ROAM

30 January 2020

Judi Brennan
Permissions Manager
Department of Conservation

Tena koe Judi

SKY PLAY ADVENTURES CONCESSION APPLICATION (64297-OTH) FURTHER INFORMATION REQUEST RESPONSE

Thank you for your letter of 24 December 2019 requesting further information to better understand the proposed Wairakei Canopy Tour concession application. We have set out our responses to these queries below. For those ecological based questions, Wildland Consultants have prepared a separate report that covers off those queries. This report is attached as Appendix 1 to this response.

1. MAINTENANCE ACCESS ROUTES.

Maintenance of the structures on the reserve will be undertaken using the existing and proposed trails shown on Figure 1 of the AEE document.

In addition, access to Station 4 will be via a narrow access trail (approximately 25m long) from the adjacent farmland to the station. There will be no other trails developed for the maintenance or construction of the proposed development. Additional assessment of the effects of this trail can be found in section 2 of Appendix 1.

Public will only be able to readily access the trail to stations six and seven as these will join directly to the existing Huka-Aratiatia trail. Signs will be erected where the new trails intersect with the Huka-Aratiatia trail to indicate their length, and that they are 'no exit' trails with the platforms as destinations (i.e. there are no lookouts or other features of interests). The trail between stations three and four will not join the Huka-Aratiatia trail however it will be possible for members of the public to walk through the bush to access the track if they choose.

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2. PUBLIC ACCESS TO THE PROPOSED TOWER TRACKS AND MAINTENANCE ROUTES.

Public will have unrestricted access to the station access tracks.

3. CONFIRMATION OF CONCESSION TYPE

The applicant is seeking a lease/licence to develop and operate the proposed canopy tour. This type of application was the type recommended by Department staff (email from Brooke Cox on 17 September 2019).

Please note that Appendix 4 of the AEE considers section 3.8.2.4 of the Tongariro – Taupō Conservation Management Strategy which relates to easements. While a licence is being applied for the provisions provide useful points to consider the wider effects of the proposed development. The Department can discount this part of the assessment however if they feel it is not relevant.

4. PROPOSED ANIMAL AND WEED CONTROL AREAS

Please see Section 3 of Appendix 1.

5. SHAGS

Please see Section 4 of Appendix 1.

6. BIRD OVERFLIGHTS INFORMATION

Please see Section 5 of Appendix 1.

7. HOW THE LOSS OF VEGETATION DUE TO CLEARANCE FOR TOWERS WILL BE MITIGATED

Please see Section 6 of Appendix 1.

8. EFFECTS ON HUKA – ARATIATIA TRAIL USERS

Section 6.7 of the AEE considers the impact of the proposed zipline on those visiting the area for recreation purposes. As noted in that report, the proposed activity is introducing a new recreation activity into an area which is currently used for recreation use. The Huka Aratiatia

shared path (it is used for walking and cycling) is an important recreation facility existing in the area. It is used by a large number of walkers and bikers each year. It is also used for events such as the Huka Challenge and by concessionaires for guiding groups of walkers and cyclists along the trail. The trail is set within a 'front country' environment which experiences high use from a range tourism and recreation activities including jetboats, helicopters, sightseeing, biking and walking.

In addition to the information provided in the AEE the following sets out additional responses to matters raised in the further information request.

- In respect to the visual effects of the proposed activity of track users, paras 6.27 to 6.31 of the Landscape and Visual Assessment contained in Appendix 5 of the AEE discusses the potential impacts on trail users. Visually there will be little effect on trail users as the tour will be above the bush canopy that encloses the trail. From time to time trail users may get glimpses of people using the zipline but this will be through the canopy which will largely obscure the zip line. As noted in the LVA this use will be part of the existing wider tourism/recreational activities that occur at the wider site.
- With the exception of station 3 the proposed stations will not be visible from the existing trail. Station 3 is a low platform (3m in height) located approximately 10m from the trail. The structure will be able to be glimpsed through the trees and its use will be apparent to trail users. Use of this platform will be limited to 10 times a day for a period of no more than 10-15 minutes (dependent on group size) each time. The presence of this platform will be more noticeable during its active use when there are people present on the platform.
- A similar use is anticipated to occur for platforms 5 and 6 however these are not anticipated to be able to be viewed from the existing track. They will be able to be seen from the new trails developed, however. These new trails will be publicly accessible and trail users will be able to walk up to the platforms. The design of these platforms means that they are able to be secured so that members of the public are not able to gain access to them.
- There are no anticipated health and safety impacts on existing trail users. The key identifiable risk from the proposed zipline to the trail users is from items dropped from the zipline. This risk will be addressed via the requirement for all users to wear secure closed footwear and that no loose items (i.e. keys, wallets and phones) will be permitted to be carried by participants. All such items will be provided to SPA during the initial briefing and stored in a secured location till the end of the tour. Participants will be checked again prior to launching from the first platform to ensure that they do not have any loose items which could be dropped.

- Section 6.2.2.2 of the noise assessment (Appendix 7 of the AEE) discusses the potential impact on trail users from the noise of the zipline operating. This assessment concludes that at locations downstream of the falls where background noise levels are lower than the contribution of noise from use of the proposed zip lines, there will be periods when zip line noise is audible. However, the overall level of noise and the time of exposure that a recreational user will be exposed to it are considered to result in a less than minor noise effect.

The other identifiable effects on users of the trail are discussed in section 6.7 of the AEE.

9. REFERENCING ERRORS

Please note that during the PDF process a number of the internal document references were disrupted, a revised version of the report (without appendices can be found at https://www.dropbox.com/s/95lzi888a4bhkhi/Huka%20Zipline%20AEE%20V%20FINAL.pdf?dl=0)

To clarify the references referred to should have read as follows:

- Page 16 reference to Figure 1
- Page 29 first reference to Section 6 of the AEE
- Page 29 second reference to Section 4 of the AEE
- Page 29 third reference to Section 8.2 of the AEE, however a permitted baseline assessment was not carried out due to the nature of the proposed activity.
- Page 36 first reference Section 2.1 of the AEE
- Page 36 second reference Section 2.2 of the AEE
- Page 36 third reference Section 6 of the AEE
- Page 36 fourth reference Section 2.4 of the AEE

10. Filming

As per the information request letter, Section E of application 5A should be revised to note that no DOC facilities will be used for filming. There will be no filming undertaken on the Huka-Aratiatia track.

Filming may be undertaken within the wider reserve on and of the facilities mentioned in the application however.

11. Business Plan

A copy of the business plan for the activity, containing three years of financial projections, can be found in Appendix 2.

12. Bats

Please see Section 7 of Appendix 1.

13. Lizards

Please see Sections 8 and 9 of Appendix 1.

Please do not hesitate to contact me if you wish to discuss this information and assessment further.

Your sincerely,

Rowan Sapsford - Director

Roam Consulting Limited

CC: Karina Brennan-Evans

Appendix 1 Wildland Consultants Report

RESPONSES TO A REQUEST FOR FURTHER INFORMATION ON A PROPOSED ZIP LINE OPERATION NEAR HUKA FALLS

Angela Simpson and William Shaw
January 2020

1. INTRODUCTION

This short report provides a response to a request for further information dated 24 December 2019 from the Department of Conservation. The scope of the request is restricted to public conservation land, specifically Huka Falls Scenic Reserve. Structures proposed within the Reserve are Platforms 3, 4, and 6, two tracks, and the sections of zip line wire above the reserve. The proposed locations of Towers 1 and 7 are on the eastern margin of the reserve. Ecologically-based questions from the request are listed below (Sections 2-9), along with a response to each question.

2. FURTHER INFORMATION ON THE PROPOSED MAINTENANCE TRACK ROUTES

There will be a basic access track to proposed Platform 4, from the adjacent farmland. This track will be *c.*25 metres long and will only be used by operational staff. It will be a narrow informal route used to access the Platform for daily checks and maintenance.

Potential ecological effects of this maintenance access track will be less than minor. No indigenous trees will require felling and clearance of vegetation will be kept to an absolute minimum. Damage to tree roots and changes to the natural ground surface will be avoided because no earthworks are required and use of this track will be very limited. It will be intended that this track will be obscured from views from the platform, to prevent access by the public.

3. MAP SHOWING THE PROPOSED ANIMAL CONTROL AREA (INCLUDING CONTROL LINES THAT ARE PROPOSED TO BE ESTABLISHED), ALONG WITH THE AREA PROPOSED FOR WEED CONTROL

Figure 3 (below) shows potential areas for weed control within the site, as discussed in Section 12 of the ecological assessment report (Wildland Consultants 2019). Control of wilding pines and climbing spindleberry (*Celastrus orbiculatus*) has been undertaken previously at the site. The proposed zipline operation could provide support for ongoing regular control of these pest plants.

On the true right side of the river, within Huka Falls Scenic Reserve, there is a total of *c.*2.5 hectares of blackberry vineland and these areas could be controlled and restored to indigenous forest. Although indigenous vegetation will regenerate naturally within these areas over time, weed control and indigenous restoration planting will speed up this process. Initially, restoration should target the larger areas of blackberry (such as the southern-most area - *c.*1.2 hectares) which will take longer to return naturally to

indigenous forest. The southern-most area of blackberry vineland and three smaller areas along the eastern margin of the reserve (*c.*0.6 hectares total) could be accessed from the adjoining farmland. Pest plants should be controlled and then these areas should be planted with indigenous species which occur naturally within Huka Falls Scenic Reserve.

In terms of pest animal control, Predator Free Taupo have established and maintain a network of DOC200 traps alongside the Huka-Aratiatia Walkway. Predator control as mitigation for the proposed zipline operation would be additional to existing trapping efforts.

As per Figure 4 (see below), potential locations for additional trapping lines are: B. Farm margin, and C. Proposed tracks. The most benefit for the reserve is likely to be achieved by installing pest control along the farm margin. Possum traps could be installed at *c.*100 metre intervals, and rat traps and bait stations could be installed at *c.*50 metre intervals. At these spacings, about 14 possum traps and about 28 rat stations could be installed along the farm margin. Two or three possum traps and six rat traps could be installed along the proposed tracks. Possum traps (about 21 traps at *c.*100 metre intervals) could also be installed alongside the Huka-Aratiatia Walkway to complement the existing network of DOC200 traps. Such a network of pest animal control within this section of Huka Falls Scenic Reserve would provide a good level of ongoing habitat protection for indigenous vegetation and fauna.

Other opportunities for weed control and pest animal control also exist on the true left side of the river (not within Huka Falls Scenic Reserve). There is *c.*4.75 hectares of blackberry vineland and willow treeland which could possibly be restored to indigenous cover. The Tasmanian blackwood forest also has potential for restoration to indigenous vegetation, but this would require landowner engagement and support. Some pest animal traps have been established alongside tracks on the western side of the river although this is not a continuous trap line. In the future, a more complete pest animal control network could be established along the tracks on the western side of the river.

4. INFORMATION ON WHETHER ANY SHAG BREEDING SITES (OF ANY SPECIES) ARE KNOWN TO EXIST WITHIN 10KM OF THE APPLIED FOR SITE

Little shag, little black shag and, black shag, and occasional pied shag, have been recorded at Huka Falls since 2017. There are currently no known shag nesting colonies in the subject area (helicopter operator pers. comm. to Rowan Sapsford).

There are trees adjacent to the river that are potentially suitable for shag nesting, but there are also existing jet boat and helicopter tours which operate along the river. Noise created by these activities is likely to comprise substantial disturbance, which could be preventing nesting activity in this area. Shag colonies commonly leave a site if subject to heavy disturbance.

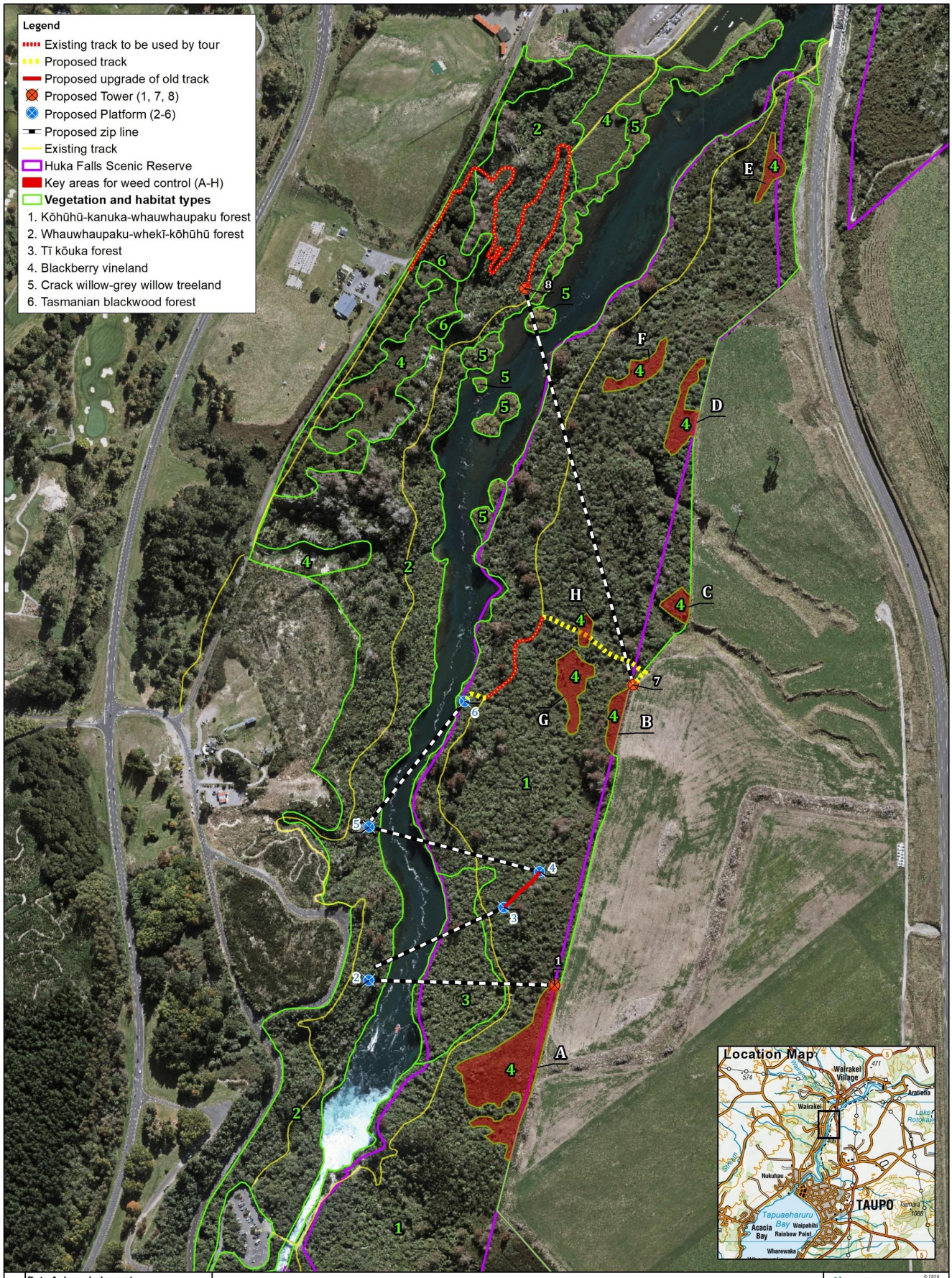

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Figure 3. Areas for weed control within the site of the proposed tour, Huka Falls Scenic Reserve

0 100 200 m

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Scale: 1:4,850
Date: 14/01/2020
Cartographer: FM
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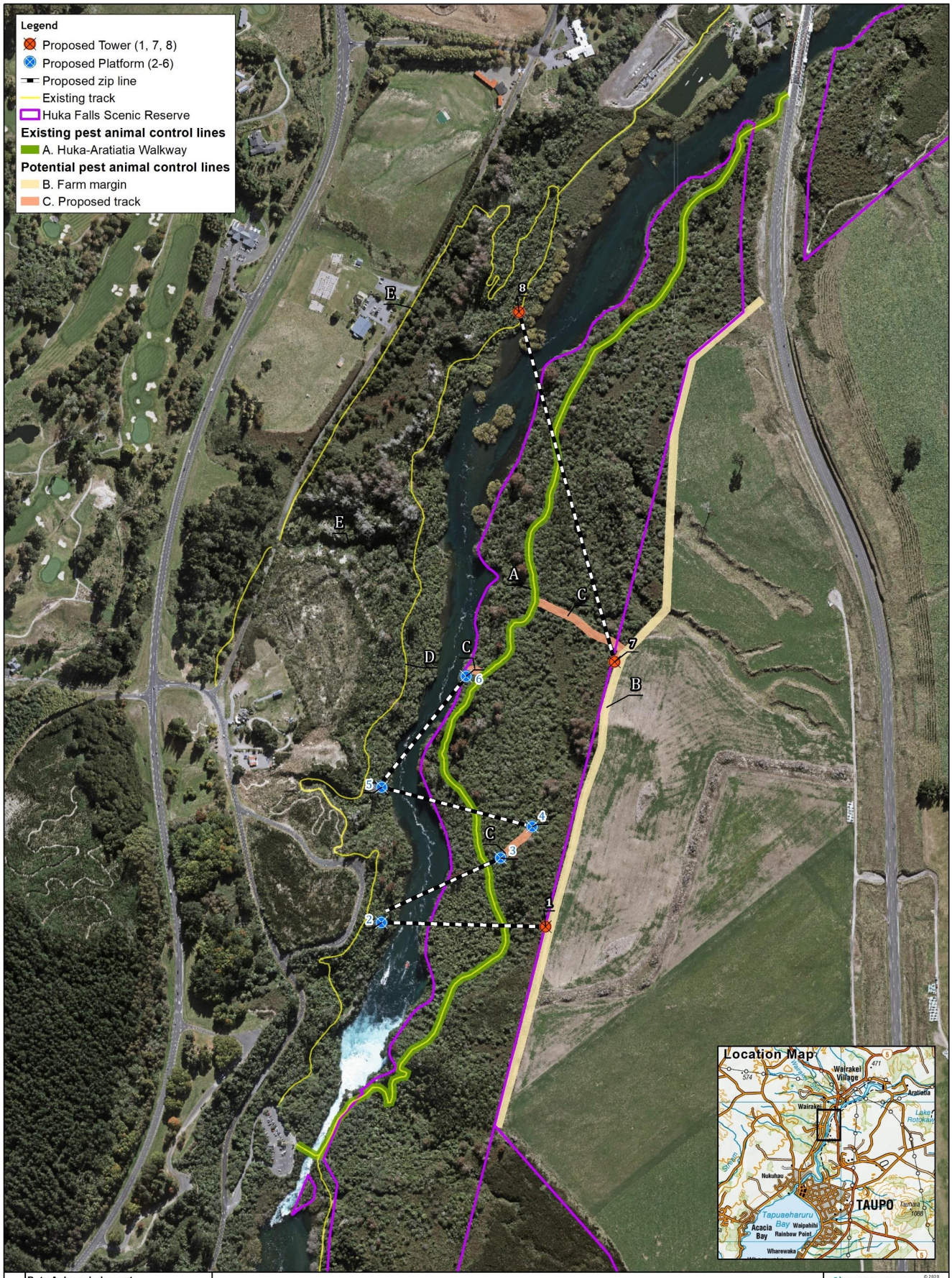

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Figure 4. Potential and existing pest animal control lines, Huka Falls Scenic Reserve

0 100 200 m

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Scale: 1:5,500
Date: 14/01/2020
Cartographer: FM
Format: A3

Wildland Consultants has undertaken recent annual surveys of wetland birds along the upper Waikato River downstream of Ngaawapurua Rapids and little shag, little black shag, and black shag are all common in this area, and also breed at various sites.

5. AN ESTIMATE OF THE MEAN NUMBER OF BIRD OVERFLIGHTS PER DAY OVER THE APPLIED FOR AREA (DURING BOTH BREEDING AND NON- BREEDING TIMES), INCLUDING ESTIMATED FLYING HEIGHTS ABOVE THE GROUND

Given the small-scale and minor effects of the proposed activity, this requirement is considered to be excessive. Little shags nesting in the Hemo Gorge in Rotorua commonly fly across urban areas and heavily-used tourism sites such as Te Puia. Their flight heights vary markedly, being within 20 metres or so above canopy height in the immediate vicinity of the nest colony but 50-100 metres above canopy height further from the colony site.

6. FURTHER INFORMATION ON HOW LOSS OF VEGETATION DUE TO CLEARANCE OF TOWERS AND TRACKS WILL BE MITIGATED

Actions which should be undertaken to avoid or minimise potentially adverse ecological effects due to clearance of vegetation for construction of the zipline structures and tracks are provided in Section 11 of Wildland Consultants (2019). Construction is intended to be undertaken in a low-impact manner. The adverse effects of vegetation clearance will be minor if these actions (such as avoiding physical contact with large indigenous trees and tree roots) are implemented.

The footprint of each structure (Platform and Tower) will be approximately 5.0 metres by 5.0 metres. Including Towers 1 and 7, the total footprint of proposed structures within Huka Falls Scenic Reserve is 125 m^2 (or 0.0125 hectares).

The total length of the two proposed walking tracks (Platform 3 to Platform 4, and Platform 6 to Tower 7) is *c.*295 metres. These tracks will be *c.*1.0 metre-wide. The total footprint of proposed new tracks within Huka Falls Scenic Reserve is 295 m^2 (or 0.0295 hectares).

Any minor adverse effects of vegetation clearance for construction of structures and tracks is to be mitigated by the ecological restoration proposed. The total area identified as having potential for weed control and restoration within Huka Falls Scenic Reserve is about 2.5 hectares. Weed control and restoration planting could be undertaken within this area, to increase the cover of indigenous vegetation and habitats within the reserve. This is more than 60 times the total footprint proposed for the structures and tracks (0.042 hectares).

Pest animal control proposed along the farm margin, proposed tracks, and the Huka-Aratiatia Walkway would also provide protection for indigenous vegetation and enhance the survival of indigenous fauna within the Reserve.

There is therefore considerable potential for the ecological condition of Huka Falls Scenic Reserve to be improved through construction of this zip line operation.

7. GIVEN THE IDENTIFIED LIKELY PRESENCE OF BATS ON THE SITE, SUPPLY A BAT MANAGEMENT PLAN THAT DETAILS HOW ADVERSE EFFECTS ON BATS WILL BE AVOIDED ON THE SITE DURING CONSTRUCTION AND OPERATION OF THE PROPOSED ACTIVITY

As no larger trees are to be felled for the proposed activity, effects on bats are very unlikely. A bat management plan should not be required.

Bats are nocturnal. Because the tours are not intended to operate at night, there is likely to be minimal or no disturbance of bats during operation of the tours.

8. WHILE THE APPLICATION NOTES THERE ARE NO RECORDS OF LIZARDS AT THE SITE, FURTHER EVIDENCE IS REQUIRED OF WHETHER OR NOT LIZARDS ARE PRESENT AT THE SITE. AS SUCH A LIZARD SURVEY SHOULD BE UNDERTAKEN ON THE SITE BY AN APPROPRIATELY QUALIFIED AND EXPERIENCED HERPETOLOGIST (USING A VARIETY OF METHODS IN OPTIMAL CONDITIONS) TO DETERMINE WHETHER LIZARDS ARE PRESENT AND IF SO, WHICH SPECIES ARE PRESENT AND AT WHAT ABUNDANCE

Due to the lack of previous records of indigenous lizards at this site, or in the wider area, the very localised nature of the structures, and the limited extent of new tracks, any potential effects on lizards are likely to be negligible or less than minor.

Actions to avoid and minimise effects on lizards have been described in Wildland Consultants (2019). Where possible, an indigenous forest canopy should be maintained both above, and around the structures and tracks, to enable any arboreal lizards to be able to continue to move throughout the site.

Any vegetation (other than pest plant material), soil, rocks, or any other material, which is cleared during construction should be scattered sparsely within the adjoining indigenous forest, greater than two metres from the structures or tracks. Such material should not be pushed/dumped on the track margins or into the interior of the indigenous forest during construction. There are several reasons not to remove cleared vegetation from the site: felled logs will provide habitat for indigenous lizards and invertebrates; any felled material will act as nursery sites for seedlings of indigenous forest species once they begin to decay; and retention of the vegetative material within the forest helps to return the carbon, nitrogen and other nutrients stored within the material to the forest.

Upon completion of the proposed tracks leaf litter will spread naturally over the track surfaces. This will improve the opportunities for terrestrial lizards to move across the track.

During operation of the tour, any trees or large amounts of vegetation which fall onto the structures or tracks should be scattered within the adjoining indigenous forest, more

than two metres from the structures or tracks. Care should be taken to avoid damaging the remaining forest vegetation.

Further survey for lizards should not be required for this proposed activity as there is only a very low likelihood of them being encountered during the survey, or during construction and operation of the zipline tours.

9. IF, AS A RESULT OF THE SURVEY, LIZARDS ARE DEEMED LIKELY TO BE PRESENT ON THE SITE, SUPPLY A LIZARD MANAGEMENT PLAN THAT DETAILS HOW ADVERSE EFFECTS ON LIZARDS WILL BE AVOIDED ON THE SITE DURING CONSTRUCTION AND OPERATION OF THE PROPOSED ACTIVITY

As discussed above, a lizard management plan is an excessive requirement based on the relatively small-scale of the proposed activity and the extremely low likelihood of adverse effects on indigenous herpetofauna.

REFERENCES

Wildland Consultants 2019: Assessment of ecological effects for a proposed zip line and cultural tour near Huka Falls. *Wildland Consultants Ltd Contract Report No. 5077*. Prepared for Skyplay Adventures, Taupō. 49 pp.