

Crown Pastoral Land Tenure Review

Lease name: THE LARCHES

Lease number: PO 254

Public Submissions - Part 5

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

November

08

Dave Payton

From: Sue Maturin [s.maturin@forestandbird.org.nz]
Sent: Monday, 15 September 2008 16:10
To: Dave.payton@opus.co.nz
Subject: Resending submission
Attachments: sub to Larches.doc

Sorry Dave – I see the formatting changed a fair bit so please use the attached one and read as print layout to get all the pictures.

Regards

Sue

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FOREST & BIRD *Shark finning is illegal in many countries but is still permitted in NZ. This wasteful practice is contributing to the decline of shark populations. Please help stop shark finning by signing the shark fin pledge at www.forestandbird.org.nz*



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15 September 2008

The Commissioner of Crown Lands
C/O Opus International Consultants Ltd
Private Bag 1913
DUNEDIN

Dave.payton@opus.co.nz

Dear Sir

Po 254 - The Larches - Tenure Review, Preliminary Proposal.

Dear Sir

This submission is presented on behalf of the Royal Forest and Bird Protection Society.

1.0 Introduction

The Society supports the proposed Conservation Area CA1, but does not support the remainder of the proposal, as it proposes to freehold dry shrublands on chronically threatened land environment. The Society submits that this proposal does not meet the requirements of the Crown Pastoral Lands Act 1998 (CPLA), and must be reassessed.

The Society is disappointed that the Conservation Resources Report which forms the basis of this proposal was completed in 2002 and has not been updated to incorporate the new criteria for assessing significant inherent values, nor has it included a LENZ analysis of threatened environments.

2.0 Proposed conservation Area CA 1

The Society supports restoration of CA1 to crown control as a conservation area for the reasons outlined in the Conservation Resources report and the proposal document.

3.0 Proposed Conservation Covenant CC2

CC2 like CA1 is modified however there is little difference between the conservation and landscape values in CA 1 and CC2. CC2 contains some areas of intact stands of narrow-leaved snow tussock, as well as boulder fields with shrublands and rock outcrops with

distinctive indigenous species, including *Luzula banksiana*, *Leptinella pectinata* var. *villosa*, *Celmisia viscosa*.

This area has high significance for its scenic value, as it is the most intact indigenous landscape along the western faces of the Pisa Range as viewed from Wanaka and the Cadrona Road.

CC1 contains significant inherent values that require protection under the CPLA. CC1 is classified as an under-protected environment as it represents an environment which has >30% indigenous cover remaining and between 10-20% protected. The remaining vegetation contains representative examples of pre human vegetation. These are likely to represent the best remaining opportunity to protect examples of this environment on the western slopes of the Pisa Range.

F&B Submission

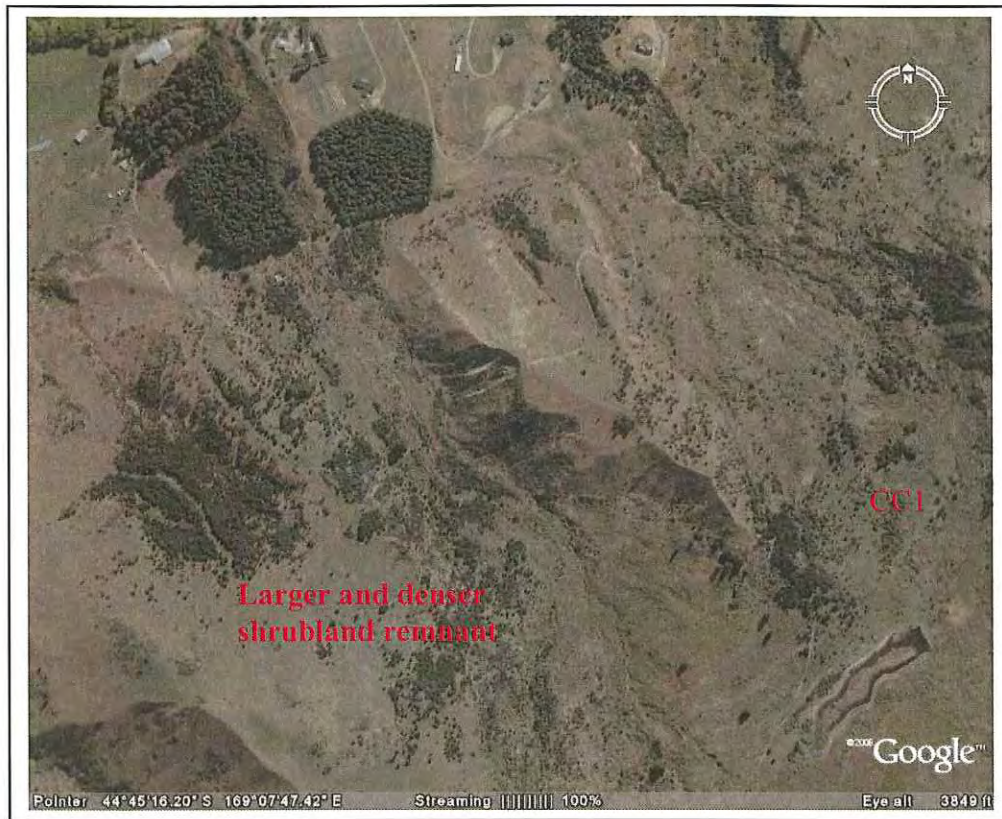
Forest and Bird submits that CC2 be incorporated in to CCA and be retained or restored to full crown ownership and control.

4.0 Lower to Mid Slopes

The proposal provides for most of the mid slopes to be freeholded with only 18 ha of remnant woody vegetation to be covenanted by a covenant which provides for ongoing grazing, until such time as the Minister might erect a fence.

Ongoing grazing will not sustain the values of the covenant, and will prevent the establishment of any palatable indigenous species and eventually will probably lead to the removal of the 'protected' shrublands. This covenant does not meet the objectives of the CPLA as it will not enable the protection of these significant shrublands.

The covenant values describe this as being the most extensive shrubland on the property. However as can be seen from the Google earth image reproduced below this claim is questionable as there are other larger and denser patches.



The larger shrubland shown above is centered at 480m and includes a mixed stand of 4-5m tall manuka, with kanuka, Coprosma sp, matagouri, Olearia sp, including *O lineata* – ranked as a threatened species- sparse, (NZ threat classification lists 2002), native broom, sphagnum and silver and fescue tussock. This and other stands are more visible from parts of Wanaka, including the popular Mt Iron walkway, and the Cadrona Valley than the proposed CC1, as shown in the photograph below.

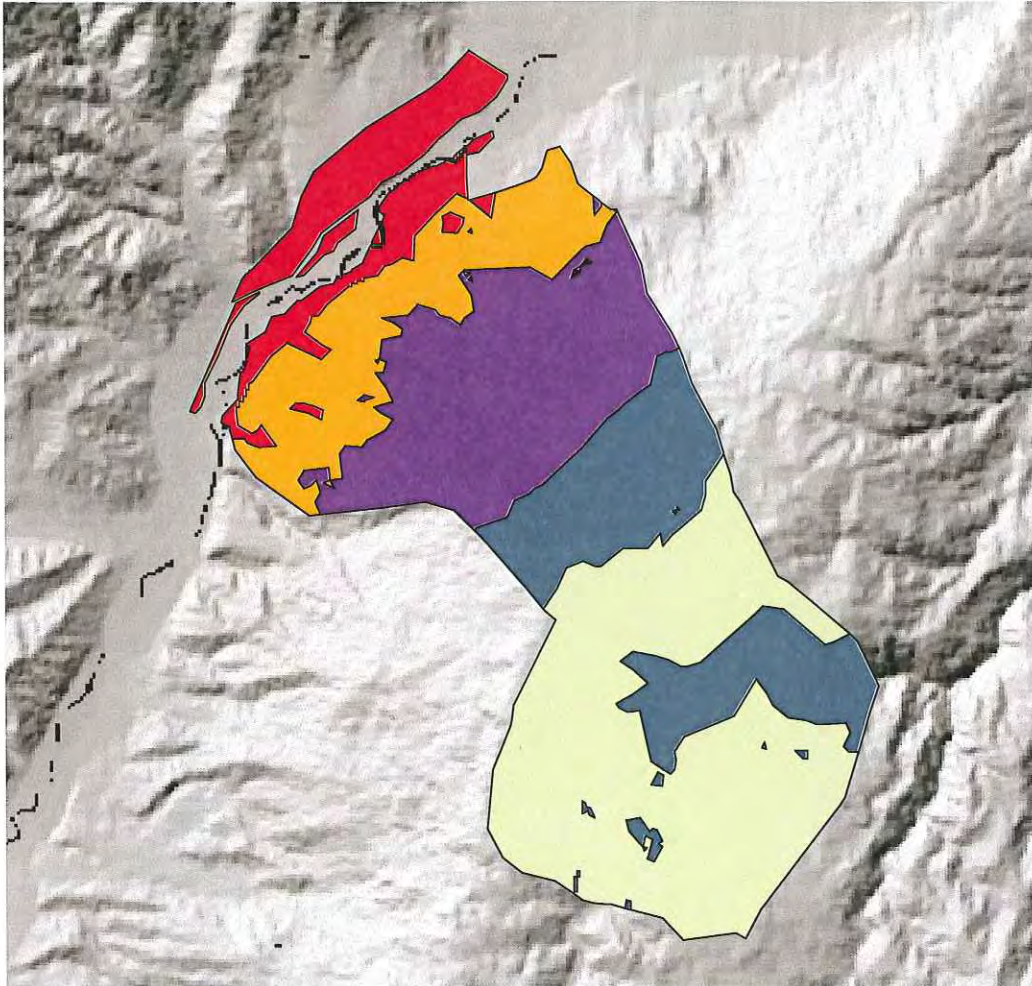








The Larches from the Cadrona Valley Road. Note CC1 mid left is one of the smaller remnant shrublands.

The remnant indigenous shrublands on the Larches occur on a chronically threatened environment (<10-20% of their land area still in indigenous cover) and represent the most visually significant indigenous vegetation remaining on the lower slopes of the western Pisa range. (See map on following page). Collectively they provide an attractive component to the landscape in an area that retains little of its natural character. These shrublands provide an insight into the character of the area prior to the increase in fire frequency associated with Maori and European settlement. The Landscape report recognized the shrublands as being a notable visual feature contributing to the local character and identity.

Forest and Bird submits that this band of shrublands across the lower faces of the Larches represents a landscape and conservation significant inherent value that requires protection under the CPLA.

The Larches



Thelarches.shp		
	Acutely Threatened	<10% remaining
	Chronically Threatened	10 -20% remaining
	At Risk	20-30% Remaining
	Critically Underprotected	>30% remaining <10% protected
	Underprotected	>30% remaining 10-20% protected
	Less reduced and better protected	>30% remaining >20% protected

It is a National Priority to protect indigenous vegetation associated with land environments that have 20% or less remaining in indigenous cover. Such areas should by definition be assessed as being a 'significant inherent value' (SIV), and should preferably

be retained in Crown ownership and control under s36 (1) (a) Crown Pastoral Lands Act 1998, (CPLA).

The shrublands also meet the DOC criteria for assessing significance in tenure review.

The DOC Tenure review SIV Guidelines state:

- The highest significance will be accorded to examples of Level IV 'much reduced' environments, (<20% indigenous cover remaining) where the examples soils are uncultivated and it has characteristic indigenous species present.
- Highest significance will be accorded to remnants of woody indigenous vegetation in their approximate position in the pre human landscape.

The shrublands form part of an altitudinal sequence which includes the short tussock grasslands and bracken above the shrubland belt, and the snow tussock and alpine vegetation on the tops. Such altitudinal sequences represent a SIV under the CPLA.

- High significance will be accorded to continuous altitudinal sequences of indigenous vegetation – (DOC guidelines)

This bracken shrubland, short tussock dominated landscape is highly visible from Wanaka and the entrance to the Cadrona Valley as well as from points along the Cadrona Valley. It stands out as being the land with the most indigenous vegetation remaining on the western slopes of the Pisa Range.

F&B Submission

Forest and Bird submits that the entire face upslope from the lower elevation of CC1 be protected and incorporated in to CCA1 and be retained or restored to full crown ownership and control.

5.0 Sustainability of Proposed Freehold

The proposal document is deficient as it does not discuss the ecological sustainability of the land that is proposed for free holding. This land contains several woody weed species, including wilding pines. Their continued presence will not promote ecologically sustainable management. These pines will contribute to an increasing wilding problem on neighboring freehold and crown land if left unmanaged. Land to be freeholded with wildings on should be subject to a sustainable land management covenant requiring ongoing control of wilding trees.

6.0 Easements and public access b-d-e

The proposal does not provide secure public access, and consequently does not meet the requirements of the CPLA.

There is no current marked route from the Mt Barker Road to point b. We understand the intention is to use an unformed legal road. However legal roads can be closed, and are not subject to Crown control. To ensure secure access into the future there needs to be provision for public access along the management easement a-b in the event that the public can not access b from the Mt Barker Road.

- The access between b-d is currently not practicable, due to the steeply eroded gully, and briar infestation, an alternative access must be provided, or and preferably provision for public access over easement b-c in the event that practical access from b-d is not possible.

7.0 Conclusions

Forest and Bird submits that this proposal should not proceed as advertised as it does not protect large areas of low altitude lands which have significant inherent landscape and conservation values.

We submit that the conservation and landscape issues be reassessed, and the proposal re negotiated to ensure that it fulfills the requirements of the objects of the Crown Pastoral Lands Act. Unless the Society's submissions, summarized below, can be successfully concluded Forest and Bird does not consider there is sufficient conservation or public outcomes to warrant Crown expenditure on pursuing this tenure review, and the option of retaining the land as a pastoral lease should be adopted.

- CC 2 be designated as land to be restored to or retained in full Crown ownership and control as Conservation Area
- The Cadrona Faces from the lower boundary of CC1 to CC2 be designated as land to be restored to or retained in full Crown ownership and control as Conservation Area
- Secure public access be created by providing for public use of the management easement should access from Mt Barker Road be threatened or revoked.
- Practical access from point b-d and provision for public access over easement b-c in the event that practical access from b-d is not possible.

Yours sincerely

Sue Maturin
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Forest and Bird