



## Federated Mountain Clubs of NZ (Inc)

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Consents Operations  
Environment Canterbury  
P O Box 345  
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**Submission on the resource consent applications CRC094168, CRC094169, CRC094170, CRC094171, CRC094172, CRC094173, CRC094347, CRC094350 from Hurunui Water Project Ltd.**

**Submission from: Federated Mountain Clubs**

### Summary

1. The Federated Mountain Clubs opposes all the applications. We request that the commissioners decline all applications. The upper Hurunui catchment should be left in its natural state.
2. FMC wishes to be heard in support of this submission.

### Our Background and Interests

3. Federated Mountain Clubs is the national alliance of tramping, mountaineering and alpine clubs. Federated Mountain Clubs affiliates also engage in a wide range of other outdoor activities. Federated Mountain Clubs was formed in 1931 to advocate for outdoor recreation and for the conservation and wise management of New Zealand's natural wild lands, mountains, lakes, rivers and coasts. Federated Mountain Clubs has been a major player in the development of our National Parks, Forest/Conservation Park network and protecting lands and waters of high recreation and conservation value. We represent about 12,500 club and individual members throughout New Zealand.

### The importance of the Hurunui catchment to our members

4. The upper Hurunui catchment is an area readily accessible yet still offering a remote experience in a largely natural landscape. It is highly valued by trampers. Our member clubs in the Canterbury region frequent the area. Club members and other trampers from further afield, including the North Island, also seek out the area for recreation because of its accessible, but varied and natural character.
5. The historic Harper Pass track through to the West Coast is popular, as is the wide variety of trips – from daytrips to multi-day journeys – in and from the upper Hurunui catchment. Lake Sumner is a particular focus for such trips because of its stunning setting and natural beaches. The area is appreciated for its gentler terrain compared to valleys and mountain

elsewhere, and it is generously provisioned with well-maintained tracks and huts. This makes it more suitable to family groups, less-experienced and less-fit tramping parties. However, those seeking remoteness and adventure can also find such opportunities in the upper Hurunui. For example, the South Branch Hurunui and North Esk rivers provide entry to the remote zone in the north-eastern sector Arthur's Pass National Park.

6. Our members also appreciate the tamer holiday, easy walking and camping opportunities around Lakes Sumner, Taylor, Mason and Loch Katrine. These provide a delightful natural setting appreciated by thousands of holiday-makers, and are a site where youngsters can be introduced to outdoor recreation pursuits and skills. Water storage infrastructure of the scale proposed will severely negate these amenity values.

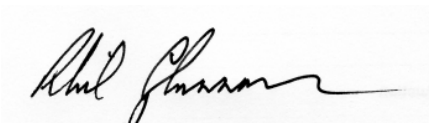
### **The impact of the proposed dams and water-take on our members**

7. The construction of a 75m high dam and 7km long inundation area on the Hurunui South Branch will utterly alter the natural landscape. Such a large-scale artificial dam would dominate the landscape, destroying all sense of naturalness, both pastoral and indigenous.
8. The proposed water take of up to 32 cumecs from the main stem of the Hurunui River for irrigation and hydro-electric generation will change the wild and natural flow of the river downstream. This will alter the ecology of the river, increase biosecurity risks, and lower the recreational amenity value of the river, to both trampers on foot and those who fish, hunt or undertake white-water recreation on the river. It will also reduce the dilution of run-off from agricultural land-use, which will increase on the plains due to the increased area of intensive agriculture facilitated by irrigation. The river gorge is a visually exciting gateway to the upper Hurunui catchment, and the introduction of dam and weir infrastructure and the reduced and unnatural flow regime will impinge on these values, as well as the ecological values of the river.
9. The proposed weir on Lake Sumner, which would raise the lake by up to 3 metres, would alter the naturalness of this highly-valued lake. It will ruin beaches and deltas, drown lake-edge tree associations, and generally reduce the beauty and natural values of the Lake. Lake Sumner is a jewel in the crown of Canterbury's conservation lands, and is renowned nationally by trampers. It should not be artificially manipulated.

### **General points**

10. Federated Mountain Clubs submitted in favour of the Water Conservation Order for the Hurunui River, and is pleased that an Order has been approved that will protect the stunning natural feature of Lake Sumner. Despite the findings of the WCO tribunal, we continue to assert that the entire upper Hurunui catchment has "outstanding amenity [and] intrinsic values which are afforded by rivers in their natural state". The regular visits to the area by trampers and tramping clubs from outside the Canterbury region illustrate the level to which New Zealand trampers respect and enjoy the catchment. The particular combination of values provides a nationally-unique theatre for outdoor recreation.

11. Wild Rivers in New Zealand have been dammed and used for irrigation takes continually for decades. This comes at a cost to recreational opportunities and the ecological integrity of our mountains. On the east coast of the South Island, very few wild rivers run free from mountains to the coast. The Hurunui is one of the few remaining, and should be protected in that state, particularly because it is so highly valued for outdoor recreation of many types.
12. Federated Mountain Clubs also has a mandate from its members to advocate for “the conservation and wise management of New Zealand’s natural wild lands, mountains, lakes, rivers and coasts”. We are aware of the ecological values of the upper Hurunui catchment – including the excellent habitat for birds. We are gravely concerned at the continued decline of the black-fronted tern, the black-billed gull and the banded dotterel, which all have populations within the upper Hurunui that deserve the utmost protection. We believe that the applications will involve permanent and major disruption of their habitat, and further threaten these species very existence.
13. As well as bird-life, our members are concerned to ensure aquatic ecological health. The Hurunui has valuable native fish populations and a highly-rated trout fishery. Dams provide major if not insurmountable obstacles for eels and fish. While mitigation attempts such as “trap and transfer” can reduce the impact, there will always be a loss of fish passage to the catchment above the dam.
14. The reduced flow variability and removal of flood flows from the South Branch in particular will increase biosecurity risks. Flood flows are important for flushing weeds, maintaining the dynamism of braided river stretches, and slow the spread of didymo. These risks threaten ecological health as well as the quality of recreational experience.
15. Finally, it has been brought to Federated Mountain Club’s attention that recent strategic planning for water storage and irrigation provision in North Canterbury identified a scenario that would provide similar irrigation potential without impacting on the upper Hurunui catchment at all. Stakeholders including the Hurunui Water Project Trust and environmental advocates like Fish and Game NZ were party to this planning and in general agreement on its preferred options, and most importantly, its rejection of the upper Hurunui water storage dams. We are disappointed, to say the least, that such alternatives have been abandoned in favour of a proposal that has extremely high impacts on an area that trampers and many other New Zealander value very highly for its natural and recreational values.
16. We urge the commissioners to decline the application. Thank you.



Phil Glasson  
Secretary

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