

SUBMISSION ON RESOURCE CONSENT APPLICATIONS

Section 96 Of The Resource Management Act 1991



THE WEST COAST
REGIONAL COUNCIL

PH: 0508 8000 118
Fax: (03) 768 7133

TO: THE WEST COAST REGIONAL COUNCIL	Copy to: Meridian Energy Limited PO Box 2454, Christchurch.
PO BOX 66	
GREYMOUTH	

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): WHITewater CANOE CLUB INCORPORATED

Postal address: P O BOX 4476 CHRISTCHURCH

ATTN: GRAEME WILSON, PRESIDENT, WGCC.

Wk Ph: _____ Hm Ph: _____ Cell: 0274 802 405

Wk Fax: _____ Hm Fax: _____ Email: president@whitewater.org.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]

REFER ATTACHED DOCUMENT

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

TO DECLINE ALL CONSENTS SOUGHT BY THE APPLICANT - REFER ATTACHED DOCUMENT

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): _____

GRAEME WILSON - PRESIDENT

Date: 22 APRIL 2008

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



Whitewater Canoe Club (Inc), PO Box 4476, Christchurch

23 April 2008

West Coast Regional Council
P O Box 66
388 Main South Road
Greymouth

Fax: 03 768 7133

By email: kq@wrc.govt.nz

Buller District Council
C/- West Coast Regional Council
P O Box 66
388 Main South Road
Greymouth

Copy to:

Meridian Energy Limited
25 Sir William Pickering Drive
P O Box 2454
Christchurch

Whitewater Canoe Club

Submission on Meridian Energy Limited's Mokihinui Hydro Proposal

Details of submitter

I am Graeme Wilson, president of the Whitewater Canoe Club (WWCC). This submission is on behalf of the Whitewater Canoe Club. The WWCC is based in Christchurch, and has approximately 200 members. Our members paddle a wide range of rivers, primarily in the Canterbury, West Coast, Buller and Otago regions. The WWCC has been in existence for approximately thirty years.

Impact of Meridian Energy Limited's Mokihinui Hydro Proposal on whitewater kayaking

Meridian Energy Limited's (MEL's) Mokihinui Hydro Proposal Resource Consent Application and Assessment of Environmental Impact document (the proposal) discusses recreation effects at section 6.10.1 on page 108.

The proposal notes that:

No activity occurring between the dam site and The Forks has been rated as nationally significant. Angling, tramping and hunting in the proposed lake area are no more than of regional importance. Whitewater kayaking and rafting are the most important activities in the gorge, but are not of national significance. The Mokihinui River between the Mokihinui Forks and the Welcome Creek road end is of no more than regional significance for recreation.

The most significant effects of the proposal are the change to the rafting and white water opportunities in the catchment. While the north branch will remain raftable and kayakable, including the short section between The Forks and the top of the lake, the need for alternative transport to the downstream end may diminish the use of this section. However, should a boat transport service develop in the lake the opportunity will still be available.

The white water setting in the main stem of the River will be removed. This cannot be avoided, but it is at least in part remedied or mitigated by a range of alternative recreational opportunities which will be created, including new kayaking and rafting opportunities.

Section 6.10.3 suggests that a *potentially popular flat water "sea kayaking" and canoeing opportunity on the proposed lake, with associated commercial support, may develop.*

Reasons for our submission against the proposal

In summary, we contend:

- that the two popular sections paddled on the Mokihinui are iconic runs in their own right, and that the proposal floods one of the runs and significantly complicates access to the second run, and
- that the Mokihinui is a valuable part of the diverse mix of rivers available on the West Coast, which is an area renowned internationally, and

- that the mitigation outlined in section 6.10.3 in no way compensates for the considerable loss in kayaking amenity, and that the provision of flat water of flat water facilities and likewise that the promised improved pedestrian, mountainbiking and fishing opportunities, although of recreational benefit, do not compensate kayakers and rafters for the loss of a substantial part of this wonderful river.

We will now discuss these points in more detail.

The sections currently paddled on the Mokihinui

New Zealand Whitewater – 125 Great Kayaking Runs, by Graham Charles, (Craig Potton Publishing, 2002) is New Zealand’s whitewater “bible”. Not unsurprisingly, Charles includes both of the Mokihinui runs on his list.

The lower section on the main stem involves a helicopter trip to The Forks, and an 18.5km three to five hour trip to the takeout near Seddonville. Charles describes the trip as follows:

Any time the river is running clear it contains five or six rapids that may reach class IV. All are easily portaged. The scenery is spectacular, starting at the wide open Forks and an old earthquake dam caused by the “twenty-niner” earthquake. The first few steep rapids flow between large limestone boulders that tumbled from the surrounding hillsides at some stage in the past. These give way to even larger granite boulders and fantastic boulder garden rapids so common along the West Coast. The rapids ease after the first hour. Long flat pools give a study in every shade of green possible.

The overall run is described as class III-IV. On the internationally-agreed scale, grades or classes range from I (easy) to VI (extreme). Class III water has rapids with high, irregular waves and narrow passages, and the ability to spin and manoeuvre is required. Class IV rapids are more difficult, and typically require the completion of a series of controlled moves to negotiate the rapid. A reliable roll is essential. Class III paddlers are generally of an “intermediate” level, and class IV-V are typically “expert”.

One of the key attractions of the main stem Mokihinui run is that the rapids at the start of the run are easily portaged (ie, the kayak is carried around the rapid) or inspected. Inspection provides a sound opportunity for less skilled paddlers to watch the lines taken by their more experienced companions, prior to either running or portaging the rapid themselves. The open nature of the rapids also permits safety systems to be put in place (eg, throwbags) to assist in the event of a swim or a pin in the rapids.

Many other grade IV rivers do not offer the opportunity to inspect or easily portage the major rapids, so the presence of a grade IV rapid may limit the run to those capable of running at that level.

Under the proposal, the dam on the Mokihinui would flood the valley most of the way back to Lake Perrine, which is only a kilometre or so below the Forks. This iconic run would be lost, replaced with a flat water paddle down a lake to a takeout somewhere above the dam. This run would be lost.

The second major section paddled is on the north branch of the Mokihinui. The run starts around the Johnson-Allan confluence, and also relies on helicopter access. With an overall class IV+ grading, the run is a step up on the lower river. Typically after completion of the upper section, paddlers then run the main stem section to the same takeout near Seddonville.

While the north branch run itself remains available under the proposal, if the proposal proceeds a paddler completing the section would face either a boring flat water paddle down to a takeout above the dam, or the added expense of a boat trip down the lake (if a service does, in fact, develop) or the considerable additional expense of a helicopter pick-up from some agreed location at some pre-agreed time. Running rivers at speed to meet a pick-up is inherently dangerous, with paddlers having to take greater risks to avoid missing their flight out.

WWCC member Hugh Canard, who is also patron of the New Zealand Recreational Canoeing Association (NZRCA), was interviewed as part of MEL's Assessment of Environmental Effects.

Hugh has rafted and kayaked the Mokihinui River three times, which he describes as a wilderness experience. He notes that Mokihinui white water differs from other West Coast rivers due to its geology and variety of rapids. His comments follow:

The North Branch is a good grade 4 when it has sufficient water flowing, with a classic series of drops and pools, with the pools just sufficiently long to allow a rest between rapids. The North Branch has been rafted and kayaked, with the put in dependent on flow.

The main stem below The Forks has two drops – potentially grade 4 – above and immediately below Lake Perrine, but is otherwise a grade 2 to 3 experience. The rapids below The Forks can be very bad at low flows with 'nasty' sharp rocks – young and un-eroded.

The river from the bottom of Lake Perrine has a number of boulder rapids in bedrock and most are Grade 3, getting easier as you reach the confluence with Rough and Tumble Creek. The gorge is narrow and has very steep bush-clad sides. The river from Rough and Tumble Creek has fewer and easier rapids. The lower River has few rapids and can be a slow paddle in moderate flows. An up-river wind is common in the afternoons, which can present a hard slog. Conversely, strong easterlies can funnel downstream and be quite violent – akin to a nor-westerly in Canterbury.

The difficulty of the Mokihinui gorge section varies considerably with flow. At low flows it is more of a pool-drop experience and the rapids are more technical but lack powerful hydraulics. At medium flows, probably near to the mean flow of around 90 cumecs, it is a good kayaking experience for confident intermediates, as the pools are sufficiently deep and long for recovery from a mishap in the rapids themselves. At high flows the early rapids are very powerful and have caused some very competent paddlers to swim. The main gorge itself becomes almost a continuous cascade of large wave trains and hydraulics and is a challenging experience for rafts and kayaks alike. The geology is unlike the more mobile river beds of the South Westland rivers, making the river slightly safer in respect of undercuts and sieves in rapids of equivalent difficulty.

Despite the presence of many alpine rivers in the West Coast region, the Mokihinui is in that rare category of rivers that can be paddled by intermediate kayakers, and has a relatively stable bed. The two rapids around Lake Perrine are unstable, varying with floods. The main stem gorge is valuable as a stepping stone for paddlers wishing to progress to the Karamea and the catchments of the Hokitika, Whataroa and Wanganui. There are possibly only two or possibly three runs of this level of difficulty on the West Coast. (Others are Waiatoto, Grey)

The Mokihinui main stem gorge is therefore one of the few wilderness river trips within the scope of the vast majority of middle order canoe club whitewater paddlers who would be insufficiently skilled to paddle the more abundant Grade 4 high gradient wilderness rivers further south.

Although it is unlikely that the South Branch has ever been kayaked, there appears to be a short section in its upper reaches through what appears to be limestone territory that could be worth exploration. This section features a series of short pool drops (“tea kettle rapids”). Above this are two probably unpaddled continuous Grade 4 - 5 runs which would be flow dependent.

The river would be paddled more frequently if it were closer to an urban population, or on a more heavily travelled tourist route that would make a commercial operation more viable.

Hugh believes the quality of the Mokihinui is understated in comparison with, for example, the Karamea River. While the latter may be a more popular river for white water, the Mokihinui retains its own character – “different – not better or worse”.

The Mokihinui as part of the wider mix of West Coast rivers

Hugh Canard’s comments in the section immediately above highlight the unique nature of the Mokihinui.

Although MEL’s proposal dismisses the Mokihinui as “not being of national significance” we contend that the Mokihinui is a very important part of the “mix” of West Coast rivers, and that the West Coast rivers are of national and international significance.

The West Coast is renowned internationally for its whitewater. 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, with a high potential for kayaks to be pinned against rocks; caught in sieves (ie, the water goes through, around or under rocks but the gaps are too small for a kayak or a swimmer to go through) or pushed into undercut rocks.

As Hugh points out, many such rivers are out of the grasp of intermediate paddlers. The majority of WWCC paddlers will never run some of the other iconic West Coast rivers, such as the upper Crooked, upper Taipo, Arahura, Styx, Whitcombe, or a long list of others. In fact, the WWCC does not conduct club trips on water above grade IV. However, we have members who have sufficient skill to do so in smaller groups outside of the club environment.

Importantly, the Mokihinui main stem run offers an experience to which many of our club members can reasonably aspire.

Mitigation proposed is not whitewater mitigation

We note that in section 6.10.3 of the proposal MEL outlines a variety of possible “opportunities” which could be provided by the new lake and walking track. These opportunities include enhanced pedestrian and mountainbiking access; flat-water kayaking; and a potential water taxi service.

One of the specific points in section 6.10.3 is misleading. The sentence says:

Potential water taxi service on the lake to below the Forks (subject to obtaining any necessary approvals), potentially obviating some helicopter activity in the backcountry-remote setting and enabling whitewater rafting and kayaking on the North Branch.

Helicopter access is, at present, the only practical way to get to the put-in for the North Branch run. If the project proceeds, helicopter access will still be necessary to get to the put-in. Some minor reduction in helicopter trips would only result if the few parties who currently get lifted out from the Forks at the end of the North Branch trip can take a boat out instead. However, the majority of paddlers currently completing the North Branch run paddle out along the main stem, and this will; no longer be feasible under the proposal – leading to more helicopter trips.

The increase in flights will arise because under the proposal, future paddlers will not have the choice to complete their paddle down the main stem section. Instead, they will have the choice of either a boring flat water paddle down to a takeout above the dam in a kayak (or raft) which is not suited to such a paddle, or the added expense of a boat trip down the lake (if a commercial service does, in fact, develop), or the considerable additional expense of a helicopter pick-up from some agreed location at some pre-agreed time, together with the accompanying risk of paddling to a deadline as outlined above.

The backcountry-remote setting referred to in the proposal will be destroyed by the dam and eroded further by increased helicopter movements (unless the substantial increase in costs deters use of the North Branch) and the numbers of power boats on the lake.

Further, whitewater rafting and kayaking on the North Branch is available now, whereas the sentence implies that the proposal will enable such use.

We agree that the proposed enhanced pedestrian and mountainbike access, and the provision of flat water kayaking facilities are desirable things. Many of our members also tramp and mountainbike, and many also kayak on flat water and/or sea kayak.

However, what concerns us greatly is that if the proposal proceeds we are losing a whitewater resource at the important intermediate grade, and none of the mitigation proposed is in any way whitewater mitigation. We would lose a unique and precious whitewater river – not just now, but for future generations – and receive no whitewater mitigation whatsoever. We will lose the gorge on the main stem, and the North Branch will become less accessible.

Although flat water kayaking and sea kayaking are also kayaking, the skills and experience of whitewater kayaking are quite different – in the same way that track cycling, road cycling and mountainbiking are markedly different subsets of cycling. In a broader sense all three kayaking disciplines listed use a boat and a paddle, but the types of gear which are suitable for running grade III or IV whitewater are not suitable for a long flat paddle out. There is a general correlation between the length of a kayak and its speed. Typically multisport kayaks and sea kayaks are 5-6 metres in length, whereas whitewater boats are less than half that length. Whitewater boats are designed to be turned quickly and moved easily across stream, whereas multisport boats are designed for speed, and could not be safely paddled on the North Branch.

Decision sought

For the above reasons, we ask that the West Coast Regional Council and the Buller District Council decline all of the consents sought by MEL.

We believe that the Mokihinui in its present state is an irreplaceable resource, and that the loss of the river should not be permitted.

We believe that the whitewater mitigation outlined is non-existent, as any mitigation proposed is directed at parties other than the whitewater rafters and kayakers who would lose access to the existing main stem run and face additional complexity and cost when undertaking the North Branch trip.

Concluding remarks

I wish to be heard in support of this submission. I can be contacted at 0274 802 405, emailed at president@whitewater.org.nz or contacted at WWCC, P O Box 4476, Christchurch.

Thank you for the opportunity to make this submission.



Graeme Wilson
President
Whitewater Canoe Club

**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: WHITEWATER CANOE CLUB INCORPORATED
(full name)

Address: P O Box 4476 CHRISTCHURCH
(full postal address)

Correspondence to be sent to the following name and address: (if different to above)

ATTN: GRAEME WILSON, PRESIDENT WWCC

Phone No: 0274 802 405

Fax No: _____

Email: president@whitewater.org.nz

I/we **support** the application numbers ticketed on the back of this form
I/we **oppose** the application numbers ticketed on the back of this form

(tick one)

My/our submission is that: WE ARE OPPOSED TO THE
(state in summary the nature of your submission. Clearly indicate whether you support or oppose
PROPOSED SCHEME.
the specific proposal, or wish to have amendments made, giving reasons)

REFER ATTACHED LETTER.

WE ASK THAT THE CONSENTS SOUGHT
SHOULD BE DECLINED.

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

REFER ATTACHED LETTER. WE ASK THAT
THE CONSENTS SOUGHT BE DECLINED.

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

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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.

(signature(s) of person making submission)

(Date)

22 APRIL 2008

(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



Whitewater Canoe Club (Inc), PO Box 4476, Christchurch

23 April 2008

West Coast Regional Council
P O Box 66
388 Main South Road
Greymouth

Fax: 03 768 7133

By email: kg@wrc.govt.nz

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Copy to:

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25 Sir William Pickering Drive
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Whitewater Canoe Club

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The most significant effects of the proposal are the change to the rafting and white water opportunities in the catchment. While the north branch will remain raftable and kayakable, including the short section between The Forks and the top of the lake, the need for alternative transport to the downstream end may diminish the use of this section. However, should a boat transport service develop in the lake the opportunity will still be available.

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Reasons for our submission against the proposal

In summary, we contend:

- that the two popular sections paddled on the Mokihinui are iconic runs in their own right, and that the proposal floods one of the runs and significantly complicates access to the second run, and
- that the Mokihinui is a valuable part of the diverse mix of rivers available on the West Coast, which is an area renowned internationally, and

- that the mitigation outlined in section 6.10.3 in no way compensates for the considerable loss in kayaking amenity, and that the provision of flat water of flat water facilities and likewise that the promised improved pedestrian, mountainbiking and fishing opportunities, although of recreational benefit, do not compensate kayakers and rafters for the loss of a substantial part of this wonderful river.

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Although MEL’s proposal dismisses the Mokihinui as “not being of national significance” we contend that the Mokihinui is a very important part of the “mix” of West Coast rivers, and that the West Coast rivers are of national and international significance.

The West Coast is renowned internationally for its whitewater. 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, with a high potential for kayaks to be pinned against rocks; caught in sieves (ie, the water goes through, around or under rocks but the gaps are too small for a kayak or a swimmer to go through) or pushed into undercut rocks.

As Hugh points out, many such rivers are out of the grasp of intermediate paddlers. The majority of WWCC paddlers will never run some of the other iconic West Coast rivers, such as the upper Crooked, upper Taipo, Arahura, Styx, Whitcombe, or a long list of others. In fact, the WWCC does not conduct club trips on water above grade IV. However, we have members who have sufficient skill to do so in smaller groups outside of the club environment.

Importantly, the Mokihinui main stem run offers an experience to which many of our club members can reasonably aspire.

Mitigation proposed is not whitewater mitigation

We note that in section 6.10.3 of the proposal MEL outlines a variety of possible “opportunities” which could be provided by the new lake and walking track. These opportunities include enhanced pedestrian and mountainbiking access; flat-water kayaking; and a potential water taxi service.

One of the specific points in section 6.10.3 is misleading. The sentence says:

Potential water taxi service on the lake to below the Forks (subject to obtaining any necessary approvals), potentially obviating some helicopter activity in the backcountry-remote setting and enabling whitewater rafting and kayaking on the North Branch.

Helicopter access is, at present, the only practical way to get to the put-in for the North Branch run. If the project proceeds, helicopter access will still be necessary to get to the put-in. Some minor reduction in helicopter trips would only result if the few parties who currently get lifted out from the Forks at the end of the North Branch trip can take a boat out instead. However, the majority of paddlers currently completing the North Branch run paddle out along the main stem, and this will; no longer be feasible under the proposal – leading to more helicopter trips.

The increase in flights will arise because under the proposal, future paddlers will not have the choice to complete their paddle down the main stem section. Instead, they will have the choice of either a boring flat water paddle down to a takeout above the dam in a kayak (or raft) which is not suited to such a paddle, or the added expense of a boat trip down the lake (if a commercial service does, in fact, develop), or the considerable additional expense of a helicopter pick-up from some agreed location at some pre-agreed time, together with the accompanying risk of paddling to a deadline as outlined above.

The backcountry-remote setting referred to in the proposal will be destroyed by the dam and eroded further by increased helicopter movements (unless the substantial increase in costs deters use of the North Branch) and the numbers of power boats on the lake.

Further, whitewater rafting and kayaking on the North Branch is available now, whereas the sentence implies that the proposal will enable such use.

We agree that the proposed enhanced pedestrian and mountainbike access, and the provision of flat water kayaking facilities are desirable things. Many of our members also tramp and mountainbike, and many also kayak on flat water and/or sea kayak.

However, what concerns us greatly is that if the proposal proceeds we are losing a whitewater resource at the important intermediate grade, and none of the mitigation proposed is in any way whitewater mitigation. We would lose a unique and precious whitewater river – not just now, but for future generations – and receive no whitewater mitigation whatsoever. We will lose the gorge on the main stem, and the North Branch will become less accessible.

Although flat water kayaking and sea kayaking are also kayaking, the skills and experience of whitewater kayaking are quite different – in the same way that track cycling, road cycling and mountainbiking are markedly different subsets of cycling. In a broader sense all three kayaking disciplines listed use a boat and a paddle, but the types of gear which are suitable for running grade III or IV whitewater are not suitable for a long flat paddle out. There is a general correlation between the length of a kayak and its speed. Typically multisport kayaks and sea kayaks are 5-6 metres in length, whereas whitewater boats are less than half that length. Whitewater boats are designed to be turned quickly and moved easily across stream, whereas multisport boats are designed for speed, and could not be safely paddled on the North Branch.

Decision sought

For the above reasons, we ask that the West Coast Regional Council and the Buller District Council decline all of the consents sought by MEL.

We believe that the Mokihiui in its present state is an irreplaceable resource, and that the loss of the river should not be permitted.

We believe that the whitewater mitigation outlined is non-existent, as any mitigation proposed is directed at parties other than the whitewater rafters and kayakers who would lose access to the existing main stem run and face additional complexity and cost when undertaking the North Branch trip.

Concluding remarks

I wish to be heard in support of this submission. I can be contacted at 0274 802 405, emailed at president@whitewater.org.nz or contacted at WWCC, P O Box 4476, Christchurch.

Thank you for the opportunity to make this submission.



Graeme Wilson
President
Whitewater Canoe Club