



Draft Kahurangi National Park Management Plan partial review submission

Part A

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Part B

I wish to be heard in support of my submission. Preferred time for a hearing: weekend

Part C

1. The specific parts of this Plan that my submission relates to are:

1.1. Section 4.2.A Aircraft Access

- 1.1.1. Kayaking, Page 69
- 1.1.2. Section 4.2.A.3 Background and current use
- 1.1.3. Section 4.2.A.5 Air supported activities
- 1.1.4. Section 4.2.A.7c Rafting/Kayaking (private)
- 1.1.5. Table B, page 118.

2. My submission is that:

2.1. About Whitewater NZ

- 2.1.1. Formed in 1957, Whitewater NZ is the national representative organisation of canoe clubs and recreational kayakers throughout New Zealand. Whitewater NZ is a voluntary, non-profit, incorporated society and is affiliated to the NZ Canoe Federation. NZCF is in turn affiliated to the International Canoe Federation. Whitewater NZ has delegated authority to represent NZCF and all its member disciplines on advocacy issues.
- 2.1.2. Whitewater NZ was known as the New Zealand Canoe Association until 1995/6. At this time the competitive canoeing disciplines were spun off into their own associations, the new umbrella body the NZ Canoe Federation was formed, and NZCA renamed itself to the NZ Recreational Canoeing Association (NZRCA) to reflect its non-competitive advocacy role. The organisation was renamed Whitewater NZ in July 2009.
- 2.1.3. Whitewater NZ represents both club and individual members and further associated clubs. At time of writing there are 24 full member clubs with a combined membership of around 1000 kayakers, the largest of which is Whitewater Canoe Club, with approximately 200 members. There are also 90 members who have joined individually. Another 30 organisations representing over 1200 kayakers are associate members.

- 2.1.4. The combined total of around 2,300 full and associate member kayakers in no way adequately represents the sum total of kayakers in New Zealand, as there are many who do not belong to clubs, and who have not joined Whitewater NZ as individuals.

2.2. National Importance of the Karamea River

- 2.2.1. The only survey information we have is the NZCA River Use Survey (Hunt, Unwin, Rankin), 1991/1993. An examination of the results shows the Karamea River ranked in the top handful of all rivers nationally. Rankings on the various questions asked include:
- 2nd highest for overall importance (only the Motu River ranked higher)
 - 2nd highest for scenic beauty (only the Landsborough River ranked higher)
 - 2nd highest for wilderness feeling (only the Landsborough River ranked higher)

2.3. One Day Kayaking Trips on the Karamea River

- 2.3.1. The best one-day whitewater trip on the Karamea River requires helicopter access, but is not possible because of the Tasman wilderness area.

2.4. Multi-day Whitewater Expeditions

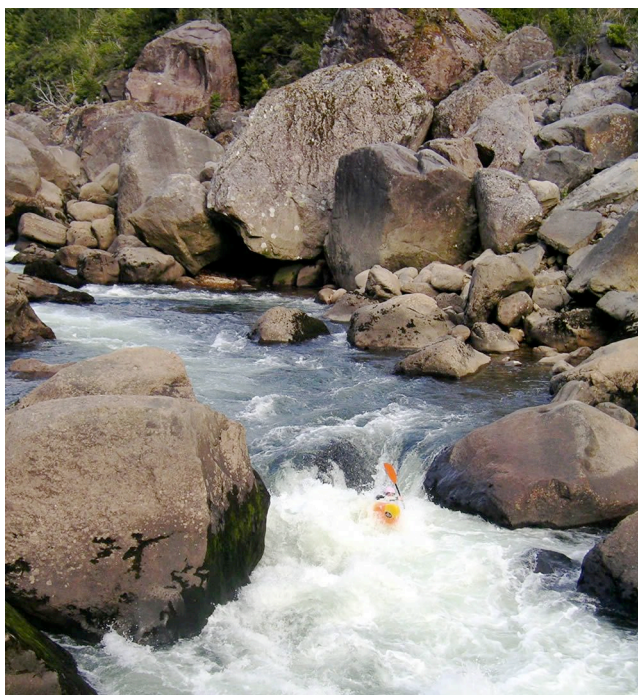
- 2.4.1. There are only five wild, multi-day, South Island, whitewater river trips. These are the Karamea, Upper Waiau, Landsborough, Waitoto and Waipara. In the North Island there are two more, the Mohaka and Motu. These seven river trips are some of the absolute gems of NZ whitewater, in many ways the equivalent of the “Great Walks” to tramping.
- 2.4.2. As can be seen above in 2.2.1, the survey ratings for these rivers support the statement that these are the “Great Walks” of kayaking. Five of the six highest rated rivers by overall importance in the NZRCA River Use Survey are in this group of seven multi-day river trips. The remaining two, the Upper Waiau River and the Waipara River are not rated quite so highly due to access issues, the latter of which is due to DOC, despite its statutory role to foster recreation.
- 2.4.3. In the case of the Karamea River, one of the attributes that make it very special amongst this group of the most highly valued rivers in NZ is that it is not restricted to expert paddlers and is highly rated for scenery and wilderness. As Graham Charles writes in the kayaking guidebook “NZ Whitewater” (1999 edition):
“The Karamea is magic. Located in the heart of Kahurangi National Park, the huge surrounding valleys, limestone walls and enormous earthquake slips hint of powerful forces at work in the landscape, conjuring an aura hard to beat anywhere. The whitewater is fun, but don’t expect a full-on hair-trip. People mostly come to the Karamea for its atmosphere, scenery and relaxation”.
- 2.4.4. South Island whitewater river trips are suffering severe and increasing access issues. This loss of amenity is exacerbated by other factors such as water extraction, dams and irrigation and examples are listed in the table below.



River	Threat to kayaking for multi day trips, classic West Coast rivers and Kahurangi National Park
Motu	Horizon Energy and the East Coast Regional Council have announced their intention to attempt to rollback the Water Conservation Order for the purpose of building up to 3 dams on the Motu
Mohaka	Access to the upper river has been banned for decades by the overseas owners of Poronui Station
Karamea	DoC eliminated the best one-day option on the Karamea. Helicopter access may be limited to Kahurangi NP.
Slate	Helicopter access may be limited to Kahurangi NP.
Aorere	Helicopter access may be limited to Kahurangi NP.
Anatoki	Helicopter access may be limited to Kahurangi NP.
Waingaro	Helicopter access may be limited to Kahurangi NP.
Big	Helicopter access may be limited to Kahurangi NP.
Heaphy	Helicopter access may be limited to Kahurangi NP.
Mokihinui	Meridian has applied for consents to build a dam
Matiri	NZ Energy has applied for consents to build a dam
Matakitaki	Network Tasman are planning 3 dams
Arnold	Trustpower has applied for consents to build a dam
Taipo	An unknown company has surveyed a dam site
Karangarua	Ski-tourers and hunters have 4 landing sites in the Karangarua Valley, all of which fly past Cassel Flat which kayakers would like to paddle from. DOC would not let flights land at Cassel Flat.
Landsborough	Access to the most scenic and challenging day of the 3 day trip has been eliminated by DOC
Other unidentified rivers	There are many other potentially classic river trips that have been lost to the Olivines and other Wilderness Areas.
Toaroha	The Electricity Commission "2008 Statement of Opportunities" suggests a dam in 2015
Kakapotahi	The Electricity Commission "2008 Statement of Opportunities" suggests a dam in 2015
Arahura	The Electricity Commission "2008 Statement of Opportunities" suggests a dam in 2038
Nevis	Pioneer Generation is planning a dam on the Nevis and opposed the recent Fish & Game application to add the Nevis to the Kawarau Water Conservation Order.
Kawarau	Otago region. Many large rapids lost to hydro development.
Clutha	Otago region. Many large rapids lost to hydro development.



2.4.5. **Karamea River, April 2005.** Seven paddlers enjoy a three-day journey



2.5. Kayaking, page 69

- 2.5.1. *“Impacts on the ground are generally negligible as they do not use tracks and move quickly, therefore requiring fewer nights in huts or camping in the park.”*

If kayaking impact is generally negligible, there should be no restrictions applied.

2.6. Section 4.2.A Aircraft Access

2.6.1. Section 4.2.A.3 Background and current use

- 2.6.1.1. *“Cavers, rafters and kayakers have traditionally made use of helicopters to transport people and equipment.”*
- 2.6.1.2. Kayakers need air access in order to run many of the rivers within Kahurangi National Park. They often carry gear into rivers for day trips, but for a multi-day trip, or a remote river, the logistics and weather window opportunities mean that for the majority, air access is the only practicable means to enjoy the river.
- 2.6.1.3. The weather usually dictates when kayakers can run a particular river. Rainfall events can cause steep rivers to rise and fall very quickly resulting in a small window of opportunity. A good example is the Anatoki River which requires rain:
“You need a good northerly rain, check out the Tasman District Council website that has flow readings. The Anatoki drops very quickly so you will need to be on the spot, most reliable flows in Spring. Runnable between 7-20cumecs but the day before would need to be up to 50 cumecs.”
<http://rivers.org.nz/forums/read.php?f=4&i=270&t=266>
- 2.6.1.4. The four most popular rivers in Kahurangi National Park, which are currently kayaked and require helicopter access include:
- Karamea River (see 2.4.3 for further information)
<http://rivers.org.nz/nz/west-coast/karamea/venus-creek-to-gauge>
- Slate River
<http://rivers.org.nz/nz/tasman/slate/above-snow-to-devils-boots>
- Waingaro River
<http://rivers.org.nz/nz/tasman/waingaro/forks-hut-to-hamama-road>
- Anatoki River
<http://rivers.org.nz/nz/tasman/anatoki/anatoki-hut-to-anatoki-valley-sawmill>



Anatoki River.

Kayaker: Trent Garnham. Observer: Blair Bowker. Photographer: Mark Eames.

2.6.1.5. There are many other rivers in the park, which require helicopter access, including: Big River, Aorere River, Heaphy River, Waingaro River and many others.

2.6.1.6. Other rivers in the park that are accessible on foot: Parapara River, Pearse River, Oparara River.

2.6.1.7. Some rivers have only recently been kayaked for the first time, e.g. the Big River. An account of the first descent can be seen on YouTube: <http://www.youtube.com/watch?v=dhTITXTI3vg>

2.6.1.8. Kayakers have a long history of recreation in the Kahurangi national Park, and enjoy many rivers for their whitewater, landscape and scenic qualities. Some rivers have yet to be kayaked, or may be regarded as unnavigable, but that may change in the future, as kayaking skills and techniques improve and equipment develops.

2.6.2. 4.2.A.5 Air supported activities

Kayaking is not listed as an air-supported activity.

2.6.3. Section 4.2.A.7c Rafting/Kayaking (private)

- 2.6.3.1. *“This allows for rafting clients and their guide to be dropped upstream on a river.”*
Private trips will have no “guide”. This appears to be copied directly from 4.2.A.7b.
- 2.6.3.2. Twelve trips is an arbitrary figure and is not compatible with the way private kayak trips are planned or run. It does not take into account the character of the rivers in Kahurangi National Park combined with unpredictable rainfall events. It will needlessly restrict access for kayakers.
- 2.6.3.3. There appears to have been no consultation with kayakers. Whitewater NZ is the national body for recreational whitewater kayaking and has not been consulted. Planning supervisor Rod Witte informed Whitewater NZ's Conservation Officer Tony Ward-Holmes, that consultation was by means of interviewing the eight helicopter concessionaires. This is unacceptable, and has obviously led to a lack of understanding of the activity. As noted above (2.2.6.1.), private trips do not have clients and guides, and very few require anything like the five flights allocated per trip. This ignorance of kayaking is a trend exhibited by DoC throughout the country. DoC has failed to consult with kayakers for access to the Waiatoto River and other rivers in Mt Aspiring National Park, and to the Upper Waiau River (St James station). DoC is statutorily required to consult with stakeholders, and to foster recreation. The New Zealand whitewater resource is shrinking (see table in 2.4.4. on page 3) and DoC should be improving access to rivers for kayakers when there are no conflicts with conservation.
- 2.6.3.4. Is there any evidence that kayakers are causing environmental impact or conflict with other users? It is probable that neither of these are an issue. Most users of the park, and DoC staff are probably unaware of any kayaking usage in Kahurangi National Park, except for the Karamea River. Kayak parties occupy the river itself, often well away from tracks. River gorges like the Anatoki River (pictured in 2.6.1.4.) are rarely visited by any other users apart from kayakers. This is certainly true in the gorged sections. Arbitrary limits on numbers of kayakers are not appropriate if the visits to the park have low impact and are not noticed by any other users.
- 2.6.3.5. If DoC has evidence that there is conflict with other users, then there may be other ways of mitigating this conflict than simply restricting access in this way.
- 2.6.3.6. A fixed number of trips makes no allowance for the changing nature of the sport of kayaking in relation to skills and equipment. In the 1970's it was inconceivable that rivers like the Anatoki River (pictured in 2.6.1.4.) would be kayaked at all, let alone on a regular basis. Modern plastic kayaks have revolutionised the sport and skill levels have increased markedly in recent years, enabling harder rivers to be run by a larger number of people. Who knows what the future may bring? More kayakers may be running the most difficult whitewater gorges that are



virtually inaccessible to most other users of the park.

2.6.3.7. A fixed number of trips fails to allow for seasonal variation. The availability of helicopters, and the numbers of active kayakers in the region, vary from year to year.

2.6.3.8. *Individuals or groups organising a rafting or kayaking trip involving helicopter landings need to first apply to the Department for a helicopter landing permit and then present this to a helicopter operator who is authorised to land in the park.*

There has been no information provided about how the permit system will work, particularly regarding issues like costs, dates and times, postponements and cancellations. Kayaking is very weather dependant and if applying for a permit means being tied to a fixed departure date then this will not be practical. The final decision to run a trip can happen within hours of the actual departure, leaving no time to apply for permits.

3. I seek the following decisions:

3.1. Section 4.2.A.5 Air supported activities

3.1.1. Include kayaking in the list of air supported activities.

3.2. Section 4.2.A.7c Rafting/Kayaking (private)

3.2.1. Reword to remove any restrictions to the number of flights for helicopter flights for private groups of kayakers.

3.2.2. Remove the requirement to apply to the Department of Conservation for a helicopter landing permit.