

Crown Pastoral Land Tenure Review

Lease name:

ALLANDALE / GREENVALE

Lease number: PS 068 / PS 067

Public Submissions

- Part 5

These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

February

08

Southern Office

Forest and Bird

Box 6230

Dunedin

0064 3 477 9677 ph

s.maturin@forestandbird.org.nz

The Commissioner of Crown Lands
C/o Opus International Consultants Ltd,
Land Resources Division
PO Box 1482
Christchurch

26.2.08

Submission to Allendale & Greenvale Preliminary Proposal**1.0 Conservation Area 6505ha**

Forest and Bird supports designation of the proposed conservation area with additions.

Recommended CA additions**CC1A – Middle proposed covenant on old lake Outlet.**

This well defined terrace and outlet channel (adjacent to the Glen Allen Scenic Reserve) is identified in the 'Threatened Environment Classification system as containing 'acutely threatened' and 'chronically threatened environments'. This has not been identified in the Conservation Resources Report, which we note has not been updated since it was compiled in 1999.

Prior to the advertisement of the Preliminary Proposal, the Government released it's National Priorities for protecting rare and threatened native biodiversity. We expect that pastoral leases undergoing tenure review will be assessed to identify any areas meeting the national priorities, as such areas should by definition be assessed as being a 'significant inherent value' (SIV), and should preferably be retained in Crown ownership and control under s36 (1) (a) Crown Pastoral Lands Act 1998, (CPLA).

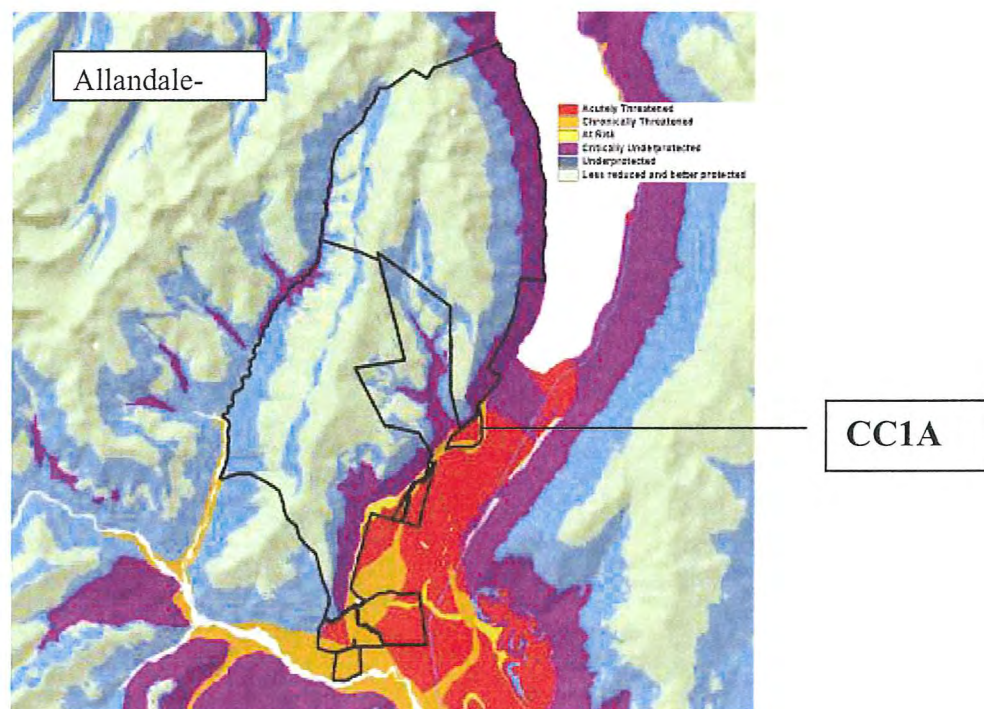
Our inspection revealed that the terrace is covered predominantly in short tussock, matagouri and small native herbs. Although modified and slightly degraded this vegetation retains characteristics of the original vegetation. Some broom and gorse is present. The terrace does not appear to have been ploughed, and so retains its original landform.

The SIV Guidelines state that the highest significance will be accorded to examples of Level IV 'much reduced' environments, where the examples soils are uncultivated and it has characteristic indigenous species present.

These Guidelines also note "*Degraded ecosystems may still have significance if they are one of few remaining examples ...*"

'Progressing Goal 3 of NZBDS implies that degraded but representative examples should also be considered for protection to secure the opportunity to restore them. Restoration potential on its own is not enough to attain significance must be something more such as representative importance, distinctiveness or rarity.'

The Society submits that the proposed covenant CC1A meets the CPLA guidelines for containing significant inherent values; it contains both acutely and chronically threatened Environments with a representative short tussock grassland. As it is a National Priority to protect such environments, and as it has opportunities for restoration, this area must be retained in Crown ownership, and returned to full crown control as a conservation area, not freeholded with an inadequate covenant. It may be that restoration requires some periodic light sheep grazing, however this will need to be carried out through an adaptive management process under DOC's management, where the goal is restoration rather than economic return. This management is not possible under a covenant. There is also need for public access through and in this area.



Categories of 'threatened environments'

Category	Criteria	Name
1	<10% indigenous vegetation left	Acutely threatened
2	10-20% indigenous vegetation left	Chronically threatened
3	20-30% indigenous vegetation left	At risk
4	>30% left and <10% protected	Critically under protected
5	>30% left and 10-20% protected	Under protected
6	>30% left and >20% protected	Less reduced and better protected



Figure 1 Proposed CC1A. This 'Acutely Threatened Environment' retains a short tussock grassland.

A walking track passes along the margin of the terrace, and the area is viewable from the Kingston Flyer.

Extend CA boundary at E to meet with C and protect the remnant beech forest in Roberts Creek.

This riparian beech remnant is the southern most extension of the Robert Creek mountain and silver beech forest and abuts the proposed Conservation Area between C and E above the ford.

This forest has significance for its landscape values (included as a significant landscape in the DOC Conservation Resources Report), it's protection of the riparian margins of Robert Creek, and habitat for bush birds. This small extension has similar values to the upstream beech remnants, which were identified for their high botanical values as a RAP. It is threatened by burning as evidenced by recently singed trees on its margin.



Figure 2 Riparian beech forest in Roberts Creek at the Ford and adjacent to CC2.



Figure 3 recent burning of the proposed CC2 covenant and beyond has scorched nearby beech forest remnants.

2.0 Proposed CC2

Schedule One of this proposed covenant does not adequately identify the values to be protected. The creek bed contains mixed shrublands of manuka, hoheria, hebe, flax and spaniard as well as beech forest remnants. These should be listed in Schedule one as being part of the natural environment that is to be protected. Riparian vegetation is important for the protection of native fish. The purpose of the Covenant should be defined as:

Purpose is to protect freshwater life, indigenous riparian vegetation, the tussock grassland catchment and the natural environment.

New fence C-N must not be bulldozed. This face is already significantly scarred by recently poorly sited tracking.



Figure 4 Part of CC2 – Note shrublands and beech remnant in tributary creek

3.0 Proposed CC1b

The Society supports the protection of this highly visible face. We note that it has similar SIV's to the proposed Conservation Area, and it is part of a continuous face visible from two important tourist routes the Kingston Flyer and the main Wakatipu – Te Anau highway.

The SIV values in the covenant document are not adequately described. Values to be included:

'Natural character, in particular the general absence of unnatural forms, colors and shapes.

The conditions permit erection of new fences. This will significantly detract from the inherent landscape values, should not be permitted. Clause 3.3 should be re written to provide for maintenance only of existing fence lines.

The covenant does not restrict stock type. As cattle, deer, goats, pigs etc., cause significantly greater damage to regenerating shrublands and tussock cover, than sheep, grazing must be restricted to sheep only and be specified in the Covenant document.

4.0 Wetland on proposed freehold

There is a significant wetland at GR 68522 26141 on the valley floor near Allen Creek. This does not appear to have been identified in the Conservation Resources Report. Wetlands are National Priority Two for protecting rare and threatened biodiversity. Given the significance of remaining natural wetlands we expect this wetland to be a SIV under the CPLA.

The Society requests that this wetland be investigated for protection. Due to time constraints we did not inspect this area; however we noticed the presence of wetland birds including ducks, paradise shell duck, plastic ducks and little black shags.



Figure 5 Un-protected wetland on proposed free hold

5.0 Shrubland Riser - Cainard Road – Mataura Valley

There is a narrow band of shrubland, with manuka, coprosma sp., cabbage trees and some mature beech as well as exotic elderberry. This shrubland riser contributes to the landscape experience along the Cainard Road entrance to public conservation lands in

Roberts Creek. It retains vegetation characteristic of the original species and is likely to be a 'threatened environment'.



Figure 6 Shrubland Terrace Riser – with landscape and shrubland SIV's warranting protective covenant

6.0 Proposed Freeholding Robert Creek Faces – Covenant needed

The landscape report notes that this area has moderately high landscape SIV's, although recently scarred by new tracking, burning and AOSTD. In order to protect the landscape integrity, coherence and legibility of the proposed CA the Society recommends that a covenant be placed over these faces to ensure that any plantation forestry does not create straight line boundaries between the proposed CA and proposed freehold, and that it provides for a grazed buffer between any plantings and the proposed CA.

The Society further recommends that a bond for wilding tree control be attached to the covenant. Burning and spraying should not be permitted within 300m of the proposed CA boundary, to prevent inadvertent damage, and to aid in the visual transition between differing management regimes. These conditions are necessary in order to ensure sustainable management of both the proposed freehold and the proposed conservation area.

7.0 Other Matters

Fencing

Due to landscape sensitivity bulldozers must not be used to clear any fence lines. We seek that LINZ ensure landscape architects review all proposed fence lines before

finalizing this tenure review and oversee fencing contractors during construction to ensure fences are sensitively and practically sited.

Access

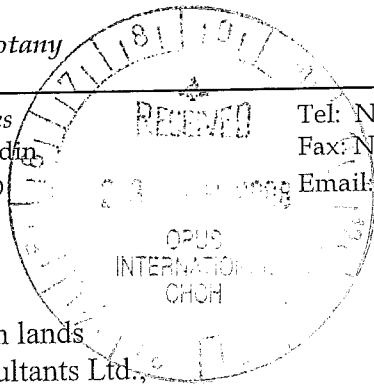
There is potential to better develop the walk/ mountain bike trail along the base of the hill through proposed CC1a to Kingston. Creation of an easement is warranted, as there does not appear to be legal access currently.

Yours sincerely

Sue Maturin
Otago/Southland Field Officer
Royal Forest and Bird Protection Society



Department of Botany

University of Otago
Te Whare Wananga o OtagoDivision of Sciences
PO Box 56, Dunedin
NEW ZEALANDTel: National 03 479 7573 International 64 3 479 7573
Fax: National 03 479 7583 International 64 3 479 7583
Email: amark@otago.ac.nz

November 22, 2005.

The Commissioner of Crown lands
c/o Opus International Consultants Ltd.,
PO Box 1482,
CHRISTCHURCH.**SUBMISSION ON PROPOSED TENURE REVIEW:
ALLENALE (Ps 068) and GREENVALE (Ps 067) PASTORAL LEASES.**

Dear Sir,

Thank you for sending me a copy of this proposal and I appreciate the opportunity to comment on it, based on my knowledge of the area involved, gained over many years of ecological research on the tussock grasslands and pastoral leases of the Central and western Otago, region, particularly the Eyre Mountains block where I lead a comprehensive ecological assessment of the Eyre Creek and Cainard Runs as part of the Government's land allocation exercise in the late 1980's (see Mark, et al., 1989: "An ecological survey of the central part of the Eyre Ecological District," J. Royal Soc. N.Z. 19 (4): 349-384). I have not visited these properties recently but am aware of most of the ecological/conservation issues and values there, most of which were well covered in the "information pack" you sent out on 7 Dec. last.

Referring to the details of this preliminary proposal, the overall distribution of the land between full Crown ownership and control, and freeholding, is commendable. The proposed Conservation Areas (CAs) comprise 6505 ha is endorsed and would make an obvious and worthwhile addition to the recently gazetted Eyre Mountains Conservation Park. In particular, this would ensure the protection and conservation of the outstanding glacially-derived landscape on the Lake Wakatipu face between Southwestern Bay and Bushy Creek, which is an important aspect as viewed from the Queenstown-Kingston highway.

Regarding the Robert Creek margin of the proposed Conservation Area, the higher elevation areas and headwaters are certainly justified for formal conservation and protection, and should also be added to the existing Conservation Park for their complementary ecological, conservation and landscape values. The section in the vicinity of the fence E-F should be part of the proposed extension to the CA, to include the remaining riparian beech stand, including the part which has been recently burned, since this has the potential to recover once grazing is excluded.

NOTE: It is critical to the future integrity of these conservation areas that any future further planting of exotic conifers on land to be freeholded here, should have conditions pertaining to the control of wilding spread as has been imposed by the Southland District Council on existing Douglas fir plantings in the vicinity.

Proposed Easements

I endorse the three proposed easement concessions but am concerned with possible stock movement along the e-d-c easement which should not allow for delay in the movement of stock in relation to their predictable undesirable grazing impacts.

Additional Protective Mechanisms

CC1: This Conservation Covenant of c.449ha under S 77 of the reserves Act is endorsed. It is to be formalised in three parts as follows:

CC1a: This section is to protect the landscape/landform and historical values within the Covenant. The presence of a valuable remnant stand of short tussock grassland towards its centre (and not mentioned in the Conservation resources report) is worthy of special attention, particularly only very light grazing by sheep, sufficient to retain the indigenous grassland component but manage the exotic grass growth.

CC1b: I also endorse this proposal to protect the hill slope landscape and its ecological values, and would recommend that a condition be imposed to restrict grazing to sheep since deer and/or cattle would predictably impair the future of this grassland. Ideally, this area should be added to the Conservation Area since it is an integral part of the iconic landscape visible from the main highway.

CC1c: I also endorse the proposed protection of the important historical values in this area.

CC2: Approx. 100ha to protect indigenous fish and their habitats under the Reserves Act. This area should be extended to provide protection to the indigenous shrubland in the associated gullies, both for their own intrinsic value and also for their value in protecting the aquatic habitats.

Wetland values: I am aware of a small wetland near Waterwheel Creek, close to the main farm access road which is worthy of formal recognition and protection with a perimeter fence.

Land to be freeholded:

I note that the 2204ha proposed to be freeholded will be subject to access easements and also two covenants, with appropriate conditions. These provisions are also endorsed.

I thank you for the opportunity to comment on this proposal and trust that you will give my recommendations serious consideration.

Sincerely,

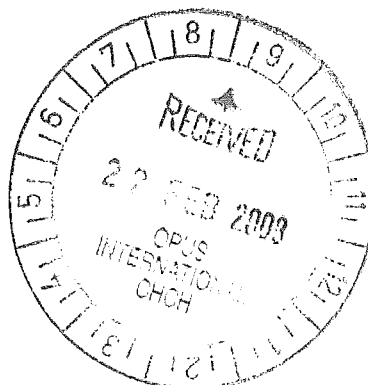

Alan F. Mark FRSNZ, Emeritus Professor.

APPENDIX IV

**Additional letters received
(not treated as submissions)**



Canterbury Land Rover Owners Club Inc.
P.O. Box 13-275
Christchurch
email:secret@clroc.net.nz



20th February 2008

Bob Webster
Tenure Review Consultant,
Opus International Consultants Ltd
P O Box 1482
Christchurch

Dear Bob,

On behalf of the combined four wheel drive clubs, I would like to thank you for the opportunity to have input into the Allandale-Greenvale pastoral leases.

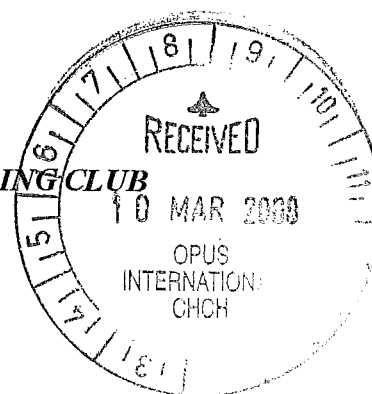
It would appear that after reading the documents it really has no impact on us and therefore we have no submission to make, other than to wish both parties a quick and speedy resolution to the proposed leases.

Yours faithfully

A handwritten signature in cursive script, appearing to read "M A Moodie".

M A Moodie
Canterbury Landrover Owners Club

NORTH OTAGO TRAMPING AND MOUNTAINEERING CLUB
PO Box 217
Oamaru 9444



5 March 2008

Commissioner of Crown Lands
C/o Opus Consultants Ltd
PO Box 1482
Christchurch

Dear Sir

Allandale and Greenvale Pastoral Leases Tenure Review

This letter is to confirm that the North Otago Tramping and Mountaineering Club does not wish to make a submission on the above tenure review. We do, however, appreciate being given the opportunity.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Chetwin".

John Chetwin
Secretary