From: <u>David Bishop</u>
To: <u>David Bishop</u>

Subject: FW: Ruahine Conservation park - Status Hearing-Science and Capability Report

Date: Monday, 22 June 2015 10:02:48 a.m.

From: Owen Cox (Parawai)

Sent: Friday, 19 June 2015 11:00 p.m. **To:** Reg Kemper; FMC Administrator

Subject: Ruahine Conservation park - Status Hearing

Reg Kemper

Director, Conservation Partnerships and Hearing Panel Convenor

Department of Conservation

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Ruahine Conservation Park Change of Status Hearing

Thank you for the report on the two blocks of the Ruahine Conservation Park and the Smedley Block.

Before commenting on the report I must note that Federated Mountain Clubs have looked at the legal analysis in nthe Forest and Bird submission (dated 3 March 2015) and we find ourselves in agreement with it. The process to remove the Conservation park status and then to do the analysis of the swap is a pretty cynical attempt to side-step legal requirements. It also goes to heart of having why other land in the estate has status other than Conservation Park. The Executive is looking at the legal argument and the next steps in this. We will write to you shortly.

The swap will lead to a loss of natural values in the Park. The other point is that the values of the Smedley block are there now, no new habitat is being created.

Comment on the report:

- 1. The report makes light of the significance of the wet lands and values of Dutch Creek. These values are not replicated in the Smedley parcel. The balance on page 26 can only be reached if the wieghts the oxbow lake in the Dutch Creek block lower than the small-leafed scrub in the Smedley block. This sort of comparison is meaningless.
- 2. It also makes light of the values of the river. Page 4 refers to these as being "At risk-declining". The final balance in the table on page 26 would seem to suggest these values were not given any weight.
- 3. The comment about fernbirds being 'displaced' and finding habitat elsewhere. The point is we know fernbirds use the Dutch Creek habitat and if the transfer goes ahead this habitat will be flooded. Less habitat means fewer birds. The report isn;'t even sure the Smedley land has fernbirds it is merely 'considered suitable'.
- 4. On bats, the chances are these do roost in the Makaroro river block. I have seen them at night, amittedly some years ago, when heading to camp on the edge of the

Park before going on to Parks Peak. DoC reporting also indicate bats are present in reasonable numbers. Again it needs to be emphasised that any swap will lead to habitat loss for the bats when looking at the area both in and out of the estate available to them now.

- 5. Falcon are regularly seen in the area, both in air and on the ground.
- 6. Much is made of the geology being different. However we would be interested in seeing some evidence of direct cause and effect. We note that the Smedley block is further east and is likely to be drier. We also question the repeat assertions about the associations on dry slopes not being present in the Park. There are area of drier associations with beech further north in the Ruahines.
- 7. We see repeated comment in the report about areas needing 'higher management input''. The interesting thing is we haven't seen sign of any management input into the ecological values of the Makaroro block ever beyond access to the pine beyond. The truely sad thing is the only real interest in the block seems to have been connected with the desire to give it away and making the case for this.

While we do agree with the comment on page 5 that the Smedley would be a worthy addition tom the Ruahine Conservation Park we don't accept the exchange. Firstly, the exchange takes out land with conservation values from a protected area that is by law not a land bank for excahnge. Second, any exchange would result in the destruction of values in the blocks lost to the Park and there is no net conservation gain in terms of biological values. All that happens is the ownership of a block with some existing biota would change.

Owen Cox

FMC Executive

19 June 2015

Federated Mountain Clubs

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