

## Your Comment on the Waitaha Hydro application

### 1. Contact Details.

**Organisation name:** West Coast *Tai Poutini* Conservation Board

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2. I can receive emails and the email address is correct.

### 3. Comments.

#### 9;7 Background;

Conservation Boards are established under section 6M of the Conservation Act (1987) and are independent statutory bodies that links local communities with the Department of Conservation (DOC). The primary role is to advise DOC and the New Zealand Conservation Authority (NZCA) on regional conservation strategies and conservation management plans with a focus on policy and, planning by regional conservation management strategies (CMS) over a period of 10 years or more. Members of the 15 national conservation boards are appointed by the Minister of Conservation based on expertise, experience and local community links.

#### 9;8 Role of Conservation Boards under the Fast Track legislation;

Under the Fast Track Approvals Act (2024; FTAA) the role of conservation boards is specifically defined as 'advisory' only. Additionally, the FTAA does not make provisions for public consultation. During the consultation period and at the time of writing of this application the West Coast *Tai Poutini* Conservation Board (WCTPCB) has not been approached by any community-based organisations or individuals and has had presentations relating to this application from Westpower. In considering this application the WCTPCB acknowledges the limitations of the Board members to assess and comment on significant areas of this application such as engineering requirements, detailed hydrology and construction due to the limited resources available to the WCTPCB.

#### 9;9 Overall comments relating to Westpower consultation process;

- i. The WCTPCB is satisfied that adequate consultation has taken place between NGOs, interested parties, local and regional authorities and landowners.

- ii. The WCTPB considers that the consultation processes undertaken with Poutini Ngai Tahu were substantive and that any concerns relating to cultural values and whenua were adequately addressed. There were no concerns relating to this process.
- iii. The WCTPCB notes that the area currently under FTAA consideration remains classified as Stewardship land following the Stewardship Land Review.
- iv. The WCTPCB supports the concept of increasing the resilience for electricity supply to the West Coast Region.
- v. Given the scale of the overall project the WCTPCB considers that compensation needs to be embedded within the operational activity and not considered within the resource consent process. This will permit alignment of specific activities and any statutory requirements.
- vi. The 'one-off' compensation for track and hut maintenance is inadequate and does not reflect the loss of long-term recreational opportunities. The proposed alternative financial compensation indicated in the Department of Conservation submission (Waitaha Hydro-DOC S51 Covering Report, Appendix F) is endorsed by the WCTPCB. Similarly, the current proposed "Certification" processes for both wildlife and activity on public conservation land is inadequate and must involve the Department of Conservation at all stages of the development and beyond (Appendix F).
- vii. In section 3.5.6 (Waitaha Hydro Scheme: Substantive Application of Listed Project) there are no maps to indicate modelling the areas that will have "Indigenous Vegetation Clearance". Table 5 provides the location and areas; however, computer generated maps indicating the modelled cleared areas would provide a clearer indication of the impact of vegetation clearance. Similarly, there are no maps indicating vegetation loss in: Appendices 20,27 or 35.
- viii. The WCTPCB notes that there have been fewer than 10 specific helicopter deliveries of white-water kayakers in the last 10 years and that alternative sites are available with better access. (Existing Environment section 5.5.3)
- ix. The WCTPCB supports the monitoring and mitigation of construction on the bat population, however it is noted that there is no reporting system for harm or deaths of bats (Assessment of Environmental Effects section 6.9.2 Effects on Bats During Operation). This should be addressed. Overall, the WCTPCB supports the recommendations provided in Appendix 21 terrestrial fauna report.
- x. Similarly in Assessment of Environmental Effects section 6.10.2, (Effects on Avifauna During Operation) there is no indication of a reporting system for harm or death. This is not considered in the Appendix 21 terrestrial fauna report.
- xi. The WCTPCB supports the recommendations provided in Appendix 22 Whio report, but notes that the feasibility of Whio being relocated

at an alternative site rather than attempts to manage 'at site' was not considered.

- xii. The WCTPCB supports the recommendations of the terrestrial invertebrates' report and notes that any impacts will be "less than minor" on terrestrial invertebrates.
- xiii. The WCTPCB supports the recommendations provided in Appendix 24 lizard report. In addition, although the use of DNA is considered, it is not recommended and the WCTPCB would support the use of DNA in providing information on the relocated lizard populations.
- xiv. The WCTPCB supports the recommendations provided in Appendix 25 Freshwater ecology report. There are concerns relating to the potential to spread didymo as indicated in section 2.11b Periphyton and bryophyte communities and Appendix D section 13 Periphyton - Nuisance didymo. The WCTPCB considers that if eDNA is being used the limitations of the technique should be stated e.g. the techniques indicates presence and not numbers, may have false positive and negatives, depending on the method used and may be influenced by sediment in freshwater amongst other limitations.
- xv. The Westpower Management Plans for the following Appendices are considered appropriate as currently presented:
  - Appendix 35 Vegetation management
  - Appendix 36 Avifauna management
  - Appendix 37 Bat management
  - Appendix 38 Lizard management
  - Appendix 39 Freshwater ecology
- xvi. The WCTPCB notes the Conditions indicated in the following Appendices:
  - Appendix 45 Proposed conditions resource consents
  - Appendix 46 Proposed conditions DOC consents
  - Appendix 47 Proposed conditions wildlife approvals
  - Appendix 48 Proposed conditions complex freshwater fisheries

The WCTPCB confirms that it has had the opportunity to read and consider all lodged documents.

**END**