SUBMISSION

Remarkables Ski Area Upgrade and Doolans Expansion (FTAA-2605-1236)

To: The Expert Panel, Fast-track Approvals Act 2024, c/o Environmental Protection Authority

Applicant: NZ Ski Limited

Submitter: Queenstown Mountain Guides Ltd (QMG)

Submitted by: Mike Madden, Owner and Chief Guide

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1. Position

Queenstown Mountain Guides (QMG) opposes the Doolans Basin expansion component of this application and asks the Panel to decline the approvals sought for it. The Doolans Basin is, on the applicant's own evidence, the most accessible high-quality backcountry ski area in the Southern Lakes. The proposal would permanently convert it into a lift-served ski area. The applicant's recreation expert accepts that this loss cannot be mitigated.

We do not oppose the upgrade of existing infrastructure within the current Rastus Burn ski area, and we consider the Panel can separate the two.

2. Who we are and our interest

QMG is a small, locally owned mountain guiding company based in Queenstown, which I have owned and operated for about 15 years. We are led by IFMGA-qualified mountain guides and are a DOC concession holder. Our work includes guided ski touring, avalanche skills courses, introductory ski touring and splitboarding courses, mountaineering courses and guided climbs in the Remarkables, as well as helicopter-accessed ski touring and guiding further afield in Mt Cook, Mt Aspiring and Fiordland.

The Doolans Basin is the foundation of our local winter programme. About 90 per cent of our winter guiding takes place in the Remarkables and Doolans area, and only about 10 per cent elsewhere. Our road-accessed ski touring days, our Avalanche Skills Course, our four-day backcountry avalanche course and our Intro to Ski Touring & Splitboarding Course all rely on the Doolans' combination of safe, varied terrain, reliable snow and short, affordable access. We run these between roughly late June and early October. A few hundred clients use the basin through QMG each year.

I was interviewed by the applicant's recreation consultants in 2025, and QMG's views are recorded in Appendix 1 of the Recreation Assessment. This submission builds on that record and responds to how the application has treated it.

3. The Doolans is an exceptional and unusually accessible resource

The applicant's Recreation Assessment (Rob Greenaway & Associates, May 2026, document B-07A) rates the existing recreation values of the Doolans Basin as 'very high'. It identifies ski

touring and splitboarding as the most prominent winter uses, with an estimated 20 to 50 users on a good day. The assessment and the interviews it records establish that:

- The basin is reached in roughly ten minutes from the top of the Curvey Basin chairlift, with no helicopter, long approach or lift pass needed to enjoy it.
- Its southerly aspects retain snow reliably, and its terrain suits everything from beginner instruction to avalanche courses and advanced touring.
- Interviewees, including a long-serving NZSki snow safety officer and several guiding operators, describe it as one of the best and easiest places in New Zealand to access backcountry skiing.
- QMG told the consultants it is the only high-quality, easily accessible backcountry ski area left in the Southern Lakes. Comparable options elsewhere (Pisa Range, the back of Treble Cone, Cardrona's Soho Basin, the Hector Mountains, Glenorchy) involve helicopters, lift passes, long approaches, steeper or more hazardous terrain, or greater cost.

As a company that also sells helicopter-accessed ski touring, we know first-hand how different those alternatives are in cost and in what they offer a client. Helicopter days serve a different, far smaller market. The Doolans is what makes affordable, road-accessed guided backcountry skiing and avalanche education possible in Queenstown.

Federated Mountain Clubs and the NZ Alpine Club told the applicant's consultants that the area is regionally irreplaceable, particularly as an introduction to ski touring for novices.

4. The applicant's own assessment concedes a very high or high adverse effect that cannot be mitigated

The Recreation Assessment rates the operational effect on backcountry winter ski sports as 'very high or high'. It describes a fundamental shift from a backcountry to a frontcountry experience, and states that there are no opportunities to mitigate that change. It also acknowledges few regional alternatives with comparable 'backcountry in the frontcountry' access.

We make four points on how this should be weighed.

- **The loss is of a type of activity, not just a place.** The new lift-accessed terrain is a different product. Ski tourers and guided clients seeking untracked snow, quiet and avalanche-education terrain will not find these qualities on groomed runs or beside lift infrastructure. Another guiding operator told the consultants that clean runs would be tracked out very quickly and that displaced users would be pushed into terrain that is unlikely to be of the same quality.
- **The 'moderate' rating for winter recreation opportunities understates the effect.** Infrastructure, boundaries and avalanche-control operations will constrain the 'anywhere, anytime' access that defines backcountry touring, a concern the assessment itself records. Hazard-driven closures near Helicopter Ridge are an obvious example.

- **The proposed mitigation does not address the loss.** A Recreation User Group, a staff liaison role and promotion of one-up passes may improve communication and cost of access to the ski area, but they do not replace the setting that is lost.
- **The effect is permanent and effectively irreversible** on public conservation land, and the assessment records stakeholder concern about stranded assets as climate change reduces snow reliability.

5. Significant adverse effects on QMG and other backcountry guiding businesses

The Recreation Assessment records that several guiding companies, including QMG and Wanaka Mountain Guides, report potential effects on their commercial activities from the loss of the remote backcountry experience and untracked snow. It also states that NZSki is "in conversation" with affected operators. Since the consultation interviews, NZSki has not, to our knowledge, offered QMG any assessment of, or commitment to address, the commercial effect on our business. We have not found any quantification of these effects in the application documents, any assessment of how many operators or jobs depend on the basin, or any compensation or conditions directed at guides.

For QMG the effect would be severe. With roughly 90 per cent of our winter guiding in the Remarkables and Doolans area, there is no like-for-like replacement for the Doolans within reach of Queenstown. Another operator interviewed for the assessment acknowledged that QMG is more dependent on the basin than he is. The alternatives we use (the Pisa Range, the back of Treble Cone, the Hector and Harris Mountains, Glenorchy) either require helicopters or long approaches, are further from Queenstown, or are less suitable for teaching and for beginner and intermediate clients. Moving clients to them would raise prices and cut the number of people who can afford to learn or enjoy backcountry skiing with a guide.

What we sell is the qualities the applicant's assessment says will be lost: remoteness, low encounter rates and untracked snow. Avalanche education in particular depends on a natural, uncontrolled, unmodified snowpack and terrain where clients can practise decision-making and travel techniques. We cannot teach that on a groomed, patrolled and avalanche-controlled lift-served slope, and our clients will not pay a guide to teach it beside lift infrastructure.

Our concern is not only the footprint of the new ski area. It is the combined effect of infrastructure, boundaries, avalanche-control operations and much higher encounter rates, which will remove the setting we operate in. We have also previously raised with the consultants that road tolls and access conditions impose costs on local guides and independent users. A larger ski area controlling access to the only practical entry point would add to this concern, and the proposed conditions do not give guides any security of access.

Other guiding companies, and a small number of operators who told the consultants they are only slightly affected, have access to alternatives and are less dependent on the basin than we are. That does not reduce the severity of the effect on those, like QMG, whose businesses are built around it. QMG holds a DOC concession to operate on this same public conservation land and has invested in staff, qualifications, equipment, client relationships and reputation in reliance on the area remaining available.

The Panel is entitled to a proper assessment of this effect before it weighs benefits against costs. The economic case in the application (document B-01), which we understand focuses on the benefits to the commercial ski industry and the tourism economy, appears not to account for these losses.

6. Backcountry skiing is part of what Queenstown offers its visitors

The application treats the Doolans Basin mainly as terrain that could host a ski area. That overlooks the role that guided and independent backcountry skiing already plays in Queenstown's visitor offer, and the fact that many visitors do not want a ski-field experience.

Destination Queenstown actively promotes backcountry skiing as part of the region's identity. Its website describes endless backcountry options around Queenstown that make it a prime destination for ski tourers and splitboarders. It features a guided Remarkables backcountry tour with QMG that begins with a skinning ascent above the ski field. Another article describes touring routes that take experienced skiers from the topmost lifts into the backcountry to find untouched powder runs. A third directs readers to locally operating guiding companies for backcountry touring, mountaineering and avalanche courses. NZSki's own Remarkables website also has a dedicated touring and backcountry page.

These are not minor or incidental promotions. They show that the region's tourism body treats backcountry skiing as a distinct product for visitors who want something different from lift-served skiing: quiet, untracked snow, new skills and time in a natural alpine setting. Destination Queenstown's own guidance notes that touring is not for people learning to ski and recommends that those new to the backcountry book a local guide. That is exactly the market QMG and other operators serve, and it depends on safe, accessible and unmodified terrain close to Queenstown.

The Doolans Basin is where that offer is most accessible. It is reachable on a day trip from the town, without a helicopter, and suits clients from first-time tourers to experienced skiers. QMG's one-day Intro to Ski Touring & Splitboarding Course, for example, starts from NZ$325, a price that makes it a realistic addition to a holiday for visitors who would never book a helicopter or multi-day expedition.

We acknowledge that the Recreation Assessment records Destination Queenstown as supporting the expansion and expecting it to complement existing options. We respectfully disagree that the two can coexist in the same place. The assessment's own conclusion is that the Doolans would change from a backcountry to a frontcountry setting, and that this cannot be mitigated. Once that happens, the area stops being a backcountry product. Visitors who want a ski-field experience already have four ski areas within a short drive of Queenstown. Visitors who want a backcountry experience will have lost the most accessible place to have one.

Queenstown's appeal as a destination rests on the breadth of what it offers. Removing its most accessible backcountry skiing area would narrow that offer, and would reduce the region's ability to attract and keep the visitors who seek those experiences instead of a ski area.

Please see the following articles from Destination Queenstown promoting backcountry skiing -

https://www.queenstownnz.co.nz/stories/post/mike-madden-gives-us-the-lowdown-on-backcountry-skiing-in-queenstown/

https://www.queenstownnz.co.nz/stories/post/how-to-prepare-for-an-epic-backcountry-skiing-experience-in-queenstown/

https://www.queenstownnz.co.nz/stories/post/8-reasons-why-queenstown-is-the-ultimate-winter-holiday-destination/

7. The planning framework does not support the Doolans component

Without suggesting that the Panel is bound by them in the way a consent authority would be, the following instruments and the applicant's own analysis of them are relevant to the weighing exercise under the Fast-track Approvals Act 2024:

- **Otago Conservation Management Strategy.** The Doolans lies in a backcountry visitor management zone. Policy 2.3.21 requires particular regard to effects on natural character where structures are currently absent, on natural quiet and on current recreational uses. Policy 2.3.22 permits Remarkables expansion only if adverse effects on the recreational experiences of other users are avoided, remedied or mitigated. The applicant's own expert says the effect on backcountry experience cannot be mitigated. Policy 3.25.1 prefers further development where natural values are already modified, which the Doolans is not.
- **Precaution on climate.** Policy 3.25.2 requires a precautionary approach to new ski-field structures having regard to the likely longevity of the field in the face of climate change and removal and remediation costs. We ask the Panel to scrutinise carefully whether a bond or equivalent security for removal is proposed and adequate.
- **Central Otago District Plan.** The Doolans forms part of an outstanding landscape of national importance, with the upper valley described as unmodified. Policy 4.4.14 seeks to avoid, remedy or mitigate adverse effects on backcountry amenity values, including natural quiet and natural character.

Taken together, these provisions indicate that this is exactly the kind of location where development should be avoided, not enabled. We acknowledge the Remarkables ski area is regionally significant infrastructure under the Proposed Otago Regional Policy Statement, but that status concerns existing infrastructure and does not remove the need to weigh effects on the values of the new location.

8. Weighing costs and benefits

We understand the Panel must consider the project's regional or national benefits against its adverse impacts, and may decline an approval where adverse impacts are out of proportion to those benefits (section 85, Fast-track Approvals Act 2024). In our submission:

- The adverse effect on backcountry recreation is rated at the top of the applicant's own scale, is unmitigable, is permanent, and falls on a resource the applicant's evidence describes as unique in the region.

- The claimed benefits are real but are largely benefits to a commercial operator and the tourism economy. Much of the climate-resilience and capacity rationale could be pursued through the upgrades within the existing ski area, without sacrificing the basin.
- The commercial losses to guiding operators and other concession holders are unquantified, so the balance cannot be properly struck on the present record.
- Public conservation land is held for all New Zealanders. Converting a free, low-impact and accessible backcountry area into a ticketed ski area transfers a public recreational resource to private commercial use.

9. Relief sought

Primary relief: That the Panel decline the approvals for the Doolans Basin expansion (including the Doolans gondola, mid-station, day lodge, trails, water intake and associated works), while considering the Rastus Burn upgrades separately on their merits.

Alternative relief: If the Panel is minded to grant approval for the Doolans component, we ask that it be subject to conditions, at a minimum:

- Binding commitments to concession holders for the term of any approval: no new fees or charges on guided groups for backcountry access beyond those that apply to non-concessionaire users, and continued access to the road and to the top car parks for guides and clients at no more than a reasonable, published, non-discriminatory rate.
- A comprehensive, independent assessment of the economic effects on commercial guiding operators using the Doolans Basin before any construction begins, with a mechanism for compensation or other relief for demonstrated loss.
- Guaranteed free or very low-cost public access (including to the access road and car parks) for backcountry users and concession holders, with a one-up pass priced at a small fraction of a day pass.
- Binding commitments that Upper Wye Creek remains free of structures and ski-area operations, and that boundaries and avalanche-control closures are kept to the minimum necessary for safety and are publicly notified.
- Retention of designated, unobstructed ski-touring corridors and access lines into and across the basin, developed with the recreation community and commercial operators.
- A financial bond or equivalent security sufficient to fund full removal and rehabilitation of infrastructure should the field become unviable, at no cost to the public.
- Binding terms of reference for the proposed Recreation User Group, including genuine representation for commercial guiding operators and monitoring of effects on backcountry use.

Thank you for considering this submission.

Mike Madden

Owner and Chief Guide, Queenstown Mountain Guides