



**NZRCA submission;  
Draft Mt Aspiring National Park Management Plan**

**PART A**

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Signature/Date: Tony Ward-Holmes. 30 June 2009.  
*(Person authorised to sign on behalf of person or organisation making submission. Type name if via email)*

**PART B**

Do you wish to present your submission at a future hearing? No... Craig Adams, Access Officer for NZRCA, will be presenting on behalf of NZRCA. He has entered a submission on behalf of NZRCA Otago section.

How much time would you prefer for presenting your submission? N.A.  
*(Please note that the standard time allocated for hearing of submissions is 15 minutes, unless you stipulate otherwise)*

## PART C

### The specific part of this plan that my comment relates to is:

*(Please state section number/s and page of plan)*

#### Section 6.6.5 Aircraft

“This plan proposes that one of the roar sites (site 7 at Bonar Flats) may also be used by recreational river users to access the upper reaches of the Waitotō River from mid October to 31 December annually. This recognises the value of the two-day kayaking trip on the Waitotō River and the opportunities it provides for a remote experience for moderately experienced kayakers. This site is also used by the occasional rafting party.” (p 71)

#### Section 6.6.5 Aircraft, Policies

“7. Concessions for aircraft landings at roar landing sites, R1-R8, should be restricted to access by recreational hunters for the roar period only, to protect remote values for the majority of the year, except that roar landing site R7 (Bonar Flat on the upper Waitotō River) should also be available for kayaking and rafting parties from 15 October to 31 December (inclusive) annually, with a maximum party size of 12.” (p 73)

TABLE 1 Aircraft Landing Sites (p 76)

Landing site	Location	Grid Ref	Level of use	Exclusions
Roar site 7	Bonar Flats	G38 734 529	Low	Access only during roar and for kayaking and rafting parties not exceeding 12 people from 15 Oct to 31 Dec

**My comment is that:**

*(Please state concisely the nature of your concerns. Clearly indicate whether you support or oppose the specific part of the plan or wish to have amendments made. Please give reasons.)*

This section is structured as follows:

- About the NZ Recreational Canoeing Association.
- The issue addressed by this submission.
- Background on the Waiatoto kayaking and rafting amenity
- The legislation that governs the management plan.
- NZRCA comment on the legislation that governs the management plan.
- Usage by kayakers and their effects on other user groups
- NZRCA comment on other arguments that have been advanced by interested parties.
- Conclusion.

**1 About the New Zealand Recreational Canoeing Association.**

- 1.1 Formed in 1957, NZRCA (the New Zealand Recreational Canoeing Association) is the national representative organisation of canoe clubs and recreational kayakers throughout New Zealand. NZRCA 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. NZRCA has delegated authority to represent NZCF and all its member disciplines on advocacy issues.
- 1.2 NZRCA 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 to reflect its non-competitive advocacy role.
- 1.3 NZRCA represents both club and individual members and further affiliated clubs. Currently there are 30 member or affiliated Clubs with a combined membership of around 2,500 kayakers plus another 65 individual members. The figure of 2,565 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 NZRCA as individuals

## 2 The issue addressed by this submission

- 2.1 Kayakers have been using aerial access to Bonar Flats to access the Waiatoto River since the early 1970s. It is very highly valued and relatively highly used for a remote, multi-day whitewater trip. There is no recent survey information but the writer knows of 6 trips totalling approximately 120 individuals between October 2005 and November 2008.
- 2.2 The Waiatoto has mostly been paddled from Bonar Flats, although some people have walked up to near the Pearson confluence and a group is known to have descended with inner tube rafts (and presumably a large amount of walking) from Lake Waiatoto.
- 2.3 The Mt Aspiring National Park Management Plan, as first presented to stakeholders before the draft was produced in early 2009, proposed to ban landings by kayakers at the Bonar Flats site. Kayakers found this unexpected and outrageous. They were very aware that few other park users are to be seen in the Waiatoto, and that other no park users at all appeared to have walked in. This banning of landings at Bonar Flats appears to have little relation to the actual usage of the site or the rest of the Waiatoto valley, and therefore seems driven by ideological or theoretical management considerations.
- 2.4 A number of representations by NZRCA have resulted in a compromise in which the draft allows landings allowing landings at Bonar Flats from mid-October to end of December, for parties of up to 12 paddlers. NZRCA does not agree with these restrictions.
- 2.5 A second river, the Burke, is one of those most difficult that has been paddled in the region, and has an even more difficult, but still likely kayakable un-run gorge. It is a challenge for the best paddlers of today or perhaps the future, but it is also being banned for no clear reason.



Casey's Flat Rapid. Feb 2006 WWCC trip.

### 3 Background on the Waitatoto kayaking/rafting amenity

- 3.1 The Waitatoto is one of the country's classic river trips. It is very highly valued from a number of different points of view or "dimensions".

#### The National Dimension

- 3.2 The only survey information we have is the NZCA River Use Survey (Hunt, Unwin, Rankin), 1991/1992. This survey did not include the Waitatoto in its final tabulated results, as only 9 respondents had paddled it, and a limit of 10 respondents was chosen as a cut-off to ensure consistency. It is certain that the Waitatoto had been paddled more than 10 times. We know the first kayak descents were as early as the 1970s, and also that hunters had rafted out from Bonar Flats with deer carcasses in the early 1960s. 600 people responded to the NZCA Survey, which was about 8% of the estimated kayaking population at that time. The survey authors noted some obvious omissions since they were aware of descents of the Nevis, Godley and Broken rivers, each by teams of several people, however none of these rivers were reported at all in the survey.
- 3.3 An examination of the results for all rivers, with no cut-off at 10 respondents, shows the Waitatoto would have ranked in the top handful of all rivers nationally. Rankings on the various questions asked include:
- 1<sup>st</sup> equal on scenery (with the Landsborough)
  - 1<sup>st</sup> on length of time taken to travel (i.e.: the time that kayakers are prepared to spend to travel to the river.)
  - 2<sup>nd</sup> of all rivers in overall importance (after the Motu, and followed by the Whitcombe, Karamea, Landsborough and Mohaka)
- 3.4 As stated earlier, in recent times it has become much more popular. This writer knows, first-hand, people who have participated in 6 trips between October 2005 and November 2008; of 12, 12, 32, 27, 3 and 30 people. These trips have been by Dunedin, Central Otago or Christchurch based paddlers. There are known to have been other trips including by internationals but I don't know who or how many they were.



Feb 2006 WWCC trip.



Feb 2006 WWCC trip.

### **The Multi-day expedition dimension**

- 3.5 There are only 5 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 are some of the absolute gems of NZ whitewater, in many ways the equivalent of the “Great Walks” to tramping.
- 3.6 As can be seen above in the “National Dimension”, the survey ratings for these rivers support the statement that these are the “Great Walks” of kayaking. 5 of the 6 highest rated rivers by overall importance are in this group of 7 multi-day rivers. The remaining 2, the Upper Waiau and the Waipara are not rated quite so highly due to access issues, the latter of which is due to DOC.
- 3.7 In the case of the Waitoto, one of the attributes that make it very special amongst this group of the most highly valued rivers in NZ is that it is the most suitable for intermediate paddlers and also for large groups. As Graham Charles writes in the kayaking guidebook “NZ Whitewater” (1999 edition): *“It is a beautiful river for intermediate paddlers wanting to get away for a wilderness self-support trip. The very idea of a Waitoto trip is to enjoy the wilderness experience, get a group of friends and enjoy it with some good food and wine”*. Many older paddlers who would probably not be capable of the more difficult multi-day rivers have greatly enjoyed the Waitoto.



Superannuitant rowing a cataraft, late 2007 WWCC trip



Topoduo double kayak. First of the October 2005 Dunedin trips.

- 3.8 All but the Upper Waiau suffer access restrictions due to Wilderness Areas. The Upper Waiau has access issues also but of a different kind due to the owners of the surrounding properties. In the case of the Waipara, an almost unique but more difficult trip from an iceberg-choked lake to the sea is completely eliminated by the Olivines Wilderness Area. Kayakers were not consulted in the process to gazette this area. On the Landsborough, the first day of the original 3-day trip has been eliminated by the Hooker-Landsborough Wilderness Area. Kayakers were also not consulted. On the Karamea it is the best one-day option that is eliminated by the Tasman wilderness area.

### The West Coast dimension

- 3.9 The West Coast is renowned internationally as a destination for kayaking. It has appeared in countless documentaries, magazine articles, videos, web blogs and pages. The West Coast kayaking amenity is composed of a number of wild rivers, each with its own unique attributes.
- 3.10 Some are amongst the most serious and committing kayaking runs in the world. Former world freestyle champion Ken Whiting of Canada has said that the Upper Hokitika and the Upper Whitcombe are the two most committing rivers he has ever run. Others are classic easy instructional rivers, such as the Arnold and the Milltown Gorge section of the Arahura. Some rivers are fed by snowmelt and are an amazing blue that has been compared to the colour of Bombay Gin. Others such as the Karamea, Mokihinui, Waikiti are an almost luminous clear green through which you can see to the bottom of the deepest pools, while yet others are classic tannin-stained rainforest streams like the Kakapotahi. Some like the Arnold or Styx provide quick after-work runs for the locals, while the Karamea, Waiatoto and Landsborough are classic 4, 3 and 2-day trips respectively.
- 3.11 Many, in fact probably most, of these runs require helicopter access. This mode of access to remote, committing gorges is one of the internationally unique features of the West Coast.
- 3.12 The loss of any of these rivers, whether by hydro development or by access restrictions, in turn reduces the value of the West Coast amenity as a whole.

### The loss of amenity dimension

- 3.13 As said above, even the "Great Walks" of NZ kayaking... the 5 wild, multi-day, South Island whitewater river trips are suffering severe and increasing access issues. Much of this is due to DOC despite its statutory role to foster recreation. This loss of amenity is exacerbated by the fact that the loss is from an already shrinking pie because of loss of amenity due to other factors.
- 3.14 Here is the loss of amenity we are currently experiencing, or are threatened with, for relevant rivers... i.e. multi-day, or in the West Coast suite of rivers:

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.
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
Adams	Access lost due to Adams Wilderness Area
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
<b>Waipara</b>	Access lost due to the Olivines Wilderness Area, despite only needing a 2km corridor to allow access.
<b>Cascade</b>	Access lost due to the Olivines Wilderness Area, despite only needing a 4km corridor to allow access.
<b>Waiatoto</b>	Access threatened by DOC's Mt Aspiring National Park Management Plan.
<b>Burke</b>	Access threatened by DOC's Mt Aspiring National Park Management Plan.
<b>Joe/Arawata</b>	Probably never paddled, access lost due to the Olivines Wilderness Area
Other unidentified	There are many other potentially classic river trips that have been lost to the Olivines and other Wilderness Areas.

rivers	
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	This is neither a multi-day river nor a West Coast river. It is in the adjacent Otago region. 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. It has recently been reported that DOC had previously done a deal with Pioneer to keep the Nevis out of the Kawarau WCO.
Kawarau	Otago region. Many large rapids lost to hydro development.
Clutha	Otago region. Many large rapids lost to hydro development.

- 3.15 The point of this section is that kayaking has lost far too much amenity already to add the Waitototo to the list. It is not acceptable that the government ministry statutorily charged with "fostering recreation" is proposing further loss of amenity.



Walking up to kayak from the Pearson confluence; and Cooking a large trout. Nov 2008 trip.

#### 4 The Burke and other threatened kayaking/rafting amenity

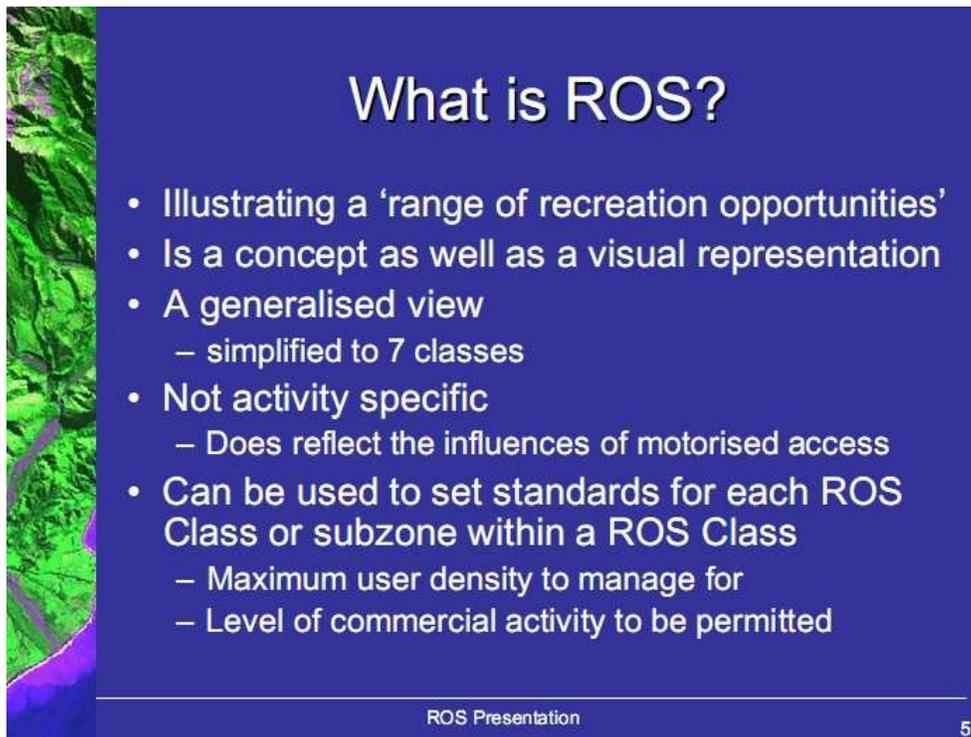
- 4.1 The Burke is in a slightly different suite of rivers, it is a very difficult river with an un-run but probably kayakable gorge. Other rivers in the same category include the Waitaha and Nevis, both of which are threatened also. Together they constitute most of the top-level amenity in the region between Central Otago and South Westland. The loss of any of them is a blow to current and future top paddlers of the Central Otago and Westland. The potential loss of all of them, including one entirely and one partially due to DOC action, is outrageous. It would be very easy for DOC to allow access, even if limited, to the Burke in this park management review. The NZRCA asks that DOC does so.
- 4.2 The kayaking amenity of the Waipara and Cascade rivers has already been lost due to inappropriately defining the borders of the Olivines Wilderness Area, without consultation with kayakers. Kayaking has already lost too much in this region.

## 5 Legislative and administrative context

- 5.1 The Conservation Act and the National Parks Act are the statutes that must be obeyed in formulating the Management Plan. In addition, DOC has policies and plans which provide guidance on managing the conservation estate.
- 5.2 The Conservation Act, Section 6 Functions of the Department states:  
*“(e) To the extent that the use of any natural or historic re-source for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.”*
- 5.3 The DOC Visitor Strategy has Section 10 Establishing and Managing Wilderness Areas, which is relevant to the Bonar Flats site as it is adjacent to the Olivines Wilderness Area. It says that Wilderness areas will be managed in accordance with the 1985 Wilderness Policy, including that: *“adjoining lands should be managed as buffers to assist in the protection of a wilderness area; buffers may contain huts, tracks and bridges, but these should be few and vehicle access will be discouraged near the wilderness boundary”*
- 5.4 The DOC General Policy on National Parks, Section 8 Benefit, Use and Enjoyment of the Public has some relevant comments on managing conflicting user interests in National Parks Visitor Strategy has Section 10 on establishing and managing Wilderness Areas, which is relevant to the Bonar Flats site as it is adjacent to the Olivines Wilderness Area: *“People of all ages, cultures and backgrounds go to national parks for a variety of reasons: to be inspired by the scenery, unique features, sights and sounds of wild nature, to experience solitude, remoteness, peace and natural quiet, to experience nature on nature’s terms, to experience the challenge of being self-reliant and adventurous, to explore, enjoy and learn about new and natural places, to share experiences, to maintain active, healthy lifestyles, and “to get away from it all”. People can also have an adverse impact on the very qualities that attract them to national parks in the first place. In addition, the enjoyment of some can be at the expense of the enjoyment of others. A range of activities and behaviours, facilities and services, and large groups, can erode enjoyment of national parks in their natural state and as places of refuge from commercialism and urbanisation.”*

## 6 NZRCA Comment on the Legislative and administrative context

- 6.1 Re “*To the extent that the use of any natural or historic re-source for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation*”, there has never been any suggestion that aerial access for kayaking by 9 – 13 helicopters annually is inconsistent with conservation. This is only a tiny proportion of the total helicopter traffic, which is mostly for pest control and deer recovery. The park management question of aerial access for kayaking thus boils down to a matter of balancing the requirements of different and occasionally conflicting user groups.
- 6.2 Re “*adjoining lands should be managed as buffers to assist in the protection of a wilderness area; buffers may contain huts, tracks and bridges, but these should be few and vehicle access will be discouraged near the wilderness boundary*”:  
ROS mappings are used to determine recreational management zones and buffers. They are inevitably generalisations. As a result the policy is a guideline, not a prescription. “Should” is the operative word. Within each type of ROS zone, there will often be special sites that do not fit the generalised ROS classifications and should not be managed as such. Two such sites in the Remote zone surrounding the Olivines Wilderness Area are Mt Aspiring and Bonar Flats. Mt Aspiring is of course an iconic and popular destination, with a very busy hut at its base and a relatively busy landing site nearby. In no way does it conform to usual Remote classifications whereby you should expect to see few or no other parties in the course of a trip. It obviously either
- should not have been classified as Remote (or Wilderness Area.. there is a Wilderness Area border drawn along its most popular route)
  - or the intention is that it would not be managed according to usual Remote (or Wilderness) zone criteria.
- 6.3 Any doubt on the generalised, not specific and not prescriptive nature of ROS mappings is easily dispelled by the relevant literature. For example, this slide, from “Zoning In on the Outdoors”, DOC’s Steve Sutton, notes that classes are generalized and simplified, and importantly, not activity specific.

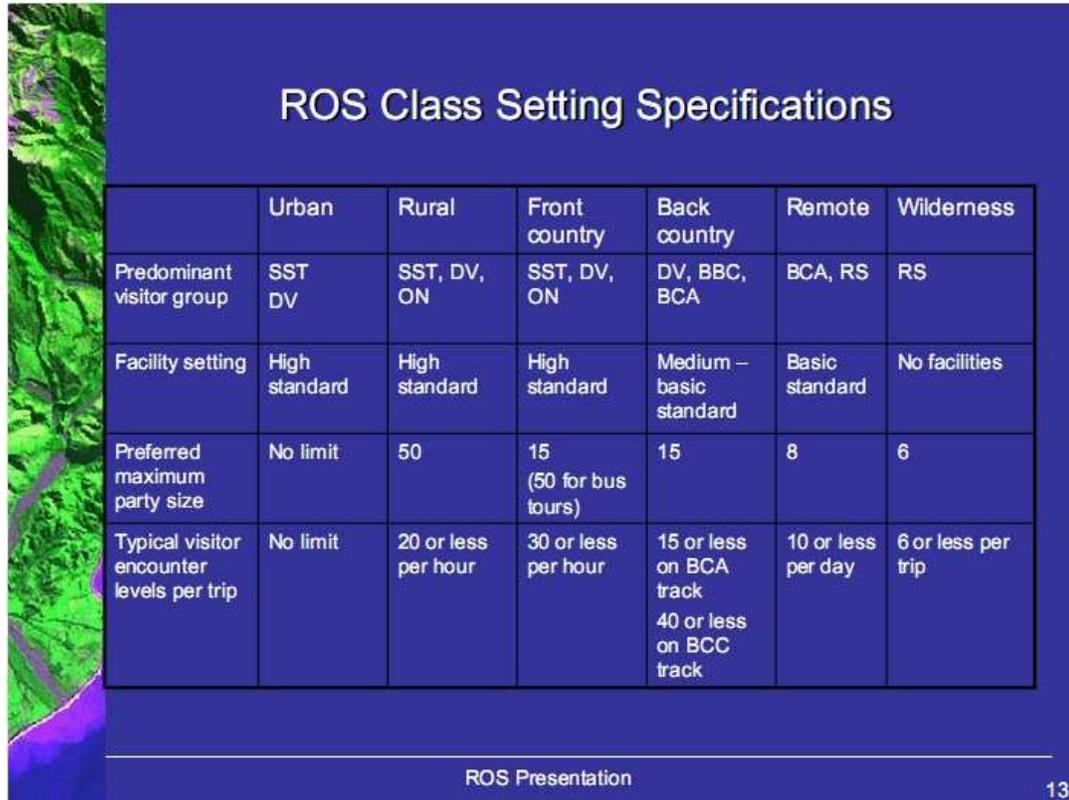


### What is ROS?

- Illustrating a ‘range of recreation opportunities’
- Is a concept as well as a visual representation
- A generalised view
  - simplified to 7 classes
- Not activity specific
  - Does reflect the influences of motorised access
- Can be used to set standards for each ROS Class or subzone within a ROS Class
  - Maximum user density to manage for
  - Level of commercial activity to be permitted

ROS Presentation 5

6.4 Examples of exactly what that actually means are easy to find. For example, in this next slide, it says a Remote Zone would have typical visitor encounter levels per trip of 10 or less per day, and that a Wilderness Zone would have 6 or less per day. In Mt Aspiring National Park, these figures would often be much higher for Mt Aspiring itself. In much of the rest of the Remote and Wilderness Zones, these figures would typically be much lower.



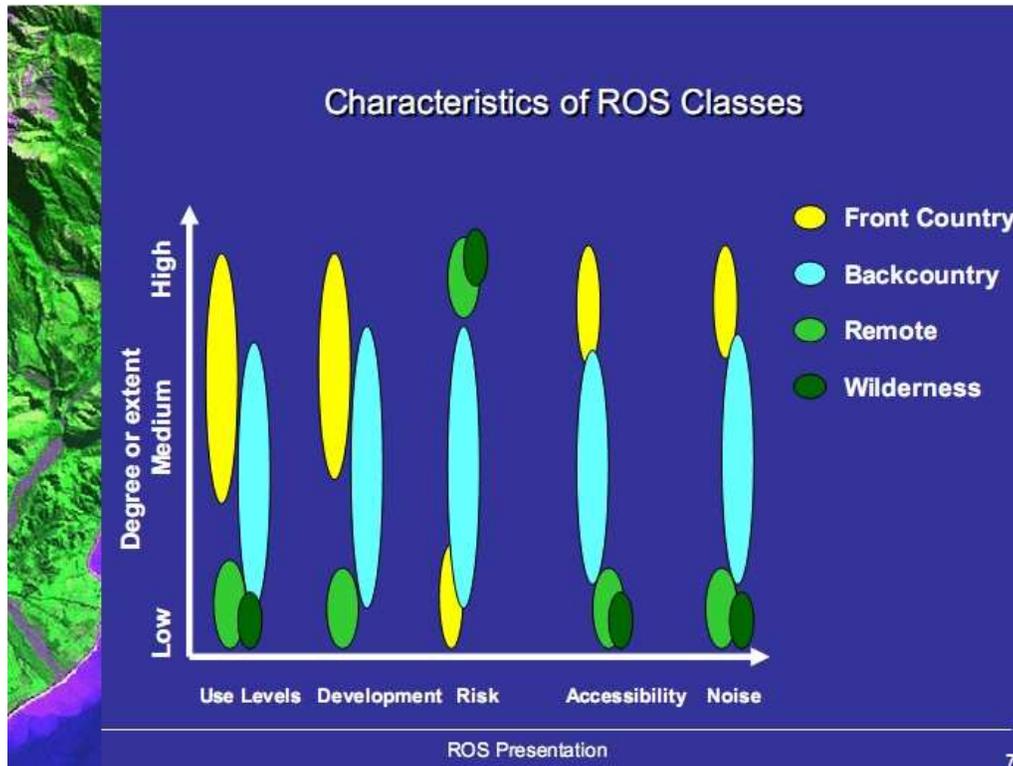
### ROS Class Setting Specifications

	Urban	Rural	Front country	Back country	Remote	Wilderness
Predominant visitor group	SST, DV	SST, DV, ON	SST, DV, ON	DV, BBC, BCA	BCA, RS	RS
Facility setting	High standard	High standard	High standard	Medium – basic standard	Basic standard	No facilities
Preferred maximum party size	No limit	50	15 (50 for bus tours)	15	8	6
Typical visitor encounter levels per trip	No limit	20 or less per hour	30 or less per hour	15 or less on BCA track 40 or less on BCC track	10 or less per day	6 or less per trip

ROS Presentation

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- 6.5 Another example is this slide on risk. If an activity of kayaking, and a specific site of The Gates of Haast were used as an example, it is obviously Front Country being with 50m of the road. It is also at the very top end of Risk if it is kayaked (This is not a moot possibility.. most of it has been run although I am unsure if the complete rapid has been run in its entirety). The ROS Characteristics below show only Wilderness and Remote zones have the characteristic of highest Risk.



- 6.6 The only conclusion that can be drawn from this is that ROS zones are very highly generalized, and to be used for broad guidance for management purposes. To go back to point 6.2, this means the choice must be that it was never intended that all sites should need to be exclusively managed according to usual Remote zone criteria.
- 6.7 Mt Aspiring is one of these special sites that does not conform to Remote criteria. Bonar Flats is another. There is no management conflict in allowing aerial access to Bonar Flats, it simply need to be recognised as what it is; a special site within the Remote zone that needs to be managed accordingly.
- 6.8 The management question is still that of balancing the requirements of different and occasionally conflicting user groups.
- 6.9 Re: *"In addition, the enjoyment of some can be at the expense of the enjoyment of others. A range of activities and behaviours, facilities and services, and large groups, can erode enjoyment of national parks in their natural state and as places of refuge from commercialism and urbanisation."*
- Exclusive (ie if the Bonar Flats site were eliminated) enjoyment of the middle Waitotō by a few trampers would indeed be at the expense of many kayakers and rafters who can no longer enjoy a rare, nationally important whitewater resource.
  - It is also true that the occasional large groups of kayakers may impact the enjoyment of the occasional party of trampers. However at the current level of activity this is so rare that it has probably never happened, and without evidence to the contrary there is no reason to limit party sizes descending the Waitotō.

## 7 Usage by kayakers and their impact on other user groups.

- 7.1 I endeavoured to find out how often trampers use the Waiatoto. All members of the FMC executive (18 individuals) were emailed asking this question, plus Geoff Spearpoint author of the relevant guidebook "Moir's Guide North", plus those members of the West Coast conservancy board that I had email addresses for – Mark Planner and Gary Nixon. Bron Hunt of DOC Alexandria was also asked.
- 7.2 Amongst the 22 people that were asked, 5 individuals were named, plus "others I can't think of at the moment", who have tramped in the Waiatoto:  
*"I've been in there, and on the ranges beside it, and so have people like Kelvin Lloyd, (Dunedin), Frazer Munro (Timaru), and others i cant think of at the moment."* (Geoff Spearpoint)  
and:  
*"I tramped into the Waiatoto with a friend who has attempted that trip twice, and I was with him when we had to abandon an attempt in the reverse direction due to bad weather."* (Mark Planner)
- 7.3 In contrast, I have been on two trips down the Waiatoto. The first of those was in a WWCC (Whitewater Canoe Club, from Christchurch) party of 32 organised by Hugh Canard in Feb 2006, the second was in a private group of 30 in November 2008. There was only one other person in common with those two trips, so that is 58 individuals. In addition to that, I know about half of the 12 in a Dunedin-based group that paddled it in Spring 2005, at least one person who paddled it with another Dunedin group of 12 a few weeks later, probably another half dozen people in a second large WWCC group of 27 in late 2007, and 1 more of a Central Otago group in January 2008.
- 7.4 So this particular kayaker knows over 70 people who have paddled the Waiatoto. 22 trampers (or people at least well connected in the outdoors) between them can only come up with 5 names, and a few unknowns. When asked in 2006, DOC Haast had received no intentions cards for anyone tramping up the Waiatoto this century. A strong case can be made here that kayakers are the dominant users by a factor of probably 10 to 1 and maybe a lot more (since my questions to the trampers were not limited to the period Oct 2005 – Nov 2008).
- 7.5 One of the questions asked of the FMC executive (i.e. 18 people) was whether they know of any trumper who had been disturbed by kayakers accessing the Waiatoto. There were no replies to this question. Given that the only people seen by a total of 6 kayaking parties between 2006 and 2008 were two fishermen who also used aerial access, it is possible or even likely that none of the 115 or so kayakers total in those groups disturbed any other user groups.
- 7.6 I can only guess at usage by parties that I don't presently know of. My guess would be that the 6 trips mentioned in Oct 2005- Nov 2008 constitute 50% - 75% of all trips down the Waiatoto in that period. If I take the most recent 4 year period i.e. Dec 2005 – Nov 2008, and an average load factor of 3.5 people per flight to allow for rafts and boats, my estimate of average annual helicopter use is  $90 \text{ people} / 4 \text{ years} / 3.5 \text{ people per flight} / 50\%-75\% = \text{between } 9 \text{ and } 13 \text{ flights/year}$ .
- 7.7 My estimate of peak annual use is from the 56 people in the year from Oct 2005 – Sept 2006, using the same assumptions  $56 \text{ people} / 3.5 \text{ flights per year} / 50\%-75\% = \text{between } 21 \text{ and } 32 \text{ flights that year}$ .
- 7.8 The NZRCA would have no problem with discouraging a level of access activity that causes significant impact to other users. That would be far higher than the current level of activity, for which there is no evidence of impact.

## 8 NZRCA Comment on other arguments

- 8.1.1 Many other arguments have been advanced by various parties in favour of banning landings at Bonar Flats. Some are dealt with here. Italics are quotes from correspondence with a range of people.
- 8.1.2 The “Commercial Intrusion” argument. This argument deserves a swift death. The use of helicopters by private kayakers and rafters to access the Waiatoto does not make it a commercial trip any more than refuelling a car at Haast, Makarora or Wanaka petrol stations makes a tramping trip a commercial trip. I note that a meeting organised by DOC in Haast for helicopter operators and other interested parties resulted in NO attendees whatsoever. This is because kayaking access is not a significant part of the business that helicopter operators have in the west of Mt Aspiring National Park, and it is not a line of business that helicopter operators promote. Their operations depend on guided fishing trips, pest control and deer recovery. By contrast, kayakers are a significant, in fact the dominant non-hunting visitors to the Waiatoto.
- 8.2 An argument is that of not wanting to make exceptions in management ROS zones. E.g. *“..focussed on maintaining the integrity of the zoning. If you have a remote zone that says no aircraft and then add a “but” for one user group at one site you get another group wanting special case access at their site & on it goes”*. This logic ignores the following points:
- This quote is from an FMC member. FMC are themselves one user group who are asking for special treatment by eliminating other user group’s aerial access even when (in this case) there is no impact on FMC members
  - Some other user groups (climbers with the Bevan Col site, hunters with the roar arrangements) are being catered for to some extent. These are NOT “exceptions” to the rule. These are special sites that are to be expected, that do not conform to the generalised classifications of the ROS zones, and that were always going to have to be specially managed.
  - The remote zone is an arbitrary construct for which borders and rules were created without consultation with the major impacted user group in this case, i.e. kayakers. FMC’s position is based on maintaining this arbitrary construct, not based on managing user groups. It is this latter point that is the question at hand.
- 8.3 Another argument is that of intrusion on activity on the Haast range. *“The Haast Range is a popular remote tramping and climbing area that is affected by aircraft activity associated with hunting and kayaking.”*  
Aerial activity associated with hunting may effect tramping and climbing, I would not know and can not speak for hunting. Aerial access for kayaking certainly does not. The bulk of the Haast range is well up-range from the Bonar Flats landing site. The northernmost and closest object of most climbing interest, Moonraker, is still 6km distant from Bonar Flats and hidden behind the subsidiary peak of Corner Post. Tramping / climbing access routes are chiefly on the west side of the range and nowhere near flight paths for kayakers that are along the valley floor to the east. Kayakers don’t fly up and down for extended periods along the ridges and hanging valleys looking for deer. It is unlikely that any tramping or climbing party along the Haast range has ever seen helicopters carrying kayakers.
- 8.4 Re: *“A group of 30 paddlers flying in groups of 4 requires 16 over flights and roughly 3 hours of flying activity. This would certainly impact me if I were tramping up the East matukituki, Up Rabbit Pass, over Pearson Saddle, down the Waiatoto, up the Te Nahi, and down the Wilkin, and hoping to experience remoteness, solitude, the sounds of wild nature, and experience nature on natures terms.”*  
Actually it is not true that it would “certainly” impact such a trip. There is a conceivable impact, but not only is it highly unlikely that two such trips would overlap given the volume of traffic, but the Waiatoto leg is only in the middle day or two of what might be a 6-8 day trip. Kayaking access by helicopters would be at the start of a holiday period, not in the middle when trampers on such a trip would most likely be in that part of their trip. There is no record of anyone on such a trip being impacted by helicopter access for kayaking.

8.5 Following on from the above quote: *"That great tramping routes are little known, or not presently widely appreciated, is not an excuse to spoil them for future generations."*

This is an interesting and revealing rationale for eliminating kayaking on the Waiatoto. It could much more accurately be paraphrased: "That this great kayaking and rafting trip is little known or appreciated outside of kayaking and rafting circles, is not an excuse to outlaw it for future generations". It is an unjustifiable leap to say that tramping routes are spoiled for future generations when the real effect is a very small chance of some noise intrusion on perhaps 20% of the route, whereas trampers' wish to eliminate a very small chance of some noise intrusion on perhaps 20% of a route results in the complete loss of a classic and nationally significant amenity for kayakers.

8.6 Re: *"Wilderness areas cover less than 3% of the conservation estate"*. This statement in no way conveys the impact Wilderness Areas have, and Remote zones are proposed to have, on kayaking access. Wilderness Areas and no-fly Remote zones cover 60-70% of MANP. Wilderness Areas impact 80% of the multi-day south island kayaking trips.

8.7 Re: *"Fostering recreation must include an acceptance that some forms of recreation are incompatible. Considerable thought has gone into how that conflict can be managed. Zoning of places is what is being explicitly used. Some separation in time is also used less explicitly. Supporters of Helisking often use the argument that no one else is there in winter. It's a line of thinking I don't support."* The NZRCA does not agree. The "no one else is there" argument is the crux of the entire matter. Issues created by management zones are a side-effect of the choice by DOC to use the ROS tool. The tool is only a generalised approach that must take into account sites of specific interest.

## 9 Comments Conclusion

9.1.1 Any restrictions on access to Bonar Flats by kayakers and rafters are not justified by usage or effect on any other parties.

9.1.2 Any restrictions on access to Bonar Flats as a result of Recreational Opportunity Spectrum mapping, or any other policy or instruments merely indicates flaws in the policy or instrument. Bonar Flats is a valued landing site of long-standing and regular use with no impact on other user groups. It therefore should either not have been classified Remote, or the management of Remote zones needs to cater for specific amenities within the zones.

**I seek the following decisions:**

The NZRCA requests no restrictions on aerial access to Bonar Flats on the Waitotō by date. If there does need to be some restriction by dates then the obvious boundary holidays are South Canterbury Anniversary Day (4<sup>th</sup> Monday of September) and Anzac Day (April 26). These two holidays result in boundary dates of September 20 (the Saturday before the earliest possible 4<sup>th</sup> Monday of September) and April 29 (if Anzac fell on a Thursday and people took Friday off work).

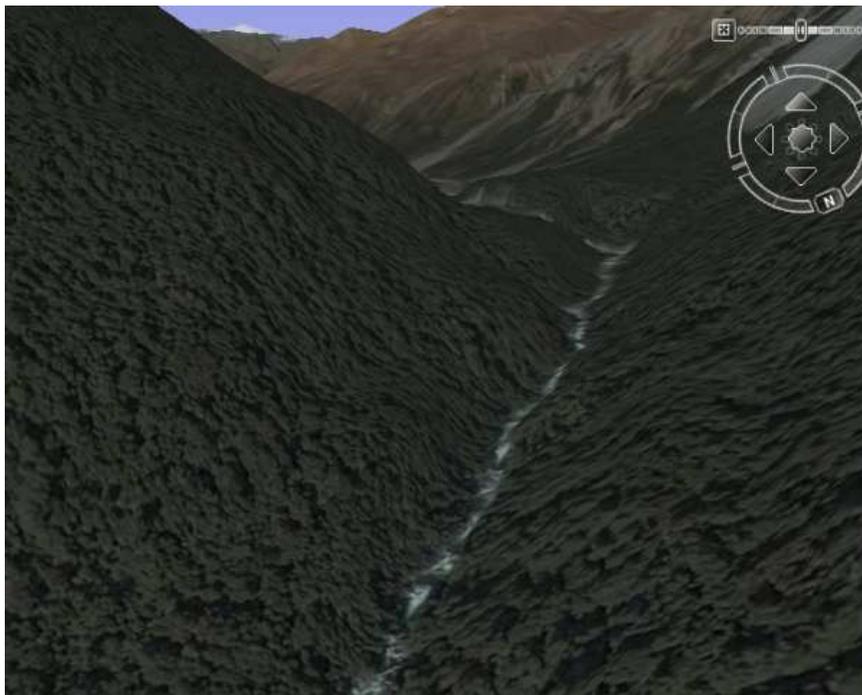
The NZRCA requests no restrictions by numbers. These restrictions are unsupported by usage or effects. The Waitotō is well suited to parties of as many as 30.

The grid reference given for Bonar Flats in the draft is incorrect, the map should be F38 not G38, and 734 529 is near Bonar Flats but a couple of hundred metres up a very inconvenient and bushy hillside. It would be best not to give a grid reference at all as Bonar Flats is sufficiently descriptive, and would allow for any changes to the position of the riverbed in the flat. If a grid reference for some reason really is needed, then "In the vicinity of F38 740 515" would be suitable.

The NZRCA requests a similar dispensation to provide access to the Burke River at the monument, i.e in the vicinity of F38 070 780.

The NZRCA requests DOC outline what statutory processes are available whereby limited access may be gained to two sites in the Olivines Wilderness Area. These are the Waipara River at Lake Waipara, and the Cascade River immediately below Durwood Falls. Neither of these sites should ever have been gazetted in the area in the first place, and kayakers were not consulted when the boundaries were decided.

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Google Earth view of Cascade River below Durwood Falls. Gyrae, 15km away on the edge of the Olivine Plateau, is the snowy peak on the skyline. The Olivines Wilderness Area border is at the end of the gorge. The border could easily have been drawn around this gorge.