



SUBMISSION ON RESOURCE CONSENT APPLICATIONS
Section 96 Of The Resource Management Act 1991

TO: THE WEST COAST REGIONAL COUNCIL
PO BOX 66
GREYMOUTH

Copy to:
Meridian Energy Limited
PO Box 2454,
Christchurch.

THE WEST COAST
REGIONAL COUNCIL
PH: 0508 8000 118
Fax: (03) 768 7133

Applicant: Meridian Energy Ltd **Application Numbers:** tick boxes overleaf
Closing Date for Submissions on the Mokihinui Hydro Proposal: (Wednesday 23 April 2008)

(Please print clearly) Title: Mr Mrs Miss Ms (Please circle the appropriate title(s) or write below)

My/Our Full Name(s): NELSON/TASMAN BRANCH,
ROYAL FOREST AND BIRD PROTECTION SOCIETY INC.

Postal address: P.O. BOX 7126, NELSON

Wk Ph: _____ Hm Ph: 03 540 2323 Cell: _____

Wk Fax: _____ Hm Fax: _____ Email: gillian.pallock@xtsa.co.nz

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

The reasons for ~~my~~/our submission are as follows (*further information attached (tick for yes)*)
[State in summary the nature of your submission, giving reasons]
The Mokihinui river and gorge are too
important to lose - for historical, scenic,
ecological and environmental reasons.

~~I/we wish the consent authority to make the following decision~~ [Give details, including the nature of any conditions]
TO DECLINE ALL APPLICATIONS

Use the tick boxes below to indicate the resource consent applications your submission concerns.

I/we make ~~my~~/our submission concerning **all** the resource consent applications below (tick)
 My/our submission **only** concerns the resource applications ticked below (tick)

I/we **wish to be heard** in support of ~~my~~/our submission (tick one)
 I/we **DO NOT** wish to be heard and hereby make my/our submission in writing only

Signature(s): C. H. Dallock
committee

Date: 19 April '08

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 Limited as per Section 96(4) of the RMA (tick)

Consent List

Mokihinui River
 consents RC07150/1 – RC07150/6

Earthworks and Vegetation
 consents RC07150/14 – RC07150/19

Inundation Area
 consents RC07150/7 – RC07150/8

General Construction
 consents RC07150/20 – RC07150/23

Staging Area
 consents RC07150/9 – RC07150/10

Access Roads, Walking Tracks and Recreational
 Activities
 consents RC07150/24 – RC07150/26

Substation and Transmission
 consents RC07150/11 – RC07150/13

To: The West Coast Regional Council
P O Box 66
Greymouth

SUBMISSION ON THE MOKIHINUI HYDRO PROPOSAL BY MERIDIAN ENERGY INC.

The Nelson/Tasman branch of the Royal Forest and Bird Protection Society is one of 53 branches nation-wide which has a mandate to promote the wellbeing and improvement of New Zealand's natural scenery, habitats and eco-systems. The branch represents over 500 Forest and Bird and Kiwi Conservation Club families in the District.

We are opposing Meridian Energy's Resource Consent application to create hydro power in the Mokihinui valley because of our concerns about the adverse effects the proposal will have on the environment of the area.

The Mokihinui River and its adjacent hillsides are ranked in the database of waterbodies as seventh nationally because of its natural values. In its lower reaches it passes through the dramatic Mokihinui Gorge, the subject of this application.

The gorge is scenically grand and has a great diversity of plant, bird, aquatic and invertebrate life forming an important ecological entity. It is relatively untouched by forestry and other commercial activities and has been described as a 'wilderness treasure.' It has a substantial area of ancient rimu, beech, kahikatea and several species of rata. Many of these trees provide brilliant flowering and fruiting spectacles. The entire catchment from mountain ranges to the sea is considered nationally important for biodiversity. It is particularly important for long-finned eels, blue duck, and native land snails. Wild life in the gorge is living in relative safety as the steep walls give good protection from predators.

Besides its significance as a potentially long-lasting historical feature the Mokihinui Gorge Track provides one of the most spectacular - if not the most spectacular - traverses of the lowland segment of a major West Coast river, and is still a major river track on the West Coast, much used by walkers, trampers and professional and amateur ecologists. The problem of visitors getting across the final slip face can be solved by re-routing that section of the track and is no reason to peremptorily dismiss the importance of the track as Meridian appears to have done.

Because the Mokihinui river and gorge are in a reasonably pristine state they host a rich bio-diversity which will not survive a drowning of the area to any depth, let alone 85 meters.

Many forest and aquatic species will be adversely and probably terminally affected and it is most unlikely that there can be remediation.

Longfinned eels are in high densities in the gorge being partially protected by the steep inaccessible nature of the walls, the dam has huge implications for this population as the eels cannot negotiate a dam of that size.

The blue duck that live in the gorge would probably perish as any attempts to transfer adult blue duck from their habitat have always resulted in them flying home.

All the bird, lizard and invertebrate species adapted to living in, on or near the river would simply have nowhere to go. The Mokihinui River is also a major component of the hugely important West Coast whitebait fishery, and damming the lower sections of the river would shut off access to essential upriver migration of koaro (*Galaxias brevipinnis*) which constitute an important part of this fishery.

Because of its geographic situation the gorge is in an area affected often by earthquakes. Glen Coates, a Christchurch geologist and author, in his book "The Rise and Fall of the Southern Alps" illustrates that the Westport area has frequent shallow earthquakes up to a magnitude of 6.9.

The Ministry of Civil Defence in the June 1998 volume of "Tephra" also illustrates that West port will have occasional shallow earthquakes up to 6.9 and to the north more frequent earthquakes up to 5.9 magnitude.

J J Aitken and M A Lowry, Institute of Geological & Nuclear Sciences Limited, show a mean return period for the Westport area of magnitude VI every 8 years and Magnitude VII every 26 years. Such frequent tremors are likely to have a cumulative effect on the surrounding steep terrain and this is illustrated by the slips which have occurred along the benched track.

The dam wall itself may stand up to these tremors but the raised water tables as a result of a lake will increase the probability of earthquake-triggered landslides from the upper gorge walls, and the creation of dam-topping waves.

This would also cause a significant increase in the sedimentation which a dam would trap anyway and which could not be transferred downstream.

Cutting off sediment supply to the coast

Dams and lakes trap all bottom sediment (sand and coarser) being transported to the coast. A continual supply of sand and coarser sediment is essential for maintaining coastal beach and dune systems. The west coast is characterized by a strong northwards movement of beach sand and immediately offshore sand, pushed along by the prevailing southwesterly swells. F. W. Furket (Westport Harbour: Transactions of the Royal Society of New Zealand 76, 373-402, 1947) estimated that some 5 to 6 million cubic metres of sand move up the west coast each year.

Reduction in supply of sand from rivers results in loss of beach sand, landward retreat of beaches and dunes, and thus loss of coastal land. There are already reports of significant beach retreat and loss of land along the west coast. Cutting off the sand delivered by the Mokihinui River would exacerbate that trend. The increase in coastal erosion is expected

to be 3 metres a year which would cause the loss of the estuary and habitat for wading birds and other estuarine species which dwell in the area of the river mouth.

Meridian suggests the dam lake would allow for water activities including motorized craft. But the river is already used for many less intrusive activities much more suited to the important wilderness area that it is.

Power generation

A Meridian spokesperson states that, "If the West Coast is to contribute to the supply of electricity to NZ, it can either be coal or hydro". Also, "The West Coast has the longest transmission path for electricity anywhere in New Zealand. As a result high transmission losses are experienced".

To attempt to solve these problems with a dam is a conception from a bygone era. Surely we have moved on from this thinking. Power generation should be small scale, supplying local needs and should no longer even consider destroying our remaining distinct scenery, ecological systems or wild recreational sites.

Britain successfully uses off-shore wind power generators and Meridian has this option as an alternative to destroying yet more of New Zealand's unique terrestrial habitat. Wind power generators off or along the Westland coast would create local power thus solving the problem of long transmission line losses.

We should be well past the time in history when we lay waste to our unique and species rich wild places in order to provide energy for far distant cities and industries"?

We ask Meridian to examine this and any other non-invasive options for creating power.

Signed:-



Gillian Pollock, committee.
Nelson/Tasman Branch,
Royal Forest and Bird Protection Society
P O Box 7126
Nelson

