

Comment on the Queenstown Arterials Project Fast-track Application and Notice of Requirement

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Royal Forest & Bird Protection Society		
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2. *We will email you draft conditions of consent for your comment about this application

<input checked="" type="checkbox"/> 	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on the Queenstown Arterials Project Application

If you need more space, please attach additional pages. Please include your name, page numbers and [insert project name] Application on the additional pages

INTRODUCTION

1. Forest & Bird is New Zealand's largest and longest-serving independent conservation organisation, with many members and supporters. Its mission is to be a voice for nature, on land, in fresh water, and at sea, on behalf of its members and supporters. Forest & Bird volunteers in 50 branches carry out community conservation projects around New Zealand.
2. In support of the society's objectives, it has been involved in resource management processes around New Zealand for many years, at the national, regional, and district level. Forest & Bird has been involved in many plan and resource consent processes in the Queenstown Lakes District.
3. Forest & Bird provided a submission on the COVID19 Bill and is recognised as a party that must be consulted with for listed projects.
4. With respect to this proposed project, Forest & Bird is most concerned with the clearance of 2,821m² of indigenous vegetation as part of Stage 3 of the project. This vegetation includes a remnant forest, regrowth and stands of mature beech trees which provide habitat for the eastern falcon - an at-risk species.

IMPACT OF PROPOSED PROJECT

5. Protection and the maintenance of indigenous vegetation and habitat is important in this location for habitat and connectivity to Ben Lomond Scenic Reserve. A variety of native bird species including the at-risk eastern falcon, riroriro/grey warbler, tui, tauhou/silvereye, korimako/bellbird, pīwakawaka/South Island fantail, ngrungiru/yellow-breasted tomtit, and kererū, have been identified in the area with the indigenous vegetation providing an important habitat and flight corridor connections (Terrestrial Ecology Report, pg. 9).
6. There has already been extensive vegetation clearance in the region of similar ecosystems so we must protect and restore what's left.
7. Removal of vegetation will also expose remaining remnant forest to edge effects increase vulnerably from pest weeds and animals.
8. The clearance of indigenous beech tree stands will remove the remaining forest remnant near the One Mile Creek Roundabout which currently provides connectivity and buffering to Ben Lomond Scenic Reserve.
9. The application identifies that this area of beech forest provides habitat to the iconic and at-risk eastern falcon, The Terrestrial Ecology Report assesses the ecological value of the beech stand and falcon as moderate, and recommends measures to avoid adverse effects during breeding periods in this area during construction and prior to removal of the trees. However the effects of the loss of beech stand has not been addressed.
10. Forest & Bird is concerned that the designation in this area for Stage 3 seems to appear far larger than is needed for the roading corridor and that the clearance of vegetation beyond the physical location of the road is inappropriate.
11. The proposed project should take all steps to minimise the impact on these areas. We have suggested additional conditions below which should be adopted. Such measures would

significantly reduce the adverse effect of the proposal by retaining buffering, ecological contentions and in particular reducing loss of habitat on the eastern falcon.

12. Forest & Bird is concerned that the proposal appears include the clearance of indigenous vegetation for construction staging areas. The clearance of indigenous vegetation for the purposes of creating staging areas in inappropriate and indigenous vegetation should be retained. However, the lack of a legend on the Preliminary Engineering Plans makes them difficult to assess and the impact of the proposed staging areas for Stage 3 on indigenous vegetation is not clear.
13. Cumulative effects include past and future effects. However, it is not clear that the proposal has considered the potential for future effects as no provision has been made to protect indigenous vegetation within the designation or on areas adjacent to the designation which have been made more venerable due to the loss of vegetation within the proposal's footprint.
14. The proposed project should take all steps to minimise the impact on these areas to preserve the mature forest and habitat it provides given the extensive clearance that has already occurred in the region of similar ecosystems. Further impacts that should be considered are increased edge effects and resulting risk of pest incursion. In addition to the suggestions above, set out below are additional conditions below which should be adopted
15. It appears the Alternatives Report has not assessed any alternative route or ways to minimise the impact on indigenous vegetation clearance for Stage 3.
16. Nor does the Alternatives Report appear to assess whether improved active transport routes and public transport could reduce pressure on the roading network to avoid the project. It's well established that encouraging active and public transport is key to reduce greenhouse gas emissions and climate change impacts whereas new roading projects encourage a modal shift towards higher emission use of private vehicles.
17. The proposal does not appear include an evaluation of the additional fire risk posed by construction activities does not appear to have been undertaken yet. Construction machinery is a known risk for igniting fires and dry conditions. Given the devastating impact any fire would have on the adjacent Ben Lomond reserve and residential areas prudent fire prevention measures should be included within the construction methodology and conditions.
18. All stages of the project will have an impact on waterways and without stringent mitigation plans and monitoring the construction activities could mean pollution ending up in the highly regarded Lake Whakatipu. From experience even best practice measures do not work unless regular monitoring to ensure compliance with the condition is undertaken. The Cultural Impact Statement Report, Aquatic Ecology Report, Terrestrial Ecology Report, and Storm Water Report all identify the risks posed to the aquatic ecosystems, and need for fish passages must be maintained. We support the proposed conditions in this respect and encourage stringent monitoring of them takes place.
19. We also note that the designation for Stage 3 sits within the Ben Lomond Commonage Recreation Reserve which has provided for the retention of the beech trees and habitat. The application does not appear to have considered the impacts on the reserve or benefits of retain some of this reserve for the ongoing protection of the vegetation by reducing the designation footprint.

PROPOSED CONDITIONS

20. Forest & Bird considers that additional conditions should be applied to the designation and the proposal refined to reduce the extent of vegetation clearance and the designation itself to address and provide for the following:
- a. The clearance of vegetation will lead to. Include conditions to provide for sustained weed and pest control in perpetuity to mitigate increased edge effects on the remaining indigenous vegetation within and adjacent to the designation and within areas a replanting.
 - b. Require covenants to be put in place on the remaining indigenous vegetation retained within the designation or on areas adjacent to the designation which are in the ownership of the applicant to reduce the potential for cumulative effects of the proposal by prevent any further loss in the future.
 - c. Retain indigenous vegetation as far as possible, reduce the proposed designation to avoid areas of mature forest
 - d. Prevent unintended loss of further habitats by ensuring strong fire mitigation measures are in place
21. Forest & Bird also recommends the following amendments to proposed conditions to clarify and strengthening measures to mitigate the impact of the proposed project on indigenous plants and wildlife. Amendments are shown with underlined or ~~striketrough~~ below to the proposed designation conditions:

Vegetation clearance and restoration planting

60. Ecological restoration plantings are to be established within the vicinity of the new One Mile roundabout no later than 1 year following the completion of construction works. A suitably qualified ecologist is to prepare a restoration management plan for Stage 3 within 20 working days after the final design has been completed to ensure that an area of indigenous vegetation greater than that removed (2,821 m²) is planted in species that will facilitate the area to be restored to beech forest. This planting must be actively maintained with weeding, pest control, and any additional planting needed for a minimum of 10 years to ensure restoration to a beech forest.

61. Prior to any vegetation clearance occurring within Stage 3, ~~if relevant based on the time of the year the works are to occur~~, the area is to be checked for any avifaunal nesting or breeding activity (undertaken by a suitably qualified ecologist or ornithologist). Any subsequent recommendations to protect avifaunal nesting or breeding activity of this survey are to be adhered to.

62. The Requiring Authority shall undertake on-going monitoring and eradication of woody weed species which may establish within the plantings and across the designated area. These control measures could include a combination of spraying and hand pulling depending on the species. Target species will include, but not be limited to broom and Douglas fir

[New Clause]. There shall be no clearance of existing vegetation for creation of any staging areas for construction purposes

[New Clause]. Remaining and restored indigenous vegetation on QLDC or Crown Land within and adjacent to the project area shall be designated scenic reserve or covenanted for protection

and connectivity of wildlife to the adjoining Ben Lomond Scenic Reserve. On-going pest control on this land shall be maintained by the Requiring Authority.

22. We recommend a new proposed condition to mitigate the fire risk. Consultation with FENZ should be undertaken to finalise the wording:

[New Clause]. The Requiring Authority shall ensure an appropriate fire risk mitigation plan is in place for all stages of the project with fire suppression and control resources located on site

23. We also recommend revising the plans in vegetated areas to reduce as far as possible the designation areas to better match the area needed for the road footpaths and cycleways.

Thank you for the opportunity to comment on this proposal.

Rick Zwaan

Forest & Bird Regional Conservation Manager Otago/Southland.