

Submissions needed on Proposed Milford Dart Tunnel and Fiordland Link Monorail

The Minister of Conservation has recently announced her intention to grant two major developments affecting Fiordland and Mt Aspiring National Parks, and Snowdon Forest in Te Wahipounamu (South West New Zealand) World Heritage Area, both designed to provide faster access for tourists to Milford Sound.

Both proposals will have significant impacts on internationally significant National Parks and public conservation lands. The tunnel and new road are inconsistent with the National Parks Act, and the Mt Aspiring National Park Management Plan and will destroy some large trees, possibly home to threatened bats. The monorail involves clear felling old growth beech forest and disturbing rare red tussock grasslands, to construct two parallel roads. Neither proposal is essential. The public and tourists already have access by public roads to these areas in the National Parks and the jury is out as to whether they would alleviate, or even add to congestion at Milford.

Forest and Bird is opposing both proposals. Submissions for the Milford Dart Tunnel are now due **20 February** and **19 March** for the Monorail.

Submissions to both applications are to be sent/mailed to the Southland Conservancy Office, Department of Conservation, Box 743, Invercargill 9810. Email: invercargill@doc.govt.nz

What you can Do

We encourage anyone who loves our parks and outdoors to read the DOC Officer's reports the technical audits and make submissions in your own names. If you don't have time to write a submission please write/email the Minister of Conservation kate.wilkinson@national.org.nz

The Milford Dart Tunnel in a Nut Shell

This involves constructing a 150m long road in to Mt Aspiring National Park, 150m east of the Routeburn shelter and carpark through grassland; construction of a 11.3km one way (for exclusive use) bus tunnel (460m beneath the Humboldt Mountains in Fiordland and Mt Aspiring National Parks), from the Routeburn road end through to the Hollyford Valley immediately south of the current Hollyford airstrip. Construction is projected to take 27 months. The developers expect an average of 23 buses a day with a peak of 40 a day. The Hollyford and Routeburn Roads will need to be widened (but DOC have, excluded this from the concession as they are mostly outside the National Park. The proposed mitigation for pest plant and animal control in Hollyford and Routeburn Valleys is minimal. See DOC

Officers report for maps and details at <http://www.doc.govt.nz/getting-involved/consultations/current/notified-concession-applications/dart-passage-tunnel-milford-dart-ltd/>

Specific Impacts

- Clearance of 8,500m² (80m by 120m,) of mature mixed broad leaf forest 6 large podocarp trees (probably kahikatea) for portal and staging area Hollyford Road. Identified as may be preferred nesting or roosting habitat for 2 species of bats and kaka and rifleman (Survey not done).
- Removal of vegetation from Hollyford Portal and Hollyford airstrip construction Staging area over about 7ha. Hollyford airstrip area includes vegetation important for red admirals and small area of intact conifer/broadleaf forest but remainder is modified.
- Clearance of at Hollyford for construction – includes concrete batching plant, gravel crushing , workshops, generators, water treatment plant, office accommodation, fuel storage, sedimentation and water treatment ponds. (80-100 people on site during construction).
- 12m diameter 4m high spoil surge pile and settling ponds and tanks at Routeburn portal site.
- Noise, dust and lighting effects on wildlife not known.
- Spoil disposal will raise airstrip by 7-7.5m – potential flooding risks.
- Sediment flowing into waterways and thence into Hollyford River.
- Taking gravel from river for concrete making.
- 30 -35 truck movements per day from portal to airstrip on Hollyford road.
- Exclusive use of tunnel via a lease.
- Noise and increased activity impacts on natural quiet.
- Acid leachate – 1% of tunnel spoil may contain sulphide rich rocks. They don't know what types of rocks will be encountered, the applicant is unconcerned as appropriate engineering solutions will be available.
- Tunnel discharge water into Hollyford River.
- Weed invasion to disturbed sites.
- Increased visitors during the off peak times at Milford – protection of natural quiet in these times was a main driver for restricting hours at Milford aerodrome. (Can be mitigated by restriction times tunnel can be used).

The Monorail Proposal

<http://www.fiordlandlink.com/project.htm> for description and maps

This application seeks to have legal authority over a 29.5km long 2-300m wide corridor through old growth beech forests and tussock grasslands from the Mararoa River/Kiwi Burn Junction through the Snowdon Forest Conservation Area in Te Wahipounamu South West New Zealand World Heritage Area. Within this the applicant proposed to construct two parallel roads, a monorail track and and a construction/service road with a myriad

of interconnecting roads. The specific routes are not described, which creates an unprecedented

To make it more palatable the service road will be adapted to a mountain bike track. Where this passes through private land a new mountain biking track will be cut through public conservation land. See video recorded live on site by Sue Maturin on Forest and Bird's Utube Chanel.

<http://www.youtube.com/watch?v=0hkHvlyNu28>

This proposal will fragment and clear unmodified tall beech forests and could have catastrophic impacts on the nationally endangered long-tailed bat population and significant impacts on threatened mohua, falcon, kaka as well as clearance of rare low altitude red tussock grasslands.

Despite these significant adverse effects and the severe misgivings about the project expressed by all the technical audits, the DOC



level of uncertainty, in regard to assessing the potential effects.

officer's report concludes that they could be overcome to the point where the effects on the flora and fauna values are minor. The company has offered compensation for the unavoidable adverse effects in the form of an additional 200ha of pest control in the Eglington Valley, which will not compensate for the impacts on the Snowdon Forest.. The officer's report states that DOC can-not determine if this is the most appropriate form of compensation until the final route has been determined.

The DOC officer's report and other supporting documents can be viewed at

<http://www.doc.govt.nz/getting-involved/consultations/current/notified-concession-applications/fiordland-link-experience-monorail-riverstone-holdings-ltd/>.

Project Summary

- 29.5km long 6m wide monorail track
- Parallel 3m wide construction/service road with spur tracks every 2-300m linking the two.
- Terminus buildings and facilities at the Kiwi Burn/Mararoa Junction and Te Anau Downs in Fiordland National Park.
- Re location of the Kiwi Burn track and tramping hut.
- Construction of 17km mountain bike track through public conservation land.
- Toilets, day shelters along the mountain bike track.

Impacts

Potential adverse effects include:

- Considerable earthworks to construct monorail and access tracks – to be converted to a bike trail following construction.
- Clearance and edge effects of at least 68ha of wildlife rich forest, approximately 19,555 trees, including around 76 very large red beech trees in significant lowland red beech forest.
- Significant adverse effects on rare unmodified low altitude red tussock valley grasslands – about 4.5ha.
- Significant adverse effects on threatened species including the nationally endangered Long-tailed bat, threatened mohua, and kaka, and other forest birds. (Around 5,500 large trees would be cleared). As bats roost in clusters of trees, DOC says, if such a cluster were felled the effects on the bat population could be catastrophic.
- Impossible to accurately assess the impacts due to use of an envelope approach over a 200m wide corridor rather than precise routes..
- Increased weeds and pests.
- Sedimentation pollution runoff, to affected small streams and rivers including the Mararoa and Kiwi Burn Rivers.
- Potentially significant landscape effects, described by the technical landscape audit as significantly compromising the outstanding natural values of the landscapes of the Snowdon Forest part of Te Wahipounamu South West New Zealand World Heritage Area..
- Loss of the popular family tramp to the Kiwiburn hut – (hut is to be relocated).

Your submission can be in the form of a short letter, or it can be more detailed to address the specific matters the Minister must consider.

1. Send/email your submissions to the Southland Conservancy Office, Department of Conservation, Box 743, Invercargill 9810. Email: invercargill@doc.govt.nz
2. State your name and address (Please write as an individual, not as Forest and Bird, to avoid confusion).
3. If you wish to be heard (advisable) state this.
4. State your general views on the proposal.
5. Include a paragraph about why these areas are important for you, what you value about these areas, eg natural quiet, birdlife, water quality, tall unmodified forests, any relevant experiences you have had in the vicinity of the proposals, eg walked the Routeburn. You do not need to have visited these areas to care about them.
6. Your submission will carry more weight if you can address the matters that the Minister must have regard to when considering a concession. These include the National Parks Act 1980, specifically sections 5 and 49 (copied into the Officers report, the General Policy National Parks, sections 4 and 10; see <http://www.doc.govt.nz/publications/about-doc/role/policies-and-plans/general-policy-for-national-parks/> and the Conservation Act, specifically Section 17U and 17W found at: <http://www.legislation.govt.nz/act/public/1987/0065/latest/DLM104648.html>. The relevant National Park Plan – doc website and the Conservation Management Strategy. See below for more details.

General Guidelines for Writing Submissions on Concessions

Guideline for Submission to the Milford Dart Tunnel

Southland Conservancy Office,
Department of Conservation,
Box 743, Invercargill 9810.
Email: invercargill@doc.govt.nz

Date:

Submission to the proposed Milford Dart Tunnel

Your name and Address:

Whether you wish to be heard:

Why you are writing this submission, your views on the proposal, how it will affect your enjoyment of the area, what you value about our National Parks, and the areas affected.

Matters to be considered include:

National Parks Act 1980

The Minister under S49 must be satisfied that the concession wont permanently affect the rights of the public in respect of the park and that it is not inconsistent with section 4 of the Act.

Section 4 (1) of the Act requires that the scenery, ecological systems and natural features of the parks are to be preserved in perpetuity for the benefit , use and enjoyment of the public.

Points to note:

Proposal involves removing potential habitat of threatened species

- Clearance of 8,500m² (80m by 120m,) of mature mixed broad leaf forest 6 large podocarp trees (probably kahikatea) for portal and staging area Hollyford Road. Identified as may be preferred nesting or roosting habitat for 2 species of bats and kaka and rifleman (Survey not done).
- Removal of vegetation from Hollyford Portal and Hollyford airstrip construction Staging area over about 7ha. Hollyford airstrip area includes vegetation important for red admirals and small area of intact conifer/broadleaf forest but remainder is modified.
- Noise impacts on wildlife not known
- These adverse impacts not necessary for general purpose of national parks and is not consistent with the Act.

- Access is not for the general public but will be for private, sole operator access through/under a national park, so there is no added benefit to users of Mt Aspiring National Park.

Section 43 National Parks Act requires the park to be administered according to the General Policy National Parks.

- Inconsistent with Policy 10.3;- presence and development of new roads is generally inconsistent with preservation of National Parks in a natural state, and further roads are not desirable.

Proposal likely to detract from public enjoyment of national parks both during construction and operation; e.g.

- Average 23 buses a day, peak 40 and winter 8 per day – close to Routeburn Information Centre and car park.

Inconsistencies with Conservation Act 1987 specifically Section 17U and 17W

17 (U) (1) (2) Adverse effects and methods for remedying, avoiding or mitigating them; e.g.

- Loss of old growth trees
- Noise from construction activities can't be adequately remedied, avoided or mitigated.
- Noise from buses will impact on Routeburn track and visitor centre and cant be adequately remedied, avoided or mitigated.

17 (U) (4) The Minister shall not grant a concession to build a structure where the activity could be undertaken in another location or could reasonably use an existing structure

- Existing roads provide access to the Parks and to Milford Sound.

Inconsistencies with Mt Aspiring National Park Management Plan

The proposed road and tunnel entrance at the Routeburn end is in the back country zone, key attributes include; *'facilities may include basic huts, well marked tracks and bridges in some places...'*

The Plan considers it unnecessary and inappropriate for the Plan to provide for new roads, and has an objective to not provide for new roads or other land transport links, except for those required to facilitate access to departmental facilities in the front country zone and a specific policy 1 section 6.6.4 that states: *'A new road should not be authorized anywhere in the park, except in the front country zone and only in the following circumstances:*

- (a) If it would significantly enhance visitor access and enjoyment of Mount Aspiring National Park, without adversely impacting on other recreational opportunities and other national park values, and;*
- (b) It is specifically required to maintain or restore access to departmental visitor facilities, such as campsites, parking areas, toilets and walking tracks within Mount Aspiring National Park.'*

The road in Forest and Bird's view is inconsistent with the Mt Aspiring National Park Plan. It is not in the front country zone, it will not enhance access or enjoyment of Mt Aspiring National Park, nor is it required for access to departmental visitor facilities.