
From: Scott Pearson <spearson@fishandgame.org.nz>
Sent: Monday, 26 March 2018 5:33 p.m.
To: Customer Services; Mailroom Mailbox
Subject: Resend of F&G LTP Submission with Larger Font Size
Attachments: Long Term Plan Sub Larger Font Fish & Game 2018 28.pdf

Hi,
I decided to resend this document with a larger font for ease of reading. Please use this document in preference to the first one sent.

Kind Regards

Scott

Scott Pearson | Environmental Advisor

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ENVIRONMENT CANTERBURY LONG-TERM PLAN 2018 / 2028

**SUBMISSION ON PROPOSED PLAN WITH AMENDMENTS
NORTH CANTERBURY FISH AND GAME**

To: Environment Canterbury

From: North Canterbury Fish & Game

Address for service:

North Canterbury Fish & Game

PO Box 50

Woodend 7641

Attn: Scott Pearson

Email: spearson@fishandgame.org.nz

ROLE OF FISH AND GAME

Fish and Game Councils are Statutory Bodies with Functions (*inter alia*) to:

'manage, maintain and enhance the sports fish and game bird resource in the recreational interests of anglers and hunters...

(b) 'to maintain and improve the sports fish and game resource-

(i) by maintaining and improving access

(c) 'to promote and educate-

(i) by promoting recreation based on sports fish and game

(e) 'in relation to planning-

(i)'to represent the interests and aspirations of anglers and hunters in the statutory planning process; and

(vii) 'to advocate the interests of the Council, including its interests in habitats...'

Section 26Q, Conservation Act 1987.

In addition, Section 7(h) of the RMA states that all persons *'shall have particular regard to... the protection of the habitat of trout and salmon.'*

INTRODUCTION

1. North Canterbury is one of the key regions in the South Island for quality river and lake fisheries. The sports fish and game bird resources of North Canterbury are highly valued.
2. The Canterbury sports fishery is significant, with 477,000 ± 20,000 angler days noted in the 2014/15 National Angling Survey. The value placed on the sports fish and gamebird resource in a wider Canterbury context is encapsulated by the four operative Water Conservation Orders in the Region (Te Waihora/ Ellesmere, Rakaia, Rangitata and Ahuriri.)

GENERAL SUBMISSION

North Canterbury Fish and Game (**Fish and Game**) supports the intent of Environment Canterbury (ECan) in developing an integrated to land and water planning, to address significant resource management issues, and ensure land and water resources are sustainably managed and their values protected. The items raised below in relation to the Long-Term Plan 2018/28, are submitted to give effect to the purpose of the Act, give effect to the National Policy Statement for Freshwater Management 2014 (NPSFM), the Canterbury Regional Policy Statement 2013 (CRPS), the vision and principles of the Canterbury Water Management Strategy 2009 (CWMS) and adequately address the significant water quality and quantity issues that Canterbury faces.

Fish and Game consider the financial recommendations made below build on our previous submission lodged under the Draft Annual Plan 2017/18 to provide a pathway for extended funding in the areas requested below.

PLAN IMPLEMENTATION CONSENT REVIEWS

- 1) Fish and Game is concerned that consent reviews, signalled for implementation in land and water plans, are being re-prioritised against other projects and objectives, that sit outside the Schedule 1 planning process. The amount of resource and stakeholder effort that goes into this process, means the signalled consent reviews are a necessary part of zone implementation delivery.
- 2) We do not consider it appropriate to go beyond the “intent” of anticipated consent reviews, which have timeframes and reasons noted specifically in land and water regional plans, in order to achieve general agreement from the consented parties being reviewed; or in situations where the re-allocation of these funds is deemed worthwhile. It would appear there is a large conflict of interest in taking this approach, and the ability to cause delays in the consent review process. There is also no guarantee, that parties will forgo their rights to appeal, once the process commences.
- 3) Fish and Game want to ensure that LTP funding has made early allowances for plan-signalled consent reviews, and that funds are adequate to undertake the reviews, with or without the immediate support of the consented parties. Some self-interested catchment communities, may seek to avoid or delay the consent reviews by seeking to trade-off costs and benefits. Unfortunately, in North Canterbury, this approach has not delivered on expectations and has weakened the primacy of operative plans.

RECOMMENDATION: Ensure that appropriate funding is allocated to deliver on the intent of operative plan decisions, for signalled consent reviews. This funding should not be re-allocated to other purposes or catchments, for the purpose of achieving consented party buy-in and the potential of cost-savings.

COMPLIANCE FUNDING

- 4) Fish & Game has consistently raised concerns in relation to ECan's compliance and associated statutory enforcement obligations to ensure Land and Water Plan rules are adhered to. This concern included a request for improved regulatory funding.
- 5) Fish and Game is pleased to acknowledge the improved 2017/18 annual plan funding and the renewed focus in the compliance and enforcement area, with improved response times and a stock exclusion protocol to guide compliance teams. We wish to see this momentum continue with at least a sustained level of funding going into the next Long-Term Plan (LTP).
- 6) There is still a lot of work to be done in the compliance and regulation area, with the efficacy of fish screen compliance, consented condition monitoring and permitted activity monitoring, still to be proven adequate for meeting the requirements of the RMA and associated planning documents.
- 7) Fish and Game would specifically like to request additional funding for the purchase of a designated Acoustic Doppler for the compliance team. This device is essential for testing fish screen compliance with the NIWA 2007 Fish Screen Guidelines, measuring both sweep velocity and approach velocity at the point of take. Without this device, it is very difficult for ECan compliance staff to know whether a fish screen is effective in excluding fish and preventing mortality, particularly for juvenile fish. There is also a practical advantage through use of the doppler, as it is much more cost effective than testing screens (including rock bunds and intake galleries) using live fish methods. The device can also provide cost efficiencies, through improved prioritisation of high-risk fish screens.
- 8) Fish and Game staff have been witness to the effects of ineffective fish screens, particularly over the last twenty years with the growth of irrigation-led development. While we recognise there are higher-level discussions underway via the Regional Water Committee, it is imperative that compliance staff are given the tools and skills to effectively measure compliance

with the “best practice” guidelines mentioned above, noting these guidelines have been in place since 2007, yet rarely have they been adequately tested.

RECOMMENDATION: Allocate new compliance funding in the 2018/19 to cover the cost of purchasing two Acoustic Dopplers, to be assigned specifically for fish screen and water take infrastructure compliance. This recommendation is anticipated to cost an additional \$36,000 of funding tagged to capex expenditure, associated with the “compliance” area specifically. If approved, it is suggested to locate one device in Timaru and the other in Christchurch.

Sustain the existing level of investment in compliance funding to achieve the necessary improvements required in compliance programmes.

RECREATION AND AMENITY (R&A)

- 9) Recreation and Amenity (including tourism) is a second order priority in the CWMS. While areas such as biodiversity and targeted stream augmentation may provide some “potential” indirect benefits to recreation and amenity activities, there is limited designated spend for R&A, which is probably the second most widespread value-associated use of freshwater by Cantabrians, beyond domestic supplies.
- 10) After significant lobbying effort to the Regional Water Committee (dating back to early 2016), Fish and Game is pleased to acknowledge that a Recreation and Amenity Scoping project is nearly underway, with the intention of advising on future research needs and methods, to address data gaps and develop a high-level work plan for the next three financial years. This work will inform ECan with respect to R&A activities and in meeting the associated CWMS targets.
- 11) In line with our Draft Annual Plan submission 2017/18, and detailed submissions to the Regional R&A sub-committee, Fish and Game requests that allocation be made for sufficient funds under the CWMS budgetary area, to implement the high-level R&A work plan proposed above.

- 12) Comparative funding for water storage infrastructure investigations, total in the millions of dollars since inception of the CWMS, therefore the requested amount below is considered reasonable and in keeping with the size of the CWMS funding pool; and expenditure in associated second order priorities. Fish and Game would also request a more proportionate level of expenditure in meeting CWMS R&A targets, particularly in those areas where significant catch-up is required.
- 13) Fish and Game consider it is vital to tag part of the proposed funding expenditure, to keep the R&A data project on track and ensure all resource users and managers are well informed about R&A values and their freshwater attribute requirements, plus the opportunities to partake-in and better sustain this highly valued area; for present and future Cantabrians and those visitors we host in our region.

RECOMMENDATION:

Provide funding in the Long-Term Plan to undertake the proposed Recreation and Amenity Working Plan over the next three years. This recommendation is anticipated to cost \$75,000 per year for the 2018/19, 2019/20 and 2020/21 financial years.

FUNDING FOR RESTORATION OF THE SILVERSTREAM CATCHMENT

- 14) The Silverstream catchment is a spring-fed system which is located on the Canterbury Plains near Springston. It is comprised of three tributaries: Silverstream, Snake Creek and McGraths Creek. The catchment is significant because it flows into the Selwyn / Waikirikiri River just upstream of Coes Ford. ECan investigations have shown it is largely responsible for the elevated E. Coli levels often present at Coes Ford; a once popular swimming hole.
- 15) The catchment is also an important breeding ground for Selwyn River trout. The Selwyn River once supported some of the best trout fishing in the world. In 1966, it supported a run of 14,000 brown trout. Today, the estimate is around 500. Climate

change, water takes, and land intensification have contributed to this, including a loss of habitat in the spawning streams, such as Silverstream. Snake Creek for instance has seen a reduction in spawning numbers from 350 trout redds in 1981 to 50 in 2017.

Snake Creek Restoration Project

- 16) In 2017, Fish & Game met with landowners on the Snake and other groups with an interest in the catchment to gain support for a project to restore the waterway. Support was gained from local iwi, the Selwyn District Council (SDC), Living Waters – DOC/Fonterra partnership, the Ellesmere Drainage Committee, The University of Canterbury's CAREX team, the Selwyn Waihora Zone Committee and Environment Canterbury.
- 17) The restoration project seeks to restore approximately 3km of Snake Creek and the springs. This is about 80% of the entire length of the waterway. This project is estimated to cost \$600,000. The project commenced in November 2017 and to date the top 1.1km of the main stem of Snake Creek and the spring heads (130m over two springs) has been restored using the techniques described below. This is more than the year one project deliverable of 600m. Year one has been delivered within budget.

The following table is a breakdown of the problems and the restoration techniques the project team is using to fix them:

| Problem | Fix |
|---|---|
| <p>Little terrestrial biodiversity, little shade, little overhanging vegetation to provide cover for stream life.</p> | <p>Establish native vegetation on the stream banks.</p> |
| <p>Erosion prone banks, macrophyte (water weed) problems leading to the need for mechanical drain clearance. Bed disturbance, sedimentation and physical removal of species during mechanical drain clearance.</p> | <p>Create shade of the banks to suppress macrophytes and eventually largely eliminate the need for mechanical drain clearance.</p> <p>Reshape the banks to create a gentler slope that allows grasses to be planted close to the waters' edge to provide shade. The reshaping also removes material and increases the flood carrying capacity offsetting the reduction caused by plantings.</p> |
| <p>Water quality issues, e.g. elevated <i>E. coli</i>, phosphorus and Nitrate concentrations. Problem sediment smothering the substrate (in places) and filling interstitial spaces between gravel. This reduces invertebrate species diversity and abundance, fish abundance and trout spawning success.</p> | <p>Sediment traps to protect downstream reaches and aid easier sediment removal. These remove sediment and the <i>E. coli</i> and phosphorus bound to it. Reshaping the banks to remove areas where paddock run off is channelled. Where this is not suitable buffering (fencing off) the low points to provide some settlement and removal of pollutants prior to reaching the riparian margin.</p> <p>Creation of river features (such as pinch points, low weirs and flow deflectors) that create scour of the riverbed and thus clean the gravel. Reducing the amount of macrophytes (as described above) to reduce the <i>E. coli</i> associated with the biofilm on the</p> |

| | |
|---|---|
| | <p>macrophytes.</p> <p>Protection of springs through fencing and planting.</p> |
| <p>A lack of in-stream habitat diversity (e.g. pool, riffle, run, backwater, woody debris, leaf packs). This also equates to a lack of invertebrate diversity and abundance and thus food for species higher up the food chain, e.g. trout/ eels.</p> | <p>Creation of features as described above and the addition of wood (e.g. root wads and side/ mid-stream boulders). Leaf packs will follow establishment of healthy riparian vegetation.</p> |
| <p>The decline of the Selwyn River Fishery</p> | <p>Use the above techniques to enhance spawning and rearing habitat for brown trout. This is expected to lead to increased adult fish in the Selwyn and other Lake Ellesmere/ Te Waihora tributaries.</p> |

Funding for Snake Creek Restoration Project

18) To fund this \$600,000 project a successful application was made to the Ministry for the Environment’s Freshwater Improvement Fund for approximately \$300,000 to be spent over three years. To qualify for this amount, a further \$300,000 had to be funded externally. Living Waters, Fish & Game, the SDC, Environment Canterbury and the Pub Charity all put in money to make up this \$300,000. Part of this included \$10,000 from Environment Canterbury (contributed in the 2017/2018 financial year) and a further \$22,500 (2018/2019 – year 2) and \$22,500 (2019/2020 – year 3) to be given pending approval through the LTP process. This submission seeks to gain funding approval for years two and three. If this is not successful, MfE will withdraw the \$55,000 they have committed.

Silverstream Restoration Project

19) As discussed above, Snake Creek is one part of the larger project to restore the Silverstream Catchment. The University of Canterbury's Carex team began the project when they started work on Silverstream, and, alongside landowners, restored the top 1km and created a 1-hectare wetland at the springs. As we had hoped, the Snake Creek and the Silverstream work has inspired other landowners and we now have many other Silverstream and McGraths Creek landowners wishing to do work on their properties; however more funding is needed. The next area planned for restoration on the Silverstream waterway is a section between Chamberlains Road and Leeston Road which is 1.4 km. It is estimated we will require \$156,000 to complete this section (this includes maintaining plants for three years). We currently have a crowd funding campaign underway to raise \$56,000. We hope to raise a further \$60,000 in corporate sponsorship over the next three years. In addition, further funding is sought from ECan through the LTP process. This is \$20,000 in the 2019/2020 financial year and \$20,000 in the 20/21 financial year.

Alternative Funding

20) Consideration was given to seeking this funding from the Immediate Steps funding; however, on advice from ECan staff it was ascertained that Immediate Steps and internal ECan biodiversity funds allocate funding based on existing biodiversity values and therefore restoration of degraded lowland streams struggle to meet these criteria. There is no current fund available at Environment Canterbury to fix degraded waterways, even if their restoration can significantly improve recreation and amenity opportunities and native species abundance and diversity.

21) Ultimately, the main goal of the project is to showcase an alternative way to manage drains that can be rolled out throughout Canterbury. To do this it is important to show that through active intervention degraded lowland streams can be restored to a level where they support healthy fish populations and have good water quality. To this end the project

includes robust scientific monitoring to let us measure its success and considerable person hours are being devoted to spreading the message and the learnings amongst landowners and agencies.

RECOMMENDATION:

Provide new funding in the Long-Term Plan for the Silverstream Catchment Restoration, specifically:

Snake Creek: \$22,500 in 2018/2019 and \$22,500 in 2019/2020

Silverstream: \$20,000 in 2019/2020 and \$20,000 in 2020/ 2021.

LONG TERM ENVIRONMENTAL TREND MONITORING AND FRESHWATER SCIENCE INVESTIGATIONS

22) Fish and Game is very supportive of ECan's "State of the Environment" monitoring work and has in recent years partnered with ECan to undertake specific monitoring work in high country spawning streams. Fish and Game has also contributed to a telemetered real-time nitrogen logger for placement at the SH1 Hurunui River site and participated in science stakeholder groups such as the Waimakariri Science Liaison Advisory Group and the Hurunui Science Stakeholders Group.

23) At a high level, Fish and Game wishes to see sustained investment in the collection and analysis of scientific information, pertinent to sustainably managing our freshwater resources. We would also like to see more emphasis placed on "catchment level" environmental trend monitoring, alongside specific waterbody monitoring.

24) The objective is to ensure that progress in catchment wide environmental improvement is occurring at a rate and trajectory that at least matches the long-term targets and limits set in respective land and water plans. This approach requires the data to be expertly analysed and reported on, but also for members of the public to be able to access this information at a

catchment level or water body level. We think more can be done in this area, to inform stakeholders and provide easier linkages between detailed scientific reports and associated plan outcomes, limits and targets.

25) ECan's website and associated sites such as LAWA are helping to provide this insight, but we would like to see better linkages between trend monitoring and plan deliverables; presented in a user-friendly format. This approach would show current state trends (actual environmental measurements), alongside the desired trend line or improvement band, anticipated by the deliverables in land and water plans. This approach provides guidance to the broad range of stakeholders and assists with the early detection of worsening environmental problems, as well as demonstrating the results from successful environmental interventions.

26) Fish and Game is aware that ECan is currently reviewing how it collects, analyses and presents a diverse range of data sets, and we would encourage sufficient funding capability to ensure this critical work continues to be well-funded.

RECOMMENDATION:

Provide adequate funding in the Long-Term Plan to ensure data collection associated with freshwater plan outcomes, targets and limits is sustained and increased where possible.

Provide additional investment, to ensure that data presentation provides simplified "actual" versus "projected" trend monitoring, when compared against the outcomes, targets and limits of land and water plans, at both catchment and waterbody levels.

From: ECInfo <ecinfo@ecan.govt.nz>
Sent: Tuesday, 27 March 2018 8:04 a.m.
To: Mailroom Mailbox
Subject: FW: LTP Submission Presentation by Fish and Game EMAIL:04930011189
Attachments: image001.jpg

Importance: High

----- Original Message -----

From: Pearson Scott
Received: 26/03/2018 5:47 p.m.
To: ECInfo; Mailbox Customer Services
Subject: LTP Submission Presentation by Fish and Game

p.s. Could you please note that North Canterbury Fish and Game wishes to present the submission in person.

Presenters will be Scott Pearson and Emily Arthur-Moore.

Kind Regards

Scott

Scott Pearson | Environmental Advisor

North Canterbury Fish & Game Council

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