

Crown Pastoral Land Other Crown Land

Lease name: MT IDA

Lease number: 00 090

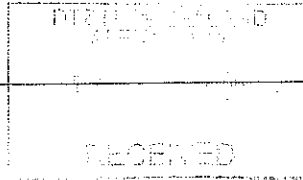
Public Submissions - Part 1

These submissions were received as a result of the public advertising of the Preliminary Proposal.

July

07

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Ken Taylor

From: Brian Patrick [bpatrick@xtra.co.nz]
Sent: Wednesday, 13 September 2006 9:29 p.m.
To: Alexandra
Subject: Mt Ida Syndicate Draft Review

Dear DTZ Alexandra

Thank you for the opportunity to comment on the Mt Ida Syndicate Review of other Crown Land.

I am familiar with this tract of high altitude, largely natural land. I have researched the natural values of this area particularly the insects and insect-plant relationships.

I fully support the proposal to designate this land in its entirety as land to be retained in full Crown ownership and control as a conservation area.

This high alpine plateau is significant for its native vegetation particularly the magnificent *Chionochloa macra* grasslands with their herbfields and rich high altitude native insect communities. Wetlands, shrublands and scree communities also support important plant and insect species that continue to yield new undescribed species. For example recent research has shown that the scree black butterfly (*Percnodaimon* species) so common here, is in fact two undescribed species – one species emerging early in the season and overlapping with a larger later emerging species. Many more insect and plant species from here surely await such scrutiny to elucidate their status.

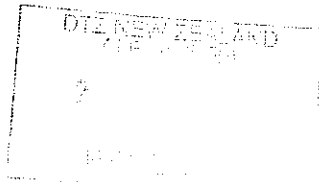
I support appropriate compensation to the licencees and thank them for their stewardship over the years, and appreciate the connection the families must have built up for this tract of land over the years. But I hope they can feel that they are not losing that close connection – simply sharing it with all New Zealanders now.

Cheers
Brian

Brian H Patrick
23b Kenmare St
Alexandra 9320
Otago
New Zealand
Phone 03 4485075
Mobile 027 2354444

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13/09/2006



PJ Smythe
33 Ngapuhi Rd
Remuera
AUCKLAND 1050

20 September 2006

Commissioner of Crown Lands
C/- DTZ NZ Ltd
Land Resources Division
PO Box 27
ALEXANDRA 9340

Dear Sir,

**Mt Ida Syndicate Review, Part Run 362B and Run 362C
Submission in Support of the Syndicate's Continued Use**

I am familiar with the area currently under review, and have visited it on several occasions.

From what I have seen and understand, the current Licensees have managed this area of Crown Land in an ecologically sustainable way for 100 years, in the form of summer grazing. Who better to manage the area than local farmers who are close at hand, understand the land and who have a vested interest in it. Their livelihood depends on their management skills, whether up on the Syndicate Block or down on the lowlands. The extent of their success is evident from their years of continued occupation, in both areas.

Had the Runs been mismanaged or overgrazed, the affects would have been evident before now, and both sheep and vegetation would have suffered. The condition of the sheep seen coming off the blocks each Autumn is about the best to be seen, as though they have been on holiday and taking tonic. Clearly, the vegetation in this area improves their health and well-being. And the vegetation, like a good lawn, probably does well after a bit of a nibble.

There is no indication to me that controlled grazing would be unsustainable, given the current management regime. To the contrary, should grazing be discontinued in the future, weed control and the like may become an expensive issue.

Where is the sense in changing an arrangement that has worked for the benefit of so many for so long?

The consequences of grazing rights being revoked will severely affect those farmers and their families who depend on summer grazing for their livelihood. The affect would roll on down through the whole community. Further, farmers pay local body rates, DoC does not. Every area DoC takes over increases the rates burden on the community.

At the present time, the Licensees take care of the maintenance of the tracks and fences in the area for free, and the Crown gets a return from the rental of the land. What is the point of the Crown taking over full ownership and its maintenance and losing the income from the rental at the same time? Who needs Land Tenure Review if this should be the outcome - not the taxpayer, and certainly not the farmer?

I have enjoyed the freedom of, and access to the area over a number of years, which I have grown to love and enjoy. Its altitude, vistas and isolation form a very special part of the country and our national heritage. It must be preserved and maintained for all to enjoy, now and in the future, in its natural state. Should the Crown take full ownership of the area, what guarantee will there be for continued free access to individuals such as me?

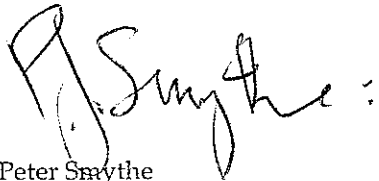
Truth and transparency is required in this matter.

The land tenure review should be stopped, pending the release of the review by the Parliament Commissioner for the Environment.

The Crown 'controls' too much of our high country and then allows an anti conservation deal to go ahead such as on Richmond Station, Lake Tekapo.

I would be pleased to answer any questions that may arise from this submission.

Yours Faithfully

A handwritten signature in black ink that reads "P. Smythe". The signature is written in a cursive, flowing style.

Peter Smythe

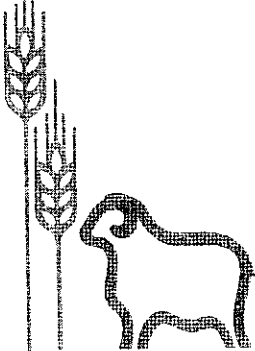
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24th September 2006

The Manager,
 DTZ New Zealand Limited,
 Land Resources Division,
 PO Box 27,
 Alexandra

Dear Sir / Madame,

Mt Ida Syndicate, Review of Other Crown Land : Notice of Preliminary Proposal

Please find attached a submission made with reference to the DTZ's preliminary proposal following a review of the Mt Ida Syndicate land.

In summary, it is clear that there is no compelling reason to designate the land, to which the Mt Ida Syndicate has access under a Pastoral Occupation Licence, as a conservation area to be managed by the Department of Conservation.

Mr Taylor's own assessment (for DTZ) notes that the flora in the area is improved in comparison with 20 years ago, and there is no information presented that a regime of continued intermittent grazing would cause effects which will change that situation. Further the DOC report (2002) provides no information that there are any fauna in the area which are adversely affected by the present grazing regime.

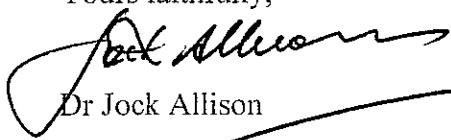
Information is presented that suggests that the transfer of the land to DOC, and shutting up of the land (without any grazing allowed) will eventually cause marked deterioration of the flora in the area as there is an ingress of weeds, particularly Hieracium lepidulum.

I suggest that either

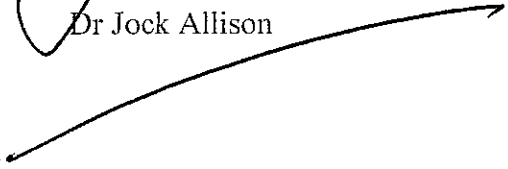
1. The land be re-designated as Pastoral Lease in favour of the members of the Mt Ida syndicate, as is the situation with other like areas in the immediate vicinity, or
2. That the present POL administration of the area is continued as it has for a very long time.

Thankyou for your consideration.

Yours faithfully,

A handwritten signature in cursive script that reads "Jock Allison". The signature is written in black ink and is positioned above the printed name.

Dr Jock Allison

A long, thin, curved line drawn in black ink, starting from the left side of the page and extending towards the right, positioned below the printed name.

SUBMISSION : Re the MT IDA SYNDICATE REVIEW OF OTHER CROWN LAND : NOTICE OF PRELIMINARY PROPOSAL

July 2006 LAND INFORMATION NEW ZEALAND

Dr Jock Allison, Dunedin : September 2006

Summary

The Mt Ida Syndicate : Review of the Preliminary Proposal and various reports on the Mt Ida Syndicate (MIS) Pastoral Occupation Licence land area have been reviewed. No compelling evidence is presented to show deterioration of either the flora or fauna, and therefore to support the change in classification of the MIS area to a Conservation Area under the management of the Department of Conservation (DOC). In fact it is concluded that such designation will allow a marked deterioration of the area flora due to an invasion of Hieracium species. The proposed re-designation of the MIS area, appears not to follow DOC policy of minimising the adverse effects of management activities or the logical conclusion from assessment of various factors as required under Part 3, of the 1998 Crown Pastoral Land Act. We suggest that the concept of "ecologically sustainable management" the main justification plank of DOC's aspirations for assuming control of large tracts of tussock grasslands, is in fact far from that. Also it is concluded also that the proposed changes may have a negative effect on the access to the area for the general public, again outside the intent of the 1998 CPL Act.

General Description of the Proposal :

8,401 ha (approximately) to be designated as land to be retained in full Crown ownership and control as a conservation area pursuant to Section 86(5)(a)(i) Crown Pastoral Land Act 1998.

It is assumed for the purposes of this submission that this means that the Syndicate members will no longer have access to the area for the grazing of sheep as has been allowed since 1860 and the management of the land will be assumed by the Department of Conservation (DOC). This in effect means that the area will be "shut up" with all domestic livestock excluded at all times, with some (often minimal) access for the public.

The Review :

When undertaking a review of other Crown Land account must be taken the objects of Part 3 of the CPL Act 1998. The objects of Part 3 will be considered in turn with regard to the Mt Ida Syndicate's (MIS) stewardship of the land during their intermittent occupation under a Pasture Occupation Licence (POL).

The submission will advance the thesis that this area of land will be better managed under the status quo (ie. intermittent grazing under a POL or like administrative arrangement) according to effects on conservation values that it otherwise might be under the auspices

of DOC management without grazing. It is recognised that this area of land is seen by DOC as a key part of the proposed Oteake Conservation Park (DOC, 2002).

Objects of Part 3 of the CPL Act :

- a) *Promote the management of the Crown land in a way that it is ecologically sustainable, and...*
- b) *to enable the protection of significant inherent values of Crown land; and*
- c) *subject to paragraphs (a) and (b), to make easier*
 - i) *the securing of public access to and enjoyment of Crown land, and*
 - ii) *the freehold disposal of Crown land capable of economic use*

Part 3 Object (a) Manage in a way that is ecologically sustainable :

The preliminary proposal notes that ecologically sustainable is not defined in the CPL Act 1998, but ventures the definition "*ensuring (as far as possible) that the land can be managed in a way that enables ecosystems to be maintained or enhanced*".

It is clear that the activities of the Mt Ida Syndicate have not been detrimental to the ecology in the area of their POL. This is evidenced in a number of ways

- a) The review of the Mt Ida Syndicate (The DTZ review, about which this submission is made) states "*the area has a long history of grazing and observations over a period of 20 years indicate to me (me = Mr Ken Taylor of DTZ NZ the administrative person who has by far the longest and most comprehensive experience with the MIS land) that grazing has continued in a manner which is more or less ecologically sustainable. As evidencedetc.*"
- b) Mr Taylor confirmed at a meeting of the MIS (Alexandra, 19th March 2004) *that reporting over the last 20 years had shown a steady improvement of the land*"
- c) Further in the DTZ, July 06 review Mr Taylor states "*there is no indication that continued grazing would be unsustainable*"
- d) Further Mr Taylor notes "*Under this designation (management by DOC as a reserve or conservation area) the Department would be responsible for the managing the land and the presumption would be that some forms of ecological disturbance (such as grazing by domestic stock, burning, oversowing / topdressing) would decline. In the absence of these disturbances it is expected that the tussock and shrubland eco-systems that currently exist within the area would be sustained*".

This comment has little relevance and in fact is inaccurate because

- i) the MIS have never undertaken any topdressing and oversowing, and have no intention to undertake any future burning, and or fencing,
- ii) there is good evidence that the cessation of grazing in high country will result in an increase in the density of upright forms of Hieracium (*H praealtum* and *H lepidulum*) which are particularly detrimental to the plant ecosystem. (Espie, 2001, 2005, Mead, 2005, Mead & Elstob, 2005). Grazing dramatically reduces the density (Mead 2005) and flowering (Mead & Elstob 2005) of *H lepidulum*. Further Espie (2005) concludes "*Strategic grazing is an important tool for limiting the upright Hieracium species and could possibly assist in managing conservation values*". The photographic evidence, and recorded data from these observations over a considerable period are convincing indeed.

Thus the assumption (from DOC) that tussock and shrubland ecosystems will be maintained (or enhanced) does not seem to be valid.

- iii) Mead (2005) states "*In summary, our survey found that *H lepidulum* cover in native and developed grasslands that are effectively grazed was 0 – 10%. In lightly grazed grasslands, which almost certainly include grasslands of almost nil grazing, it is 25 - 70%. In ungrazed and feral grazed grasslands, it is 40 -100%.*

*We have a major threat to our landscapes by *H lepidulum*. There are large areas that are changing from a very diverse plant system to a monoculture of *H lepidulum* with a high proportion of bare ground. The removal of grazing will be an open invitation to this weed to take over ever increasing areas of our landscape"*

Of particular interest is photographic information presented of the situation in The Rob Roy valley in the Aspiring National Park (Mead 2005). *H lepidulum* was not noticeable in the 1960s, was getting quite bad in the 1980s, now the plant dominates significant areas (see Appendix I).. Under grazing (even intermittent grazing) this plant will be seen only in small numbers.

Appendix I includes some of the data presented at the High Country Landscape & Management Forum held in 2005 which show the increase in *H lepidulum* after grazing is ceased. Clearly the most recent scientific evidence indicates it is likely that shutting up areas such as the MIS land will have detrimental consequences for the biodiversity of the area, a result in direct contrast to the DOC intentions.

- e) Following a visit of 23 people in May 2002, one of the visitors Mr M J Moynihan of North Otago wrote "*great improvement in ground cover from when I mustered here 35 years ago*"

- f) The DOC review (2002) states *"in the high country most threats to the existing character would come from further farming intensification leading to additional fencelines / firebreaks, spread of weed species and traditional farming practices such as controlled burn-offs"*

It is noted that the MIS have no intention of "further farming intensification", or adding further fencelines, and the last burn-off was several decades ago, and only about 10% was burnt. There is no intention for additional burning!

- g) It is suggested that if grazing is eliminated from the MIS area, that over time there would be a substantial build up of tussock and other growth, increasing the fuel for potential fires, certainly increasing the fire risk.
- h) In the DOC review 2002 concerning the MIS land area, there is considerable discussion about the suitable habitat for scree skinks. However three separate surveys defined in the report (1998, 2000 and 2001) failed to find any scree skinks at all and the DOC review states *"there is no sensible biological or geological reason to expect scree skinks not to reside on the Mt Ida POL"*. With the greatest of respect this comment seems to be illustrative of valuing the physical habitat as "might be suitable" for a species which can not be found. This is not a sustainable argument for retention of the area as a reserve and elimination of the practice of grazing sheep for three months of the year.

Further it is suggested that grazing sheep would spend little if any time at all on scree slopes which have little or no vegetation, and therefore could not be expected to be any threat to the skinks in the habitat, in the unlikely event that any do occur in the area, or travel into the area.

- i) The DOC report (2002) concludes *"the entire area is an excellent example of a peneplain remnant representative of the Hawkdun Ecological District" and "The area as a whole has a high degree of representativeness and naturalness, with good long term viability"* This assessment does not seem to indicate the requirement to change the present management to a *modus operandi* where an ingress of Hieracium could be the expected result over time, and also the build up of a dry matter load substantially increasing the fire risk.

Part 3, Object (b) Protection of Significant Inherent Values (SIVs) :

According to the DTZ review, July 2006, this specification is to be given equal weight to the promotion of ecologically sustainable management (above). SIVs are defined in the CPL Act to mean *"inherent values of such importance so as to deserve the protection of management under the Reserves Act or the Conservation Act. As noted in the opening paragraph (of the section of the report) the underlying assumption is that the land is in full Crown ownership and control and that retention of the land in Crown ownership as a conservation area or reserve will best protect SIVs because it will enable them to be managed under the Conservation Act or the Reserves Act"*.

The SIVs identified in the MIS review undertaken by DTZ are ...

- a) the extensive plateau tussock grasslands,

- b) the diverse and representative fauna, and
- c) the high value of the "remote experience" for recreational users

The Review states "*the significance of the inherent values has however led to the designation recommended in this report (ie. designation as a conservation area)*", the report continues

"Grazing may need to be considered as a grazing option in the future"

The Significant Inherent Values :

- a) **the extensive plateau tussock grasslands** : The DTZ study notes that this landscape is intact, and the tussock grassland is the dominant feature of the vegetation. The DOC assessment (2002) notes "*the impact of grazing overall has been low, but heavy stock concentrations have had a significant detrimental impact in three areas. These are the margins of the fell field and Chionochloa macra grassland at the highest altitude, Oreobolus bogs and their immediate tussock margins, and the eastern hill slopes above the Otematata river.*"

"Further grazing at current levels will exacerbate problems at these sites and, over time, contribute to incremental degradation at other sites"

I suggest that this latter comment is opinion only and is not supported by inspections over time (see Ken Taylor's comments of improvement of vegetation over the last 20 years, recorded above in the record of a meeting with the MIS syndicate in 2004) and scientific observations noted above. Also it is suggested that the negative effects of grazing noted in the DOC report are minor indeed in relation to the overall improvement of the ground cover over the past few decades, and the substantial negative effects that can be almost guaranteed if grazing is discontinued (discussed in a) above "Manage in a Sustainable Way").

In fact the evidence outlined in the 2005 High Country Landscape Management Forum suggests that the concept of "ecologically sustainable management" which is the basic plank for all of DOC policy to assume control of very large areas of tussock grassland is not possible with a shut up (the land) and leave approach.

- b) **The diverse and representative fauna** : The DTZ Review notes that "*the MIS area is part of an extensive home range of the NZ Falcon, a Category B threatened species. A further Category B threatened species has previously been identified in the area namely the scree skink.*"

As noted above under a) Manage in a Way that is Ecologically Sustainable, a number of consecutive surveys have failed to find the scree skink. There are significant areas of potentially suitable habitat for the skink, if it were to arrive, and with the lack of vegetation on most of the scree, the interest of these areas to grazing sheep must be minimal. Taylor in the Review further notes "*It is expected that further survey work would reveal further populations*". This

comment made in the face of the documented information in the DOC (2002) report where three separate surveys undertaken in 1999, 2000 and 2001 makes the use of the descriptor "further" in the review as very hopeful indeed.

We conclude that there is plenty of available habitat for scree skinks not threatened by sheep grazing, in the event that the specie was to arrive and build up in the area. The population estimate from the three surveys (nil) makes the possibility remote indeed.

No information is available that would suggest that the continuation of grazing of the MIS area would have a detrimental effect on the NZ Falcon, or of any other of the identified fauna. DOC's review indicates good populations of two species of lizard, and no suggestion was made that grazing of sheep had any effect on these at all.

DOC's review also notes problem animals, pigs and deer. These animals move freely around the high country, and have no relationship to whether a particular area of land is grazed or not. Further they are completely outside the control of the grazing occupiers.

- c) **The high value of the remote experience, for recreational users :** There is no argument that the MIS area is of particularly high value for recreational users. This is recognised by the MIS members who make considerable efforts to encourage groups to visit the area, and on many occasions accompany them to the area and provide interesting commentary as to the history of the MIS and features of the landform and vegetation.

It is suggested that the services provided by MIS members are likely to be as comprehensive, and or, more comprehensive than DOC could offer in the event that they assumed management control of the land area.

Mr Taylor notes in his **Review of Other Crown Land: Consultation with the Mt Ida Syndicate holders in preparation of a Preliminary Proposal 4th March 2003**,

"the information provided does suggest that the grazing of this run has been ecologically sustainable". Further it is stated

"the protection of significant inherent values is not necessarily incompatible with some ongoing grazing. Thirdly that public access and the enjoyment of the land is not necessarily incompatible with ongoing grazing"

Thus it is concluded that there are no clearly documented factors which can logically be defined that indicate that continued grazing of the MIS area by sheep under the terms of their present POL has any detrimental indications for the protection of SIVs.

Part 3, Object (c) subject to paragraphs (a) and (b) to make easier ...

- (i) **the securing of public access to and enjoyment of the Crown land, and**
- (ii) **the freehold disposal of Crown land capable of economic use**

Comment has already been made re the securing of public access, above. It is difficult to see how this requirement could be more effectively promulgated than under the present arrangements with the MIS having a POL. Mr Taylor's DTZ review of July 2006 notes

"The securing of public access to and enjoyment of Crown land is likely to be an outcome of retaining such land in full Crown ownership and control. This may however be subject to some restrictions particularly in relation to access by motor vehicle or horse."

*"The current vehicle access **enjoyed by the public** has been the outcome of maintenance of the track infrastructure by the licensees. With uncertain tenure maintenance has been reduced in recent years leading to a marked deterioration in the standard of the tracks. Continued vehicle access will require substantial ongoing cost for maintenance"*

Firstly it is noted, that the MIS have upgraded the road recently. Secondly it is very clear that access to the MIS area has been readily available to those who wish to make the trip. The comment Mr Taylor makes about the track into the area should be considered in the light of a complimentary comments made in writing by the Secretary of the Southern Trail Blazers club from Gore after their April 05 visit. Thirdly, I suggest that if there is some restriction on access to the MIS area by motor vehicle or horse (see Mr Taylor's comments above) then this would result in many fewer of the public being able to visit.

Further Ken Taylor has stated (meeting with the MIS members 19th March 2004, that there is no record of the Syndicate having been bad tenants, or having refused access to any member of the public. He has also commented that various recreational groups have no problem with the continued grazing of the MIS area in the future.

With regard to the freehold disposal of the land for economic use, this is the preferred option for the MIS members. It does not however seem to be a compatible scenario for the Crown. However it is clear that the continuation of the grazing of sheep under the terms of a POL, and or (preferably) the granting of a Pastoral Lease Tenure over the area, will provide an environment where all interests can be amicably accommodated while maintaining the significant inherent values of the run and sustainability for all. These SIVs will not be maintained in the absence of intermittent grazing.

Cultural Significance and Economic Effects of Cessation of Grazing :

I have already commented on the apparent folly of cessation of grazing re the increase in Hieracium lepidulum as experienced in other high country areas. However there should be mention of the significance of the MIS area to the district and the economic effects on the families involved.

The initiation of the grazing of the MIS area was in 1860, and there have been various changes in the lease or licence conditions from that time until the present day. The main

pioneer families represented are still the mainstays of the MIS members to this day. There has been detailed documentation of this in a number of submissions, but this aspect has been deemed dismissively by DOC (2002 assessment) as *"there is nothing here which is of sufficient significance to merit any further action"*. The most liberal interpretation of such a statement in isolation would be that there is no need to consider any change in the future. However this clearly is not the DOC's intent, and in fact they have dismissed as unimportant the reliance of families over the last 140+ years on the use of this grazing land.

The economic effects of cessation of grazing on the MIS area are substantial. The climate in this part of Central Otago is very summer dry, and at present stocking rates on MIS member's farms, substantial numbers of animals have to be grazed elsewhere to allow the fattening of lambs and the build up of weight in the ewe flock to ensure sufficient lambing percentages for the next year. Cessation of the POL really has an economic effect of about negative \$200,000 on the farms of the syndicate members. Further it will render some properties uneconomic as entities (detailed submissions are in DTZ's files).

In outlining DOC's Internal Landscape Policy at the 2005 High Country Landscape Management Forum, Mr Jeff Connell the Conservator for DOC's Otago region stated ..

"Until recently we didn't actually have a policy on landscape. We've now got a general policy that says

Conservation management strategies and plans should identify landscapes, land-forms, and geological features of international, national and regional significance or of significance to tangata whenua.... Activities which reduce the intrinsic values of the landscape, landform and geological features on public lands and waters should be located and managed so that their adverse effects are minimised"

"So we will engage with communities in the process of developing our conservation management strategies in identifying those significant landscapes. When it comes to landscape management on conservation land, our policy is to avoid or minimise the adverse landscape effects of management activities, as you would expect."

Suffice to say that I am in agreement with those policies and sentiments re engaging with communities. What seems clear re the DTZ review of the MIS area, is that all of the criteria under Part 3 of the Crown Pastoral Land Act 1998 are met under the present management arrangement, and they could also be met if the POL was changed to a Pastoral Lease.

In the 2006 review undertaken by Mr Taylor of DTZ he concludes that grazing has had no detrimental effects on the MIS area, from the point of view of sustainable land use, and protection of significant inherent values. Yet in his final conclusion he follows the advice proffered by DOC, that the land should be designated a conservation area. This conclusion is a complete switch of logic, and indicates that DTZ is merely an extension of that department, and in their required review they do not come to the logical conclusion from their detailed assessment under the required headings under Part 3 of the CPL Act 1998.

Further the DOC policy elucidated by Mr ~~Connell~~ the Otago Conservator has not been followed in that there has been little engagement with the community. **Engagement with**

the Community becomes more difficult when it is necessary for that community to use the Official Information Act to gain access to the DOC report of their assessment of the MIS area! We suggest that this situation fails to show any real intention to engage with the community in an open way. The recommendation of the DTZ review that the MIS area should be designated a conservation area under the management of DOC, that has been made actually fails to identify the main future threat to the landscape, the ingress of Hieracium sp. and the way to address that, ie. to continue to allow intermittent grazing. Clearly the recommendation of the DTZ report to designate the MIS grazing area as a conservation area does not follow the DOC policy as recorded from Mr Rodda's public exposition, ie. *"minimise the adverse landscape effects of management"*.

It is clear that the proposed result of the DTZ July 2006 Review, ie. to designate the MIS area as a conservation area, under the management control of DOC, is diametrically opposed to DOC's expressed wishes for the landscape.

CONCLUSION :

The question must be asked

"Is the assumption of the management of the MIS area by DOC in the future, with no grazing by sheep allowed, the most sensible future scenario?" when...

- i) it is most likely that there will be a marked deterioration of the flora valuable flora over time,**
- ii) under limited and intermittent grazing there has been a marked improvement in the flora over the past 20 years,**
- iii) under the present arrangements of the MIS POL, public access is very well catered for, and this is recognised and supported by recreational groups,**
- iv) no information is available to suggest that there are any detrimental effects of sheep grazing on the fauna,**
- v) cessation of grazing will have significant economic impacts on the syndicate members,**
- vi) there will be the end of an era, in the area history when there seems to be no coherent reason for the change.**

The answer to the question seems to be a resounding NO. No information has been presented by the proponents that there is any logic for a change to the designation of the MIS area to a conservation area under the management of DOC.

References :

DOC., (2002), Department of Conservation, Conservation Resources Report on Mt Ida Syndicate Pastoral Occupation Licence. **(obtained under the Official Information Act).**

Espie, P., (2001) Hieracium in New Zealand. AgResearch.

Espie, P., (2005) Landscapes in Transition. Proceedings, High Country Landscape Management Forum, September 2005, p 55-59. Otago Regional Council.

Mead, G., (2005) Farming in the wetter country. Proceedings, High Country Landscape Management Forum, September 2005, p 73-75. Otago Regional Council.

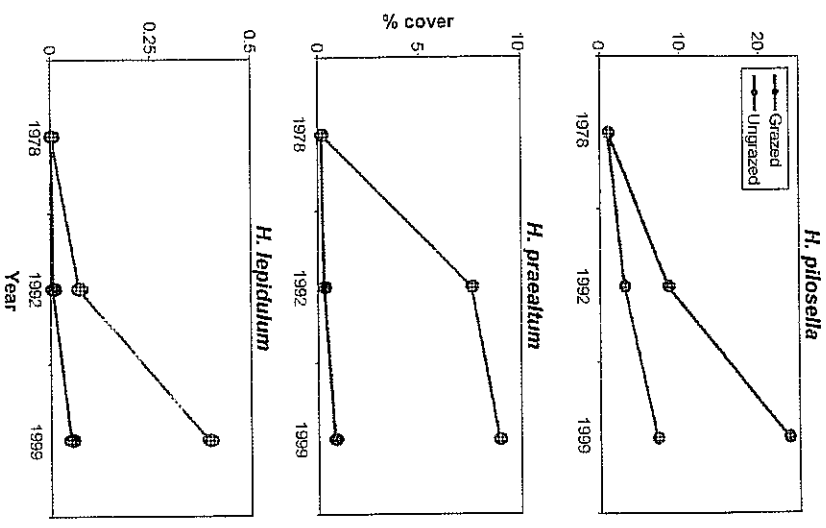
Mead, N. & Elstob, B., (2005) Managing Obelisk, a semi arid high country run. Proceedings, High Country Landscape Management Forum, September 2005, p 78-79. Otago Regional Council.

From Espie 2005

Grazing management

Grazing management is potentially one of the most feasible strategies currently available for slowing Hieracium spread on unfertilised or low-input land. This has important implications for both pastoral farming and nature conservation. We have seen how grazing can significantly alter the rate Hieracium invades tussock grassland (previous section). Here we examine the interaction with grazing in more detail.

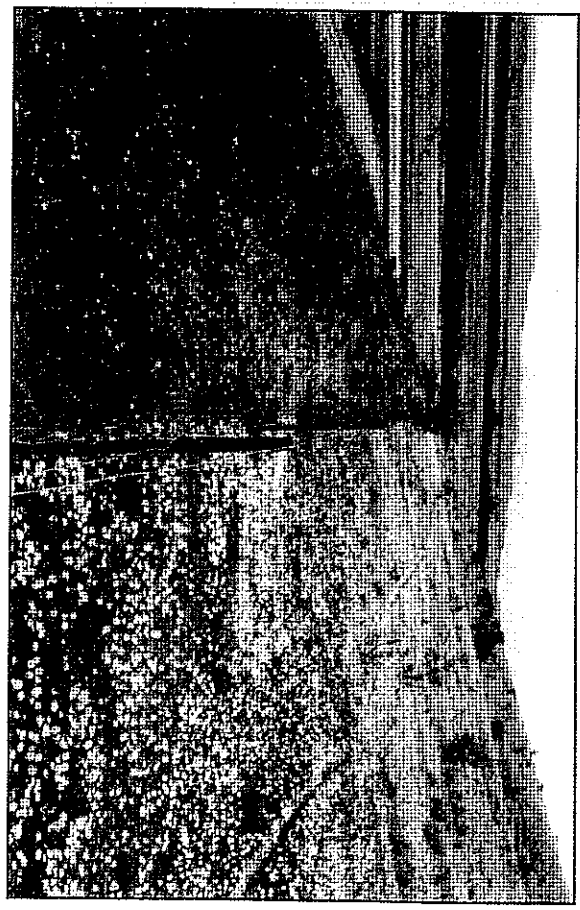
How different Hieracium species were influenced by low-intensity grazing is shown in a long-term trial at Flock Hill Station, Canterbury⁴. In 1978 a large enclosure plot in modified fescue tussock grassland prevented further grazing by sheep or hares. Grazing intensity with occasional merino sheep ranged between 0.1 - 0.5 SU/ha/yr. Initial *Hieracium* abundance was low and was later assessed in twenty-four 30m² plots inside and 24 plots immediately outside the enclosure. The number of vegetative and flowering *H. lepidulum* plants was counted in each plot. The following graphs show how grazing affected Hieracium invasion over the next 21 years.



The flat growing *H. pilosella* increased faster in the grazed grassland. This is probably due to its prostrate habit and vegetative spread through stolons which are largely unaffected by grazing. In addition, reduced competition from taller growing companion species removed by grazing may also help expansion. In contrast, the upright growing species *H. praealtum* and *H. lepidulum* were restricted by grazing but rapidly increased when ungrazed. This is probably due to direct removal of accessible leaf tissue and also to flowerhead removal reducing seed for establishment of new plants. *H. lepidulum* density was reduced 4 times by grazing and flowering by 40 times (Table 4).

Table 4: Effect of grazing on density and flowering of *H. lepidulum*, Flock Hill Station, Canterbury, 1993⁴.

	Grazed	Ungrazed	Difference
Density (plants/m ²)	0.2	0.8	4x
Plants Flowering (%)	0.8	36.1	40x



Spring grazing (left of fence) can dramatically reduce Hieracium flowering, Mackenzie Basin.

During the 1980's the thinking was that although *H. pilosella* and *H. praealtum* produced masses of seed, the probability of successful establishment was negligible (about 1 in 230,000)⁹. Based on this, management recommendations did not emphasise the importance of seedling control. This changed during the 1990's when new research

FARMING IN THE WETTER COUNTRY

Guy Mead – Dingleburn Station, Lake Hawea

It is my hope that these two days, following on from the original High Country Science day held in Cromwell two years ago and picking up on the Obelisk Field Day held last autumn, may be the start of a concerted effort to tackle the management of *Hieracium lepidulum* in our high country landscapes by all interested people.

I'm going to start by asking the question: could our perception be wrong of how we manage the landscape? Keep an open mind. Davida and I, with our family, have farmed Dingleburn for 17 years. Our grandchildren are the fifth generation of this family to have lived on the shores of Lake Hawea. I'm not a botanist or ecologist, I'm a stockman who was taught by my father at an early age to be keenly observant of what is going on in the environment around me. I've watched the devastating advance of *Hieracium* throughout our landscape; the change in the McKenzie Basin from golden tussocks waving in the afternoon breeze to the barren purple of today.

Dingleburn is a dynamic high country station which is in the final stages of completing tenure review. In a snapshot summary of this review: the Department of Conservation takes 16,800ha, we take 7000ha and there's a net loss of 4000 stock units made up of the entire wether flock and summer grazing for ewes. There is a grazing licence in the Hunter River Flats in the head of Timaru Creek, and public access is lavishly accommodated. We're going to take you on a tour of Dingleburn and demonstrate that grazing plays an important role in the containing of *H. lepidulum*. I would like you to remember that 60 – 70% of the area that is going to the Department of Conservation has grazing value as well as significant inherent value. The major significant inherent value is landscape value which, in most cases, can be protected without excluding grazing.

I first noticed *H. lepidulum* in the early 1970's. Ian Sargenson told us that he first noticed it in the Timaru Creek Basin area in the early 1970's. It rapidly increased through the 80's. There are other *Hieracium* species on Dingleburn, but they are in very small amounts. *H. lepidulum* is a major concern for the management of this property. It affects us from the low lake shore to the high basins. After the Obelisk Field Day, Peter Espie and I carried out a survey of the occurrence of *Hieracium* on

Dingleburn. We covered the whole property and included the High Burn Valley (which is part of Hunter Valley Station on the western side at the head of the lake). We estimated the cover using a one metre² quadrat placed at random within the landscape in typical grassland situations. We covered three types of management: lightly grazed, undeveloped native grasslands; grazed, undeveloped native and agriculturally developed grasslands; and ungrazed native grasslands (except for being grazed by feral animals). With the advent of deer hunting by helicopters twenty-five years ago, the feral grazing has been very light.

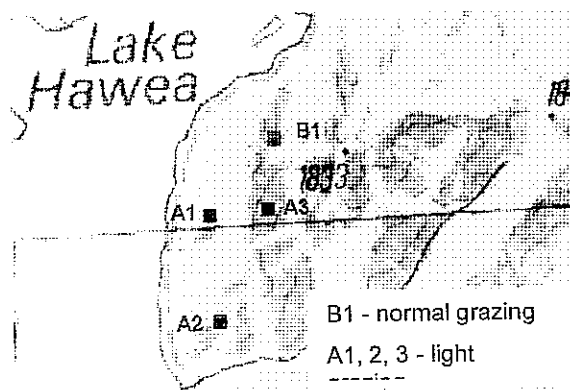


Figure 1: Extensive 7000ha block

The four sites in Figure 1 are part of an extensive 7000ha block which is only managed by the use of natural boundaries. This results in sheep choosing some country in preference to others.

H. lepidulum cover at these sites:

- A1: 70% (sunny aspect);
- A2: 60% (dark aspect);
- A3: 10 – 40% (dark aspect);
- B1: < 1% (sunny aspect)

It is so severe at Site A2 that matagouri and native shrubs are being completely smothered out. Sites A1, A2 and A3 are all lightly grazed. B1 is on a northerly facing sunny aspect - sweet warm country with a good diverse cover of plant species. Sheep love to graze in this area and are very easy to keep within these basins. This is typical of the basins on the sunny side of the ridge. This demonstrates how we can control *H. lepidulum* with grazing. The grasslands here have less than 1% *H. lepidulum*.

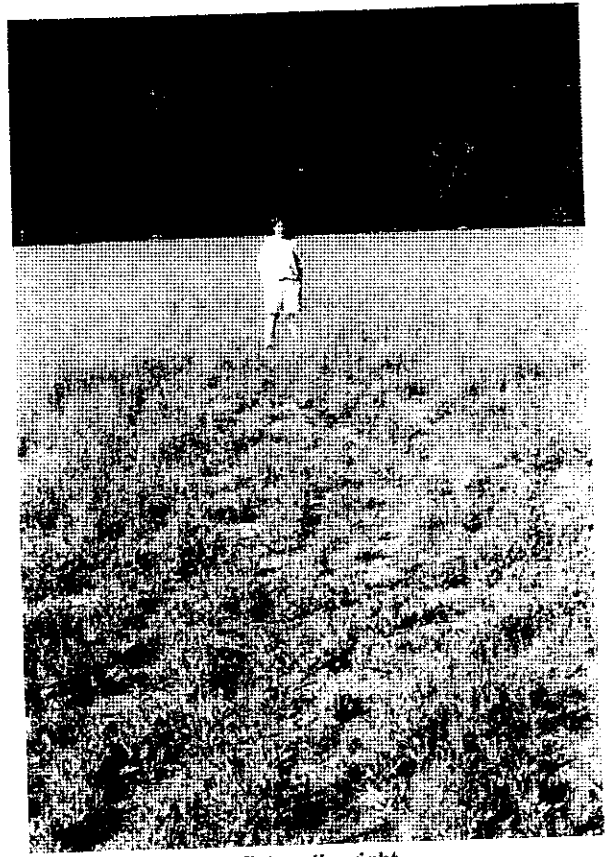


Figure 6: Rob Roy Valley - the arrow in the left hand photo is pointing to the river flat on the right.

In the Rob Roy Valley in the Aspiring National Park (Figures 6 and 7), *H. lepidulum* was not noticeable in the 1960's. It was getting quite bad by the mid 1980's. The arrow in the left hand photo is pointing to the river flat on the right. It is dominated by *H. lepidulum* and *H. praealtum* and bare ground. On the valley shoulder, *H. lepidulum* is rampant within small shrubs (Figure 7).

In summary, our survey found that *H. lepidulum* cover in native or developed grasslands that are effectively grazed was 0 - 10%. In lightly grazed grasslands, which almost certainly include grasslands of almost nil grazing, it is 25 - 70%. In ungrazed and feral grazed grasslands, it is 40 - 100%.

We have a major threat to our landscapes by *H. lepidulum*. There are large areas that are changing from a very diverse plant system to a monoculture of *H. lepidulum* with a high proportion of bare ground. The removal of

grazing will be an open invitation to this weed to take over ever increasing areas of our landscape. There is a desperate need for all land managers, people with a genuine interest in our high country, to put our differences on a high shelf and pool our resources for the good of the landscape.

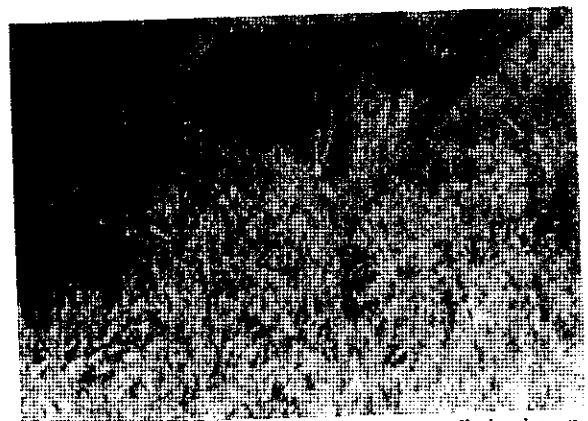


Figure 7: *H. lepidulum* rampant within small shrubs on the shoulder of the Rob Roy Valley

Mead + Kistob 2005.

We didn't use the top plot to compare grazing as this fence was down due to snow damage. The time since these plots were last burnt ranges from 13 to 65 years.

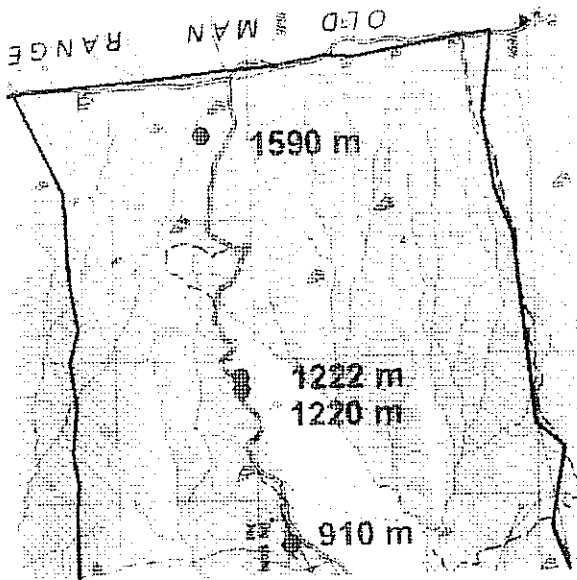


Figure 1: Location of exclosures

In our study we used height frequency transects and quadrats to record the effect on vegetation structure, plant biodiversity and weed invasion in snow tussock grasslands. Thirteen years after burning, there was very little difference between the frequency of the maximum height of the vegetation in the grazed and the ungrazed grasslands, and no difference after forty-four years.

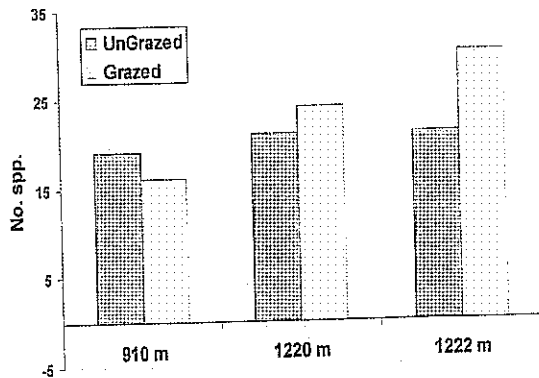


Figure 2: Biodiversity

Under the dense tall tussock at 910m (Figure 2), biodiversity was highest in the grazed grasslands. There were other species present but in such low frequencies that they weren't recorded on our transects. This same pattern holds for native species.

We have three problem weeds at Obelisk, *Hieracium*, wilding pines and broom. We can control the last two but the real threat to the property is *Hieracium*.

The frequency of *H. lepidulum* on the transects is shown in Figure 3 and you don't need a PhD to see it increases where it is not grazed. Because *H. lepidulum* is just beginning to invade these grasslands and the numbers are still quite low, we counted and scored as cover in the entire exclosures and then in a similar area of nearby grazed grasslands. Frosting made these plants difficult to identify at two sites (we are going to repeat the counts in summer) but the trends are exactly the same as with the frequency transects. *H. lepidulum* is unquestionably higher in the ungrazed grasslands.

In conclusion, our monitoring results prove that *H. lepidulum* is a major threat. It smothers nature and it reduces biodiversity. We can see that grazing controls *H. lepidulum*, minimises wilding pines and can enhance biodiversity.

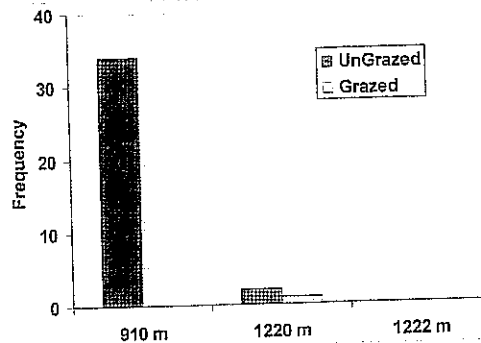
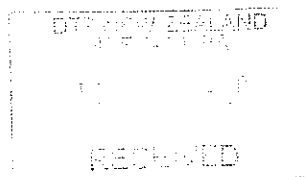


Figure 3: Grazing and *H. lepidulum* occurrence

We are going to leave you with a thought about how high country farmers regard the land. This is a quote from the late Arthur Borrell - 'Why would you steal from your own bank.'

The old guard is changing and needs to change. It also needs recognition of its hard work in a sometimes hostile environment such as the high country can be. The change in our high country and landscape is happening very fast. There is no room for cheap shots and personal attacks; these are boring and unproductive and will only stand in our way.

We need to step up to the mark and effect the change. We all need to assume we could be wrong and make further change - together.

**Ken Taylor**

From: Dunstan Mining [dunstanmining@xtra.co.nz]
Sent: Monday, 25 September 2006 2:01 p.m.
To: Alexandra
Cc: Crownminerals Crownminerals; David Parker
Subject: Mt Ida Syndicate. Land Tenure Review . Otagos Mineral Estate Protection . From D O C .

Afternoon DTZ. I would like to make comment on the above Land Tenure Review . My main concern is the Mineral Estate being put into the Department of Conservation basket. This area contains the well known Buster Diggings, historically produced some many millions of \$\$ of gold and still has the potential to produce much more , provide jobs and wealth , and continue our historical connection to the land , it is important that that area has the ability for the continuum of mining into the future, and it is not sterilized by D O C , and the otago C M S plan. You will be well aware of my views on this issue, and a prize example of what can happen, is well known to you at DTZ , is the Nevis / Kilgour case which is still on going , when u delve into the nevis case one gets a very good incite into just why it happened like it did . It would appear that there was a concerted effort by certain people to achieve the result at Nevis , I understand that some changes have or are taking place . I would like your feed back on my comments and would appreciate what DTZ and LINZ and DOC are now doing to make sure the mineral estate , remains a viable to the people of otago , and does not just become another D O C museum , I await your reply
Cheers Bob Kilgour . I have no interest in the Buster Diggings .

25/09/2006

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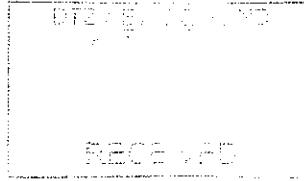
FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)

P.O. Box 1604, Wellington



4 October 2006

The Commissioner of Crown Lands
 C/- DTZ New Zealand Ltd.,
 PO Box 27
 ALEXANDRA



Dear Sir,

Re: Preliminary Proposal for Tenure Review: Mt Ida POL (Oo 090)

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents some 13,000 members of tramping, mountaineering, climbing and other outdoor clubs throughout New Zealand. We also indirectly represent the interests and concerns of many thousands of private individuals who may not currently be members of clubs but who enjoy recreation in the back country.

On their behalf, FMC aims to enhance recreation opportunities, to protect natural values, especially landscape and vegetation, and to improve public access to the back country through the tenure review process.

FMC fully supports the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the more recently stated government objectives for the South Island high country especially the following:-

- to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- to secure public access to and enjoyment of high country land.*
- to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy.*
- to progressively establish a network of high country parks and reserves.*

[EDC Min (03) 5/3; CAB Min (03) 11/5 refer]

FMC appreciates this opportunity to comment on the Preliminary Proposal for the review of Mt Ida POL.

THE PRELIMINARY PROPOSAL

FMC notes that the proposed designations are described as follows:-

General description of the proposal

8401ha (approximately) to be designated as land to be retained in full Crown ownership and control as a Conservation Area pursuant to Section 86(5)(a)(i) Crown Pastoral Land Act 1998

FMC SUBMISSIONS

The details of FMC views on the Preliminary Proposal are presented below.

THE PROPOSAL That 8401ha (approximately) be designated as land to be retained in full Crown ownership and control as a Conservation Area pursuant to Section 86(5)(a)(i) Crown Pastoral Land Act 1998

FMC notes that in the Summary of the Preliminary Proposal, the objects of a Part 3 are defined and discussed. We recognize that these objects are subtly different from the objects of Part 2 of the Crown Pastoral Land (CPL) 1998. In particular no preference for the method of protection of Significant Inherent Values (SIVs) is stated (in Part 3) because of the presumption that the land is, or will return to, full Crown ownership and control on expiry of the non-renewable licence (Pastoral Occupation Licence). We further recognise that in Part 3, Object (a) To promote the management of the land in a way that is ecologically sustainable, and Object (b) To enable the protection of significant inherent values of Crown land, are of equal value and carry equal weight in terms of consideration.

It is also important to note that retention of land in Crown ownership as conservation area or reserve will best protect SIVs because it will enable them to be managed under the Conservation Act or the Reserves Act.

FMC notes that the Scoping Report quotes the review of the licence by DOC staff in 1998, and that the particular values were summarized as follows: *"The vegetation on the POL is ranked by DOC as an area of outstanding natural value."* The area of the POL includes an area on the Central Otago peneplain recognised in the PNAP survey report for the Hawkdun Ecological District as a Recommended Area for Protection (1,250 ha RAP Hawk 10, Plateau).

The Scoping Report further states *"The Canterbury Conservancy draft CMS Waitaki Unit Section and the Otago Conservancy CMS Special Place # 17 St Bathans-Hawkdun-Ida both highlight landscape, recreation, natural and historic features of the POL and adjoining lands. These strategies also contain a common objective to create the proposed Oteake Conservation Park through tenure review in order to give recognition and formal protection to these features."*

In the Assessment of ability to achieve an outcome, the Scoping Report states that in terms of the CPL Act an outcome is required and that *"the provisions of the Act suggest that the entire licence will be restored to full Crown ownership and control."* FMC agrees that an outcome is required by the Act, and fully endorses the expectation that the entire licence will be restored to the Crown.

Furthermore, FMC agrees that in terms of the objects of the CPL Act, Object (b) is considered to take precedence because of the nature of the SIVs located within the area concerned, and freehold disposal is not therefore considered to be appropriate in the document dealing with Drafting Instructions for the Draft Preliminary Proposal.

FMC notes that the statements in the Scoping Report and the recommendations in the Drafting Instructions are well supported by the detail presented in the Conservation Resources report. That detail is reported in sections dealing with landscape, landforms and geology, climate, vegetation, invertebrate and other fauna, historic values and public recreation. The recommendations are further emphasized by the recognition of the outstanding natural qualities of an RAP which lies centrally within the POL, and which covers some 1250ha on the Central Otago peneplain.

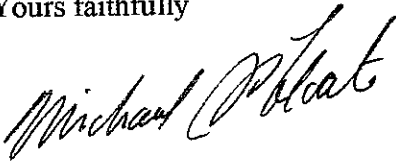
For all these reasons, and from our own understanding and observations of the area (which we believe will form a worthy addition to the proposed Oteake Conservation Park) FMC strongly supports the proposal that the entire area of the Mt Ida Syndicate POL should be returned to full Crown ownership and control.

FMC Submission

FMC unreservedly endorses and supports the proposal that the entire area of the Mt Ida Syndicate POL (some 8,401ha) should be returned to full Crown ownership and control.

Finally, FMC thanks the Crown Agent, DTZ New Zealand Ltd, and the Commissioner of Crown Lands for the opportunity to comment on the Preliminary Proposal for the tenure review of Mt Ida POL.

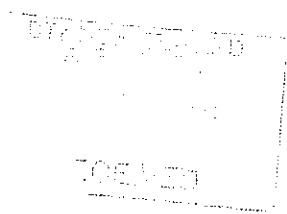
Yours faithfully



pp. Barbara Marshall
Secretary, Federated Mountain Clubs of NZ, Inc.

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C.A.G Richardson
Heriot
RD2
Tapanui



26th September 2006

The Manager
D.T.Z NZ Limited

Dear Sir

I attended your recent meeting at Roxburgh and was staggered to hear that once again you intend to add the MI Ida Syndicate to the DOC Empire. I spent five years working on the Maniototo in my youth and still remember how vital it was for my employer to be able to move ewes up to a small tussock run that he owned when the Maniototo Plain is so often in what most of us would call drought conditions in the summer.

The reason for DOC wanting the land was that a Botany student doing his thesis found a number of plants of outstanding significance one in particular (Plantago Obconica) which DOC report states is found in only 3 other sites in New Zealand. One of the shareholders asked the question "Doesn't that say something about our management for the last 100 years." What did he mean? After 100 years a plant considered to be so rare was still there in good condition. Kevin O'Connor a former Lincoln College lecturer at the Tussock & Mountain grasslands Institute, who summarised the day said there were a lot more than 3 sites claimed, - is DOC honest?

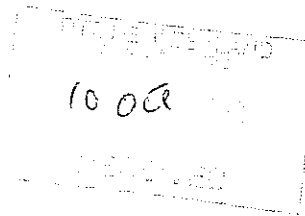
*Wilson
Doe
first said
they wanted
MI Ida*

If you take this land you will make most of the effected farms uneconomic with the result of the country having less income for a government that has had a dream ride for six years on the back of a very strong rural economy.

I have always thought that DOC was there to provide jobs for Botany students who have very little prospects of employment at anything else. Finally I was pleased you were able to confirm my question that DOC doesn't pay any rates, which means that rural ratepayers have to subsidise the people that take land in their district. I thought the days of subsidies were over.

C.A.G Richardson

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THE NORTH OTAGO FOUR WHEEL DRIVE CLUB INC
P O Box 202
OAMARU

Sunday, September 24, 2006

The Manager
 DTZ NZ Ltd
 Land Resources Division Ltd
 P O Box 27
ALEXANDRA

Dear Sir/Madam

RE: Mt Ida Syndicate Review of Crown Land - proposal to revert use to Crown Reserve.

The Members of The North Otago Four Wheel Drive Club have discussed the implications of the Crown's proposal to turn this area into a Crown Reserve.

This proposal is opposed by the Club for the following reasons:

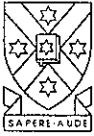
1. It actively discriminates against the activities of our Club Members whose membership numbers 85 fwd owners by stopping any reasonable access for fwd vehicles. Club Members usually have as passengers either family or friends. There are effectively hundreds of people who will now lose access to this pristine area. This also means that our Club members many who are either elderly or in some cases disabled cannot be permitted to travel through and view an attractive reserve area.
2. Removal of access means that issues of safety e.g. fire and sudden weather changes will mean that this area which while already remote will become more remote on account of removal of access. Fire is already creating havoc in reserve areas which will become increasingly overgrown with all sorts of flora and fauna many of such are introduced and almost impossible to eradicate. This applies to pests as well. Costs of fire fighting will increase as access is removed and the movement of personal becomes very difficult.
3. This track has been used by hundreds of fwd owners over the years – it has not been abused and will become another example of a small group of people often Forest and Bird members who are having far more say in the running of the Department of Conservation than is either desirable or fair. Park lands should be for all not simply for the able bodied, horse riders and trampers to the exclusion of people who do not “fit into this category.”
4. We do not see the Ahuriri Valley saga as being either acceptable or desirable – this would appear to be another example of this happening.
5. We do not agree with the creation of large park areas which will become a haven for noxious weeds, noxious animals and run by people who actively pursue policies of selective discrimination and the use of doubtful large expense methods of trying to control the problems which have been created over a period of many years.
6. There are many fwd clubs up and down NZ – these Clubs are well run and actively pursue the responsible use of fwd vehicles which seems to be ignored or not recognized by some DOC principals who we have had dealings with.

We believe that the whole issues of CROWN TAKEOVERS of land while ostensibly idealist is in effect by implication saying that Central Government is a better landlord than private management – this philosophical assumption is grossly discriminatory for the ordinary New Zealander who has had a good historical relationship with Landowners and Lessees. This is now going to be removed as we face all of the uncertainties of public office people who seem to enjoy their “hour of power and control.” Beurocracy leads to a great deal of frustration and creates a great amount of distrust of power hungry people who wish to control the movement of people except for those who follow their narrow minded dictums.

Yours sincerely

Ron Sim
 Ron Sim

SECRETARY

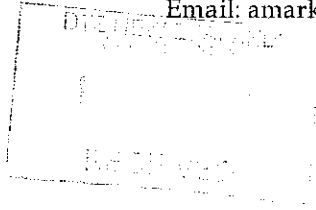


Department of Botany

Division of Sciences
PO Box 56, Dunedin
NEW ZEALAND

University of Otago
Te Whare Wananga o Otago

Tel: National 03 479 7573 International 64 3 479 7573
Fax: National 03 479 7583 International 64 3 479 7583
Email: amark@otago.ac.nz



October 10, 2006.

Commissioner of Crown Lands
c/o Manager,
DTZ (NZ) Ltd.,
PO Box 27,
Alexandra.

**SUBMISSION ON PRELIMINARY PROPOSAL TO REVIEW THE
MT IDA SYNDICATE OCCUPATIONAL LICENCE**

Dear Sir,

Thank you for sending me a copy of this document and I appreciate the opportunity to comment on it. I am very familiar with the area, based on many years of ecological research on the Otago high country, and specifically as supervisor of the PNA survey of the Hawkdun Ecological District by Philip Grove, published by the Department of Conservation in 1994.

I note from the information supplied with the proposal that the outcome of this review must be consistent with Part 3 of the CPL Act, which requires promotion of "the management of Crown land in a way that is ecologically sustainable (Object a), plus "the protection of significant inherent values (Object b), and that, subject to these objects, "to make easier" (i) "The securing of public access to and enjoyment of Crown land; and (ii) the freehold disposal of land capable of economic use." Moreover, as stated, "Objects (a) and (b) are of equal value and carry equal weight in terms of consideration, whereas Object (c) is subject to both (a) and (b)." The definitions supplied of "ecosystem" ['a system of interacting living organisms and their environment'] and "significant inherent values" ['inherent values of such importance so as to deserve the protection of management under the Reserves Act or Conservation Act'], are endorsed, as is the underlying presumption in the relevant legislation (CPLA) "that retention of land in Crown ownership as conservation area or reserve will best protect SIVs because it will enable them to be managed under the Conservation Act or the Reserves Act."

It is also noted that "an unrenewable occupation licence [as the Mt Ida Syndicate is] does not carry any pre-emptive right to the licensee on expiry of the licence" and, moreover, that there is a presumption that when a review of such land is undertaken "the land is already in 'full' Crown ownership and control or will be so on expiry of any non-renewable licence."

The area of about 8401 ha comprising this pastoral occupation licence, ranges in altitude from 780 to 1575 m between the Otematata river and the crest of the Hawkdun Range. The core 1250 ha of the block was recognised as having very high SIVs in the Hawkdun PNA Survey report where it was recommended for formal protection as Plateau RAP or Hawk 10, on the basis of its "sequence from high-alpine cushion-fellfield to subalpine tussockland" and including "on the leeward side of the crest, from 1550m down to 1300m, low-alpine *Chionochola macra* [slim snow tussock] tussockland extends in a veritable ocean to the horizons across the broad expanse of the plateau." The photograph included with the proposal gives a good indication of this "ocean" of tussockland. "Bog-tussockland communities" are also described from this area. Also, "below the 1300m contour, the angle of spur slope and side slopes increases. At this point a subalpine *C. rigida* [narrow-leaved snow tussock] tussockland occupies the eastern and lower altitudinal margins of the RAP." Beyond the RAP, as the proposal describes, there are important examples of montane shrublands and short tussock grasslands which add considerable ecological value to the altitudinal sequences of indigenous plant communities and the full range of indigenous biodiversity present on the property. There are also important faunal components of this diversity, particularly NZ falcon (a Category B threatened species), which is known to have an extensive home range in this region. A similarly threatened species, the scree skink (which here

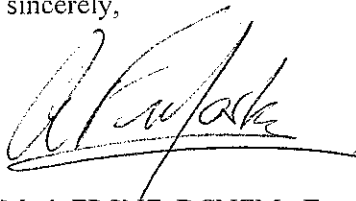
may be genetically distinct from the scree skinks of Canterbury and Marlborough), has also been identified on the property, together with at least five endemic invertebrate species.

The network of 4WD and other tracks on the property, which is readily accessible by a legal dry-weather road from the Maniototo, greatly enhances its importance for various forms of recreation, and public enjoyment, including botanising by both professionals and amateurs. The generally good condition of the upland snow tussock cover also enhances the value of the property for the production of water which is coming into increasing demand downstream, for a wide range of important uses.

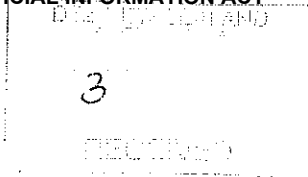
All of the above values contribute in various but important ways to the overall extremely high conservation value of the property as a whole, which clearly would justify its contribution to the Oteake (Hawkdun) Conservation Park, identified in the Otago Conservation Management Strategy of 1998 (p.283).

I trust that my recommendations will be seriously considered and, again, I thank you for the opportunity to comment on this proposed review of 'other Crown land' in the South Island high country.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A F Mark', with a long horizontal flourish extending to the right.

Alan F Mark FRSNZ. DCNZM. Emeritus Professor



“Pear Tree Cottage”
 PO Box 18
 Naseby 9354
 Central Otago

10 October 2006

The Commissioner of Crown Lands
 C/- DTZ NZ Ltd
 Land Resources Division
 PO Box 27
 Alexandra

Submission re the MT Ida Syndicate

I have read the notice of preliminary proposal of the land described as Part Run 362B and Run 362C Mount Buster Survey District comprising 8401.2739ha. The pastoral lease is currently held under licence by the Mt Ida Syndicate and I understand that the Crown after almost 100 years are wanting to retain this land under their ownership and control as a conservation park.

I have worked with, and know well, all the families involved in this syndicate – in some cases third generation family members. I do know from experience that should these farmers loose this summer grazing for their sheep their existing freehold land would become marginal economic units.

As fas as the development of a Conservation Park and public access for all New Zealanders is concerned I agree with the concept. The present syndicate have always managed the land, allowed access to the public and maintained the tracks and huts at their own expense.

My belief is that the summer grazing could continue within the bounds of a Conservation Park provided the Crown provide strict controls as to stocking numbers, time of year permitted to graze, top-dressing, burning etc

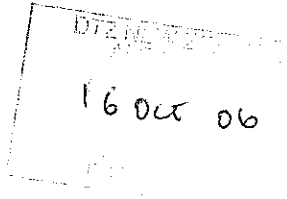
My submission absolutely opposes the Crown taking over full ownership and control and I would appear at any hearing set down should I be required.

I write this submission with over 45 years involved in the rural farming industry.

Yours faithfully

WJ (Bill) Townsend

Name Neil R. Sparks
Address. Rosemond RD13C Oamaru
Date 16th Oct. 2006



The Commissioner of Crown Lands
c/o DTZ NZ Ltd
Land Resource Division
PO Box 27 Alexander
Ph 03 448 6935

Re - The Mt. Ida Syndicate review of leased Crown Land.

I strongly support the continued lease arrangement of part Run 362B and Run 362C Mt. Buster to the Mt. Ida Syndicate and believe that under the Leasehold Agreement management by the Mt. Ida Syndicate we as New Zealand Citizens continue to inherit the following advantages.

Plants Vegetation growing in this area has cohabited along side the managed sheep grazing programme for one hundred and ten years and created a balanced habitat for this to continue.

Recreational Public Access Managed access is available to responsible persons by the Syndicate Chairperson. Advice on safety issues, climatic conditions, track and hut locations are given freely based on first hand knowledge of this area.

Huts Four huts are located in this area, they are used for accommodation and kept to a basic standard by the Syndicate. Huts in this type of country can mean the difference between survival and death.

Tracks The Mt. Ida Syndicate have formed and maintained a significant amount of access tracks to ensure their grazing plan is well managed.

These tracks also make access available for the following recreation activities - fishing, hunting, tramping, 4 wheel driving, horse riding, mountain biking. These tracks also provide emergency access for fire fighting, search and rescue.

Unique Historical Farming Practice For one hundred and ten years the same five farming families have been involved in the summer grazing of this high country land. Since 1897 the muster of five thousand ewes by eleven musterers in late April has become a local tradition and a social occasion held in high regard within the local community

Local Economic Values The availability of this Leasehold Crown land strongly supports the farming operations in this area. Three of the five farming properties are reliant on this summer grazing to remain economical farming identities.

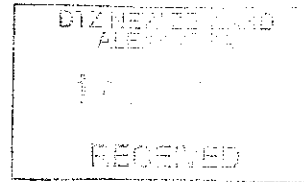
Local Council Rates Under the Leasehold agreement rates are met by the Mt. Ida Syndicate which financially supports all persons residing in the Waitaki District.

I strongly support the continued lease arrangement of part Run 362B and Run 362C Mt. Buster to the Mt. Ida Syndicate and hope the Commissioner will support this community orientated view.

Signed

N. R. Sparks.

Waitaki LandRover Owners and Enthusiasts Club
 c/o The President
 Mr L. Gray
 7 Sussex St.
 Weston, Oamaru.
 11th Oct. 2006



The Commissioner of Crown Lands
 c/o DTZ NZ Ltd
 Land Resource Division
 PO Box 27 Alexander Ph 03 448 6935

Re - The Mt. Ida Syndicate review of leased Crown Land.

The Waitaki LandRover Owners and Enthusiasts Club strongly support the continued lease arrangement of part Run 362B and Run 362C Mt. Buster to the Mt. Ida Syndicate.

It is our club's belief that under the Leasehold Agreement management by the Mt. Ida Syndicate has the following advantages and therefore gives credit to this submission.

Plants Vegetation growing in this area has cohabited along side the managed sheep grazing programme for one hundred and ten years and created a balanced habitat for this to continue.

Recreational Public Access Managed access is available to responsible persons by the Syndicate Chairperson. Advice on safety issues, climatic conditions, track and hut locations are given freely based on first hand knowledge of this area.

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Local Economic Values The availability of this Leasehold Crown land strongly supports the farming operations in this area. Three of the five farming properties are reliant on this summer grazing to remain economical farming identities.

Local Council Rates Under the Leasehold agreement rates are met by the Mt. Ida Syndicate which financially supports all persons residing in the Waitaki District.

Crown Lands Income Under the Leasehold agreement income is generated from local farming activities and returned to Crown Lands.

The Waitaki LandRover Owners and Enthusiasts Club hopes that the Commissioner of Crown Lands accepts this submission in favour of the Mt. Ida Syndicate and our community.

The Waitaki LandRover Owners and Enthusiasts Club Committee Members

L R Gray (President)

Al Hordley (Secretary)

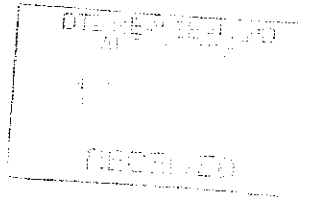
Pa Clarke

and Hodder.

Vernon J. Hayes

Pross Hayes.

N. R. Sparks.



14th October, 2006

The Commissioner Of Crown Lands
C/- DTZ New Zealand Ltd,
P.O. Box 27
Alexandra

Re: Review Proposal Mt Ida Syndicate Occupation Licence

Dear Sir,

I read with interest the information and reasoning contained in the DTZ New Zealand 'Summary of Preliminary Proposal' (July 2006) regarding 0o090, Mt Ida Syndicate,

First, I am familiar with the land in question and have even, with the assistance of members of the 'farming syndicate', organised a party of interested persons to travel through and inspect the property

From the 'Letter of Appreciation' sent to those members of the syndicate at the time (24.03.02) I quote the following:

'Just a letter of appreciation and compliments to you all: first our sincere thanks for your co-operation in permitting our party of nine vehicles and the 32 interested persons to travel through the land farmed by you all. Laurie for organising and suggesting on how we should attack our idea. To Jock and John for going to the trouble of obtaining the Communication system and especially for the commentary while escorting us from Naseby up to Mt Buster and beyond to Hills Creek (The Mt Buster Diggings, comfort stops, a place for lunch at the hut and all)

In the party were people from all walks of life and not once did you hear any adverse comments. Myself, having been involved with land development most of my life, especially during the 1960's and 70's can appreciate the time, difficulties, and the expense involved in providing access to the area. **It is amazing that after more than 'one hundred years' under the stewardship of the syndicates that everything seems to be in balance: throughout the various altitudes, ground cover was what it should have been (two people in our vehicle commented on the wide range of native plants flowering in places where you would expect sheep camps to be). The stock were well spread out and in good condition "**

(cont)

(2)

Sir, the reasons put forward in the proposal for the retention of the entire area by the Crown for 'conservation purposes' (i.e. Management by the Department of Conservation) are based on the recent findings of 'Flora and Fauna' unique to the area ; public access for skiing and other recreational activities such as horse trekking, walking and mountain biking .

May I submit that for the following listed reasons,(along with many others) -'It is essential, that the 'Crown Land' in question' should remain under the stewardship of the Mt Ida Syndicate

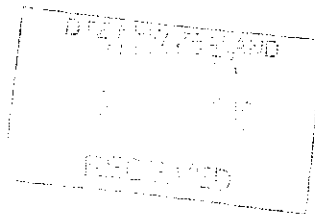
- The Syndicate Land and its use is a unique part of The Otago Historical Heritage
- For One Hundred and Nine (109) years 'The Syndicate' have grazed and managed the area without undue detriment to flora and fauna (Skins inc)
- The Syndicate have ensured 'public access' for recreation etc, as well as establishing roads and tracks
- The traditional use of the land has been to balance the dryland farming operations of those involved by providing supplementary summer grazing (this has ensured economic farming units for those involved and should continue to do so)
- Under D.O.C. management, no substantial benefits would be gained as the suggestions outlined regarding public access, recreation of all types and practical conservation are already in operation

Yours faithfully



L.W.Brensell
3 Royal Terrace
Alexandra.

13



18th October, 2006.

The Commissioner of Crown Lands,
C/-DTZ New Zealand Limited,
Land Resources Division,
P.O. Box 27,
ALEXANDRA.

Dear Sir,

RE: MT. IDA SYNDICATE REVIEW OF OTHER CROWN LAND

I enclose my written Submission on the above Crown proposal.

Yours faithfully,

Handwritten signature of Ola M. Burt.

Ola M. Burt. (Mrs.)

Enc.

2. OBJECTS OF A PART 3 REVIEW:

OBJECT (a) TO PROMOTE MANAGEMENT OF THE LAND IN A WAY THAT IS ECOLOGICALLY SUSTAINABLE:

The ecologically sustainable condition of this land shows that the Leaseholders have, and are ensuring, that the area is managed so that the ecosystem is maintained & very definitely, enhanced.

It would be impossible to see how the status quo could be improved upon.

OBJECT (b) PROTECTION OF SIGNIFICANT INHERENT VALUES:

The significant inherent values have, and are, treated by the Leaseholders with the importance, care & protection uppermost in their management – as has been the case for 110 years. Who better to know an area such as the area under discussion as these Leaseholders. It would certainly not be in the interests of the Leaseholder or his family to permit anything detrimental to the welfare of this type of country.

It is highly improbable that officers of the Crown could be anymore informed than the Leaseholders who have had the length of PRACTICAL experience of 110 years management. It is doubtful too, if the probable governing body (Department of Conservation) will have the manpower to husband this area enabling the ecosystem to be maintained in the manner that it is at the present time.

Therefore, it would seem indeed 'presumptuous' to conclude that the land in full Crown ownership & control could best protect the significant inherent values.

OBJECT (c) (i) SECURING OF PUBLIC ACCESS TO AND ENJOYMENT OF THE LAND:

The 'securing of public access & enjoyment' is already well & truly instituted whereby people are definitely given access to the area defined; the only prerequisite is that the Leaseholders are informed of their departure, so ensuring the safety of the said person or persons.

Some community volunteer clubs regularly run 4 wheel drive visits (using the tracks prepared, at their own cost, by the Leaseholders) to the area giving the elderly & many other age groups an opportunity to visit the said area. Object (c) (i) is therefore being carried out at the present time.

OBJECT (c) (ii) FREEHOLD DISPOSAL OF LAND CAPABLE OF ECONOMIC USE:

Surely 'freehold disposal of land' could indicate that the Crown might intend to sell, for PROFIT, some portion of the said area? If this was to occur, then OBJECT (a) & (b) would, to all intent & purpose, be negated & the significant inherent values would

be under severe threat of mismanagement. This area is providing economic income - for the Leaseholders, their families, the District and, through their expert endeavours, for the benefit of our country, NEW ZEALAND.

3. DESCRIPTION OF PROPOSED DESIGNATIONS:

PARAGRAPH 6:

‘It has a significant opportunity for cross country skiing & also potential summer recreation use involving mountain biking’ :

To comment on this section - there are already many areas for SKIERS in the South Island.

MOUNTAIN BIKING would bring about the subject of pollution from fumes AND human excrement which would surely disturb & obliterate the significant inherent values. As we do not generally have an obedient population living in this country, it is highly improbable that any intended route would be adhered to.

The noise & human vocational activity would be certainly detrimental to the native flora & fauna, not to mention ‘horse trekking’ - bringing in the element of a ‘foreign animal’ to the natural flora & fauna. At present, foot & 4 wheel vehicles are the mode of transport.

PARAGRAPH 7:

‘This area has also been subject to a long history of grazing’ & ‘Grazing may need to be considered as a management option in the future.’

How will this ‘grazing’ be any different from what is currently being carried out at the present time by the Leaseholders?? Surely Proposal reasons are contradictory?

CONCLUSION:

Obviously, we have been under the misapprehension that the farmers were the backbone of our New Zealand economy; but, if this was so, surely the Crown would seek to uphold & reap the benefits produced by the total commitment to the land that the Leaseholders exhibit?

As a Taxpayer I understand that we, being the Crown, are the Landlords & the writers of this Proposal are the ‘Servants’ of the State with your incomes derived from the energies of the Taxpayer.

Therefore, we would appreciate our wishes in this matter to be carefully noted.

If it was envisaged that this said historic area has been uncared for & totally mismanaged, naturally our desires would be yours. As this is not the case, we see no reason at all for this land to be in full Crown ownership.

Perhaps there are reasons, which have not been presented in this Proposal, that we the Taxpayer are not privy to?

It is fervently hoped that the Crown will not seek to reclaim the Leases under review.

Thank you for your attention.

Ola M. Burt.

Ola M. Burt. (Mrs.)