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Department of Conservation

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Attention: Bronwyn Hunt

cc. West Coast Conservancy

Submission to the Department of Conservation -Draft Management Plan – Mt Aspiring National Park

Executive Summary of Submission

Kayakers have an established pattern of existing use of the rivers of Mount Aspiring National Park (MANP). Most of the rivers on the Otago side of the Main Divide in MANP have been paddled, some frequently. On the western side of the National Park, however, although a number of rivers have been kayaked and many more have been scouted, little is known or understood about the extent of our activities. The kayaking use of these western rivers is little known by those outside the sport, partly because we have a culture of understatement, and partly because our activities intrinsically have such a small impact that we are rarely seen or attract attention.

What is known only to an even smaller group within kayaking is that the western side of MANP contains a number of "impassable" gorges that have been actively scouted with the intent of attempts at first descents. Members of our club representing successive generations have done a number of first descents of West Coast rivers dating back to the 1980s. (Taipo, Arahura, Turnbull, Otoko, Moeraki, Adams, and others) Our club has run a major trip to the Waiatoto in each of the last three years.

These rivers are very important to us.

This brief outlines the concerns that our member kayakers have regarding the threats to the diminishing resource of New Zealand's longer rivers that enable river runners in kayaks and rafts to experience overnight self-supported river trips. There are seven such rivers remaining largely un-modified in New Zealand, and of these three are threatened by hydro damming, and two have Wilderness designations that prohibit air access.

Specific to the Mount Aspiring National Park Management Plan, the Waiatoto River in South Westland is the subject of proposed constraints on air access through Wilderness and Remote zoning that would effectively deny all future overnight river trips. Without air access, longer wild rivers like the Karamea, Waiatoto and Landsborough are denied to river runners.

Kayakers seek to maintain the current traditionally used Bonar Flats site.

The South Westland valleys of Mount Aspiring National Park such as the Waiatoto are a long way from urban centres. The fact that this river is run regularly despite 1000 to 3000 km return drives demonstrates how valued it is. This also means a lot of planning goes into any well run trip.

We request access as follows:

a. Max party size 16. This is about optimum for safety and is economic for helicopter use.

b. Max no flights on any single day = 5. This allows for 16 in the party, which might comprise a mix of kayaks and a few rafts. One of the flights will be to carry a sling load of gear. For a rafting party, this allows for 2-3 rafts and a safety kayaker or two.

c. Window of access = from the Friday immediately before Labour Weekend to March 31st. This avoids the Roar.

d. The map reference for the river runners' Landing Site is towards the top of Bonar Flats on river True Left at approximately ref. NZMG E2173859 N5651895: Sheet F38 NZMS 260 Nov 2007. This site has relatively elevated terraces and should be safer than sites further downriver in the event of a repeat of the massive flood event of 1978.

In the interest of all user groups, kayakers are willing to be excluded from accessing this area of the Remote Zone by air during periods of peak use by hunters. For this reason we have proposed that kayakers will cease accessing the Waiatoto after March 31st. This is for three reasons;

1. Hunters are a major user group and river parties can reduce the possibility of meeting hunting parties during their busiest time.
2. Reduces peak demand for helicopters and fixed wing aircraft.
3. Safety.

If we are agreed that our wild rivers need better protection against irreversible development such as hydro dams, pollution and major abstraction or diversions, the possibly the best way to protect our wild rivers is to encourage more people to experience them on their own terms, wild and free flowing. In this way there will more people who value and care about our remaining wild rivers, and more advocates for protection against destroying them in the name of progress.

Kayakers want to both protect and enjoy the rivers of MANP. We need air access to enable us to do so.

Background

This submission is on behalf of the Whitewater Canoe Club (WWCC). The WWCC is based in Christchurch, and has approximately 200 members. The WWCC has been in existence for approximately thirty years. The WWCC is affiliated to the New Zealand Recreational Canoeing Association (NZRCA).

Our members paddle a wide range of rivers, in organised club groups and in private groups, primarily in the Canterbury, West Coast, Buller and Otago regions.

Our members are gravely concerned over the various serious threats which face our rivers, locally and nationally, for hydro developments, irrigation offtakes, and access restrictions. Our primary interest is recreational, but we too share the values of those that wish to protect environmental values. We highly value our wild rivers in their natural state, and are passionate about being able to paddle them. We enjoy the challenge of the whitewater, and the natural beauty of our surroundings.

The context for this submission is one in which we express our growing concern at the diminishing opportunities to enjoy our chosen recreational activity – whitewater kayaking and river running and exploration.

There are a number of highly valued rivers in Mount Aspiring National Park that our members have paddled and in some instances were the first and most likely the only user group to explore and descend. Some of these rivers will be effectively denied to future generations of kayakers as a direct consequence of the proposed revisons of Remote and Wilderness zones in the MANP Management Plan. The deep and seemingly inaccessible gorges of the Waipara and Burke Rivers, amongst others we could name, are only accessible by river runners – kayakers, and in some cases non-commercial rafters. The proposed boundaries were drafted without consultation and we have been forced to explain our activities ever since we were first alerted to the Draft plan.

The New Zealand Energy Strategy (*New Zealand Energy Strategy, 2007, section 9.1.2*) notes that over 80% of our country's hydro electricity generation resource has already been developed . Currently plans for either hydro development or irrigation extraction are under investigation, or underway, for a number of the remaining rivers, including the following South Island rivers enjoyed by our members as places of relaxation and recreation:

- Matiri
- Mokihinui
- Matakitaki
- Glenroy
- Arnold
- Wairau

- Waitaha
- Waimakariri, and
- Hurunui.

In addition to the outright loss of entire rivers and their valley ecosystems we are increasingly concerned by access constraints.

The signatories of this submission have first-hand experience of the rivers of the Park, and in some cases this experience goes back over 40 years, and much of our collective experience is very recent and current. We have experienced some of these rivers prior to helicopters in the back country. Some our members have been involved in the first descents of some of the rivers in the Park.

Basis of Our Submission

Our particular interest in the MANP review is air access to the navigable rivers on the western side of the park.

Our submission is based on the need for mechanized access, usually by air, for us to pursue our enjoyment of the Park. We contend that the impacts of our use of air access have a minimal impact on the environment, eco-systems and the enjoyment of other park users.

We ask you to note the following points of difference between river parties and other user groups;

1. Air access for kayaking parties involves a single flight. We paddle out to road ends and highway bridges. Trampers, fishers and hunters frequently require a flight in and a flight out. Sightseers tend to linger in an area by comparison.

2. Kayakers never land in the high alpine environment above the snowline, only in the valley floor and often this is well away from tramping tracks and routes.

3. River parties usually land on the active river bed. Any signs that they have landed are wiped out by the rain event.

4. Many of the river valleys we frequent are not often visited by other users, and those other users have often flown in themselves and therefore are not disturbed by others who have chosen the same means.

5. Kayakers need landing sites above navigable gorges, and below un-navigable gorges. This is an important consideration, as often sites have been chosen above gorges to reduce the carrying of heavy packs by hunters and trampers.

6. Kayaking parties are capable of carry in-carry out waste practices, and are well equipped to do so.

7. Unlike sight-seeing flights, kayaking parties typically fly up river valleys and drop off and then the helicopter is gone and inaudible within two to three minutes.

8. Once paddlers are on the river, impacts of all kinds are minimal to non-existent. Not even footprints are left behind.

9. As kayakers are on the river, often in in-accessible gorges, it is very rare for paddling parties to see or meet tramping or hunting parties. Occasionally paddlers meet fishers on the open flats.

Kayaking in Remote Environments

Kayaking is an evolving recreational activity. Techniques, skills and technology improvements mean that what is un-navigable today may be run by the next generation of paddlers on a regular basis.

The rivers of Mt Aspiring National Park, and to some extent Fiordland National Park, represent an analogous situation to the exploratory days of New Zealand alpine exploration from the 1880s to the 1930s. The headwaters of the Arawhata have been scouted and some of the gorges could have been kayaked in the next few years as part of an exploratory interest in first descents in the general area. Some sections may prove impassable, others could have been navigated.

In the 1930s the great exploratory alpine tramper, historian and author, John Pascoe, suffered a harrowing and near fatal experience over a week or more in probably the first exploration of the Waipara River tributary of the Arawhata. In the last few years since the first descent in 1996, kayak parties have navigated the Waipara in two days from the glacial lake source to the Arawhata bridge. This is no longer possible due to Wilderness zoning which was gazetted without consultation with kayaking organisations.

Not all kayakers seeking air access to the Main Divide Westland rivers are elite experts. Like all activities we represent a spectrum of skills and aspirations. Certainly the exploratory first descents and similar expeditions demand exceptional skills, but a number of the river sections affected by the proposed MANP plan will deny even moderately skilled paddlers access to run these rivers.

The Waiatoto is a case in point. It is only one of three multi-day river trips in New Zealand of Grade 3-4 that can be done by the middle cohort of 'average' kayakers. The other river, the Landsborough, has longer stretches of relatively easy Grade 2 water, but a section of much harder rapids up to Grade 4-5 in Hell's Gate Gorge. The Motu in the Raukumara ranges is of similar challenge but is more technical and confined, and the Clarence is easy enough to be paddled by relative newcomers to the sport. The Waiatoto from Bonar Flats is a two day trip which is runnable from September to May by that majority middle cohort of club paddlers who will most likely never attempt the deep Grade 5 gorges of the Hokitika, Waitaha, Whataroa and Wanganui catchments.

While future demand is unpredictable, kayaker use of the Waiatoto would be very infrequent when compared to tourist flights, hunting activities or alpine hut access flights. Our use is mostly seasonal, but not exclusively so, and typically limited to the warmer months, when there is a suitable river flow, mostly on weekends or public holidays.

The draft plan appears to be addressing the issue of air access impacts arising from commercial alpine guiding to the high peaks of the Park, specifically Mt Aspiring itself. Somehow this approach has caught kayakers' use of the western valleys of MANP in the same net. We have different needs, different uses, and, we contend, much lower impacts on the qualities of natural quiet and remoteness that the draft plan wishes to address.

Cattle and Grazing Leases

We note that there are large numbers of cattle in the Waiatoto up to Ferny Flat. These animals are trampling wetland margins, defecating in the river and the small creeks and streams in a manner which would cause outrage if observed by most outdoors people. Cattle are entering the forest margins where there is a Kiwi Sanctuary for the endangered *Tokoeka,* and where we have seen similarly rare *Whio,* and we where we understand the Department has undertaken extensive pest control work.

We think it is highly anomalous to allow this to occur right up to a Remote zone that as a major recreational user group we are expected to be constrained in accessing.

Kayaking Rivers in MANP

We include a Table below in which the schedule shows the rivers and sections in MANP that we currently paddle and those which are potentially navigable in the time of the draft plan.

Please note the following:

- Where rivers are noted as "Paddled", this means that we know of the party and the difficulty of the river section involved. Those rivers or sections noted as "not known" are potentially navigable, but we are not certain if the section has been paddled or not.
- "Kayakers" is used throughout, but it is interchangeable with canoeing, private rafting and other pack rafting type activities, all of which require some mechanized access for people and equipment. The common element is running down the river.

West of the Main Divide			
River Catchment	**Section or Tributary**	**Landing Site**	**Paddled?**
Haast	Burke	Monument at head	Yes
Okuru	Ngatau	Ultima Creek	Not known
Waiatoto	Main stem	Bonar Flat	Yes
	Main stem	Pearson River	Yes (Whitewater CC)
	Main stem	Glacial lake (L. Volta?)	Not known, but it may have been run/portaged in the 1980s.
	Te Naihi (trib.)	Upper river flats above the forks	Not known, but it feasible
Arawhata	Arawhata main stem	Below Ten Hour Gorge	Yes, also jet boated
	Arawhata main stem	Above Ten Hour Gorge (McArthur Flat)	Not known. Ten Hour Gorge is considered feasible to paddle with some portages.
	Arawhata – upper river	Williamson Flat	Not known
	Joe River	Victor Creek	Not known, but sections are definitely navigable by kayak.
	Williamson River	Andy Flat	Not known
	Waipara River	Glacial lake	Yes, more than once.
	Waipara River	Flats opposite Mt Helen	Yes
Pyke River	Forgotten River	Near Blockade Creek	Not known
	Olivine River	Near Fiery Creek	Not known

The Bonar Flats Landing Site

The landing site used by kayakers and rafters at Bonar Flat has proved itself to be practical for a number of reasons for over 30 years and we wish to retain it.

1. The location and the scenery are highly valued.
2. The experience of the upper valley, and although it is easy water is highly valued for its scenery.
3. The valley at Bonar Flats is open and offers a warm up section of Grade 1-2 (easy) before reaching the harder rapids.
4. It means we can run one Grade 3 (moderate) rapid near Gloomy Gully. This forms a staged introduction to the harder rapids to follow. This rapid is well above Drake Flat, where the crux rapids start.
5. Drake Flat is immediately above the two most difficult rapids on the river trip. The crux section of around 3 km of Grade 4 (difficult) and technical Grade 3 rapids follows.

The following pictures were taken on three different trips over a period of three years.

Bonar Flat, looking upstream. The preferred landing site is at the top of the flats on river Left.

On overnight trips kayaks and rafts usually travel together to allow gear to be carried in and out, to encourage less skilled paddlers and non-kayaking friends and family to access this river, and for safety.

This is a party of 15 at Bonar Flat.

Mt Aspiring is 16 km distant, but still inspires. This site, which is our preferred location, allows for parties to get well above the river and is away from the likely path of a major flood.

In 1978 a massive rockfall fell into the glacial lake sending a wall of ice, rocks, trees and mud down the whole Waiatoto valley, covering the flats in silt, killing many animals, destroying huts and vegetation.

The effects can still be seen 30 years later in the upper river. This is just above the Bettne confluence above Bonar Flats.

It’s not just about raging rapids

Looking down to Drake Flat and the narrow rocky section below the Drake. River runners value this experience too.

Who wouldn't?

This Grade 3 rapid is the first rapid of consequence and is between Bonar Flat and Drake Flat.

Drake Flat is immediately above two of the hardest rapids on the first day. This rapid gets harder as the flow increases.

This Grade 4 drop is the biggest on the river and is just below Drake Flat. The raft in the background has just capsized and the kayaker is about to rescue the rafter clinging to the rock.

River parties can camp well away from other users. This camp is on an island surrounded by rapids. There are substantial rapids above and below this spot. Location: near Ferny Flat.

Axius Flat is another good campsite.

Kayakers' Issues

1. Kayakers and rafters need air access in order to participate in our recreational activity. We often carry gear into remote rivers for day trips, but for a 2 day trip the logistics and weather window opportunities mean that for the majority, air access is the only practicable means to enjoy the river. A kayak typically weighs 20kg, 10 kg of personal gear, and overnight gear, another 15 kg. All up 45kg is a deterrent to an extended carry in trip. Rafts weigh from 40 to 60kg and are beyond the capacity of most mortals to carry up river for any distance.

2. There is a very long history of use of the Waiatoto River and other West Coast river valleys by kayakers and rafters.

3. Kayakers and rafters are likely to be the principal existing user group in the Waiatoto valley.

4. Informal enquiries of 3 local helicopter operators indicate that hunters, kayak/raft parties, and fishers, along with DoC pest management operations, are the predominant user groups in the western valleys of MANP. Hunters fly along the tops and along the valley flats, making frequent low level runs and landings for animal recovery.

5. Discussions with trampers indicate that the principal route in the Waiatoto is to and from the Wilkin and East Matutkituki rivers via Rabbit Pass. To access the upper Waiatoto a high level alpine route is followed from the Pearson. The Pearson is well above the Bonar Flats landing site, and parties in the Pearson would not be aware of aircraft landings for river trips. Early kayak parties accessed the upper Waiatoto by tramping over Rabbit Pass and into the Pearson, and recently kayakers have portaged kayaks a small distance up the Pearson confluence from Bonar Flat. There is a physical limit to how far one can portage an object as awkward as a kayak or as heavy as a raft.

6. Kayakers and rafters, who equally value remote experiences, have no issues with the presence or use of air access by other user groups in the Waiatoto. The only reported sighting of another user group by kayakers comprising over 100 individuals over 5 trips between 2006-2008 were two fishers landing at the Te Naihi confluence on Waitangi Day 2007. Despite the helicopter landing on the opposite bank in calm weather, many of the kayak party were unaware that a helicopter had been and gone.

7. We are not aware of any current or pre-existing issues regarding aircraft noise in the upper Waiatoto valley floor level.

8. Kayak/raft parties occupy the river itself often well away from tracks. This is certainly true in the gorged sections. Some parties camp overnight on the mid-river islands at the top of Ferny Flat and Axius Flat. These are inaccessible to trampers, hunters and fishers. There is very limited opportunity for other users to even be aware of parties on the river.

9. The proposed limits on party size to a maximum of 7 persons originally proposed in the MANP review markedly increases the cost of air access per person and reduces safety margins. Cost is a barrier to recreation. A party of 4 will pay (2009) around $250 pp and a party of 16 will pay $150pp. There is always a 'positioning' cost which reduces per person costs the greater the party size.

10. Group safety. Club trip leaders and members on the three most recent trips on the Waiatoto report that they were grateful for the diversity and range of skills that these groups provided. Almost every kayak party will wish to include rafts and vice versa. There is safety in numbers - within limits - on river trips in remote areas, and importantly to our club, it enables those paddlers not quite confident enough to kayak Grade 3-4 remote rivers to experience such a journey. Portaging the major rapids in the event of flooding requires manpower and a sprinkling of truly expert kayakers for safety.

Casey's Creek Rapid in a rising NW rain event. In situations like this there is safety in numbers in combination with skills and experience.

11. The imposition of no landing Wilderness and Remote zones means that any future challenges in attempting first descents of the upper Waiatoto (and tributaries and the main stem of the Arawhata) are denied permanently. Kayakers have explored the upper Waiatoto, and one described it as "the Mt Everest of kayaking". The section from the glacial lake to Bonar Flat is

Grade 5-6 with medium volume and very high gradient. The setting is truly awe-inspiring. (video available)

12. Scenic flights will continue, and kayakers maintain that their landings will create far less intrusion and less impact on wilderness values than over-flights.

13. Helicopters are an 'enabler' for kayakers and rafters. In some cases the view of the river on the way in is an important safety step, scouting the river for logs and new slips. There is no temptation to skimp on carrying full safety equipment when you fly in.

14. In 21st Century New Zealand, none of us can spare the time and expense in planning expeditions where one camps out somewhere waiting for the right conditions. We now possess the means to watch the weather, and even the flow gauge, and get to a river in half a day, and run our trip over short breaks. No-one is going to spend a week carrying a raft or kayaks up any river in New Zealand, and then hope the weather holds for the two day trip back down.

15. The Waiatoto two day river trip represents a recreational opportunity that kayakers have valued and enjoyed for over 40 years, possibly longer. It is 118 years since Charles Douglas' first kayak/canoe voyage in the Waiatoto River. Kayakers have run the river from Labour Weekend to Easter.

16. The river is at its best when the glaciers are delivering meltwater to the glacial lake at the river's source. By Easter the freeze has started to set in and the river can become too low for navigation, certainly by rafts, and in some rapids, even for kayaks. Labour Weekend is similar. The Waiatoto when low (no rain or no melt water) is un-navigable by rafts. For trampers and other parties on foot, we should mention that the Waiatoto when flowing with glacial meltwater is a formidable obstacle to cross on foot. River parties, therefore, prefer the times when trampers might find the river a significant obstacle.

17. Realistically the Waiatoto River can only be run on longer breaks such as Labour Weekend, public holidays that extend a weekend, such as Otago (late March), Canterbury (mid November), Westland (early November), Nelson (early February), Waitangi Day, and the 2-3 week Christmas New Year holiday period. Travel times and weather dictate. For a reasonable access period we submit that the Friday immediately before Labour Weekend to the 31st March would be appropriate.

Conflict among User Groups

It is our contention that <u>there is no conflict</u> and therefore it <u>does not need to be managed</u>. There may be conflicts arising in the future, but we believe they can be managed should they arise. The Waiatoto River, in our opinion, can absorb significant numbers of responsible kayakers, rafters, hunters and trampers, without compromising the values of remoteness.

Each user group occupies a different niche in the back country environment.

- Kayakers/Rafters – are on the river, deep in inaccessible gorges and rapids, camping on islands and river banks. Are independent of tracks.
- Trampers - main valley tracks and flats, tributaries (e.g. Pearson), high level routes above gorges, saddles, ridges
- Hunters – flats, easier tributaries (e.g. Te Naihi), forest margins, on the tops and high ground in general, using helicopters for hunting and recovery
- Fishers – flats, open flattish water stretches, also the Te Naihi, usually fly in or jet boat in and out.

Even larger groups such as ours disappear into the vastness and are only visible when camping. We are invisible from the tracks, such as they are. On the river we are transients.

We support the absence of man-made structures such as huts and bridges. We are the most capable group in this regard, and we have the means to carry in – carry out without a second air flight and landing.

Kayakers would tend to avoid the Roar, purely on safety grounds, and because Easter is late in the season and it's colder. The landing sites mooted for hunting parties are really of no concern to us. We see no reason why all user groups should be confined to a single one-size-fits-all landing site. Hunters land all over the high ridges and hanging valleys and we would barely notice their presence if at all.

The Waiatoto Jet runs up to the bottom of Casey's Creek rapid, which is the last of the bigger rapids. There is potential for accidents when river parties run the Grade 2 rapids below Casey's Creek, but the sensible thing is for river parties to advise the tourist company of one's plans, and this common practice.

Wildlife

Kayakers report W*hio, Kereru* and *Karearea* in the section from Axius Flat down to Casey's Creek. *Kiwi* can be heard at night when camping at Axius Flat. *Whio* are wary, but generally do not attempt to fly away when rafts or kayaks float by.

Adventure and Challenge

The upper Waiatoto is in the proposed Wilderness Zone. The river above Bonar Flat has some of the most challenging whitewater in the world, and kayakers have scouted this section. The challenge remains. Experts believe the section will be paddled one day in the right conditions, by the right party.

The Waiatoto River above the Pearson confluence – very high gradient, medium volume and highly technical whitewater of Grade 5-6.

West Coast Rivers and Access

A number of West Coast rivers which have been paddled by kayakers have been affected by DoC decisions, and we have not been aware of any consultation with kayakers prior to reaching such decisions.

- Burke – in the MANP Wilderness zone
- Waipara – Olivine Wilderness Area
- Landsborough – the upper Landsborough used to be paddled, but is now in the Wilderness Zone.
- Karangarua – despite our submissions, access is now denied.
- Adams Wilderness Area – our submissions were acknowledged and we have access sites.

Upper Landsborough, Easter 1989.

This upper section of tight steep river is no longer accessible due the Wilderness zoning. This was a highly valued section which made the river a 'total' experience. Since the Wilderness zoning, river parties are forced to land below this section. The remaining accessible section of the Landsborough is less frequently paddled by kayakers despite growth in kayaking generally.

This example shows the differences between commercial rafting and amateur kayaking and rafting.

The section pictured above is unsuitable for commercial rafting, but is valued by amateur river parties.

Rivers in MANP affected by the proposed zoning

The descriptions referenced below have been in the public domain since the mid 1990s.

1. Burke River kayaking description

http://rivers.org.nz/nz/west-coast/burke/monument-to-haast-river

2. Waiatoto River kayaking description

http://rivers.org.nz/nz/west-coast/waiatoto/bonar-flats-to-waiatoto-bridge

3. Waipara River kayaking description

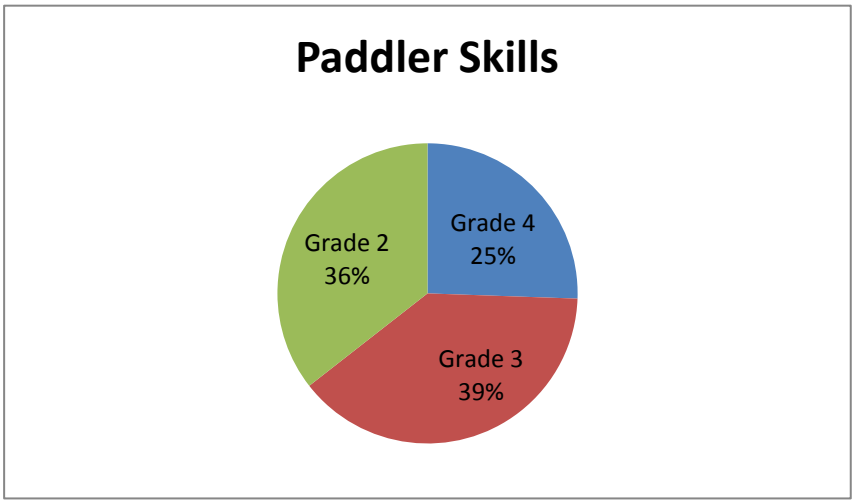
http://rivers.org.nz/nz/west-coast/waipara/source-lake-to-arawhata

The unpaddled section of the Waiatoto, and the previously paddled Burke and Waipara Rivers will be closed off to kayakers by the proposed zoning. Why? What basis is there for these decisions? Kayakers were not consulted in the drafting of the proposed zones. We submit that the Department had absolutely no knowledge of our use and therefore had insufficient grounds to deny the continuation of our existing and established use. The fact that no-one was evidently aware of our use speaks volumes about what possible impact could we have by continuing to access these rivers by air.

National Context

The Waiatoto in particular should be seen in a wider context. It is unique nationally, and it also forms part of a symphony of wild rivers on the West Coast. The largest whitewater kayak club in NZ, the Whitewater Canoe Club, which is typical of the whole diaspora of kayaking, comprises;

- 23% capable of paddling Grade 4 and above (Arahura, Whitcombe, N Branch Mokihinui)
- 45% capable of paddling up to Grade 3 (Hurunui, Matakitaki, Grey, Mokihinui Gorge)
- 32% capable of paddling up to Grade 2 (Arnold, Waiau, middle Matakitaki)



In practice this means that up to two thirds of active whitewater kayakers in our club are capable of paddling the Waiatoto in a reasonable sized party with raft support and a few expert leaders.

DoC understands that habitat protection is the fundamental strategy in protecting any species. Kayakers as a 'species' are threatened by their habitat destruction in the form of hydro schemes and irrigation diversions. It is compounded by DoC management actions that exclude kayakers from much of the shrinking habitat that remains. What is little appreciated is how very limited the opportunities for overnight kayaking trips are in New Zealand.

We have;

River	Challenge	Availability	Access	Constraints	Threats
Motu	Grade 2-4 Intermediate	First Wild and Scenic river (WCO)	Road top and bottom	None	New hydro proposals
Clarence	Grade 2-3		Road top,	Clarence management	Identified as potential

	Novice to intermediate		middle and bottom	plans have had good consultation between DoC and kayaking interests.	for hydro
Waiau (upper) Canterbury	Grade 1-4	Spring flows only Intermediate to Expert	Heli or portage	Vehicle access denied despite being a legal road.	Since transfer to the Crown, DoC management is TBA.
Karamea	Grade 3 -5	Either a 4-5 day or a one day trip	Heli	Cut by Tasman Wilderness Area, which denies air access for 2 and 3 day trips	
Mokihinui	Grade 2-5	One or two day options, with 2 day trip for experts only	Heli	None	Threatened with total destruction by hydro scheme.
Landsborough	Grade 2 -4	Can be paddled by intermediates, with expert support and portages in Hell's Gate gorge	Heli and fixed wing	Access to the Grade 4-5 narrow gorges above Kea Flat denied by Wilderness Area	
Waipara (trib. Arawhata)	*Grade 3-5*	*Air access only. Experts only*	*Heli*	*Completely denied due to Olivines Wilderness Area*	No longer feasible due to Wilderness zoning.
Waiatoto	Grade 1-4	Air access only. Upper section of Grade 5-6 remains virgin.	Heli and fixed wing	None at present.	Existing use threatened by new Remote and Wilderness Zones proposed in MANP plan.

Every river is either compromised, threatened, or both.

Wilderness and "Remote" zones.

Wilderness Areas and no-fly Remote zones cover 60-70% of MANP. Wilderness Areas impact 80% of the multi-day alpine kayaking trips in the National Park.

We agree that New Zealand needs wilderness and remote zones where man-made intrusions, peace and quiet need to be preserved. Any human presence in such places is an intrusion in itself. There is an assumption, however, that the only acceptable way to access and enjoy such areas is entirely on foot. Exploring the wildest rivers in New Zealand is a wilderness experience. Due to New Zealand being a long narrow island, we do not have many longer rivers. The Waikato, Motu, Mohaka, Karamea, Clarence, Buller, Waitaki, Clutha come to mind. Our three biggest and longest rivers are now almost entirely a series of hydro lakes. Of the next tier of shorter rivers (Tongariro, Waiau (Southland), the story is much the same. Only a few of our remaining longer rivers are navigable by intermediate (or 'average') paddlers, and of those not destroyed by dams or diversions, only two or perhaps three are unconstrained by regulation, management restrictions or outright bans.

We can all tend to be ambivalent about helicopters and the back country. It is OK to fly around taking pictures, hunt deer from a helicopter in flight, distribute 1080 carrots, but not OK to land. The actual physical impacts are minimal. It is less about what you are doing there and more about how you got there. Noise issues are often raised as a surrogate for some undefined sense of social disturbance.

We submit that the situation in the open valleys of South Westland areas of MANP is minor in scale and impact from that experienced say on the Bonar Glacier or Bevan Col.

There is a huge sense of achievement and satisfaction to be gained from overnighting on a self-supported river journey. There may be many remaining half-day and one day river journey opportunities in New Zealand, but very few overnight river journeys where there is the combination of remoteness, absence of man-made structures, absence of roads, with a physical challenge that is within the reach of the middle order of skill levels of paddlers. The opportunity for New Zealanders is shrinking. This picture is repeated overseas. Even late developing countries like Chile are seeing one beautiful wild river after another going under hydro lakes.

We agree that protection of our wild rivers is essential, but not to the point where we no longer are able to enjoy them.

"We must acknowledge that our environment is not just there to be protected - it is there to be enjoyed" – Prime Minister John Key, as quoted in the Press 15 May 2009.

The Press also said "Key said he did not want the country's national parks and reserves locked up from tourism"

The Waiatoto is the one of only two such opportunities remaining in New Zealand where the rapids are challenging, but not for 'experts only" and without portages. The other is the Motu, which has road access to its upper reaches. For the Waiatoto, the only practicable means is by air.

SUMMARY

1. That the MANP plan notes that kayakers and river runners have a highly valued existing use of the Waiatoto and other rivers of MANP, specifically the Burke, which is also in the proposed remote zone..

2. We request access as follows:

   a. Max party size 16. This is acceptable for safety and is economic for helicopter use.

   b. Max no flights on any single day = 5. This allows for 16 in the party, which might comprise a mix of kayaks and a few rafts. One of the flights will be to carry a sling load of gear. For a rafting party, this allows for combinations of 2-3 rafts and a safety kayaker or two.

c. Window of access = from the Friday immediately before Labour Weekend to March 31st. This avoids the Roar.

d. The map reference for the preferred river runners' Landing Site is towards the top of Bonar Flats on river True Left at approximately ref. NZMG E2173859 N5651895: Sheet F38 NZMS 260 Nov 2007. This site has relatively elevated terraces and should be safer in the event of a repeat of the massive flood event of 1978.

Hugh Canard

on behalf of the Whitewater Canoe Club Iinc)

Kerry Hoglund,

WWCC member and Makaawhi. Tangata whenua.