

Attn: Lisa Wheeler  
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4 June 2021.

Kia ora, Lisa,

**Te Anau Helicopter Services Limited lease application, 87559-OTH**

Federated Mountain Clubs was formed in 1931 and advocates for the backcountry and outdoor recreation on behalf of over 21,000 members in 99 clubs. FMC has taken, and continues to take, a leading role in the establishment of and ongoing robust planning for much of Aotearoa's public conservation land.

We welcome the opportunity to comment on the above application.

FMC opposes the application for the following reasons:

- Its 30-year duration would inappropriately perpetuate the footprint of the company and wider industry at a time of significant local, national, and global movement away from such activity in the light of climate disruption and broader environmental concerns such as the need to protect natural quiet.
- The Fiordland National Park Management Plan is due for review. That review will consider the national park's interconnected needs as they relate to landscape; natural quiet; the health of indigenous plants, animals, and their communities; light-footed recreational provision in accord with the relevant legislation; and so on. It will open the park's management to potential significant changes. A 30-year lease in such an important part of the park, granted in the knowledge of the review's imminence, would inappropriately and unnecessarily interfere with the Department of Conservation's and the New Zealand Conservation Authority's abilities to make such changes.
- It does not make clear how the lease would relate to the Milford Opportunities Project, a multi-agency, well-funded, and ongoing body of work intended to better manage the Milford corridor and Milford Sound area.
- Climate disruption matters are not addressed by the application. These include operational carbon emissions and the potential for environmental conditions such as high water levels and storms to compromise the operation and for consequent contamination of the natural environment. (We would add here that the Climate Change Response (Zero Carbon) Amendment Act 2019 and DOC's Climate Change Adaptation Action Plan should be part of the terms of reference for decision-making).

FMC suggests that a short-term concession be considered, to allow for the park plan review and MOP work to be brought to fruition, for the company to consider its options, and for any necessary transitional arrangements to be provided for.

Federated Mountain Clubs wishes to be heard in support of this submission.

Yours sincerely

Jan Finlayson  
**President, Federated Mountain Clubs**