

Robyn Harrison

From: SStrang@HNRG.COM
Sent: Tuesday, 16 December 2008 10:06
To: Robyn Harrison
Cc: Kit.Richards@pfolsen.com
Subject: Horizons One plan hearings - further information for Hearing Pan
Attachments: Horizons Land & Water plan 2003 - permitted activity rules - with industry comments.doc; Relevant rules from the Operative Waikato Regional Plan.doc; Hawkes Bay RC permitted activity rule.pdf

Hi Robyn,

Further to my email last week, we were also asked by the Hearing Panel to provide comment on the current Horizons permitted activity rules for vegetation clearance. Apologies that this has taken a few days, but I wanted to circulate comments to all the other forestry submitters to ensure everyone was in agreement with the comments. I also took the opportunity to circulate both these comments and the amended version of the proposed rules (the version we presented to the Land hearing) to Denis Locking (Farm Forestry Association), Ian Moore who manages a number of smaller forests in the region.

For the Hearing Panel's benefit I have attached a copy of the current Horizons permitted activity rules, with combined comments from the industry. Where the current rule is not particularly practical, we have made suggested amendments. The rules relating to slash I copied to Brenda Baillie, a freshwater scientist from Scion who is undertaking a PhD thesis on the effects of harvesting slash in streams, and her response to my queries is in the email below as background. Given she is probably as knowledgeable as anyone in NZ relating to harvesting slash, I adopted her recommendations as the suggested alternative.

With regard to whether we prefer the version of the rules as currently proposed by the Horizons planners (the 1 December version with our proposed amendments) or an amended version of the permitted activity rules, either will work for industry, although I guess a 'permitted activity rule' does send the message that plantation forestry is a desirable land use in the region.

Interestingly Denis and Ian, who are representative of the smaller growers, were quite happy with the approach of a region wide controlled activity consent requirement, as they made the point that this would not necessarily load any more cost of requirements onto the small guys. The harvesting contractors that harvest wood lots would get their consents and then be free to go forward and harvest.

Ian Moore did also make the strong point about the importance of Horizons staff working with farmers and foresters to get the planting in the right place in the first place (avoiding areas that will present an unacceptable risk mid-rotation or at harvesting) - presumably this would be best done by informal advice from Council staff, potentially through the Whole Farm Plan process. I absolutely agree with him that the best approach is to ensure the right decisions are made at the time of planting, and then the harvesting can take place with the minimum necessary red tape.

I have also attached further examples of permitted activity rules from other regions by way of background.

I am happy to provide further clarification if required.

Regards
Sally

16/12/2008

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---- Forwarded by Sally Strang/MAIL on 16/12/2008 09:44 a.m. ----

Brenda.Baillie@scionresearch.com

To SStrang@hnrng.com

CC Peter.Clinton@scionresearch.com, Tim.Payn@scionresearch.com

12/12/2008 02:27 p.m.

Subject Horizons Regional plan rules for vegetation clearance and soil disturbance

Hi Sally,

Thank-you for the opportunity to contribute comments toward your submission to the Horizon Regional Council on the current permitted activity rules on the management of logging slash around water bodies and the alternate rules proposed by Hancock Forest Management. Here are some suggestions for you to consider:

I. Horizon Regional Council's Rules

Rule 1: slash, soil or debris from any vegetation clearance, soil disturbance or cultivation is not directly deposited into any permanently flowing river, or any river with a bed width in excess of 2 metres, or any lake, or any wetland; or left in a position where it may avalanche down any slope; and

Comment: It is difficult, if not impossible, to adhere to the first section of this rule when undertaking harvesting operations. Hauling across waterways will deposit material directly into waterbodies. While the amount of material entering waterways is reduced when hauling back from waterways and in ground-based operations, edge trees often need to be felled across the waterways for safety reasons (Horizon Regional Council have recognised this in Rule h.).

Rule J: any pieces of slash greater than 10 cm stem diameter or greater than 2 metres in length that enter any permanently flowing river, or any river with a bed width in excess of 2 metres, or any lake, or any wetland are removed; and

Comment: There is scientific evidence from New Zealand and overseas which shows that the larger pieces of wood are the most stable and pose the least risk to movement during high flow events and are the key pieces contributing long-term ecological benefit to stream/river ecosystems. This rule requires the removal of those larger, more stable pieces leaving the smaller material which is more likely to mobilise, dam or block stream flow or damage downstream infrastructure. There is the additional risk associated with using chainsaws in this environment to cut up

16/12/2008

these larger pieces into a more manageable size to facilitate their removal from the waterway.

2. Hancock Forest Mangement Proposed Rules

These rules are well aligned with the New Zealand Environmental Code of Practice for Plantation Forestry. They follow the 'avoid and then if necessary, remedy/mitigate' sequence of actions, which are clear and sensible.

Rule 1

- 1 *Harvesting shall be planned and carried out so as to minimise the amount of slash that is deposited into perennially flowing streams and wetlands*

Comment: This is the most important and effective rule for managing logging slash in waterways. Once the logging slash has entered the waterway, there are economic, logistical and safety issues in dealing with its removal. Reword rivers, lakes and wetlands to align with Horizon Regional Council's terminology.

Rule 2

- 1 *Wherever practical slash must be removed from within and adjacent to all perennially flowing streams, where flood flows have the potential to mobilise the slash and cause blocking or damming of stream flow, diversion of stream flow causing bank erosion, or damage to downstream infrastructure.*

Comment: The 'Wherever practical' wording is important as logistical and safety issues can limit the removal of logging slash from, and adjacent to, waterways in some instances. I would consider removing the words 'and adjacent to' as this is difficult to define. While potential mobilisation from flood flows is justification for removal it isn't the only factor. If the harvesting operation has directly deposited logging slash into the waterway where it is blocking, damming or diverting flow etc. then where practical, the material should be removed. While the wording 'potential mobilisation' is open to interpretation, it is difficult to think of alternate, more clearly defined wording.

Rule 3

- 1 *Slash shall not be left in a position where it may destabilise landings or avalanche down any slope.*

Comment: This rule is clear and straight forward

3. Suggested alternate wording to Hancock Forest Mangement Rules:

Rule 1- Original

- 1 *Harvesting shall be planned and carried out so as to minimise the amount of slash that is deposited into perennially flowing streams and wetlands*

Rule 1- Alternate

- 1 *Harvesting shall be planned and carried out so as to minimise the amount of slash that is deposited into perennially flowing rivers, lakes and wetlands*

Rule 2 - Original

- 1 *Wherever practical slash must be removed from within and adjacent to all perennially flowing streams, where flood flows have the potential to mobilise the slash and cause blocking or damming of stream flow, diversion of*

stream flow causing bank erosion, or damage to downstream infrastructure.

Rule 2 - Alternate

- 1 Wherever practical slash must be removed from within all perennially flowing rivers, lakes and wetlands, where it is blocking or damming stream flow, diverting stream flow causing bank erosion, or has the potential to move off-site and damage downstream infrastructure.*

Rule 3 - Original: leave as is.

I hope you find these comments helpful for your submission.

Regards

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