

Crown Pastoral Land Tenure Review

Lease name: AWAKINO

Lease number: Oo 098

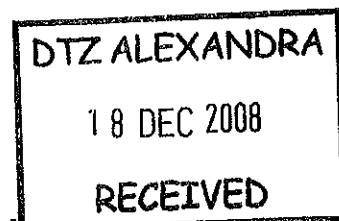
Public Submissions - Part 2

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

CENTRAL OTAGO RECREATIONAL USERS FORUM Inc. (CORUF)

18 December 2008

The Commissioner of Crown Lands
C/- The Manager
DTZ
P. O. Box 27
Alexandra



Submission on Preliminary Proposal, (the Proposal) Awakino Pastoral Occupation Licence Oo 098 (the Licence) Section 31 Block VIII Kurow Survey District (the Block)

Dear Sir,

We appreciate the opportunity to submit to the Review of the Licence.

We were able to inspect the Block on Tuesday 9th November 2009 in the company of representatives from the Royal Forest and Bird Protection Society of New Zealand, and the Federated Mountain Clubs of New Zealand. Our inspection on that day was limited by mist at the hut at NZ grid 012954 (the Hut) and on the tops, although we were able to draw on the previous experiences of our companions, including fair weather photographs and descriptions of the ground which we covered. This submission represents the views of CORUF.

Thank you to Mr Plunket for kindly giving permission to our group to inspect the Block.

CORUF wishes to make the following submission which relates primarily to the objectives of the **Crown Pastoral Land Act 1998 (the Act)** -

- **Part 3 83 (b) "To enable the protection of significant inherent values of Crown Land"**
- **Part 3 83 (c) (i) "The securing of public access to and enjoyment of Crown Land"**

S SUBMISSION

S 1) The Block is within an area of high landscape values and high natural values, both of which we value very much as recreationists, and we fully support any measures to maintain those. From our inspection, and other evidence provided to us, we broadly concur with the findings set out in section 4.4 of the Proposal which demonstrate that the Block is generally unsuitable for pastoral use.

S 2) We fully support the Proposal to designate the 800 hectares of land as land to be retained in full Crown ownership and control as a Conservation Area.

S 3) It is important to us that enduring public access is supported, at least to the boundaries of the Conservation Area being created, to allow recreational activities within it. Also we note from section 4.11 of the Proposal, and other evidence provided to us, that the Block is contiguous with conservation land to the west, which we understand will form part of the planned Oteake Conservation Park (the Park) and our comments take this into account.

S 4 Access

S 4, A 1) We note that section 4.9.1 of the Proposal states that the legal road up the East Branch of the Awakino River “does not give access to” the Licence. However, inspection of the plan provided with the Proposal shows the legal road entering the Block at its NW corner at approximate NZ grid 996952, and terminating on the western boundary at 995951. This is confirmed by other evidence provided to us (see A3 below regarding mapping).

S 4, A 2) We also note that, excluding the formed spur track to the Hut within the Block, the formed 4WD track - which runs more or less in the direction of the legal road - skirts the NW boundary of the block without entering it. So we have concluded that the Proposal has treated the formed track as if it were the legal road in this regard.

S 4, A 3) Our inspection of the Topomap representation of the line of the formed 4WD track up the East Branch of the Awakino river, and of TUMONZ information on the boundaries of the Block, the line of the legal road, and the line of the formed track, shows that the three road/track lines are all different. The closest representation of the actual line appeared, from our drive up, to be that provided by the Topomap, but we cannot confirm this because we did not carry out GPS tracking. Nonetheless, it is clear that the formed track and legal road follow mainly different lines all the way up the river valley, albeit crossing and recrossing each other as they head towards the Block.

S 4, A 4) With the above in mind we propose that enduring public access be secured to the Block by creating an easement, which would allow the formed road/track (the Track) up the East Branch of the Awakino River, which leads to the N and past the NW boundary of the Block, to be treated as if it were the legal road. We suggest that this would not only be the most practicable and cost effective approach to access provision now, but would also leave all options open to future generations as the need for access to such beautiful areas changes with increasing population and the growing popularity of outdoor recreation.

S 4, A 5) We would further propose that the easement includes access down the spur track from the junction below the zigzags at NZ grid 011956 (the Junction) to the Hut, so allowing access into the Block and the formed tracks within it. Should this easement from the Junction to the Hut be restricted, to walking, pedal cycling and horse riding, for example, we would propose the creation of a vehicle parking area at a suitable point between the Junction and the prior elbow bend in the Track at NZ grid 011957. Otherwise, parking would be at the Hut.

S 4, A 6) There is an opportunity here to create a long back country driving, horse trekking and multi day tramping route through an outstanding natural landscape by linking the Track, which enters the Park to the west of the Block, with the route through the Park from further west, that is from Home Hills Runs Road via the Johnstones Creek Track onto Walking Spur and on across Boundary and Guffies Creeks towards the Block.

S 4, A 7) In addition to the importance we attach to providing vehicular access to the Block, so that its public enjoyment is not in practice restricted only to the very fit and capable, our proposal regarding an easement along the Track would provide access from the east via Kurow, past the Block, to the Park. We believe this would be a valuable enhancement of the Park’s potential for public enjoyment.

S 4, A 8) In requesting public access to the Block, and thereby to the Park from the east, we ask this in the interests of, but not necessarily limited to, biologists, botanists, 4W Drivers, fishers, horse trekkers, hunters, skiers, trampers and walkers and all those wishing access to the enjoyment of such a beautiful area.

S5 The Hut

S 5, H 1) The Hut is in generally good condition, and well appointed. It provides a good base from which to explore the Block, and an en route stopover on longer expeditions across the Park. We ask that it be protected and maintained in good order.

S 5, H 2) The toilet associated with the hut is insanitary, and in any event is probably located too close to the stream which provides a source of fresh water. This should be remedied.

S5, H 3) We note that the Proposal refers to “a mixture of various conifers” and “a grove of cone-producing *Pinus contorta*” surrounding the Hut, suggests that these “have been planted for utility reasons” and states that “unfortunately these pines have started to cone with wildings now being relatively well established by the prevailing wind”. We support the control of wildings in the Block, but would prefer that any control regime permitted the retention of at least a minimum shelter belt for the Hut. The pines also provide a source of fuel for the Hut’s range. Shelter and fuel probably were the “utility reasons” for the original planting. However, botanical conservation values aside, the setting of the Hut among a grove of trees is attractive.

CORUF

CORUF is a voice for a diverse group of user interests, representing over 50 recreational clubs and groups in the Central Otago area. Part of our brief is to find a middle way that provides acceptable conditions to differing interests.

A fundamental principle guiding us is the belief that public lands should be accessible in some way to the public, and not restricted only to the very fit and capable.

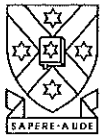
The associated principle is for due care and respect, to the land, the landscape, natural and historical values, and to the private landowners whose properties adjoin conservation land.

With these things in mind, we make the above submission.

Yours faithfully,

Jan Kelly,
Secretary,
Central Otago Recreational Users Forum
186 Faulks Road, RD 2, Wanaka 9382.
and Morley Williams, CORUF Committee

18 December 2008



Department of Botany

Division of Sciences
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NEW ZEALAND

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December 18, 2008

Commissioner of Crown Lands
c/o Manager,
DTZ (NZ) Ltd.,
PO Box 27,
Alexandra.

DTZ ALEXANDRA

19 DEC 2008

RECEIVED

**SUBMISSION ON PRELIMINARY PROPOSAL TO REVIEW OTHER CROWN LAND:
AWAKINO STATION LIMITED**

Dear Sir,

Thank you for sending me a copy of this document and I appreciate the opportunity to comment on it. I am generally familiar with the area, having visited recently to assist with the removal of wilding conifers, and based on many years of ecological research on the Otago high country, and specifically as supervisor of the PNA survey of the nearby Hawkdun Ecological District by Philip Grove, published by the Department of Conservation in 1994.

I note from the information supplied with the proposal that the ~800 ha block involves an unrenewable occupation licence known as "Awakino" for which the proposal is for the land to be retained in full Crown ownership and control as a conservation area.

I fully support and endorse this proposal and confirm that it is justified for the reasons stated in the proposal, namely under the terms of the Crown Pastoral Land Act, particularly s.83 which requires promotion of management of Crown land in a way that is ecologically sustainable; and to enable the protection of significant inherent values of Crown land while providing and securing public access.

Apart from the area surrounding the Tin Hut on the north-eastern margin of the property, the vegetation cover of the area is essentially indigenous with a strong dominance of snow tussock on the lower particularly cooler-aspect slopes, grading upwards into a mixture of mostly natural scree slopes and cushion-fellfields, with altogether a magnificent natural alpine landscape. A variety of woody indigenous plant species, particularly celery pine (*Phyllocladus alpinus*), together with a typical range of fauna, including a probable range extension for one of the four grasshopper species (*Paprides dugdali*) clearly adds justification to the proposal for a conservation outcome. With a wide altitudinal range of ~800 to ~1500 m, about half of the total area has been designated as Class VIIIe Land Use Capability which implies it has no productive value, whereas most of the remainder has been designated as Class VIIe which implies the land has severe limitations to pastoral (and any other productive) use.

The block's greatest value is as conservation land, to be managed so as to conserve and protect the indigenous cover for ecological, biodiversity and compatible recreation. The extensive areas of snow tussock cover are valuable for their water production potential, similar to the areas of upland snow tussock cover which has been documented in several parts of the Otago high country for its maximisation of water yield (see Mark & Dickinson, 2008).

Importantly, formal legal access is present to the far eastern corner of the property and along close to the eastern edge, through the adjoining pastoral leasehold property. Equally important, the block is essentially an enclave, bounded by existing conservation lands to the north-west and the south, and moreover, the land on the western boundary is now proposed conservation land.

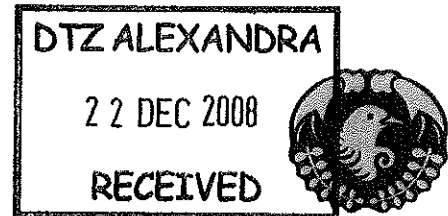
I trust that my information and recommendations will be seriously considered and again, I thank you for the opportunity to comment on this proposed review of 'other Crown land' in the Sth. Is. high country.

Yours sincerely,

Alan F Mark FRSNZ. DCNZM. Emeritus Professor.

Mark, A.F., Dickinson, K.J.M. 2008. Maximizing water yield with indigenous non-forest vegetation: a New Zealand perspective. *Frontiers of Ecology and the Environment* 6(1):25-34. (I'd be happy to supply a pdf copy of this paper, based on Otago upland studies, if an email contact is sent to me at amark@otago.ac.nz.)

The Manager
DTZ New Zealand Ltd,
Land Resources Division
PO Box 27
Alexandra



FOREST
& BIRD

Dunedin Branch
PO Box 5793
Dunedin
19 12.08

Dear Sir,

I enclose this submission on the preliminary proposal for the Awakino POL on behalf of the Dunedin Branch of Forest and Bird

Thankyou for the opportunity to make submissions on this proposal.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Janet Ledingham".

Janet Ledingham
For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society

Email jledingham@xtra.co.nz
622 Highgate, Maori Hill, Dunedin.
Phone 03 467 2960

Submission on the Preliminary Proposal for the Awakino Pastoral Occupation Licence (POL)

On behalf of the Dunedin Branch of Forest and Bird Management Committee.

This submission is written on behalf of the Dunedin Branch of the Forest and Bird Protection Society which has approximately 565 members with strong interests in botany and natural history in general and in the High Country. Many of the members enjoy active recreation in the back country and are very aware of the need to ensure the protection of natural values, vegetation and landscape, historical sites and to improve public access through the tenure review process.

The submission is written with reference to the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the recently stated government objectives for the South Island high country, especially the following:-

- *to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- *to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- *to secure public access to and enjoyment of high country land.*
- *to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy to progressively establish a network of high country parks and reserves.*

We note the objects of a Part 3 review which applies to Awakino as land which is under a non-renewable pastoral occupation licence:-

Objects of Part 3

- a. *Promote the management of Crown land in a way that is ecologically sustainable and*
- b. *to enable the protection of significant inherent values of Crown land and*
- c. *subject to paragraphs a & b to make easier-*
 - i. *The securing of public access to and enjoyment of Crown land; and*
 - ii. *The freehold disposal of Crown land capable of economic use.*

Introduction

Awakino POL covers an area of approximately 800 hectares and its western and southern boundaries, together with parts of the northern boundary, adjoin conservation land which is proposed to be part of the Oteake Conservation Park. The lease ranges from approximately 800-1500m.

Description of proposed designation

The 800 hectares of the POL is to be retained in full Crown ownership and control as a conservation area pursuant to Section 86(5)(a)(i) Crown Pastoral Land Act 1998.

We strongly endorse this proposal.

We note that the Summary in the Preliminary Proposal document points out that its location

“places the licence in the context of an enclave into associated conservation land and indeed is not separated from the land to the west. A review of the subject area must be considered in this context”. It is most appropriate therefore to designate the POL as land to be retained in full Crown ownership and control as indicated in the Proposal.

The lease includes part of the headwaters of both the East Branch of the Awakino River and the Kurow River and, as stated in the proposal ‘The landform includes the following natural features:- the deeply etched side slopes that overlook the East Branch of the Awakino, the low saddle between the East Branch and the Kurow River, and a series of steep short valleys that penetrate into the St Marys Range which are characterised by large areas of scree and stone pavement.’ The screes have their own special plant communities of great interest to ‘botanical trampers’ and there are also cushion fell-fields and lower down snow tussock and its associated inter-tussock species including *Rytidosperma pumila*, *Geum lieospermum* and many lichens. Remnant shrublands (*Ozothamnus*, Matagouri and *Dracophyllum* sp, celery pine) are scattered throughout the lease. The natural alpine landscape of the lease is of high value. On the more exposed spurs *Celmisia sessiliflora*, *Kelleria dieffenbachia*, *Dracophyllum muscioides*, *Leucopogon fraseri*, and *Luzula pumila* are found together with other cushion plants, moss (*Racomitrium*) and lichens.

As noted in the Conservation Resources report the vegetation of the lease has significant inherent values and is demands full protection.

We noted the presence of some large conifers around the Tin Hut and also the spread of smaller trees over an area some distance from these seeding trees. The Dunedin Forest and Bird Wilding tree group has recently made a start on removing the larger trees (with the permission of the leaseholder) and we plan to return and complete the task as well as removing the smaller wildings over several visits. We feel strongly that the Tin Hut should be included within the Conservation Area as it will become important for recreational use and a base for botanical trampers and others who are crossing the Range from the Maniototo to the Waitaki side.

We also note the invertebrate, reptile and fish values outlined in the proposal and agree they are worthy of protection.

342ha of the Awakino POL is classified LUC Class VIII land, defined as unsuitable for pastoral production. 342ha is LUC Class VIIe land, severely limited for sustainable pastoral use, and 54ha is Class VI, suitable for pastoral use with only limited limitations. This indicates that the lease could not be managed in a way that could support ecologically sustainable pastoral use and clearly indicates that the license should not be renewed.

In the recreational context we note that a public access route (including 4WD access) through the proposed Oteake Park crosses the St Marys Range from Hut Creek to the Awakino River and runs very close to the northern boundary of the POL before it joins the legal road which continues down the East Branch to the Awakino Road

Recommendations

The Dunedin Branch of Forest and Bird strongly endorses the conclusions drawn in the Conservation Resources report and in the proposal and fully supports the retention of the whole area in full Crown ownership and control as a part of the proposed Oteake Conservation Park. This small but important lease on the St Marys Range will add significantly to the inherent values and recreation opportunities within the proposed Oteake Conservation Park.

Acknowledgements

We would like to thank DTZ Ltd for facilitating the property inspection and the leaseholder for granting permission to inspect.

Janet Ledingham,
For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society.



**FOREST
& BIRD**

ROYAL FOREST AND
BIRD PROTECTION
SOCIETY OF
NEW ZEALAND INC

20th December, 2008

**Upper Clutha Branch
4 Brookstead Drive
WANAKA 9305**

The Commissioner of Crown Lands
C/O DTZ
PO Box 27
ALEXANDRA

alexandra@dtz.co.nz

DTZ ALEXANDRA

22 DEC 2008

RECEIVED

Dear Sir

Awakino POL - Review Under Part 3 Crown Pastoral Land Act 1998

We thank you for forwarding to us a copy of this preliminary proposal. We would be pleased if you would accept this submission on it.

Our branch has a membership of approximately 170 members and, situated where we are in Central Otago, we are very conscious of the importance of Tenure Review. We are conversant with the process and fully support the aims and objectives of the Act - in this case Part 3 of the Act.

We have read the Conservation Resources Report and have inspected the property with the permission of the licence holder and we wish to take this opportunity of thanking him for allowing us to do so.

Objectives of a Part 3 Review:

Sec 83, Objects of Part 3 - the objects of this part are -

- (a) Promote the management of Crown land in a way that is ecologically sustainable; and*
- (b) to enable the protection of significant values of Crown land; and*
- (c) subject to paragraphs (a) and (b), to make easier -*
 - (i) The securing of public access to and enjoyment of Crown land; and*
 - (ii) the freehold disposal of Crown land capable of economic use.*

1. General Description of proposal:

That 800 ha (approximately) be designated as land to be retained as land in full Crown ownership and control as a conservation area pursuant to Section 86 (5) (a) (i) Crown Pastoral Land Act 1998.

To this we fully agree.

2. A general description of the POL area under review:

- This POL lies to the east of the St Mary range of mountains at the headwaters of the east branch of the Awakino and Kurow rivers.
- It is in the St Mary Ecological District

-2-

- It lies between 800ms and almost 1500ms above sea level.
- Apart from its north-eastern boundary it is bounded by the Oteake Conservation Park.
- In winter it carries a considerable amount of snow above about 1200ms.
- The St Mary Range is much steeper in contour than the Hawkdun range which is on the other side of the Otematata catchment area, and, which forms the bulk of the Oteake Conservation Park. The Otematata river flows north and then east to join the Waitaki river just below the township of Otematata.

3. The landscape:

The landscape is made up of steep tussock covered slopes running up to bare rocky tops. The tall tussock gives these slopes their colour and texture. In places there are steep scree slopes, some of which run almost from top to bottom of the slopes. Apart from the tracking that was undertaken several years ago it is a relatively unmodified landscape; although the conifers around the hut give a discordant note right at the entrance to the block. For all that, it is a very good example of North Otago high country.

4. The vegetation:

This is mostly snow tussock; a little shorter in stature on the sunny faces than on the darker lying country, interspersed with fescue tussock and some shrubs indigenous to the area; all mostly in good order. In behind the hut and the old sheep yards, and also near the gateway to the block, there are more exotic grasses such as brown top and sweet vernal present. At the higher levels there is celmisia, cushion plants, ranunculus and other fell-field herbs present. In the bottom of the gullies there is mountain flax in evidence. We noted that the land already under DoC management immediately to the north, on the south or darker face of Mt Kohurau, had very good snow tussock and flax in the side creek catchments just above where the access track runs.

Remnant shrublands, containing cassinia, matagouri, dracophyllum and mountain toa toa, are scattered throughout the area.

The vegetation, taken as a whole, has significant inherent values and is well worthy of full protection.

5. Land Classification:

We note that there is:

- 54 ha Class VI land - Land suited to pastoral use with only limited limitations.
- 404 ha Class VII land - Land with severe limitations to pastoral use.
- 342 ha Class VIII land - Land generally unsuited to pastoral use.

-3-

The above tells us that the land, without replacing the nutrients taken off the place in the shape of meat and wool with fertiliser, is not ecologically sustainable, or, even if it were fertilised, would it be economically viable, as it is mostly land above 1000ms, the level at which it has been proven that fertiliser is far less effective.

6 Recreation:

The area will be popular with hunters seeking deer and pigs. It is a very attractive area for tramping, and a high-level remote walk from the Awakino valley to the Buster diggings and out to Naseby, when fully known, should prove to be very popular. It is noted that on the map being provided by DoC describing the Oteake Conservation Park they allow 4WD vehicles to cross from Naseby to Awakino via this route, subject to land-owner consent. The top of the St Mary range is visited by cross-country skiers on occasions. When the final gazetting of Oteake is completed we can see it being used more frequently by these people.

7. Access:

The legal road running up the East Branch of the Awakino River gives legal access through a portion of the neighbouring lease to only a small portion of the upper end of this POL. This will however not be of any major concern as, when the POL is incorporated into the greater Oteake Conservation Park, all that is required is good and reasonable access to the park boundary. The present formation, which is the property of the present lessee, will no doubt only coincide with the surveyed legal road in places.

8. In Summary:

We see the retaining of this POL in Crown ownership and adding it to the neighbouring Oteake Conservation Park as a very sound move for several reasons.

- (i) It is a small area which forms an enclave in the eastern boundary of the Oteake Conservation Park. The tussock in the neighbouring park is far superior to that in the POL. However, given time, the tussock on the POL will catch up.
- (ii) It is relatively high country, mostly above 1000ms, which is not ecologically sustainable if grazed without replacing the nutrients taken off the place.
- (iii) It is not economically viable even if fertilised in any way in order to replace the nutrients taken off it.
- (iv) It has significant inherent conservation values in its vegetation, and further grazing can only cause deterioration in those values.
- (v) So too would the tussock landscape be damaged if grazing were to be continued.

-4-

(vi) It has been Government's intention to create a series of Conservation Parks. Our Society together with the Federated Mountain Clubs of New Zealand fully support this idea.

9. Finally:

In the days of Provincial Government some very large pastoral properties were established and some land was farmed that, in hind-sight and with the knowledge we have today, should never have been farmed. The Tenure Review process is the opportunity to correct some of the mistakes that were made in the past.

When the historical background of this property is looked at, and taken in context with New Zealand's pastoral farming history, it is a natural outcome that this POL remain under Crown Control.

For the "nation as a whole" it is fortunate that large areas of our land were leased or licensed in this way as it now allows, after tenure review, the establishment of national parks and conservation areas to meet the public need in a more modern world; even though these are mostly on the higher uplands of the South Island. Land that has little expectation of being managed in an ecologically sustainable manner, yet has significant inherent values and much unique biodiversity, is also now able to be protected.

We see this is an excellent proposal and see it as the only possible outcome for this property on the St Mary Range and we fully support the land designated a Conservation Area.

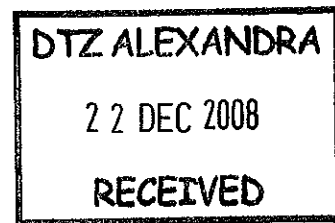
We thank you for the opportunity to make these comments and we await the outcome.

Yours faithfully

A handwritten signature in dark ink, appearing to be 'DB' followed by a long horizontal stroke.

Denise Bruns

Secretary for Upper Clutha Branch
Forest and Bird.



FOREST
& BIRD

Southern Office

Forest and Bird

Box 6230

Dunedin

0064 3 477 9677 ph

s.maturin@forestandbird.org.nz

22 December 2008

The Commissioner of Crown Lands

C/O DTZ

PO Box 27

ALEXANDRA

alexandra@dtz.co.nz

Awakino POL - Review Under Part 3 Crown Pastoral Land Act 1998

Dear Sir

This submission is presented on behalf of the Royal Forest and Bird Protection Society.

The Society supports the proposal to designate 800ha (approximately) as land to be retained in full crown ownership and control as Conservation area.

This area has the following significant inherent values which warrant protection:

- The riparian margins of the head waters of the Kurow River and East Branch Awakino River are classified as critically under protected environments, and are a national priority to protect.
- Snow tussock grasslands with high natural values and strong diversity of indigenous inter-tussock species.
- Snow tussock grasslands and shrublands similar to the original prehuman vegetation cover.
- Highly legible, largely indigenous landscape with screes and patterned ground.
- Important ecosystem services, contributing water to the Waitaki Basin.

We concur with the Conservation Resources Report that this area should be destocked, as continued grazing at this high altitude with no nutrient inputs is unsustainable. The area is generally very steep, with high alpine tops up to 1400+m, extensive screes, and has predominantly soils with low fertility. All but 50 odd ha of it are classified as land with

severe limitations or land generally unsuited for pastoral use. The continued presence of *Pinus contorta* is a threat to the ecological sustainability of the surrounding landscape.

Disposal of this land by special lease, or sustainable management covenant would not meet the objectives of the Crown Pastoral Lands Act, as it would not promote the management of Crown land in a way that is ecologically sustainable, nor would it enable the protection of the significant inherent values.

The Society is pleased that the hut and the surrounding land is to be returned to full crown ownership and control as this will fulfill the obligations of S83 (c) (i) of the Crown Pastoral Lands Act by increasing the public's ability to enjoy, access and use this land and near by public conservation land.

Forest and Bird agrees that the preliminary proposal meets the objects of the CPLA and we look forward to a speedy completion of the review process.

Yours sincerely

Sue Maturin
Otago Southland Conservation Officer
Royal Forest and Bird Protection Society

DTZ ALEXANDRA

22 DEC 2008

RECEIVED



NEW ZEALAND FOUR WHEEL DRIVE ASSOCIATION INC.

PO Box 90960 Victoria Street West
Auckland 1142, New Zealand

www.NZFWDA.org.nz

The Commissioner of Crown Lands
C/- The Manager
DTZ
P. O. Box 27
Alexandra

22 December 2008

**Submission on Preliminary Proposal, (the Proposal)
Awakino Pastoral Occupation Licence Oo 098 (the Licence)
Section 31 Block VIII Kurow Survey District (the Block)**

Dear Sir,

The opportunity to comment on the proposal is appreciated.

The New Zealand Four Wheel Drive Association Inc. (NZFWDA) is the national organisation for 4x4 recreation enthusiasts in NZ and currently represents over 2000 individual members, through more than 50 4WD clubs around the country.

The NZFWDA would like to endorse the submission provided by Central Otago Recreational Users Forum, especially with regard to the matter of vehicle access.

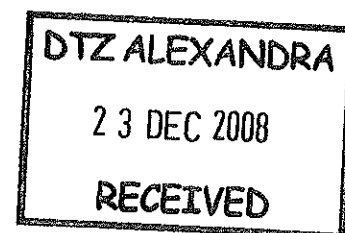
Access to public lands was clearly defined as an important consideration by recreation enthusiasts during the process of the 2008 Walking Access Bill and the eventual legislation recognised that vehicle access should not be subjugated to walking or other modes of transport.

Yours truly,

Peter Vahry
NZFWDA northern public relations

NORTH OTAGO TRAMPING AND MOUNTAINEERING CLUB
PO Box 217
Oamaru 9444

Commissioner of Crown Lands
C/o DTZ
PO Box 27
Alexandra 9340



21 December 2008

Dear Madam/Sir

Review Under Part 3 Crown Pastoral Land Act: Awakino POL

Thank you for the opportunity to comment on the proposed designations for the above land.

The primary objectives of the North Otago Tramping and Mountaineering Club are to encourage and organise tramping and preserve and protect native flora and fauna. Our concerns are, therefore, generally with legal and practical access to country which can provide a high quality tramping and environmental experience.

In the case of the land subject of this proposal, access is not an issue. It is not an area the Club has tramped, nor does it provide access to tramping destinations such as Mt Domet or Te Kohurau. The Club will, therefore, not be expressing a view on the proposed designations.

Yours sincerely

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

John Chetwin
Secretary



58 Kilmore Street, PO Box 345, Christchurch

General enquiries: 03 365 3828

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on 0800 EO INFO (0800 324 636)

Website: www.ecan.govt.nz

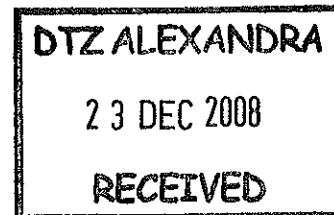
22 December 2008

The Commissioner of Crown Lands

C/- DTZ

PO Box 27

ALEXANDRA



Attention: Mr Ken Taylor
Manager

Dear Ken

AWAKINO POL

SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW

Thank you for advising Environment Canterbury of the release of the Preliminary Proposal for tenure review of Awakino POL. We appreciate the opportunity to review the proposal and make a submission in relation to the future management of this land.

Environment Canterbury has statutory responsibilities under the Resource Management Act 1991 (RMA) for the sustainable management of natural and physical resources of the region, including soil conservation, water quality and quantity and maintenance of biodiversity; and under the Soil Conservation and Rivers Control Act 1941 for the establishment and management of Land Improvement Agreements and Soil and Water Conservation Plans. In addition, Environment Canterbury also has statutory responsibilities under the Biosecurity Act 1993 for the management or eradication of animal and plant pests, in accordance with regional pest management strategies. These responsibilities are entirely compatible with achievement of the objectives of Tenure Review, specifically to "promote the ecologically sustainable management of High Country land" and protecting land with "significant inherent values" by retaining it in Crown ownership.

The Canterbury Regional Policy Statement 1998 (CRPS) provides an overview of the resource management issues of the region, and sets out how natural and physical resources are to be managed in an integrated way to promote sustainable management. Key to the management of soils is the maintenance or restoration of a resilient vegetative cover over non-arable land that is sufficient to prevent land degradation or the onset of erosion (Ch7 Objective 1). Sustainable management of water resources requires safeguarding the life-supporting capacity of water, including associated aquatic ecosystems and careful management of land within the headwaters and the riparian zone. Large landscapes are a feature of the Canterbury high country and the CRPS recognises the importance of protecting both the interconnectedness of landscape components and the vast, open nature of these landscapes.

Environment Canterbury has notified its Proposed Natural Resources Regional Plan (NRRP) to address the resource management issues identified in the CRPS and to provide more specific standards and methods, including rules, to achieve the objectives. The NRRP recognises the close relationship between land and water ecosystems by promoting the integrated management of soil and

Our Ref: PL5C-103; IN6T/46 ;

Your Ref:

Contact: Cathie Brumley

water resources across the region. In particular, the provisions of the plan emphasise the links between land use practices and the management of water quality.

The Canterbury Regional Pest Management Strategy (2005) [which is a revised combination of the former CRPMS (1998) and the Canterbury Regional Pest Management Strategy Biodiversity Pests (2002)] identifies a number of species of plants and animals for control or management as pest species.

Under the 2004 amendment to the Resource Management Act, regional councils have been given the responsibility to protect indigenous biodiversity (s32(1)(ga)) in association with their functions for land and water management. Recognising the important services provided by indigenous ecosystems together with the requirements for their long-term protection are inherent in providing for this responsibility.

In line with these statutory responsibilities and documents, and Section 24 of the Crown Pastoral Lands Act (1998) (CPLA), Environment Canterbury technical and planning staff have reviewed the information held by the Council on land and water resources relevant to the Awakino POL to assess the impacts, if any, of this Preliminary Proposal on the long-term sustainable management of the land and water resources. Our comments and recommendations are listed below.

Soil Conservation

The Awakino POL land is dominated by short, steep valleys of highly erodable soils that have an inherently low fertility. The sunny north facing slopes tend to be very dry and have only a sparse vegetation cover, which creates a high risk of erosion by wind or water or from disturbance of the soil surface. Higher altitude slopes have little soil or vegetation cover and are subject to erosive forces of wind and freeze thaw processes.

The POL is covered by a Land Improvement Agreement LIA No. 580586 which was registered by the former Waitaki Catchment Commission on 5 August 1982. It is due to expire on 8 March 2015.

A Soil and Water Conservation Plan (S&WCP) was developed in conjunction with the LIA to provide for the long-term sustainable management of the soil and water resources of the Licence land. The plan is subject to the following two key conditions (see attached plans 1 and 2):

(i) the severely depleted sunny face (shown as "Retired Block" in the attached Plan1) to be permanently destocked; and

(ii) the balance of the Licence area, being mainly Class VIII and severely eroded Class VII to be separated from the lower better class land (i.e. Horse-Shoe Block) with erosion control fencing. Grazing was with sheep only and subject to a stock limitation based on the LUC assessment.

Both of these conditions were being observed when the last monitoring visit was made in May 2000.

The erosion control fencing put in place to achieve conditions (i) and (ii) follows the lower boundary of the LIA. This is shown on the attached Plan 1.

The LUC classification used to develop the S&WCP is shown in Plan 2 attached. This classification clearly identifies the major limitations to pastoral use that dominate the POL land.

The Soil Conservation Chapter of the Natural Resources Regional Plan has set the criteria for an intact and resilient vegetation cover to include at least an 80% cover of vegetation (Objective SCN1) based on localised surveys of erosion which showed a marked increase in the incidence and extent of erosion when bare ground exceeded 20 percent.¹ On the basis of the current vegetation cover in the Licence area and the potential capability of the land as indicated by the LUC classification, Environment Canterbury considers that the Awakino POL land has very limited ability to support any

¹ Cuff, J.R.I. 1974, 1981. *Erosion in the upper Orari catchment*. SCCB Publications No.19

form of long-term sustainable pastoral use and is best suited to being managed for the benefit of soil and water conservation.

Recommendation:

From a soil and water conservation standpoint, Environment Canterbury fully supports the Preliminary Proposal recommendation to designate the entire POL area as land to be retained in full Crown ownership and control as a conservation area.

Indigenous vegetation, habitat and wetlands values

Tenure review provides a valuable opportunity to help achieve two key objectives of the Reserves Act 1977 and the New Zealand Biodiversity Strategy (2001). These are, respectively, "preservation of representative samples of all classes of natural ecosystems and landscapes" and to "maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state." A complimentary objective of the tenure review process is to ensure that conservation outcomes are consistent with the New Zealand Biodiversity Strategy.

The Land Environments of New Zealand landscape classification system (Leathwick et al. 2003)² provides a framework for securing protection and/or restoration of examples of the full range of terrestrial vegetation and habitats. Land environments, and potential natural vegetation cover (in the absence of human modification) are classified at four different national scales: Level I (20 land environments nationally), Level II (100 land environments nationally), Level III (200 nationally) and Level IV (500 nationally). Each is nested within higher levels. The 500 Level IV environments provide the most detailed information on the diversity of New Zealand's terrestrial environments and is the best nationally comprehensive estimate of the 'full range' of ecosystems, habitats and biodiversity.

Analysis of Land Environments in conjunction with spatial data depicting indigenous vegetation cover (from Land Cover Data Base) and current legal protection has recently been carried out by Landcare Research (Walker et al. 2005)³, for the Department of Conservation. This analysis offers a useful method of identifying the most threatened environments, and therefore determining what should be priorities for protection of indigenous biodiversity, as part of tenure review. In reporting this work, the authors recommended that threat classification analysis be carried out using Level IV Land Environments, as these provide a more accurate, efficient and plausible assessment at regional and local scales.⁴

Examples of three Level IV Land Environments are present on the Awakino POL:

- Q1.1d and Q1.2a – Southeastern Hill country and Mountains, high elevation range crests and slopes
- Q2.1c – Southeastern Hill Country and Mountains, steep greywacke mid-slopes.

These three Land Environments are listed, in altitudinal sequence (highest to lowest) as they occur on the Awakino POL, in the table below. The table also shows the percentage of indigenous vegetation remaining in each land environment nationally, and the proportion of each environment that is already protected in existing reserves or conservation covenants. Threat categories are assigned on the basis of these figures (from Walker et al. 2007)

² Leathwick J.R., Wilson G., Rutledge D., Wardle P., Morgan F., Johnston K., McLeod M., Kirkpatrick R. 2003. *Land Environments of New Zealand*. David Bateman, Auckland, New Zealand.

³ Walker S., Price R., Rutledge D. 2005. *New Zealand's remaining indigenous cover: recent changes and biodiversity protection needs*. Landcare Research Contract Report: LC0405/038. Prepared for Department of Conservation, March 2005.

⁴ Walker S., Cieraad E., Grove P., Lloyd K., Myers S., Park T., Porteous T. 2007 *Guide for Users of the Threatened Environments Classification*. Landcare Research. 35 pp.

Lvl IV Land Environment	% Indigenous Cover Remaining	% Protected	Threat category
Q1.2a	98.99	36.51	Comparatively secure from clearance
Q1.1d	84.66	32.48	Comparatively secure from clearance
Q2.1c	24.56	8.16	At Risk

As can be seen from the table, most of the POL is not classified as a threatened environment, except for Land Environment Q2.1c which is found along the lower slopes adjoining stream gullies. The Q2.1c environment is classified as 'At Risk' having less than 30% indigenous cover left nationally, and less than 10% currently protected. On this basis, the remaining examples should be priorities for protection.

The position of the POL in relation to the surrounding conservation land provides a valuable opportunity to protect the natural character of the wider area and add to the diversity of natural values managed within the conservation estate.

Recommendation:

For these reasons Environment Canterbury supports the recommendation to retain the area in full Crown ownership.

Surface water and ground water resources

The Awakino POL contains much of the headwaters and upper catchment of the Kurow River and borders on the upper reaches of the East Branch of the Awakino River. These rivers are both key tributaries of the larger Waitaki River system which is highly valued as a recreational fishery. Both of these tributary rivers, and particularly the Awakino River, have a naturally high water quality and provide important rainbow trout spawning habitat.

Tributary creeks and small headwaters streams, because of their size and limited assimilative capacity, are particularly susceptible to degradation from agricultural activities such as grazing, and tracking. Grazing of the riparian zone, for example, reduces vegetation stature and trampling of soils and banks results in an increase in sedimentation. One of the most effective ways of maintaining water quality is to restrict stock access to water ways, avoid disturbance of the soil adjacent to water ways, and to maintain well vegetated riparian margins to trap pollutants in runoff from adjacent land. The protection of the headwaters within any catchment provides the greatest contribution to downstream water quality and instream values by maintaining cool temperatures and reducing the generation of sediment from the more vulnerable upper catchment slopes.

Recommendation:

For these reasons Environment Canterbury supports the recommendation to retain the POL land in full Crown control as a conservation area to maintain the high water quality and important instream values of the Awakino and Kurow Rivers and the downstream values of the Waitaki River.

Public access

The tenure review process also offers an opportunity to resolve public access difficulties to the conservation estate to meet the needs of the public while minimising interference with farming

operations. The POL land adjoins areas of conservation land and provides for a potential link for access into the St Marys Range which is a popular area for tramping and hunting. On this basis the retention of the land in full Crown control would increase the opportunities for public enjoyment of the wider conservation estate.

Recommendation:

For these reasons Environment Canterbury supports the Preliminary Proposal on the grounds that it will provide opportunities for improved recreation and public access to and within the wider St Marys Range area.

Overall Recommendation:

In the interests of the long-term ecological sustainability of land and water resources of this property, and the protection of the significant inherent values identified for the land, Environment Canterbury supports the preliminary Proposal for Awakino POL as meeting the objectives of the CPL Act on the grounds that:

- (i) the land is highly vulnerable to erosion and has very limited ability to support long-term sustainable pastoral use; and
- (ii) the area contributes to the protection of important headwater streams and salmonid spawning areas for tributaries of the Waitaki River; and
- (iii) the land is situated adjacent to existing areas of conservation lands and would contribute to the overall diversity and quality of the inherent natural values of the wider area as well as providing opportunities for improved access into the popular St Marys range.

Thank you for the opportunity to comment on this Preliminary Proposal.

Yours sincerely

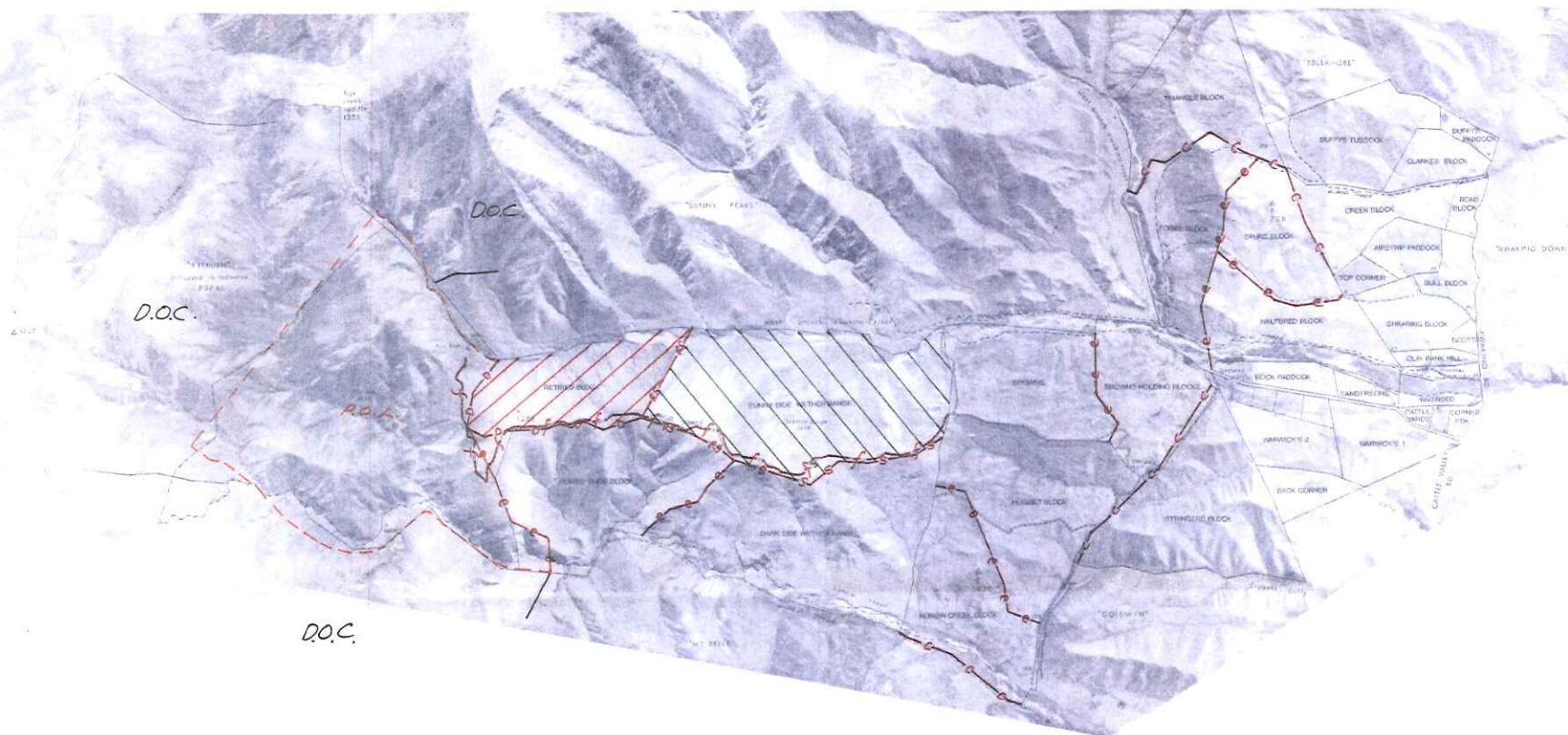


Don Rule

DIRECTOR RESOURCE PLANNING AND CONSENTS

Attachments:

Plans 1 and 2: Soil & Water Conservation Plans for Awakino Station



SOIL & WATER CONSERVATION PLAN WORKS
COMPLETED 1963-1984

- — DESTOCKING FENCING
- — EROSION CONTROL FENCING
- — RECUPERATIVE SPELLING FENCING
- — OFFSITE FENCING
- + STRATEGIC FIREBREAK
- ///// PERMANENTLY DESTOCKED
- \\\\\\\\ RECUPERATIVE SPELLING
- — P.O.L.

TOTAL COST \$52,617 GRANT \$19,194

Surveyed designed drawn traced approved amendments	by	date	catchment no.	AWAKINO Awakino Station Ltd	AREA SCHEDULE	scale	1 : 23 760	PLAN 1		
			aerial photo ref.			file				
			level book no.			plan no.	S & W 25			
						sheet	of		7	sheets

by	date
P. A. H.	5.77
A. H. H.	8.77
M. A. C.	8.77

catchment no.
aerial photo ref.
level book no.

S. N. 2085-C 11-15

AWAKINO

Est. of A.H. CHAPMAN

INVENTORY & CAPABILITY

AREA	SCHEDULE
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KREBORN occupied in advance

MT BELLE

AWARDING - - (M)

AWALINGO (C.I. and -les report)

TOTAL Management Area

$$\begin{array}{r} 89 \\ + 23 \\ \hline 66 \end{array} \quad \begin{array}{r} 66 \\ 1903 \\ \hline 3969 \end{array} \quad \begin{array}{r} 3969 \\ 4776 \text{ lbs} \end{array}$$

scale 1 : 23 760

file

plan no. S & W 25

sheets 1 & 2 of 2 sheets.

PLAN 2

WAITAKI CATCHMENT
COMMISSION AND
REGIONAL WATER
BOARD



KUROW