

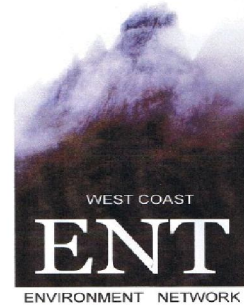
Buller District Council

and

West Coast Regional Council
Po Box 66
Greymouth

Attention: Chief Executive Officer

Dear Sir



RE MOKIHINUI DAM RC07150

West Coast ENT Inc (the society) submits in opposition to the application by Meridian Energy Ltd (the company) for the suite of resource consents associated with the Mokihinui Dam.

The society opposes all of the application, seeks that that consent be declined, and would like to be heard in support of its submission.

The reason the society opposes the proposal is that the Mokihinui Dam will destroy a significant part of the natural ecosystem of the seventh most significant river in New Zealand. The dam will have adverse effects on a wide range social and environmental systems (discussed below) from the ecology of Mokihinui Gorge to erosion of the coastline around the mouth of the river. These effects are very significant. If the dam is constructed the damage will be irreversible. There is no way to avoid, remedy, or mitigate the impacts of the proposal.

Ecological

The effects on the ecosystem are significant. A large amount of forest with the associated plants and animals, will be drowned. This destroys significant habitat for *Powelliphanta lignaria*, waho and other wildlife.

The dam will be a severe barrier to fish passage and will have significant effects on aquatic ecology including eels and whitebait. The dam will reduce the downstream water quality in the river.

The reports commissioned by the company on these matters are partial, display bias and do not provide the necessary objectivity. The conclusions of the reports do not follow from the ecological data presented. They are clearly aimed at minimizing the effects of the dam so consent can be obtained. The reports should be given very little weight.

For example, the report considering the ecological significance of the Mokihinui Gorge is flawed. The ecological data collected by the applicant clearly fit the criteria for significance.

The report commissioned by the company from Landcare Research on biodiversity offsets concluded that the adverse effects were so significant that they could not be offset. The conclusion of the Landcare Report is commonsense. It is difficult to understand what the company could offer to offset the destruction of such a pristine and significant environment as the Mokihinui Gorge. The society is fortified in this submission by the fact that Meridian has not offered any meaningful offset. This is a recognition that no meaningful offset can be offered.

The Landcare Research Report did not suit the company's purposes so it has made a sustained effort to discredit it. The company claims that the Landcare Research Report is an academic

report with no practical value. We believe that the scientific arguments put forward in the report are of more value than the company accepts.

Landscape

The Mokihinui Dam will destroy the outstanding natural feature that is the Mokihinui Gorge. The company claims that the adverse effects are no more than minor. This is obviously not the case and such a claim is trite.

In addition the transmission line will create a significant industrial intrusion through high-value landscapes.

Recreation

The Mokihinui Gorge provides recreational opportunities for tramping up, and rafting and kayaking down a pristine river gorge. This opportunity will be lost when the dam is constructed and the tramping track destroyed.

Historic

There are a number of significant historical sites in the Mokihinui Gorge which will be destroyed by the dam. These effects cannot be avoided, remedied or mitigated.

Other

There are other significant adverse effects associated with the dam. These include, but are not limited to the following.

- ⌚ The risk of over-topping from a landslide in the gorge
- ⌚ The risk of collapse during an earthquake.
- ⌚ The effect from changes in water quality.
- ⌚ The effect from changes in sedimentation.
- ⌚ The effect from changes in flow regime.
- ⌚ The effect of the proposal on coastal processes.
- ⌚ Social impacts

Conclusion

Meridian contend that the effects of the dam will be no more than minor. Meridian make this staggering contention notwithstanding the dam will destroy 330 ha of a significant forest ecosystem. The Landcare report rather eloquently provides evidence as to the impossibility of mitigating the impacts of this proposal.

In addition, Meridian has stated that it has made a number of applications for projects on the basis that a number of them will be declined. The Mokihinui Dam is one such which should not have seen the light of day. Consent should be declined.

Yours faithfully

Dr Brian Anderson
West Coast ENT Inc