

A(vi) Comments from Southland Conservation Board (December 2010)

6 December 2010

Chris Visser
Concessions Officer (Contract)

Dear Chris

Feedback on the Concession Application Riverstone Holdings (Monorail and construction track / mountain bike track, Snowden Forest) from the Southland Conservation Board.

This is a large and complex concession application with a number of issues. The Southland Conservation Board makes the following comments regarding the above project.

1. The proposed monorail and mountain bike track passes through a number of different Conservation

Landscape Unit areas including the Snowdon Forest, Mavora Lakes and Fiordland National Park. It is also part of the Te Wahipounamu (South West New Zealand) World Heritage Area.

2. The Monorail Project. The Mainland Southland – West Otago Conservation Management Strategy 1998 – 2008 (CMS) mentions a proposal for a monorail from Mt Nicholas to Te Anau Downs in Section 6.19 (Pg 296) Mavora and 6.20 (Pgs 306 – 309) Te Anau Basin Landscape units. This activity was noted in Objective 3 (Pg 307) “To ensure that any proposal for a monorail (or other similar activities) avoids damaging important natural values including landscape features in this unit; and that any proposed route through Snowden Forest is fully assessed for its effects on the existing back country walk-in and/or remote recreation opportunities for that area.”

With this in mind, the Southland Conservation Board acknowledges that the Monorail is allowable under the current CMS. It is not specifically mentioned in the Fiordland National Park Management Plan (FNPMP) but a transport node is allowed for in section 5.3.9.6 Implementation 4 (pg 195). The monorail terminal would meet those criteria, as it has the listed purpose of “reducing the perception of congestion and overcrowding at Milford Sound / Piopiotahi and along the Milford Road”.

It is assumed that if a monorail were to proceed, the attendant construction / maintenance track with the spur tracks would be part of this development. The monorail could not proceed without it.

However The Conservation Board is concerned the effects of the proposed route may have on the back country and recreation opportunities in the area.

3. Provisions for a mountain bike track

The Monorail will need an attendant maintenance track, and the proposal for a Mountain Bike trail using this maintenance track has merit. However the mountain bike track becomes a separate entity from about the 29 kilometre point and travels through pockets of conservation land whilst the monorail continues through private land towards Te Anau Downs.

The CMS provides some direction on the issue of a new mountain bike facility. Section 4.3 (Pg 122) “Any recreation or tourism development has the potential to create ... and alter the recreation opportunities already provided... The construction of facilities can alter the entire character of a recreation setting and set in place a chain of events that can have substantial and often unexpected consequences...” Objective 4 states “Encourage the involvement of recreation user groups and community and tourism interests in the planning, development and maintenance of recreation facilities.”

Section 4.7 Objective 1 allows “the use of bicycles only on formed roads and on designated tracks where their use can be undertaken to acceptable levels of ecological, social and physical impact”.

A new road would have to be built to enable the proposed mountain bike track to go ahead. Section 4.8 Implementation 1 effectively allows for this.

Section 6.20 Opportunity Objectives 2 and 4 could allow mountain biking in the area. Objective 2 states: “To allow horse trekking and mountain biking in specified back country areas where they are compatible with the protection of natural values.” Objective 4 states: “To provide opportunities outside of central Snowden Forest for visitors to enjoy backcountry areas which offer day and overnight recreation opportunities.”

The board notes that a mountain bike track through this area would complement the “Round the Mountain” cycle way and link into the proposed cycle-way between Te Anau and Manapouri. It is also aware of a growing interest in mountain biking as a leading recreation in New Zealand.

A new mountain bike track in the area using the maintenance track could be supported from the CMS however the Riverstone Holdings Monorail proposal is very short on details for the proposed bike track, with no definite route shown from about the 29 km point. There has been no public consultation for a mountain bike track in the area. Until further information is known about this, the Southland Conservation Board cannot support the Mountain Bike track as part of this application.

4. Concessions in Te Anau Basin Area. The proposed Monorail operation would be in breach of CMS Section 6.20, Implementation 9: “Concessions will be limited to low impact day use excluding weekends and statutory holidays...” The monorail proposal is not limited to weekdays therefore would be in breach of the CMS.

The specific restrictions on weekend and statutory holiday use do not apply to other lands administered by the Department outside of the Snowden Mountains and the Conservation Board would offer that this is an anachronism and is unreasonable to be applied now.

The monorail construction will not be a low impact activity; therefore the current application is not consistent with the CMS. The actual monorail bed and the attendant maintenance track is also not low impact, covering 29.5 kilometres of Conservation land and requiring the removal of vegetation, bridging, rerouting of walking tracks, placement of a new hut, and the building of terminal buildings on Conservation land.

The building of a terminus building at Te Anau Downs is covered in the FNPMP Section 5.3.9.6 Implementation 4 allows for a request to be made to further develop this site as a transport node for the purpose of reducing the perception of congestion at Milford Sound.

5. Impacts of the Riverstone Holdings Concession;

If the proposed monorail passes through the Mavora Lakes Park the following statements in the CMS (Pg 296) need to be addressed “When such proposals are considered the remote qualities and ecological values of the park must not be adversely affected”. And Section 6.20 Objective 3 quoted above in point 2, “The Monorail Project”

Any negative effects on natural values including landscape features, social effects on other recreational users, on the habitat for flora and fauna and cultural values must be avoided.

Many of the known impacts have been addressed to some degree in Riverstone Holdings extensive plans. However the board still has concerns including:

a. Visual effects. Whist the monorail, the monorail track and the maintenance track will be largely through bush, the sheer size of the track – two metres and up to six above ground in

places, with a swath cut through the bush means despite the very best intentions, the track will be visible from a distance. Probably more so than closer at hand. Currently the area is largely unmodified and visitors can experience a “remote” feeling.

The terminal building at the Kiwi Burn end will be visible from conservation land as well as adjoining private land. This is an area with very few buildings so the visual impact of a large terminal building may be significant. It is likely that the terminal and monorail will be seen from a number of peaks in the area.

Although the route of the proposed monorail does not go through the Central Snowdon remote area a section of the proposed track does go along land adjacent to the remote area. This could result in significant adverse effects for users of the remote area as the monorail route is likely to be visible in places.

b. Noise Impacts. In the CMS, Section 4.2 (p. 119) states “Snowdon Forest is an easily accessible and relatively easily navigated backcountry area, which currently provides an area with few facilities and with a level of use that retains a quiet, remote atmosphere”.

While it is noted that Riverstone Holdings have opted for a quiet operating system with the design of the monorail, the noise impacts, though sporadic during operation of the monorail, could detract from the enjoyment of other users of conservation land in the area.

During construction phase, the adverse impacts from noise is likely to be significant and could have a significant adverse effect on the enjoyment by other users of the natural quiet of the area. This is especially the case for users of the Central Snowdon remote area. Depending where the Kiwi Burn hut and track are to be relocated, noise from the monorail may have a significant impact on users of the Kiwi Burn track and hut.

In the Riverstone Holdings concession Overview Document, Section 2.1 (Page 8) states “Once operational, the monorail and mountain bike track will require maintenance, and access will be required for emergency situations. Such activities will involve vehicle and (occasionally) helicopter access to the tracks.

The CMS however (6.20, Implementation 6 pg 309) states “To retain the quiet, remote atmosphere of the Snowden Forest area, Aircraft access will be permitted only for management and search and rescue purposes.” Helicopter use for Riverstone Holdings will only be allowed in SAR context, not maintenance.

c. Ecological Impacts. While it is pleasing that the proposed monorail track is to avoid the high value wetland areas, there will still be the removal of an estimated 22 hectares of established native vegetation on conservation land to form the tracks – this is a significant adverse effect which it is difficult to fully mitigate. Riverstone Holdings have an expansive weed control programme planned (Attachment 2 Draft Predator and Weed Control Management Plan). Section 4.6 Post Construction – Rehabilitation lays out plans for rehabilitation, however rehabilitation needs to use proven methods and ‘direct transfer’ needs to be adhered to with the plants not held in storage. In Riverstone Holdings Forest Management Plan 3.1.3 regarding monitoring it states “This may include photo points ...” The Board is of the opinion photo points would be essential to give an accurate measure of the state of the rehabilitation.

The removal of significant stands of vegetation can negatively impact on remaining vegetation through exposure to environmental effects such as wind and light. The risk of significant damage to additional native vegetation would need to be mitigated, not only from a vegetation aspect but also a safety aspect.

It is essential that the planned predator control programme be fully activated along the corridor of the tracks.

Trees removed in the forming of the tracks need to be checked for nests of endangered birds, for example Kaka, and bat roosts. Removal of old trees should be done outside roosting / nesting seasons.

Sections 6.19 and 6.20 of the CMS note that the Snowdon Forest is part of the SWNZWHA and contain internationally significant low tussock altitude grasslands. A monorail and mountain bike track could have significant adverse effects on these internationally significant plant communities. Section 2.2 (p. 24) notes that “tussock grasslands are one of the most under-represented ecosystems in the protected areas of Mainland Southland/West Otago”.

Any gravels and other materials entering the area must be screen for unwanted organisms such as weed seeds, didymo. Preferably all materials will be precast (as is planned for the concrete beams etc) or obtained on site.

d. Recreational / Social Impacts on existing users. The CMS Section 6.20 (p. 307) acknowledges the use of the Kiwi Burn Hut as a popular destination for families and less experienced trampers. In Implementation 7 pg 309 provision is made for changing the location of the Kiwi Burn track and hut if the monorail proposal goes ahead. It is essential that this occurs before any work on the monorail track begins so that users of this popular and easily accessible area can continue to enjoy the area. The Kiwi burn track is particularly enjoyed by many because it has an interesting mix of forest and open clearings. To be as popular, the new track would need to have a similar mix. As a result of both visual and noise impacts, there is a risk that the traditional users of the Kiwi Burn track and hut will no longer wish to use them, because the presence of the monorail and terminal building at the Kiwi Burn removes the backcountry feel of the track and hut.

The proposed monorail track travels between the Whitestone and Upukerora valleys along the “finger” and “Ascension Creek”. This is a tramping route, easily accessible within the Snowden Forest, linking two open valleys providing a rugged back country experience. This will be lost totally unless a replacement route of a similar nature is opened. This does not appear to be mentioned in the concession proposal, and is not allowed for in the CMS. Losing this route will have an impact on users such as hunters, fishermen and trampers.

1. In the event of the monorail project being (a) not able to be completed or (b) ceasing to be used, a clause needs to be included in the contract to cover removal / restoration costs etc of the whole project at no cost to the public or DoC.