

Key bullet points about the Waitaha River and the Morgan Gorge and the Proposed Westpower Hydro Scheme to assist with submission preparation

What's at stake

- The Morgan Gorge, a spectacular and dominating steep schist gorge separating the front country from the back country on the Waitaha River, is an outstanding natural feature (ONF) in an outstanding natural landscape (ONL) (including the Morgan Gorge to its headwaters), and therefore a very 'special' piece of Department of Conservation (DOC) stewardship land, worthy of preservation and protection in its own right for the benefit of all New Zealand¹
- The Morgan Gorge, and the Waitaha Gorge and Windhover Gorge in the Waitaha River above it, is essentially a pristine river environment with outstanding wilderness and scenic values and is an exceptional Wild and Scenic river
- The Morgan Gorge and the upper Waitaha River contains some of the most challenging and technically difficult white water kayaking runs in New Zealand, in an outstanding wild and scenic river environment

Kayaking values

- The outstanding white water in the Morgan Gorge has only been run by a limited number of expert kayakers, such is its difficulty, meaning it is the 'Mount Cook or Mt Everest' of white water runs in New Zealand – it is actually more than a Mt Everest, very few have conquered it (about 12 people from around the world)
- The outstanding natural feature that is the Morgan Gorge, and the water that flows through it, is a powerful testament to the geologic and climatic forces that shape the West Coast of New Zealand
- The Morgan Gorge and the upper Waitaha River runs represent the pinnacle of white water runs for the most skilled of expert kayakers, and therefore like their exemplars of other outstanding beginner, intermediate and advanced white water runs water throughout the country, some of which are protected by Water Conservation Orders, warrant the same statutory recognition and protection

Hydro Proposal

- Westpower propose to build a run-of-the-river hydro scheme on the Morgan Gorge and have applied to DOC for concessions to do so on DOC stewardship land
- Westpower propose abstracting water via a highly visible weir across the river and tunnel entrance located in the rock face on the true right bank at the start of the Morgan Gorge
- The structures and an adjacent access tunnel portal will be significant industrial intrusions into an otherwise pristine landscape and environment
- The scheme proposes to take much of the flow of the river (up to 23 cumecs, river median flow (50% of the time) is 19 cumecs) and leave a residual flow of 3.5 cumecs in the Morgan Gorge at all times – higher and flood flows will still travel down the Morgan Gorge when the proposed Westpower take is exceeded

¹Douglas A Rankin and Shane Orchard, Impacts of the proposed Waitaha River Westpower hydro scheme on white water and kayaking values. Report prepared for Whitewater NZ, January 2015 (see <http://www.doc.govt.nz/pagefiles/164710/waitaha-kayaking.pdf>).

Impacts

- Once installed the scheme would mean that kayakers can no longer use the Morgan Gorge at all – residual flows needed to kayak the Morgan Gorge when Westpower were taking water would be too unstable (rising or falling too fast) and risky (Westpower are not confident in their ability to take constant flows and so flows could change while a descent was underway) to run the Morgan Gorge safely
- The residual flow of 3.5 cumecs in the 1.5 km reach from the bottom of the Morgan Gorge to the powerhouse would mean that kayakers doing the Waitaha Gorge run above the Morgan Gorge, and who normally portage the Morgan Gorge, would also have to portage a further 1.5 km. The residual flow would be too small to run the Class IV-III-II white water in the reach which requires 10-50 cumecs and no mitigation is provided for this loss
- Westpower is only suggesting mitigation of two 'no-take days' per year, from 7.00 am to 5.00 pm on a nominated day, which would allow natural flows to be requested down the Morgan Gorge for kayakers to run the Morgan Gorge. However, the proposed request system is tortuous, inflexible, untimely, time-limited and very poorly responsive, and in complete contrast with what we had suggested would be needed if such a proposal was ever to be considered. No mitigation offered for loss of 1.5 km river below the Morgan Gorge
- Ruin the pristine nature of this outstanding wilderness river by introducing industrial development into the environment
- Ruin the mauri, wilderness and natural character, and high energy thundering white water natural character of the Morgan Gorge with the normal flow of water down it no longer present

DOC decision

- The Minister for Conservation has announced a decision in principle to grant the concessions (leases, licences and easements) requested by Westpower
- DOC is now calling for public submissions on their decision by 14 November, which will be considered internally and at a Hearing likely in early December 2016, where you may appear in person and present if you wish to. It is good to appear in person if you at all can

Main reasons to request reversal of decision

- **It's time to speak up for common sense**
- **Even though we are swamped with power generation here in NZ, Maggie Barry, Minister for Conservation has still approved in principle a concession for a hydro scheme to be built in the conservation estate on the amazing wild Waitaha river deep in the rugged West Coast bush**
- **Electricity industry experts and MBIE say there is no need for this scheme -we simply don't need any more power generation in New Zealand**
- **Westpower believe the scheme will make them money, but only because the water and environmental destruction on public land comes more or less for free**
- **If local generation was required on the West Coast there are a number of other hydro projects that are already fully consented and waiting to be built (e.g., Arnold, Stockton). These don't require sucking the water out of our wild rivers**
- **This is crazy. If we don't need extra power generation, then why ruin this unique and beautiful wild river**

- The Waitaha is one of approx 1% of the rivers IN THE WORLD that is not modified, so let's look to the future and not make the mistakes that other countries have made - after all this is a 49 year concession!
- The Department of Conservation is now seeking submissions so this is your opportunity to tell Maggie Barry to use some common sense and avoid this needless destruction of the pristine wilderness that kiwis are so proud of.

More reasons to request reversal of decision

- Granting of the concessions is contrary to the intent of the use of stewardship land which is 'the clear intention in creating stewardship areas was to protect them from development or extractive use until their conservation value could be established, the appropriate form of protection chosen; unless of course the conservation values were found to be inadequate, when the area could be disposed of ...'². The Westpower scheme is both development and extractive (industrial structures and taking and using water) use of/on the stewardship land
- Granting of the concessions is contrary to Regional and District Plans and the DOC West Coast Conservation Management Strategy that require protection of ONL and ONF such as Morgan Gorge and Upper Waitaha River
- An independent electricity industry expert has determined that power from the proposal is not needed for many years³
- There is no significant demand for extra power on the West Coast, the National Grid has already recently been upgraded to meet any foreseeable power demand on the West Coast, and there are already consented and likely cheaper options for power provision on the West Coast
- If more reliable power is needed for the West Coast it can easily be provided for by the National Grid
- In the absence of a compelling case for the need for the development of the proposed hydro scheme ('let us build it because we can/want to' rather than 'it is absolutely imperative that we build this scheme because we are desperate for the power') the scheme should not be built on Conservation Estate, and especially not in a pristine ONF and ONL environments – we should preserve our future option values (keeping important areas intact in case they are needed in the future)
- The proposed Westpower scheme is totally out of keeping with the ONF and ONL values that exist in the Morgan Gorge and Upper Waitaha River

²Hon Philip Woolaston, Associate Minister of Conservation, *Stewardship Land and DOC – the beginning*, September 2012, p7. Available at www.pce.parliament.nz; also see Parliamentary Commissioner for the Environment, *Investigating the future of conservation: the case of stewardship land*, Wellington, August 2013, p 21.

³T Baldwin, Proposed Waitaha Hydro Scheme: Assessment of Reasons, Financial Viability and Alternative Locations, Wellington, May 2015; see <http://www.doc.govt.nz/pagefiles/164710/waitaha-reasons-financial-viability-alternative-locations.pdf>

- Such a scheme should only ever be built as a last resort on such valued DoC Estate, otherwise what is the point of having preservation and protection of highly valued DoC Estate?
- New Zealand has a number of 'magical' places that create a country with outstanding natural landforms and environments and beauty. The Morgan Gorge and the upper Waitaha River are one of those 'magical' places. It needs to be protected for posterity and for future generations to enjoy

Request for decision to be reversed and concession to be declined

- The decision to grant the concessions in principle should be reversed for many reasons, including a number mentioned above, and the application for the concession declined

Make sure you state whether

- I do/do not wish to be heard in support of my submission

Whitewater NZ

13 October 2016

NB. For further reports/documents for the application see:

<http://www.doc.govt.nz/waitaha-hydro-concession>