

Jacob Paget

From: Meredith Lawry s 9(2)(a)
Sent: Wednesday, 19 June 2024 4:21 pm
To: Listed Projects
Cc: Neil Deans [EXTERNAL] (DOC)
Subject: [COMMERCIAL]FW: Feedback on FTA256 - Klondyke Storage

Kia ora,

Please see below for DOC's assessment of this one; we do not know of a reason why it would be ineligible.

Thanks,
Meredith

From: Janine Sidery s 9(2)(a)
Sent: Wednesday, June 19, 2024 4:14 PM
To: Meredith Lawry s 9(2)(a)
Cc: Tony Preston s 9(2)(a); Chris Coulter s 9(2)(a); Brad Edwards s 9(2)(a); Jo Macpherson s 9(2)(a)
Subject: Feedback on FTA256 - Klondyke Storage

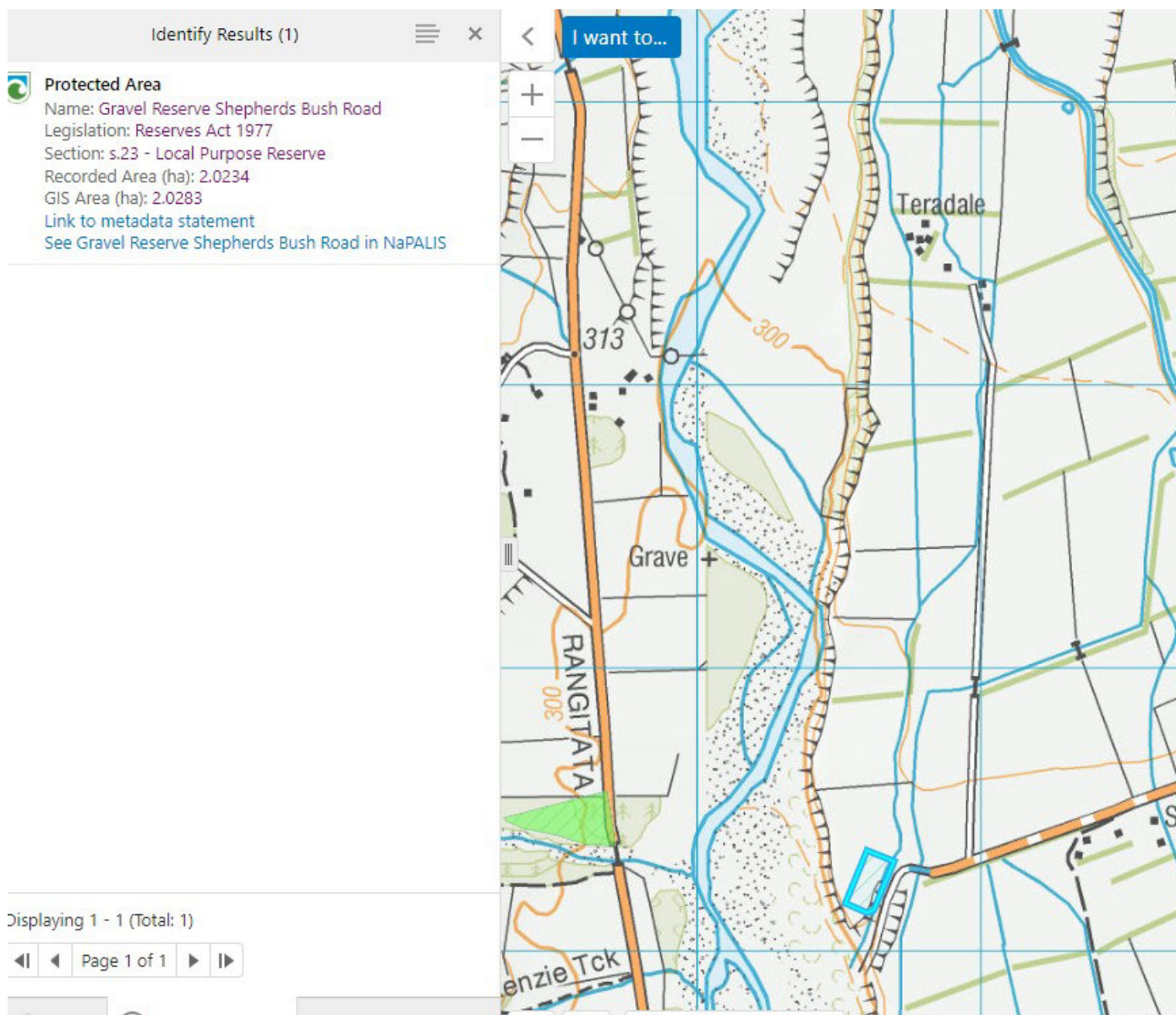
Kia ora Meredith

Here is the work undertaken by the Geraldine Team on this proposal.

Many thanks to the team for turning this around and the level of detail they have provided.

Ngā mihi
Janine

PCL
There is one tiny piece of pcl in the vicinity of Sheppards Bush Road and it's a gravel reserve Vested to Ashburton District Council.



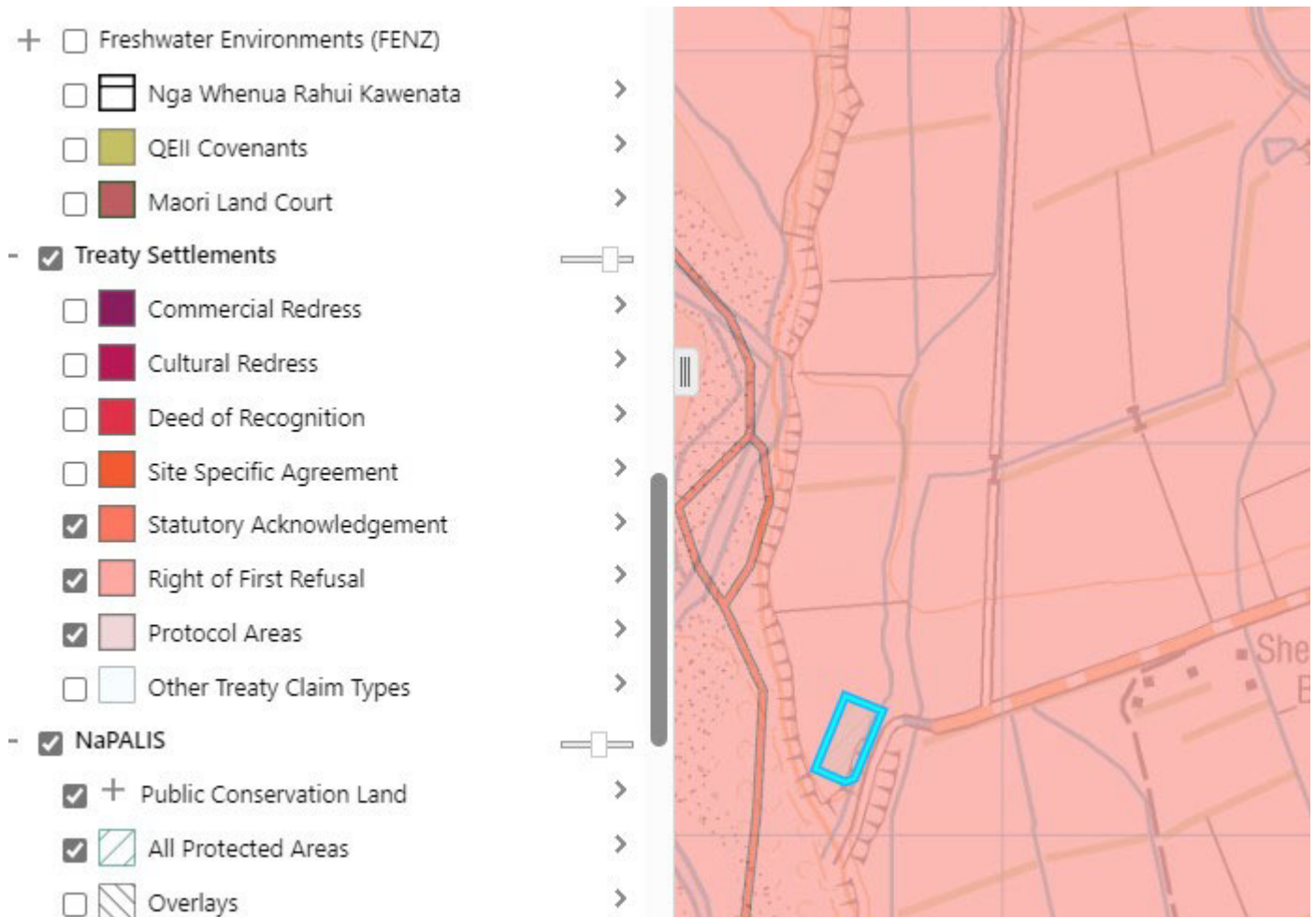
Other authorities that DOC may be party too:

- Wildlife authority to translocate lizards.

Treaty Settlements:

- Immediately adjacent to the development site lies the riverbed of the Rakitata Awa. The Ngāi Tahu Claims Settlement Act grants a Deed of Recognition and Statutory Acknowledgement that requires consent authorities to give regard of the association of Ngāi Tahu manawhenua. Manawhenua, Te Rūnaka o Arowhenua, hold considerable knowledge of whakapapa, traditional trails and tauranga waka, places for gathering kai and other taonga, including ways in which to sustainably use the resources of the river by acknowledging the relationship of people with the river and their dependence on it, and tikanga for the proper utilisation of resources.
- Te Rūnaka o Arowhenua are central to a collaboration of Manawhenua and six government agencies with various responsibilities for the Rakitata. They are committed to the wellbeing of the river and the community connected to it, and we are committed to the development and implementation of a restoration strategy.

I have also snipped the area in GIS and this shows the area under Treaty Settlement with Statutory Acknowledgement, Right of First Refusal and Protocol Area.



Other comments:

- The application does not provide much specific detail. There is not even a good site map and a very general summary of activities or mitigations they expect covered. This makes assessment of impacts difficult.

Values identified:

- Main Rakitata Awa braid plain cultural and ecological values. (possibly?)
- Lizard habitat in rock piles and stonefield/grasslands within the development footprint.
- Probably the odd scattered native plant within a highly developed pastoral farming environment- may include the odd matagouri, Melicytus, te kouka, coprosmas, pittosporum. I have not walked over this land.
- Existing public access to main riverbed appears to run through the stage 3 development area.

Explanation:

- This application uses existing water consents held by the businesses associated with the RDR, but the practical implication of this development is that it may increase water harvesting from the Rakitata- if filling the 52million m3 dam comes from any unutilised portion of the existing water consents. This is not specified by the applicant, but the possible impact of further water takes on the cultural and ecological values of the wider Rakitata Awa are a possible practical outcome.
- Increased water availability will increase farming intensity on the mid Canterbury plains. If portions of the water taken are used for environmental enhancement, we are likely to see a slaving of the

Rakitata to environmental protection across the plains at the cost of river values that would be difficult to . It is likely this application is preparatory to the development of Managed Aquifer Recharge given I understand applications are underway to transfer stock and human use water consents to include MAR activities.

- ADC have already issued consent LU16/0067 which appears to cover the development. No explanation on any shortfall within the existing consent is provided except that it isn't fit for purpose.
- It appears the applicant is seeking for required mitigations within this consent LU16/0067 to be either removed or delayed in implementation. Despite the applicant's explanation that this is because they have changed to a staged implementation of development the existing consent already has specific clauses about moving development to a staged implementation (ie. That mitigations are undertaken at the earliest development stages).
- The applicant does not specify which consent mitigations they expect to have removed except that these will be those conditions pertaining to a withdrawn water take extension. Specifically, mitigations around the creation of wetland, pond, fish refuge, shingle bird island from consent LU16/0067 are no longer mentioned and are presumed as removed? And the remaining mitigations seem to be reptile translocation and native planting areas.
- Within the footprint of works conservation values likely to be limited to reptile impacts as existing boulder fields are destroyed, of particular interest- Southern Grass Skink (clade 5 -at risk/declining). Five lizard species have been found on the south side of the Rangitata below the Rangitata Gorge within the last 15 years. The stony dry flood plains of the Rangitata where they were not completely changed and especially the dry river bed of the South Branch of the Rangitata had populations of the Southern grass skink *Oligosoma polychroma* Clade 5 (At Risk-Declining) until in recent times. However, even those few populations have been reduced through developments in connection with the establishment of the South Rangitata Irrigation Scheme and the modification of the South Branch of the Rangitata. Only a few remnants remain today. (Franks. H. 2021)
- The existing mitigations required by consent LU16/0067 include the establishment of a surrogate lizard habitat before removal of rock piles within the development area. Complimentary maintenance, weed control, translocation and monitoring are included.
- The applicant has not prioritised lizard mitigation works until the 3rd and final development stage (est to be mid 2030's) because that is when the existing habitat would be impacted. It is suggested here that any translocation is likely to be timely and require new habitat bedding in and a slow removal of the old habitation site. My recommendation is this process begins as a stage 1 implementation.
- Alternative public access to the main stem of the Rakitata will need to be developed.

From: Listed Projects <ListedProjects@mfe.govt.nz>

Sent: Monday, June 17, 2024 12:08 PM

To: Neil Deans s 9(2)(a) Meredith Lawry s 9(2)(a)

Cc: Karen Sannazzaro s 9(2)(a)

Subject: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Kia ora Neil and Meredith

This listed project application is for FTA256 - Klondyke Storage.

The project has triggered your criteria for consultation.

Could you please provide comment on:

- whether the project requires any other DOC-related approvals
- if you are aware of anything that would render the project ineligible under clause 18 of the Bill
- if you are aware of any Treaty settlement matters which relate to the project site – such as local protocols
- any other relevant matter?

If possible, could you please provide your feedback by COB 20 June 2024

Please let me know if there is anything I can do to assist.

Ngā mihi nui

MfE Listed Projects team



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