

## Submission form for draft Wellington Conservation Management Strategy

### Once you have completed this form

Send by post to: Wellington CMS Submissions, Department of Conservation, Private Bag 3072, Hamilton 3240 or email to: [wellingtoncms@doc.govt.nz](mailto:wellingtoncms@doc.govt.nz)

### Submissions must be received no later than 4pm, Tuesday 4 April 2017

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form. A submission factsheet (explaining how to make a submission, what to look for in the draft CMS, and what to say in your submission), and a Word and PDF version of this submission form can be found on the Department's website:

[www.doc.govt.nz/wellingtoncms](http://www.doc.govt.nz/wellingtoncms)

### Submitter details:

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Organisation name: (if on behalf of an organisation)	Wellington Tramping and Mountaineering Club inc
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Email:	Secretary@wtmc.org.nz
<input checked="" type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)  (tick one box)	
Signature: <i>Illona Keenan</i> (we accept a typed signature if no electronic signature)	

### Background information on Wellington Tramping and Mountaineering Club (WTMC)

WTMC has over 600 members, representing all age groups and a diverse range of backgrounds. Some of our members have tramped all their lives, while others come to the club for their first experience of the outdoors. The club is a major existing user of the New Zealand conservation estate (in 2016 we spent over 2500 days out on trips across New Zealand) and especially the areas covered in the Wellington CMS Region. We care greatly about the continued protection of these areas that our members enjoy

spending much of their spare time in. Every weekend of the year we run multiple trips, most often within the Wellington CMS Region (on average 56% of our 250+ trips per year are within the Wellington CMS Region). While in name we are a tramping and mountaineering club, our members take part in a wide range of outdoor activities in these areas through the club including mountain biking, kayaking, rock climbing, tubing, pack-floating, trail running, nav/off-track tramping, instruction/training (eg bushcraft, leadership skills) and environmental community support (whio protection trapping, track maintenance). WTMC take responsibility for checking a stoat trapping line in the Parks Peak/ Upper Makaroro area of the eastern Ruahines, and are part of the Ruahine Whio Protectors collective. There are 124 traps in our line and we have committed to checking it every month.

The club is run entirely by volunteers from our membership, which demonstrates the passion our members have for the outdoors. We welcome non-members joining our trips and we are often an avenue for people who have never tramped before to experience backcountry areas for the first time.

WTMC is an Federated Mountain Clubs affiliated club and we support their submission on the contents of this CMS.

### **General overview of WTMC submission**

WTMC broadly supports the contents of the Wellington CMS, with some exceptions as detailed in our submission. First and foremost we support efforts to maintain and protect the areas we all enjoy exploring as trampers - this includes remote, backcountry and frontcountry areas. In general we support initiatives which encourage and enable others to share our enjoyment of these areas too, while maintaining and protecting these unique environments.

#### *Key considerations*

##### **1. Recognise existing work**

Many of the milestones do not take into consideration the work that the department has undertaken for the past 30 years. WTMC finds Milestone 6.3.4.8 extraordinary, surely the Department knows which access points to the Ruahine and Aorangi FP, that don't have permanent legal status and already have a work plan in place for gaining this access. These actions do NOT need to wait for another three to five years. These milestones could be written to celebrate that work that has been undertaken to date. For example, 4.1.3.1 Department staff work with x number of community groups, achieved by end of year 3 would be an x% increase. All milestones need to be reworked to ensure work undertaken to date is recognised and therefore the 3,5,10 year achievements are worded appropriately given what is actually happening.

##### **2. Caution over targets to increase visitor numbers**

We are very conscious that any increase in visitor numbers brings associated need for infrastructure and requires dedicated resource and we are concerned about any policy whose sole and specific target is to increase visitor numbers. We do not support such targets at the expense of the quality of experience for each individual.

### 3. Use hut booking systems very sparingly

As trampers, we need access to huts for both planned and unplanned stays, and particularly for ‘shelter from the storm’. We want to be able to use our backcountry hut passes in any situation where a hut booking system is in place and we want to be consulted about any new huts to become part of a booking system.

### 4. Pest control

We are particularly supportive of measures to manage pests, but want to highlight that this must be maintained long-term even if initial goals are met fairly quickly. We would love to see who able to be reintroduced into Tararuas.

To achieve all goals and milestones there will need to be adequate resourcing and this resourcing needs to be proportional.

## Submission:<sup>1</sup>

<b>Section:</b> <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i>	<b>Submission:</b> <i>Explain the nature of your submission stating whether you support or oppose the approach in the CMS. Please provide brief reasons.</i>	<b>Decision sought:</b> <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i> <ul style="list-style-type: none"> <li>- if supporting: ‘retain Policy X’</li> <li>- if opposing: ‘delete Policy X’</li> <li>- if seeking changes ‘reword Policy X to read (give suggested wording)’</li> </ul>
p9. Stretch goals New Zealanders and our visitors are enriched by outdoor experiences	Why are only international visitors mentioned under the stretch goals?  Without increasing the type and duration of New Zealanders experiences outdoors it will be hard to enrich their lives through connection to nature	Include a stretch goal that includes increasing the number or proportion of New Zealanders experiencing our outdoors
p 15, Vision for the Wellington CMS region by 2041	This section does not include any reference to DOC support and engagement with user groups on either conservation or recreational work.	Add this sentence somewhere on p15:  The Department actively supports community and user groups in their conservation and pest control work, and these groups inspire growing numbers of New Zealanders.  Add this sentence at the end of p15, par2:

<sup>1</sup> Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG. The file must not be more than 9MB.

		User groups feel consulted and supported, and work effectively in partnership with the Department.
4.1.1.1 a)	While is it important to conserve a full range of ecosystems, given the specific nature of the priority ecosystem, where is the objective for conserving the connectivity between these priority ecosystems and larger areas of conservation land that adjoin these.	Reword to include an objective for conserving connectivity between ecosystems and adjoining land
4.1.1.1c) supporting work of others enhancement of local values	Wellington Tramping and Mountaineering club undertakes trapping in the northern Ruahines to protect whio as part of the Ruahine Whio Protectors it is vital that DOC support this work.	Support this objective
4.1.2.2 Advocate for the protection of priority natural values	We support this policy however DOC should do more than just advocate. These values need to be actively managed. Also this advocacy and management shouldn't be limited to priority ecosystem units and threatened species.	Reword policy 4.1.2.2:  Manage and advocate for the protection of priority natural values, such as: priority ecosystem units and threatened species; and significant geological features, landforms and landscapes at risk of permanent degradation selected from Appendix 8
4.1.2.7	Support this policy but it should also recognise the importance of maintaining the outcomes already achieved by past or current pest management, and that walking away from existing programmes can be considered a waste of that former investment. Changing priorities should not be at the cost of existing ecologically successful pest control programmes, additional funding should be sought for new projects rather than reducing pest control from these successful programmes. Of concern here is Project Kaka, and the need to continue this good work.	Reword policy to include taking into consideration historic efforts and the ecological costs and benefits of changing or withdrawing from existing regimes.
4.1.2.8  Natural value policy: foster pest management action	This policy is supported, however the word 'foster' is ambiguous, we suggest clarifying this policy by replacing 'foster' with "actively support", "actively encourage" or similar. Especially given our club's experiences with DOC and the Ruahine Whio Protectors.	Reword policy 4.1.2.8 to read: Actively support management action on pest plants and animals and wild animal control involving inter-agency, concessionaire and community involvement.
4.1.3.1, 4.1.3.5, 4.1.3.9  Natural value milestones: cooperative restoration	Support intention of these milestones, however they are not sufficiently ambitious - currently milestones only require identification of opportunities (Year 3) and identification of how the Department can work with others (Year 5), with no management action	Reword milestone 4.1.3.1 to read: Identified co-operative restoration opportunities for ecosystems and threatened and at-risk species in the Wellington CMS region, and identified how the Department can work in conjunction with PSGEs, tangata

opportunities	<p>measured before Year 10.</p> <p>Since the establishment of DOC, staff have been working with “conservation partners” for restoration opportunities. Where is the recognition of this amazing work within the CMS area? While this is recognised sometimes in the Document, it is not obvious from the wording of the milestones.</p> <p>Suggest including a number for how many restoration projects currently exist, and then are to be underway at Years 5 and 10, to improve ability to measure these milestones. Numbers given are a suggestion without knowing current state, and will require revision to be realistic yet ambitious.</p> <p>If your milestones don’t want to report on numbers of projects, use another metric that is currently measured - such as the number of volunteer hours. If these are linked to policies in 4.4 this could be referenced here.</p> <p>It is also important to re-assess management actions and their success, and to re-focus as a result. Things which are working well should be supported to continue.</p> <p>4.1.3.9 is ambiguously worded - not clear whether DOC is leading projects or has involved others to do the leading.</p>	<p>whenua and conservation partners to achieve conservation outcomes at these sites (effectively combines 4.1.3.1 and 4.1.3.5)</p> <p>Reword milestone 4.1.3.5 to read: Actively involved in at least 10 additional restoration projects, in conjunction with PSGEs, tangata whenua, and conservation partners in the Wellington CMS region.</p> <p>Reword milestone 4.1.3.9 to read: Actively involved in at least 15 additional restoration projects, in conjunction with PSGEs, tangata whenua, and conservation partners in the Wellington CMS region.</p>
<p>4.1.3.2, 4.1.3.6, 4.1.3.10</p> <p>Natural value milestones: pest management</p>	<p>Current wording is in past tense and so does not require ongoing/sustained pest management at sites eg. a site could receive pest control in year 1 and not again for the life of the CMS but still count towards achieving the milestone</p> <p>Also suggest increasing ambition of milestones (particularly at Years 5 and 10) to include reduction in range or populations of pest animals and plants at some sites</p>	<p>Reword milestones 4.1.3.2, 4.1.3.6, 4.1.3.10 to require sustained pest management</p>
<p>4.1.3.3, 4.1.3.7, 4.1.3.11</p> <p>Natural value milestones: Freshwater ecosystems</p>	<p>Support these milestones, however ‘improved’ is ambiguous - replace this with specific, clear and measurable target for what will be improved in these ecosystems.</p> <p>With current wording it is unclear if the target for the number of sites refers only to ecosystem improvement or also ongoing restoration and partnership.</p>	<p>Reword milestone 4.1.3.3 to read: 3 of 6 freshwater ecosystems in the Wellington CMS region have been improved [insert specific measure of improvement here], achieved through ongoing restoration from ‘mountains to sea’, and active management in partnership with PSGEs, tangata whenua and conservation partners.</p> <p>Reword milestones 4.1.3.7 and 4.1.3.11 as above</p>

4.1.3.4, 4.1.3.8 and 4.1.3.12 predator control	We support the increasing coverage of predator control, however this needs to be conducted along with other animal pest control, especially herbivores, such as possums, deer, goats. Predators are not defined in the glossary - it might be wise to do so given many of the animals listed in Appendix 6 predate on things but might not be considered predators when written like this in the text of the CMS, for example wasps, magpies or gambusia. It would also be a risk only to focus on those animals identified as predators for Predator Free 2050, names only possums, rats and stoats. Also as mentioned the sustained nature of animal pest control is key to maintaining gains.	reword milestones 4.1.3.4, 4.1.3.8 and 4.1.3.12 replacing “predator control” with “sustained animal pest control” and adjust the number of hectares.
4.1.1 (or alternative appropriate location)	There is currently no milestones relating to reintroducing whio into the Tararuas. We would like to see such a milestone included.	Add a milestone to reintroduce whio to the Tararuas
4.2 Historic Values pg 29	This section is missing references to Remutaka Forest Park. While the historic value of huts in the Tararuas and Ruahines are recognised there is no recognition of the huts in the Remutaka Forest Park. The huts in all three areas are of similar age and all should be recognised as having significant heritage value. Please note deer culler huts in the Tararuas should be added to appendix 9, especially after the volunteer restoration work done by ExNZFS	Extend the 8th bullet point to read: Historic tramping, club, private and deer cullers’ huts and tracks in Tararua, Ruahine and Remutaka Forest Parks
4.2.2.7, 4.2.3.7, 4.2.3.10  Historic values: Work with local authorities	Support these milestones, however it would be important to emphasize the value of hearing from local communities especially regarding identifying new sites. This will consequently increase engagement (point 4.4).	Reword policy 4.2.2.7 to read: Work with local authorities and communities through their district plan review processes, to ensure identification and protection of historic heritage.  It is important to specify what strategy will be used to identify new sites: will the community be heard? will the community be able to suggest and vote on potential sites to be included?
Policies 4.3.2.2 and 4.3.2.3 and associated milestones: 4.3.3.1, 4.3.3.2, 4.3.3.8, 4.3.3.9, 4.3.3.15, 4.3.3.16	We support the objective to increase visitor numbers, but note that the milestones are ambitious and if achieved would significantly increase visitor numbers to the destinations listed in Appendix 10. Also this will impact on the definitions provided in Appendix 13  However, we have concerns that such a significant increase in visitor numbers	Reword policies 4.3.2.2 and 4.3.2.3 to include provisions setting out that there will be resources available to ensure that the infrastructure is sufficient to cope with the planned increase in visitor numbers, but not at the expense of any resourcing required to maintain other backcountry destinations.  Reword milestones 4.3.3.1, 4.3.3.2,

	<p>could potentially have a detrimental impact on these destinations, particularly the huts and campsites. There needs to be sufficient resourcing to ensure that the infrastructure is able to cope with an increase in use so that the visitor experience is not degraded because of overcrowding or insufficient facilities.</p> <p>At the same time, any resource requirements for the destinations listed in Appendix 10 must not be at the expense of any resourcing required to maintain other backcountry destinations.</p> <p>The CMS sets out that the destinations listed in appendix 10 may be amended or reviewed during the term of the CMS, and we also recommend that a process for undertaking a review of the destinations, in consultation with conservation partners, be included in the milestones.</p> <p>The CMS is silent on booking systems. We are concerned with this. Booking systems change the use of huts. They tend to prevent short-term changes in plans and to exclude those taking advantage of good at short notice. This last point matters to new, less experienced people. It also makes it difficult to change plans due to deteriorating weather or injury. Access to a hut in these circumstances is a matter of safety.</p> <p>We are also concerned that as access is lost in some areas and the network gets squeezed by funding constraints that booking systems are seen as a solution. We have also noted that in trials in the Wellington region no record of costs of the system to DoC have been kept.</p> <p>In our view booking should be used very sparingly and be only when:</p> <ul style="list-style-type: none"> <li>- be only where significant overcrowding is occurring regularly</li> </ul>	<p>4.3.3.8, 4.3.3.9, 4.3.3.15, 4.3.3.16 to include a formal process for reviewing the destinations listed in appendix 10, in consultation with conservation partners.</p> <p>Provide clarity around establishing bookings for existing backcountry huts and ensure the ability to use an annual hut pass.</p>
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	<ul style="list-style-type: none"> <li>- be for bunks, not floor access (emergency shelter/change of plans)</li> <li>- there will be consultation with affected recreation groups before a final decision is made to place the facility on the booking system</li> <li>- the benefits need to be evident</li> <li>- the use of the booking system should be consistent with the historic use of the facility</li> <li>- Seasonal application of the booking system should be considered (but this should be based on common dates e.g. 1st October to the end of 30th April)</li> </ul> <p>And where booking is implemented:</p> <ul style="list-style-type: none"> <li>- Unbooked people may take any unbooked beds</li> <li>- Be for bunks, not floor access (emergency shelter/change of plans)</li> <li>- The Annual Pass is still valid for hut fees</li> </ul>	
Policy 4.3.2.4 and associated milestones: 4.3.3.3, 4.3.3.10, 4.3.3.17	<p>While we support this objective, there are additional groups to the NZ Walking Access Commission that need to be included in the policy. Access to public conservation land is important. There are significant areas of private land adjoining the Ruahine Forest Park, in particular, which make it difficult for the public to access north-western areas of the park. For example, access to the hut on the cover of the CMS, McKinnon Hut, is no longer available through private land at Rangitane Road end. This means a road end previously visited multiple times a year by our club is now never visited.</p> <p>However, the milestones associated with this objective are not sufficiently ambitious and do not provide a measure for how access will be prioritised and improved over the life of the CMS.</p>	<p>Reword milestone 4.3.3.3 to read: <i>Identified and prioritised public conservation lands and waters requiring access improvement in conjunction with the New Zealand Walking Access Commission, PSGEs and tangata whenua and conservation partners.</i></p> <p>Reword milestone 4.3.3.10 to read: <i>Initiated processes to improve access to the public conservation lands and waters that have been identified as high priority.</i></p> <p>Reword milestone 4.3.3.17 to read: <i>Improved access to all the public conservation lands and waters that have been identified as high priority.</i></p>



4.4	It appears on page 39 that engagement includes recreation partners working on huts and tracks, along side conservation activities. However in the policies and milestones tend to focus on conservation outcomes only. If this is because this engagement is included in the recreation policies and milestones section this should be made clear	
4.4.2.4 Work with regional tourism organisations, other promotional groups, and businesses to create and develop opportunities to promote conservation initiatives, products, and services.	Support this policy but it is unclear how 'work' with regional tourism organisations, other promotional groups, and business to create and develop opportunities to promote conservation initiatives, products, and services, will be done.	Reword policy 4.4.2.4 to be more specific and measurable.
4.4.2.6 Support conservation programmes in schools particularly those connected or near to sites with high biodiversity values.	Conditional support for this policy but it is unclear how 'support conservation programmes in schools' will be implemented. Why is this limited to schools? There should be wider reach for this policy especially considering your stretch goal of 90% of New Zealanders.	Reword policy 4.4.2.6 to be more specific, clear and measurable. It would be helpful if an example is added.  If possible widen the conservation programmes beyond schools.
4.4.2.9 Support research into ecosystem services provided by public conservation lands and waters to better understand and quantify these services, and make this information publicly available.	Support this policy, however it is unclear how the 'support research into ecosystem services' will be carried out. Are there funding schemes to support these research endeavours?  It would be very valuable if the Wellington CMS could foster partnerships between organizations and government bodies to create and increase funding schemes targeted to support any research endeavour related to conversation topics carried out by communities or members of the public.	Reword policy 4.4.2.9 to be more specific and clear.  Suggest including a new point probably after 4.4.2.9 policy. This point should cover fostering relationships between organizations and government bodies and creating and increasing funding schemes for research endeavours on conservation topics carried by communities and/ or members of the public.
4.4.3.6 Agreed mechanisms with relevant agencies for efficient statutory processes.	Support this milestone, however it is unclear if there will be a re-assessment and evaluation of the effectiveness of these mechanisms throughout the years.	Add a new point covering re-assessment and evaluation probably after 4.4.3.6 milestone.

4.4.3.9 Engagement milestone: quality and value of stakeholder engagement	Support intention of this milestone, but it is not clear how 'quality and mutual value' will be measured, what is meant by 'stakeholder engagement' or how an improvement will impact on conservation outcomes.	Reword policy 4.4.3.9 to be more specific, clear and measurable
5.6 Fixed Anchors	It appears that the Department wishes to impose controls on the activity of placing fixed anchors (bolting) for climbing the area covered by the Wellington CMS. The issues associated with fixed anchors and rock climbing development were extensively consulted on and considered by the Department in the context of the Paparoa National Park Management Plan. WTMC suggests that the Department refer to the outcomes achieved in that process to better inform fixed anchor policies in the Wellington CMS.	Review this section
5.6.2	WTMC approve of the NZAC guidelines and position outlined. However it is not appropriate to encourage NZAC and other recreational groups to seek authorisation and manage bolts.  It seems pointless, and unsafe to remove unauthorised fixed anchors	Delete Policy 5.6.2
5.6.4 Fixed Anchors and Table 5.15.2 p 57	Policy 5.6.4 proposes the tabulation of climbing areas where fixed anchors are permitted.  WTMC does not support the proposal to exhaustively list climbing areas within the area covered by the Wellington CMS. There is no legislative basis for differentiating between climbing activities and other activities in terms of public access on conservation land.  If the Department is intent of adopting this construct, WTMC propose that the Department adopts the approach set out in the Paparoa National Park Management Plan (including in relation to "Climbing Development Areas").	Delete Policy 5.6.4  Delete Table 5.15.2 on p 57
5.13.4	Consultation	Support this
5.13.17 c)	We endorse the goals around kiwi-aversion training for dogs but would also like to see whio-aversion training being promoted.	Reword to:  Kiwi-aversion and whio-aversion
5.13.18d)	Where are kiwi sanctuary areas and wildlife sanctuaries? Should they be listed in an appendix or added to Table 5.15.4? Do whio areas have the potential to become these or would avian	Clarification sought.  Would there be a distinction in terms of process of updating between places listed in the tables in section 5 and those

	aversion trained dogs be allowed?	items listed in Appendices?
5.13.21c)	avian aversion training	support this
Table 5.15.1	Authorisation tables - aircraft	Clarification sought - we were unable to find the existing number of landings. We wouldn't want to see large increases in the number of flights authorised.
Table 5.15.2 p 57	Fixed anchors	delete table
Discussion box 1 (p57)	<p>There are several issues arising from Discussion box 1:</p> <ol style="list-style-type: none"> <li>1. The first management issue identified (legal risk) is stated as a "potential" fact and no supporting information such as legal advice or analysis has been supplied. It not appropriate to consult on or formulate regulatory policy to manage a legal risk where the presence of that risk is ambiguous. If, for example, the Department has no legal liability for placement of fixed anchors on conservation land then the policy approach described in Discussion box 1 is unnecessary.</li> <li>2. The second management issue identified (adverse effects) is also described as a "potential" fact. As above, it not appropriate to consult on or formulate regulatory policy to manage a risk that may or may not exist. Further, it is not clear how "adverse effects" are more significant than, for example, mountain biking activities.</li> <li>3. The third management issue identified is ill-defined and does not appear to support the policy approach described in Discussion box 1.</li> <li>4. The fourth management issue identified is:               <ol style="list-style-type: none"> <li>(a) as to the first statement and in the absence of further context, nonsensical. Fixed anchors are placed to facilitate recreational activity (rock climbing); and</li> <li>(b) as to both the first and second statements, inconsistent with Section 6(e) of the Conservation Act 1987.</li> </ol> </li> </ol> <p>It is not a function of the Department to "provide for a spectrum of planned recreational opportunities". The Department is required to foster recreation (including rock climbing) on conservation land where that is not inconsistent with its conservation.</p>	

6.3.2 Central Spine Place: Natural Values Values	Bullet 1 Needs to be reworded to separate out the 4 priority ecosystems from the other values of the Place.  Are the various ecosystems of the alpine tops also a valuable and deserves mention?	Reword.  "These areas are prioritised" to "The Central Spine Place is prioritised"
6.3.2 Central Spine Place: Natural Values Issues and Opportunities	Land use change and/or reclassification is not included in the list of threats to conservation land and waters, protected wildlife and ecosystems.  Recent events demonstrate that this is a threat to the Central Spine Place and should be recognised in the CMS  To say that deer, pigs and goats require management is to imply that current levels of these introduced animals are acceptable. We would like to see more ambitious wording that recognised the negative effect that these introduced animals have.	Reword 6.3.2 issues and opportunities bullet 1 to read: Threats to public conservation lands and waters, protected wildlife, and ecosystem services within this Place include pest animals and plants (including wilding pines and the potential threat of didymo) (see Appendix 6 <a href="http://www.doc.govt.nz/wellingtoncms">www.doc.govt.nz/wellingtoncms</a> ), unauthorised grazing, land use change or reclassification, stock trespassing, and fire.  Add to bullet 3:  Managing numbers of these introduced animals is important to protect native flora and fauna and to minimize their damage to ecosystems.
6.3.2.1 Central Spine Place: Natural Values Policy: pest control and reintroductions	Support this policy, however Part a) should be more ambitious. In order to reintroduce native species (6.3.2.1 Part b and 6.3.2.10) pest populations will likely need to be reduced not simply controlled.	Reword policy 6.3.2.1 to read: Reduce pest populations to protect native species, allow for reintroduction of native species not currently present, and encourage regeneration.
6.3.2.5, 6.3.2.8, 6.3.2.12 Central Spine Place: Natural Values Milestones: Pest control	Support these milestones, however milestones should also be included that measure outcomes (pest population/distribution) not simply output (% area under pest control), suggest adding wording referring to no increase or reduction in pest populations/distribution.  It isn't clear what pests are being controlled here and why. Is it all animal pests, just predators, plant and animal pests. What is being protected, birds, vegetation or ecosystems?	Reword milestones 6.3.2.5, 6.3.2.8, 6.3.2.12 to include clarity on what pests, desired outcomes, or add additional milestones.
6.3.2.6, 6.3.2.10, 6.3.2.13 Central Spine Place: Natural Values Milestone: reintroduction of whio and eastern brown kiwi	Strongly support these milestones, however refer to comment on policy 6.3.2.1 - a reduction in pest populations and/or distribution is a likely prerequisite of whio and kiwi introduction.	retain milestones 6.3.2.6, 6.3.2.10, 6.3.2.13
6.3.2.6	Support regular surveys of whio and kiwi in these areas.	Retain

6.3.2.9	Support increasing population of who within Ruahines	Retain
6.3.2.13	Support increasing population of who into more catchments within the Ruahines.	Retain
6.3.4.2 policy 6.3.4-.8,.10 & .12 Central spine access	Strongly support these initiatives in improving access to Ruahine and Aorangi Forest Parks, establishing permanent legal access. However, it seems unrealistic to spend three years defining the problem points and a work plan, when these issues are already identified and frequently discussed by both DOC staff and user groups. A more progressive timeframe for action is needed to maintain credibility in this area. We are particularly concerned about the loss of all-weather access to Kawhatau base and its network of tracks.	retain policy 6.3.4.2  change milestones - bring 6.3.4.12 forward to 6.3.4.10
6.3.4.3	New multi-day tramps.  Support this message as a way to increase getting new people into tramping	Retain 6.3.4.3
6.3.4.7	Public booking system for private huts - CMS should provide clarity around process of establishing bookings for public huts (where no booking was previously required) - see comments above regarding Policies 4.3.2.2 and 4.3.2.3  In our view booking should be used very sparingly and be only: <ul style="list-style-type: none"> <li>- when significant overcrowding is occurring regularly</li> <li>- for bunks, not floor access (emergency shelter/change of plans)</li> <li>- there will be consultation with affected recreation groups before a final decision is made to place the facility on the booking system</li> <li>- the benefits need to be evident</li> <li>- the use of the booking system should be consistent with the historic use of the facility</li> <li>- Seasonal application of the booking system should be considered (but this should be</li> </ul>	New policy on booking outlining:  Reasons  Consultation period  Annual hut pass is still valid and can be used for booking

	<p>based on common dates e.g. 1st October to the end of 30th April) And where booking is implemented:</p> <ul style="list-style-type: none"> <li>- Unbooked people may take any unbooked beds</li> <li>- Be for bunks, not floor access (emergency shelter/change of plans)</li> <li>- The Annual Pass is still valid for hut fees</li> </ul>	
8.3.2 Wairarapa Place: Natural Values Issues and Opportunities	Poor water quality is not mentioned as an issue	Insert bullet point in Issues and Opportunities to address current issues with water quality, particularly within Wairarapa Moana, and opportunities that would arise with improvements in water quality
8.3.2.1 Wairarapa Place Policy: Wairarapa Moana	<p>Support this policy, however there should be an explicit policy about improving water quality of Wairarapa Moana</p> <p>Milestones should be added with targets for improved water quality at Years 3, 5 and 10</p>	<p>Reword policy 8.3.2.1 to read:</p> <p>Work with the Wairarapa Moana Statutory Board to: a) seek classification of Wairarapa Moana as a Wetland of International Importance; b) manage pest plants and animals, and c) improve water quality within Wairarapa Moana</p>
12.3.2.1 Coastal and Marine Place Policy: human disturbance of wildlife	Support this policy, but should be more strongly worded 'seek that' is not sufficient	Reword policy more strongly than 'seek that'
Glossary p145	<p>The use of the term "visitor" continues to inflame backcountry user groups. Especially now, when many individual users and groups are restoring and maintaining huts, and carrying out pest control. DOC seeks to have partnerships with us, but continues to use a label that firmly positions us as neither belonging to nor having any sense of kaitiakitanga in relation to this whenua. This comment is not meant to detract in any way from the special relationship and place of iwi and hapu. It is meant to illustrate that us backcountry users are quite different from tourists from other countries who come to experience New Zealand's wilderness. The ongoing use of this term by the Department continues to place a barrier between it and backcountry user groups. If the Department is genuine about ongoing partnerships, using another, less-loaded term would make sense.</p>	<p>Replace 'visitor' with a more neutral term. Consider distinguishing between different types of users and using different terms for them. Eg tourists from other countries are 'visitors'; other terms could be 'backcountry users', 'frontcountry users' - or trampers, hunters, daywalkers etc.</p>

Appendix 2 Priority sites for action p159	We endorse the priority areas for mustelid control for who protection in the Ruahines including the Oroua, Pohangina, Makaroro, Apias and Mangatera. However we note that Ikawatea is missing from this list. A lot of volunteer time goes into mustelid trapping in these areas so they need to be included as priorities. We also note there is good reason to extend these areas to include tributaries of Rangitikei in particular the Kawhatau and Maropea as well as the Tukituki.	Reword to:  Mustelid control for who/blue duck populations in the following river catchments: Pohangina, Oroua, Makaroro, Apias, Ikawatea, Kawhatau and Maropea and parts of Mangatera, as well as the Tukituki. Also kiwi protection Ikawatea/Apias
Appendix 2 Management responses p157	We endorse goal of increasing mustelid control. However we are concerned at the lack of goals focusing on possum control in the Ruahines.	Reword to:  stoat, possum, goat, and wilding pine control.
Appendix 2 Priority sites for action p157	We endorse 'Trapping network for mustelid control provides some benefit for bird species. However we are concerned at lack of mention of possum control.	Reword to:  Trapping network for mustelid and possum control provides some benefit for bird species.
Appendix 9	Additional historic huts in the Tararua Forest Park. Please recognise the work that exNZDF have done in restoring the forest service huts in the Tararua Forest Park these newly restored huts should be added to the list in appendix 9.	
Volume 2 - Maps (Also definitions)	We are concerned about the definitions and demarcations of the visitor management zones. For example, our understanding is that previously the Upper Otaki was designated a wilderness zone - but that's gone from this CMS. Also, the we have concerns about the distinction between backcountry and remote zones. The backcountry zones are larger than expected based on how they are defined.	Re-think visitor management zones definitions and boundaries in consultation with local clubs and others.  Redo maps in line with above outcomes from above to ensure they accurately represent agreed visitor management zones.