



14 October 2009

The Commissioners,
Resource Consent Hearing for Central Plains Water.

Dear Sirs,

Here is Whitewater NZ's current position re the resumed CPW hearing for a scheme without the previously proposed storage reservoir.

1. Whitewater NZ is the new name of the New Zealand Recreational Canoeing Association. The only change to contact details is the email address which is now whitewaternz@rivers.org.nz. Please use this address for future correspondence. Email correspondence is preferred to paper correspondence.
2. Whitewater NZ notes the following paragraph from the Commissioner's Minute 7.
"1.8 We also noted that we have reached a tentative conclusion that, but for our likely decision on the storage facility, the Waimakariri and Rakaia takes could possibly be granted (albeit for lesser rates and volumes of take than have been applied for, at least in the case of the Waimakariri)."
3. I have read Minute 9, and agree that pars 9.3 – 9.16 is a good summation of Whitewater NZ's flow evidence. We feel our evidence has been heard and we thank the commissioners for their time and consideration.
4. A couple of fine points I would make are:
 - Re this line from par 9.8: *"Again, we understand this evidence to relate to residual flows rather than modified flows."* All kayakers evidence concerns **measured** flows at the OHB gauge, as that is the only information available to kayakers. The actual residual flow would usually be higher than we quote, depending on how far the kayaker is upstream of loss to ground water and/or irrigation takes. To any kayaker, the perception of flow at a given location is dependent on their previous experience at that location coupled with the flow figure they have obtained from newspaper, phone or internet during those previous experiences. Eg if the newspaper said 60 when one could just float down a braid without scraping, then at a later date when one can just float down that same braid without scraping then one would think the flow is probably about 60 cumecs. Judging flow is a fairly holistic process, but our evidence always relates to measured flow.
 - Re this line from par 9.7: *"We heard that this requires a preferred water depth of around 60 cm (with a minimum of 30cm 40cm) to avoid damage to the bottom of the craft and paddle blades."* A paddle blade is 40-50 cm long, so the minimum depth is more like 60 cm.
5. Whitewater NZ feels par 9:15 from Minute 9 is the crux of the issue for kayaking amenity:
"9.15 CPW will need to demonstrate to us the effect of any modified take regime on the number of days per month on flows in the 50 to 60, 60 to 70 and 70 to 80 ranges. Clearly any significant increase in the 50 to 60 band during the season, would be unacceptable. Some limited increase in the duration of flows in the other two ranges may be acceptable. At the original hearing CPW proposed certain releases"
6. Whitewater NZ's evidence to date on recreational flows, safety of intakes and other issues is still current and the new "30-25-1:1" proposal by CPW has not changed the relevance of the evidence,

nor the Commissioner's summation of the flow evidence in Minute 9. We believe it is up to CPW to demonstrate the effect of any take regime on the days per month in the various flow ranges.

7. I have reviewed Maurice Duncan's evidence of 12-16 October 2009, particularly Figures 2 and 3. Without the detail of the data it is difficult to add further to the Commissioner's points in Minute 9. It does appear that the effect on days available to kayaking of the 30-25-1:1 regime is much reduced from previous scenarios involving water-storage.
8. In regard to consents still to be considered, I would note that a 25 cumec intake on the upstream side of the bluff at the gorge bridge still represents a severe and in our view unacceptable safety hazard.
9. In Whitewater NZ's original evidence, and then subsequent correspondence with the Commissioners, it was pointed out that it is impossible to determine the effects on the kayaking amenity from flow-duration curves alone, and that the base daily flow data is required. E.g.: these paragraphs from "NZRCA Letter to Commissioners", 23 June 2008:
"In respect to analysis vs base data
 - *The submitter's and applicant's analysis does not agree. If I take one of the most simple examples; % of days that flow does not exceed 41 cumecs, for the pre-CPW flow (to avoid any issues of which CPW scenario is chosen): Duncan (figure 2) and de Joux (par. 10.1) more or less agree at 13-14% on average. Tipler's figure for the 'typical' year (p28, 20/25/240/CPW/CPW) is about 28%, i.e. a 100% variance. This variance is not resolvable without the base data.*
 - *I also note that Tipler's pre-CPW curves vary for his CPW/CPW and Synlait/CPW scenarios, which seems unlikely given that Synlait does not have a pre-CPW take from the Waimakariri.*

I respectfully submit that my point is valid, and that CPW should have provided both their daily projected flow data and the assumptions underpinning their scenarios well prior to the hearing.

On Friday June 13 I asked Walter Lewthwaite if URS will provide such data, which he agreed to do (but as of June 23 he has not done this). However, as noted by Duncan, de Joux and one of the other submitters that week ("CPW keep changing their bloody story!"), the effects are a moving target. Walter told me that the likely scenarios are now looking more like 40-cumec scenarios again. They will of course change again if conditions are imposed on any relevant consents.

I therefore ask the Commissioners to require CPW to supply flow data whenever the scenarios change. By flow data I mean daily pre- and post-CPW flows, for the years in their model, for all the scenarios being considered together with their assumptions for each. "

10. For more detailed comment from Whitewater NZ on the current or any future scenarios, we would need the pre-CPW actual and post-CPW synthetic daily flow data series.
11. Finally, Whitewater NZ apologise for our lack of appearance at the currently resumed hearing. To some extent this is because we are confident the Commissioners have a good handle on the kayaking amenity and there isn't much further we can add. Mostly however it is due to Whitewater NZ being a voluntary organisation with all members of the executive being involved in multiple issues currently under action. Between this time last year and now these include hydro-schemes for the Mokihinui, Matiri, Matakītaki, Hurunui, Ngakawau and Waitaha; WCOs for the Nevis and Hurunui; access issues in Mt Aspiring and Kahurangi National Parks, St James Station, and Nga Awaparua rapid; planning involvement in the Canterbury Water Management Strategy and the Land and Water Forum; legislative issues such as the NPS for Renewable Electricity Generation, the NPS for Freshwater Management, the RMA amendments, and the ETS amendments; and a

number of other safety, education or related advocacy issues. We have thus found it difficult to keep up with details of the new non-storage CPW scheme.

Yours sincerely,
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