difficulties. If the proposal proceeds, paddlers completing the upper section would face a long flat-water paddle down to a takeout above the dam. The short kayaks required to safely navigate for the upper reaches of the river would make the paddle across the proposed lake very difficult.
- Both upper and lower sections of the Mokihinui are most often run in a single day. If the proposed lake is created kayakers who have completed the 10 kilometres

of the upper river are unlikely to be able to complete the paddle across the lake on the same day.

- The paddle across the lake would mean that a trip on the upper river would be very difficult to complete in a single day. The alternative would be to incur the expense of a helicopter pick-up from some agreed location. However, running rivers at speed to meet a pick-up deadline is inherently dangerous, and paddlers may take greater risks rather than miss their ride out. The Assessment of Environmental Impact suggests a boat service may be provided in the future, but it is unlikely that this would be viable.

Lack of suitable mitigation:

- The proposed mountain biking track and enhanced walking tracks are not seen as mitigation for the loss whitewater amenity on the lower river nor do they compensate for the more difficult access to the upper river.
- Meridian Energy Limited has suggested that the proposed lake will result in alternative opportunities for kayakers. This akin to suggesting that an ice-skating rink provides alternative opportunities for mountain climbers who have lost the ice they used to climb on. It is not mitigation because it is flat water not whitewater.

Incorrect assessment of significance of the Mokihinui River for recreation:

- Consultation by the applicant was not sufficiently wide.
- The Assessment of Environmental impact states that "*Whitewater kayaking and rafting are the most important activities in the gorge, but are not of national significance.*" This statement is incorrect and had Meridian Energy consulted appropriately it would have found that the usage pattern of the river indicates that it is navigated predominantly by kayakers and canoeists from outside of the region.
- Only 2 kayakers were consulted regarding the whitewater amenity. This lack of consultation may unfairly prejudice the resource consent process.
- The West Coast is an absolutely world-class paddling destination and it is world-class partly because the sum of its rivers is greater than the whole. The West Coast has national and international significance in the whitewater community.
- The South Island's West Coast has a unique array of pristine rivers in a world sense. Most other mountain ranges like the Southern Alps have had their rivers tampered with and, as yet, these have not been substantially modified. If the Mokihinui River is dammed, it would ruin the potential to establish "world heritage" or similar status for the rivers of the West Coast.
- The rapids of the lower Mokihinui River gorge are formed by bedrock features and so the rapids although challenging and exciting have less objective danger than rapids of a similar class (i.e. class 3-4) elsewhere on the West Coast.
- Many West Coast rivers are very steep, rising in the Southern Alps, and contain rocks which constantly shift in floods and slips from heavy rain or snowmelt.

These conditions pose significant dangers for kayakers and canoeists which places them beyond the ability of intermediate kayakers and canoeists.

- The Mokihinui provides a “stepping stone” to these harder rivers as such the Mokihinui River has significance beyond the immediate region.

4. The NZRCA seeks that the application be declined in its entirety.

Standards or conditions sought

- The NZRCA is opposing the proposed scheme in its entirety and seeks that the whitewater features, particularly those upstream of the proposed dam are preserved in their natural state, intact.

5. Attendance at pre-hearings and hearings

The NZRCA wishes to be heard in support of this submission.



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Date 22/4/08

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