



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

**TO: THE WEST COAST REGIONAL COUNCIL**  
**PO BOX 66**  
**GREYMOOUTH**

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): TREVOR JAMES NELSON  
CANOE CLUB.

Postal address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Wk Ph: \_\_\_\_\_ Hm Ph: \_\_\_\_\_ Cell: \_\_\_\_\_

Wk Fax: \_\_\_\_\_ Hm Fax: \_\_\_\_\_ Email: \_\_\_\_\_

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]

\_\_\_\_\_ *see attached* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

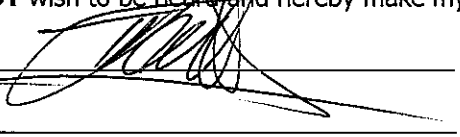
I/we wish the consent authority to make the following decision [Give details, including the nature of any conditions]

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**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): 

Date: 22/4/08

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<br>consents RC07150/1 – RC07150/6               | <input checked="" type="checkbox"/> | Earthworks and Vegetation<br>consents RC07150/14 – RC07150/19                                   | <input checked="" type="checkbox"/> |
| Inundation Area<br>consents RC07150/7 – RC07150/8               | <input checked="" type="checkbox"/> | General Construction<br>consents RC07150/20 – RC07150/23  | <input type="checkbox"/>            |
| Staging Area<br>consents RC07150/9 – RC07150/10                 | <input type="checkbox"/>            | Access Roads, Walking Tracks and Recreational<br>Activities<br>consents RC07150/24 – RC07150/26 | <input checked="" type="checkbox"/> |
| Substation and Transmission<br>consents RC07150/11 – RC07150/13 | <input checked="" type="checkbox"/> |   |                                     |

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

**To:** West Coast Regional Council

**Cc:** Meridian Energy Limited

**From:** New Zealand Recreational Canoeing Association

**Date:** 22 April 2005

**Re: RC07150 Mokihinui Hydro Power Scheme**

**Submitter Contact Details**

**Name of Party:** Nelson Canoe Club Inc

**Contact Name:** Trevor James, President

**Contact Phone:** 03 5438562 (wk) 03 547 2295

**Email Address:** [president@nelsonkayakers.co.nz](mailto:president@nelsonkayakers.co.nz)

**Postal Address:** PO Box 793, Nelson 7040, New Zealand

1. The Nelson Canoe Club **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 NELSON CANOE CLUB 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 Nelson Canoe Club Inc has about 100 members and has been operating since the 1970's. While one of the club's main objectives is to introduce people to the sport, it does have a number of trips to the West Coast each year. The details of this proposal and the submission have been discussed by the club committee. The principles of the club submission have been circulated to all members for feedback.

## **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.
- *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 grade 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 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."* This proposal has international significance from a recreational point of view.

***Further details are given below:***

### **Importance of the Mokihinui River:**

- Affects on wild and scenic values from both dam and transmission lines. This river is one of only four rivers on the West Coast that you can travel over multi-days and end up at the sea.
- Affects on recreation. The rapids and the experience of this river is important for kayaking and rafting opportunities.
- Coastal erosion near the river mouth due to curtailing of sediment supply. This will remove wetlands.
- Adverse affects on the aquatic ecology – riverine habitat loss in the flooded section and downstream of the dam from un-natural flow regime (mainly from hydro-peaking). This includes affects on whitebait populations.
- The adverse effects and cost of the dam removal.
- The Mokihinui River is amongst the top 100 most prized rivers nationally and to our club is amongst the top 30.
- This section of river affected by the proposal contains 10 kilometres of valuable class 3 three whitewater rapids (up to class 4 at higher flows). The more difficult

rapids can be safely portaged if needed in the case of paddlers encountering difficulty. This section is set in a 14 kilometre long 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 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 Grade 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).
- 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 grade 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 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.

#### **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.*" The NELSON CANOE CLUB contends that this statement is incorrect and that 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.

- The NELSON CANOE CLUB was not consulted in the preparation of the Assessment of Environmental Impacts. It is understood that consultation has been very limited in reference to this application. This lack of consultation may unfairly prejudice the resource consent process.
- The Mokihinui is a very important part of the "mix" of West Coast rivers. The West Coast is renowned internationally for its whitewater rivers.
- 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 advanced learner paddlers. The Mokihinui provides a "stepping stone" to these harder rivers as such the Mokihinui River has significance beyond the West Coast region.

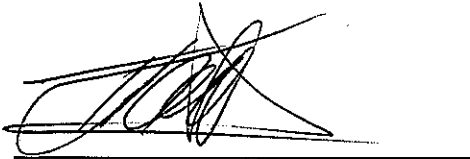
**4. The Nelson Canoe Club seeks that the application be declined in its entirety.**

***Standards or conditions sought***

- The Nelson Canoe Club 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 pact.

**5. Attendance at pre-hearings and hearings**

The Nelson Canoe Club wishes to be heard in support of this submission.



Trevor James  
Nelson Canoe Club  
PO Box 793  
Nelson 7040

Date 22/4/08

## Karen Glover

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**From:** Denise Cassidy  
**Sent:** Tuesday, 22 April 2008 8:51 AM  
**To:** Karen Glover  
**Subject:** FW: Mokihinui River Dam Submission 2008-04

**Follow Up Flag:** Follow up  
**Flag Status:** Red

**Attachments:** Mokihinui River Dam Submission 2008-04.doc



Mokihinui River Dam  
Submission ...

-----Original Message-----

**From:** gwynfaniwa [mailto:gwynfaniwa@quicksilver.net.nz]  
**Sent:** Tuesday, 22 April 2008 08:18  
**To:** info  
**Subject:** Mokihinui River Dam Submission 2008-04

This submission is from:  
Nelson Canoe Club  
PO Box 793  
Nelson 7040  
Phone 03 5472295 (Hm) or 03 5438562 (Wk)



## **Mokhiui River Dam Submission**

Nelson Canoe Club objects to the Meridian Dam proposal for the following reasons:

- Affects on wild and scenic values from both dam and transmission lines. This river is one of only four rivers on the West Coast that you can travel over multi-days and end up at the sea.
- Affects on recreation. The rapids and the experience of this river is important for kayaking and rafting opportunities.
- Coastal erosion near the river mouth due to curtailing of sediment supply. This will remove wetlands.
- Adverse affects on the aquatic ecology – riverine habitat loss in the flooded section and downstream of the dam from un-natural flow regime (mainly from hydro-peaking). This includes affects on whitebait populations.
- Affects on loss of forest and forest ecosystems
- The adverse effects and cost of the dam removal.

We believe that there is there are viable alternatives to building dams and thereby avoiding the adverse affects on the environment (as listed above). There is so much we can do to be more efficient in the way households and industry use electricity.

