

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of applications for resource consent by the Ashburton Community Water Trust to construct, operate and maintain an intake, settling pond, fish bypass, canals, tailraces and associated infrastructure and to use it for hydro-electricity generation and associated purposes.

**STATEMENT OF EVIDENCE OF DAVID MICHAEL NEWAY ON BEHALF OF THE
DIRECTOR GENERAL OF CONSERVATION**

**DIRECTOR GENERAL OF
CONSERVATION**
DEPARTMENT OF CONSERVATION

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1. INTRODUCTION

Qualifications and experience

- 1.1 My name is David Michael Newey. I am currently employed by the Department of Conservation (Canterbury Conservancy) in the position of Community Relations Supervisor (Resource Management Planner). I have held this position for two years.
- 1.2 I hold a Bachelor of Science (Zoology) and Post Graduate Diploma in Resource Studies and have eleven years experience in resource management. I was admitted as an affiliate member of the New Zealand Planning Institute in 1997.
- 1.3 My work experience has been with local, regional and central government. My responsibilities in these positions included a range of planning work in consents analysis, policy planning, strategic planning and community based planning.
- 1.4 I have been involved in several water and irrigation resource management issues including submitting on the Proposed Natural Resources Regional Plan and Central Plains Water applications.
- 1.5 I have considered the notified applications and supporting material, including the Assessment of Environmental Effects, filed by the Applicants. I have also considered the evidence circulated by the Applicant on 8 September 2008. I have also considered the Officer's Reports and recommendations of the Canterbury Regional Council and Ashburton District Council and relevant expert's evidence.
- 1.6 I confirm that I have read and agree to comply with the Environment Court Code of Conduct for Expert Witnesses Consolidated Practice Note 2006.

Scope of evidence

1.7 My evidence provides a planning background against which Commissioners may consider evidence provided by a number of expert witnesses for the Department of Conservation (the Department), both previously to the Central Plains Water hearings (CPW) and at this hearing. I also cite in my evidence where I have drawn upon evidence presented by expert witnesses for other parties to this hearing.

The substantive part of my evidence will address the following matters:

- A brief description of the activity and site
- The activity status under the provisions of the relevant plans and the National Water Conservation (Rakaia River) Order 1988 (NWCO)
- An assessment of the proposed activities against the Objectives and Policies of relevant plans, being the Canterbury Regional Policy Statement (CRPS), Proposed Natural Resources Regional Plan (NRRP) and Ashburton District Plan (ADP).
- Section 104 Resource Management Act 1991 (RMA) matters including other matters that I consider are relevant considerations.
- Relevant Part II RMA matters.
- Conclusions.

1.8 In relation to my overall evidence, I have not assessed whether all necessary applications have been applied for to construct and operate the Ashburton Community Water Trust (ACWT) Scheme. I rely on the section 42A reports of Ms Johnston for the Canterbury Regional Council, and Ms Harte for the Ashburton District Council, in this regard.

1.9 Where I substantially agree with previously presented planning evidence or s42A reports I indicate to that effect in order to avoid

unnecessary repetition. Note that in several instances I agree with Ms Johnston's initial conclusions in relation to particular Objectives or Policies, being on the basis of the information presented she is unable to determine if the effects of the proposed works will be consistent with the referred to policies. In many instances Ms Johnston then goes on to state that if suitable consent conditions are adopted the relevant policies will be met. I generally disagree with the second part of her analysis, given the lack of certainty as to which conditions she is referring to, the level of detail and standards in such conditions and how they might link to particular effects.

- 1.10 I have previously presented planning evidence on the water take applications for ACWT as part of the Central Plains Water hearings. This evidence should be read in conjunction with that evidence.

2. DESCRIPTION OF THE ACTIVITY SITE

- 2.1 The site of the proposed Scheme is located adjacent to the south bank of the Rakaia River. An intake is proposed at Happy Valley with associated settling ponds and canals to convey water past the Highbank Power Station and on to the proposed Barhill Power Station, where it will be discharged back to the river.
- 2.2 The Rakaia River, along with its adjacent terraces, contain significant ecological values as outlined in the evidence of Dr Hughey, Dr Olsen and Dr Hayes at the CPW hearing and Mr Head at this hearing.

3. ACTIVITY STATUS OF THE APPLICATIONS

Activity status

- 3.1 Having read Mr Dunnings evidence and the s42A reports of Ms Johnston and Ms Harte, there would appear to be general agreement as to the overall status of the activities being discretionary. I agree with their analysis and have analysed the applications accordingly as being

discretionary. This analysis does not however apply to activity status for water takes and discharges under the Rakaia NWCO, as I will discuss further in my evidence.

Relationship with Electricity Ashburton/Barhill Chertsey Irrigation consents

- 3.2 I note that the ACWT applications overlap with consents previously applied for and granted to Barrhill Chertsey Irrigation and Electricity Ashburton (BCI/EA). Those consents for water takes and use for the purpose of operating and maintaining a hydro generation and irrigation scheme are in the same location as part of the ACWT proposed scheme, albeit at a different scale.
- 3.3 Given that ACWT have applied for many of the same activities that have previously been consented under the BCI/EA consents, such as constructing infrastructure to divert and convey water, fish barriers, works in the riparian margin, discharges and earthworks, there is potentially the need to consider those consents which have been granted when considering the existing environment and the effects of the ACWT proposed activities.
- 3.4 However, given that ACWT have applied for their own infrastructure, take and discharge consents, I concur with Ms Johnston's analysis that these applications should be treated and assessed as being separate from the BCI/EA scheme.

National Water Conservation (Rakaia River) Order 1988 (NWCO)

- 3.5 The NWCO, like all Water Conservation Orders, is unlike a plan in that activities are either prohibited (if they do not comply with its terms or provisions), or they are not. If they are not, reference must then be made to rules in relevant plans to determine activity status. If no such plans or rules exist for a particular activity, then that activity defaults to being discretionary under Section 77(c)(1) of the Act. This is the case with respect to takes from the Rakaia.

- 3.6 The NWCO was put in place to recognise and sustain outstanding values through the protection of the Rakaia Rivers outstanding natural character and outstanding wildlife habitat, fisheries, recreational, angling and jetboating features.
- 3.7 Clause 9(2) of the NWCO is relevant to these ACWT applications in setting standards which must be met in the granting of water rights. These standards are relevant to the proposed discharges from the various aspects of the applications.

Clause 9(2) in my opinion sets a two tier test for discharges. Firstly, under 9(2(a)), discharges are to be substantially free from suspended solids, grease and oil. If that test is met then the discharge, after reasonable mixing, must meet the standards for the receiving waters listed in 2(b).

- 3.8 I note that the applicant's, through the evidence of Dr Rowe, rely on the diluting effect of "flood" flows to assimilate sediment discharges from the proposed settling ponds. I also note that the proposed consent conditions as Appendix B (Condition 5) to Mr Dunnings evidence, rely on the "reasonable mixing" clause of the NWCO 9(2(b)) without addressing 9(2(a)) which requires any discharge to be substantially free from suspended solids, grease and oil.
- 3.9 I understand there was some discussion of this matter at the EA hearings. However, in terms of these applications, the applicant has not outlined or addressed how their proposed sediment discharges will comply with Clause 9(2(a)) of the NWCO.

4. **OBJECTIVE AND POLICY ASSESSMENT**

- 4.1 The RPS, NRRP and ADP contain objectives and policies to achieve Part II of the RMA. I will examine each in turn. There are no Objectives and Policies in the TRP or the NWCO. I have however previously included some discussion of the Purpose of the NWCO.

4.2 The focus of my assessment is on those Objectives and Policies where I disagree with or add further comment to the assessment made by Ms Harte, Ms Johnston or Mr Dunning and which have direct bearing on matters raised by the Department in submissions.

Canterbury Regional Policy Statement (RPS)

4.3 The RPS became operative in June 1998 and provides a broad overview and direction relating to general management of natural and physical resources in the region.

Chapter 7: Soils and Land Use

4.4 Chapter 7 provides direction for the management of soils, erosion and land use. The applicant relies on the preparation of an Erosion and Sediment Control Plan at some point in the future to address the management and control of sediment. The details of this plan are unknown at this stage.

4.5 I agree with Ms Johnston's s42A analysis of the application in relation to these matters, being that based on the information supplied in the application I am unable to determine if the effects of the works will be consistent with the Objectives and Policies in Chapter 7.

Chapter 8: Landscape, Ecology and Heritage

Objective 2 and Policy 3

4.6 Objective 2 and Policy 3 seek to protect and enhance the regions distinctive natural features and landscapes from development. I note that neither Ms Johnston nor Ms Harte consider these relevant to the applications. However, based on Ms Lucas's evidence presented at the Central Plains hearings, the Rakaia River is regionally outstanding in terms of landscape and natural features and that proposed large scale intake structures in that case will permanently and significantly adversely affect the values which make these rivers significant.

4.7 I note that Ms Lucas did not consider the ACWT intake structures at the CPW hearings as she did not believe sufficient information has been supplied to be able to assess the impacts of those structures. It is therefore unclear if the effects of the proposed ACWT intake and river works will be consistent with Objective 2 and Policy 3.

Objective 3 and Policy 4

4.8 Objective 3 and Policy 4 seek to protect and enhance the regions indigenous biodiversity from development. Dr Hughey has previously presented evidence which establishes the Rakaia River as a significant habitat of indigenous fauna. Mr Head has provided evidence at this hearing as to the botanical and ecological values of the Rakaia River terraces within the proposed construction envelope and their significance.

4.9 Ms Harte's s42A analysis suggests given the lack of information provided by the applicant, the extent and nature of indigenous biodiversity within the scheme area is unclear and therefore the relative significance of particular areas cannot be assessed.

4.10 Primarily in relation to the loss of river terrace plant communities, Mr Head concludes the Applicant's assessments as to effects and mitigation are incomplete and will not mitigate or offset the estimated impacts of the proposal.

4.11 In summary, based on the evidence referred to above, I therefore conclude the proposal as it currently stands is not consistent with Chapter 8 of the RPS.

Chapter 9: Water

Objective 1, 2 and 3 and Policies 1-10

4.12 Overall Objectives 1, 2 and 3 and Policies 1-10 set a framework to allocate and allow water to be used for peoples benefit in an efficient

and prioritised way while safeguarding and protecting the other users and values of those waterways.

4.13 I agree with Ms Johnston's s42A assessment that there is insufficient information to determine if the application is consistent with the relevant policies in Chapter 9 in relation to water quality. I believe this to be the case particularly when read in conjunction with my earlier discussion on the Rakaia NWCO.

Chapter 10: Beds of Lakes and Rivers and their Margins

Objective 1 and Policies 1-3

4.14 Objective 1 sets a framework to protect and where appropriate enhance values in the beds and margins of lakes and rivers which is largely reflective of Part II RMA matters.

4.15 Policy 1 states that areas important for their conservation values should be identified, and that land use or development should avoid causing significant adverse effects on the conservation values in those areas. Prior to identification of those areas, activities should be carried out in ways that avoid or mitigate adverse effects, including effects on:

- habitats of indigenous fauna (particularly threatened species) and species rare or endemic within Canterbury,
 - the unimpeded passage of fish,
 - landscape values and,
 - areas of indigenous vegetation.
- Policy 2 goes on to state that areas of ecological, cultural or landscape significance or any other area with natural values which is in a degraded state, should be enhanced.

- 4.16 The beds and margins of the Rakaia River have been identified by a range of experts and Officers in the information supplied to this and the Central Plains Water hearing as having one or more of the values listed in Objective 1 and Policy 1. The applicant relies on several proposed consent conditions to meet these policies, in particular:
- limiting works within 100m of any bird nesting or rearing site (Appendix A).
 - consent conditions relating to fish screen design. The proposed fish screen conditions are unclear at present, as Mr Dunning refers to adopting to “NIWA proposed fish screen guidelines” in the body of his evidence, yet in the proposed consent conditions refer to different standards (5mm and 3.8mm screen mesh size).
- 4.17 If the proposed consent conditions outlined in the body of Mr Dunning’s evidence are adopted in relation to these matters (in particular adoption of the NIWA design guide standards for fish screen design), the relevant Chapter 10 Policies may be met.

Proposed Natural Resources Regional Plan (NRRP)

Chapter 4: Water Quality

Objective WQL1 and Policies WQL 1-5

- 4.18 Objective WQL1.1 relates to water quality outcomes for rivers and lakes, while Objective 1.2 focuses on Natural and artificial lakes. Both are supported by Policies WQL1 - 5.
- 4.19 The Objective establishes a framework for maintaining or improving water quality focussing on standards set in Table WQN 5.
- 4.20 The associated policy framework manages point and non point source discharges while ensuring that:
- Discharges will not facilitate the movement of pest species

- Discharges will not significantly alter water quality, character of aquatic ecosystems.
- How large a zone of non compliance may be.
- Preventing the discharge of certain substances.

4.21 A number of discharges are associated with the ACWT applications including during construction, and as operational discharges (sediment sluicing, hydro water discharge, fish bypass).

4.22 I agree with Ms Johnston's analysis of alignment of the proposed scheme with Chapter 4, being that the proposed activities may not be consistent with it, but that it is difficult to assess given the lack of information supplied by the applicants.

Chapter 5: Water Quantity

Objective WQN 1

4.23 This Objective, enabling surface water to be taken while protecting Part II RMA matters, is relevant for consideration for the proposed water take from the Rakaia River and has been discussed previously at the Central Plains Water hearing. The Objective is given effect through the allocation of water available under the Rakaia WCO. Provided water is allocated within the allowable limits of that Water Conservation Order, Objective 1 will be met.

Chapter 6: Beds and Margins of Lakes and Rivers

Objective BLR 1 and Policy BLR 1

4.24 Objective BLR 1 seeks to allow activities in beds and river margins subject to environmental protections being observed, such as minimising the spread of pest plants, protecting significant habitat and protecting outstanding landscapes and natural features.

- 4.25 The associated Policy seeks to control land use activities within or adjacent to beds, particularly to protect flood carrying capacity, significant habitat of indigenous fauna, other structures or prevent plant pest infestations.
- 4.26 The applicants proposed consent conditions, particularly in relation to bird survey and habitat protection may be adequate to make the application consistent with these policies.

Objective BLR 2 and Policy BLR 2

- 4.27 Objective BLR 2 and Policy BLR 2 deal specifically with human activity in riverbeds and ensuring effects of those activities avoid as far as practicable impacts on indigenous fauna, vegetation and sites of significance.
- 4.28 As discussed by Dr Olsen, Dr Hughey and Mr Hay previously, construction activities have the potential to impact on a range of values including habitat removal through sediment deposition, disturbance of birds and disruption of fish passage. All these effects could be managed through appropriate monitoring, construction management and consent conditions.
- 4.29 On this basis I conclude that if appropriate consent conditions were applied, the proposed construction activities of CPW in the beds of rivers would not be contrary to Objective BLR 2 and Policy BLR 2.

Ashburton District Plan (ADP)

- 4.30 I have considered those Objectives and Policies under the operative Ashburton District Plan relevant to issues of concern to the Department.

Utilities – Section 3.9

- 3.9.3.1 – Effects on the Environment – Objective 1

- 4.31 Objective 1 and associated Policies 1 and 2 set a framework to allow the construction and operation of utilities while protecting areas of significance and avoiding, remedying or mitigating adverse effects on the surrounding environment.
- 4.32 Ms Harte's s42A report establishes that the proposed scheme is a utility and I agree. That being the case, some consideration is therefore required as to the effects of the proposal on the Rakaia River, its margins and associated terraces.
- 4.33 I note than Dr Clemens landscape assessment, prepared for Ashburton District Council, states there will be significant impact on the natural character of the Rakaia River, particularly for some of those parts of the canal specific to the ACWT applications (Highbank to Barhill) and the Barhill power station. Dr Clemens also raises doubt as to the appropriateness and viability of the mitigation set out by the applicant.
- 4.34 In relation to adverse effects on significant indigenous vegetation and habitats, I note that while the Plan dose not identify the terrace areas where the canals are to be constructed as a Site of Significant Conservation Value, referring only to the active river bed (site 67), both Dr Keesing and Mr Head regard remnant indigenous vegetation areas significant if appropriate criteria are applied, including the Ashburton District plan criteria for assessing significant (Policy 3 section 3.1.3.2). This appears particularly so for remnants in the area from Lowes Cutting to Barhill.
- 4.35 Given the analysis by the referred to experts, I consider the actual and potential effects of the scheme on the natural character of the Rakaia River and on significant indigenous vegetation (and possibly significant habitats of indigenous fauna) are more than minor and are not consistent with Objective 1 and Policies 1 and 2 referred to above.

Natural Environment – Section 3.1

3.1.3.1 – Nature Conservation values – Objectives 1-4 and Policies 1-4, 6,8-10,13-15 and 17.

4.36 This section of Objectives and Policies sets out a framework for identifying and protection areas of significance and natural character and avoiding, remedying or mitigating adverse effects on these areas and rare species.

4.37 I note Ms Harte only considers Objectives 1-4 and Policy 17 relevant considerations. I disagree, particularly given Dr Keesing and Mr Heads analysis that remnant indigenous vegetation and possibly habitats in the scheme footprint meet the criteria for significance. Given those assessments, all relevant policies relating to effects on and protection of these areas should be considered, being those I have referred to above.

4.38 The lower Rakaia River is identified as an Area of Significant Conservation value (Appendix 2 of the ADP) in particular for its threatened bird habitat. Evidence on this matter has previously been presented by Dr Hughey at the Central Plains Water hearings.

4.39 I note that Ms Harte considers that the effects of land use (construction activities and discharges) can be mitigated through appropriate timing and management of such works. I have previously discussed this matter in relation to consideration under the NRRP and WCO.

4.40 In terms of the alignment of the Terrace Canal and the natural values of that area, issues that Dr Keesing and Mr Head have identified, being the gaps and incorrect analysis in the vegetation surveys and lack of faunal survey carried out by the applicant, it would appear that there will be significant impacts on those identified values and that the

mitigation proposed will not avoid, remedy or mitigate those adverse effects.

4.41 Consequently it is my opinion that the proposed scheme is not consistent with the Objectives and Policies referred to above.

5. RESOURCE MANAGEMENT ACT 1991

Sections 104

5.1 Relevant section 104 matters have been discussed throughout my evidence, with reference to witnesses called by the Department and other experts.

Section 104

5.2 In relation to s.104 (1)(a) I consider that there will be a number of significant actual and potential effects on the environment arising from the construction and operation of the ACWT Scheme. There is a degree of uncertainty about some of the effects. This is due to the fact that insufficient information has been provided by the applicant to confirm the extent of certain effects and precisely what mitigation the applicant proposes. Of particular note are:

- the significant and cumulative effects on threatened plants and significant indigenous vegetation, as outlined by Dr Kessing and Mr Head.
- The significant effects on the natural character of the Rakaia River, as outlined by Dr Clemens.
- The potential effects of construction activities and discharges on the significant habitats of threatened birds and fish in the Rakaia River.

5.3 In relation to s.104 (1)(b), I consider that the proposal will be inconsistent with a number of the objectives and policies of the

Regional Policy Statement, Proposed Natural Resources Regional Plan and Ashburton District Plan as outlined earlier in my evidence. Some question also remains regarding the ability of the scheme to comply with the requirements of the Rakaia Water Conservation Order, particularly in relation to discharge water quality parameters.

- 5.4 In relation to s104(1)(c), I consider there are other matters, in particular other plans and strategies, which are relevant and reasonably necessary to be considered. These are outlined below.

Canterbury Conservation Management Strategy 2000 - 2009(CMS)

- 5.5 The CMS for the Canterbury Conservancy was approved by the New Zealand Conservation Authority in 2000.

- 5.6 The CMS is prepared under the Conservation Act 1987 and its purpose is:

“to implement general policies and establish objectives for the integrated management of natural and historic resources and for recreation, tourism and other conservation purposes.” (Section 17D Conservation Act 1987)

- 5.7 The CMS provides an overview of the Conservancy’s issues and an overall direction for its activities which are carried out under the more specific management plans prepared for the Department’s major land units which include in particular National Park management plans.

- 5.8 Part 3 of the CMS outlines the Goals and Priorities for conservation in the region. This is divided into key priorities by place, based on risks, opportunities and issues identified:

Plains – For Indigenous species the Key Priorities include:

- “Wrybill and black fronted tern, threatened plants and the fragments of natural vegetation of the Canterbury Plains that remain.”

New Zealand Biodiversity Strategy (NZBS)

- 5.9 While the NZBS has not been prepared under the RMA I believe that its contents are relevant and can be taken into account. Its contents are relevant to these proceedings insofar as they address resource management matters.
- 5.10 The NZBS is applicable to the proposed scheme because there are a number of species, some of which are threatened, present in or associated with the scheme area. Maintaining life supporting capacity is a key component of sustainable management as defined in Part II of the RMA. The NZBS in Principle 8 of Part 2 states that biodiversity is best preserved in situ by conserving ecosystems and ecological processes to maintain species in their natural habitats. In this case, this means maintaining the natural functioning of the river and associated terraces and connections between vegetation and remnants in order to protect habitat of species where they occur naturally and also to adopt a cautious approach to modifications of other habitat. There is also a need to make resource management decisions that are properly informed and are based on present knowledge.
- 5.11 The NZBS consists of several parts. Part One covers a strategy; Part Two states a vision, goals and principles; and Part Three identifies action plans for managing New Zealand's biodiversity.
- 5.12 Two key related principles in Part 2 of the NZBS that are especially relevant to the present case are:
- Halting the decline in New Zealand's biodiversity by maintaining and restoring a full range of remaining natural habitats and ecosystems to a healthy functioning state (Principle 3); and
 - Maintaining habitat for all indigenous species where they naturally occur (Principle 8).

5.13 I consider that the provisions of the NZBS are relevant considerations in assessing the proposed scheme.

Section 108

5.14 Section 108 deals with conditions that can be applied to resource consents. The applicant places great significance on the use of management plans to address various effects of the scheme. While management plan templates are included as proposed condition of consent, generally it is unclear due to their lack of detail, specificity or certainty if they will be effective in avoiding, remedying or mitigating adverse effects. There is also a lack of clarity regarding what fish screen design standards the applicant is proposing, as the standards mentioned differ between the body of Mr Dunnings evidence and the proposed consent conditions at Appendix B of that evidence.

6. Part II Resource Management Act

6.1 Section 6 of the Act contains a number of matters of national importance which must be recognised and provided for when considering activities under the Act.

Section 6(a)

6.2 The natural Character of the Rakaia River will largely be maintained in the upper section of the scheme. However the visual impact of the Terrace Canal has been assessed as significant and proposed mitigation not sufficient or effective to reduce the impact to being minor.

Section 6(c)

6.3 As noted in the evidence of Dr Keesing and Mr Head, significant impacts can be expected from the proposal on, in particular, significant indigenous vegetation remnants. There are also a number of gaps in the information supplied by the applicant meaning the full range of significant indigenous vegetation and significant habitats of indigenous

fauna across the scheme are unknown. As such the effects of the proposal on them are also unknown.

- 6.4 Having considered the above information, I consider the ACWT proposal to be inconsistent with section 6(c).

Section 7 (d)

- 6.5 The intrinsic values of ecosystems are raised in general terms by Mr Head. Based on this evidence it is my view that the effects on these values is unclear, given the lack of information, or that the values will be compromised.

Section 5

- 6.6 Section 5 outlines the Purpose of the RMA, being to allow the use of natural resources for some benefit while sustaining their long term potential, ensuring their life supporting capacity is safeguarded and avoiding, remedying or mitigating adverse effects.
- 6.7 The Applicant's have put forward a case that the proposal will provide access to water to allow for electricity generation, thereby providing social and economic benefits to people and communities.
- 6.8 There are however an array of adverse effects which have been identified by the experts I have referred to. Based on the analysis presented in my evidence and the evidence prepared by the experts I have referred to, I consider the proposal in its current form and with the current level of information provided, will not avoid, remedy or mitigate adverse effects on the environment and as such is inconsistent with section 5 RMA.

7. CONCLUSION

- 7.1 I have presented evidence in support of the Departments submissions.
- 7.2 I accept this is one component of the wider analysis of the proposed ACPT scheme. The applicants have outlined positive benefits that may

occur as a result of the scheme proceeding. In the alternative, the Department and associated experts have identified a number of adverse effects arising from the proposal.

- 7.3 I consider the effects of the proposed scheme are more than minor having regard in particular to effects on ecological functioning and natural character.
- 7.4 I am of the view that the application is also contrary to a number of the objectives and policies of the RPS, NRRP and ADP. It is also potentially contrary to the Rakaia Water Conservation Order.
- 7.5 With regard to Part II of the RMA, I conclude that the applications are inconsistent with and will not avoid, remedy or mitigate adverse effects of activities on the environment and therefore will not achieve the purpose of the RMA.

David Newey

15 September 2008