



## Federated Mountain Clubs of NZ (Inc)

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Rebecca Heenan  
Department of Conservation  
P O Box 743  
INVERCARGILL

Dear Rebecca

### **Comments on proposed Southland - West Otago CMS**

On behalf of the Federated Mountain Clubs of New Zealand, we wish to provide the following suggestions that may aid in your drafting of the Southland - West Otago CMS.

#### ***Place structure:***

Federated Mountain Clubs considers the inclusion of the conservation lands in the Rowallan forest area and the Big Bay area into the Fiordland place as an excellent decision, and one that is indicative of these areas warranting addition to Fiordland National Park in the future.

We are also supportive of the creation of the Takitimu place. The Takitimus have long been a home of traditional weekend tramping for residents of Southland and Otago, and stand in contrast to the more developed areas of Fiordland frontcountry further west. This contrast should be reflected in the outcome that is drafted for this place. Legal access to the area needs to be enhanced, particularly for the southern and western approaches, and the importance of this is such that a statement such as "access to the Takitimus should be enhanced" needs to be added to the outcome.

The Western High Country and Eastern High Country place boundaries make sense, using the Maitai River valley as the border. For the Western High Country place outcome, it would be good to see clear recognition of the remote recreational characteristics of the Eyre Mountains.

Whilst the the Eastern High Country does not currently contain many areas of public conservation land, it is still highly valued for recreation by our members, as well as for its conservation values. The outcome needs to state that the Garvies Mountains have wilderness recreational values in winter, as the largest tract of continuous snow cover in Otago and Southland. For winter ski-touring in particularly, there is no better location for natural quiet, solitude and self-reliance. These values have long been promoted by Federated Mountain Clubs, and we wish to see their continuation within this CMS, as this will be of guidance in the future if these lands are returned to the Department of Conservation as a result of future tenure review. Similarly, the objectives for the Garvies section of this place should state that noise producing motorised transport devices, such as snow-cats and snowmobiles, are incompatible in this location with foot-based recreation. The outcome needs to be consistent with any outcome across the conservancy border in Otago, as the wilderness boundaries cross.

A policy for this place should be to "undertake a formal process to gazette a winter wilderness area in the Garvies and Old Woman Ranges within two years of the completion of any tenure review process". This policy should be written to be consistent with the other wilderness policies for the Poteriteri (referred to on reduced boundaries by the Fiordland National Park Management Plan as the Southwest/Cameron wilderness) and Pegasus wilderness, potentially stating that "these three wilderness processes should be run as a combined process".

The concept of a seasonal wilderness area in New Zealand is new, with all other wilderness areas having formal rules applying year around, with only limited and specific exceptions. However, the seasonality of this area has long been understood, with many summer activities such as horse riding, mountain biking, and four wheel driving able to take place in the area outside of the winter season. This limits any argument against arbitrary restrictions - it is the climate and snow-cover that acts for the most part to give the area its wilderness qualities. It only needs protection against noisy motorised access, which the wilderness provisions of the Reserves Act and Conservation Act will give it. Seasonality is a major element of the proposed Otago CMS as well, which indicates its effectiveness as a recreation planning tool in the Otago and Southland context.

Federated Mountain Clubs is supportive of the Subantarctic Islands moving into the Southland CMS, provided that their clear objective of stringent protection is not reduced by the rest of the CMS.

We hope that these comments are useful in your drafting of the CMS, and we wish you well in your task between now and the draft being released.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Phil Glasson', written on a light-colored rectangular background.

Phil Glasson  
Secretary  
Federated Mountain Clubs