



REGISTERED CHARITY CC11386

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Chief Executive
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Tēnā Koe

Resource Consent Change Application No. CH21-02259 (65979) Lake Level Control Trial - 3rd August 2021

The *Lake Rotoiti Community Association Incorporated (LRCA)* having previously offered support in principle towards this proposal, wishes to substantiate its position relative to the intention to draw-down the Rotoiti lake level to RL278.850m Moturiki Datum and hold for a period of 7 days before returning to the normal operating range, this to be attempted within a so-called 'Trial' period of 4 years 5 months from February 2022.

We concur that water quality in Lake Rotoiti is of primary consideration in levels management. With regard to this, the current consent requires that output flows from the Ōkere Gates matches or exceeds input flows to the Ōhau Channel from Lake Rotorua.

We note that this will continue to be the critical underpinning management principle under the proposed variation 'Trial' period. We are aware that this means that in a very dry year the lake could potentially decline to unprecedented levels, and in fact this has been evidenced to considerable extent over the past two summers with some of the lowest levels experienced for many years.

However we understand that during the 'Trial' period, except for **one completed drawdown to RL278.850**, Rotoiti lake levels will be managed in accordance with the proposed amendment to consent conditions relating to Condition 7.4(b) i.e. 'maintaining the level between the target range RL279.100 and RL279.200 metres wherever possible subject to maintaining the afore-mentioned input-output flows.' This is likely to reflect 'natural' seasonal fluctuations and climatic conditions.

It is assumed that the timeframe sought i.e. 6 February to 30 June is to provide for a wider window of opportunity in the event of an extended dry period. We concede that it is indeed possible that the proposed draw-down level may be reached during the prime summer months under existing operational conditions thereby potentially allowing for the 'Trial' to be undertaken simultaneously.

Notwithstanding, as previously advised, our support for the Variation included the proviso that any one-off 'low level' reduction should be conducted during a period of least disruption to the wider Rotoiti community, **i.e. not before the completion of the EASTER holiday period**. Given the AEE states that the recovery range is anticipated to be 50-95 days (presumably worst scenario in the event of extended dry weather?) we consider it imperative that this strong preference be specifically stipulated.

It is therefore recommended that the Proposal be amended to reflect that between 6 February and the end of Easter weekend, there be no deliberate attempt to draw the lake level down to RL278.850m. It is understood that the Applicant's intent coincides with such stipulation.

We also note this recommendation to be essentially endorsed by both David Rowe and Willie Shaw (Wildlands) in their reports on potential Ecological Effects of the 'Trial'. David Rowe states that whilst any impacts on fisheries should be less than minor, this would likely be compromised if the low lake level is held for longer than the proposed 7 days, and therefore the drawdown should not be undertaken during drought conditions. Willie Shaw, in coming to similar conclusions with regard to avifauna, notes that, given the proposed 6 February to 30 June window, it would be better to undertake the drawdown 'Trial' in autumn or early winter and in a non-drought year.

Further support for delaying the proposed lake level drop to a later Autumn/Winter period can be evidenced by the fact that the (now to be discontinued) annual Ōhau Channel 'flush' provided by the existing consent and which reduces the level to RL279.00m and below has been undertaken between May and September of each year including occasions during July/August.

Having materially assisted in the preparation and presentation of this proposal from the outset, LRCA is most concerned and disappointed over the latest impressions gained by many of our members due to the ambiguous nature of the phraseology contained in the AEE. Given this relationship and as a longstanding and bona fide representative of the community, LRCA should have been afforded the courtesy of receiving this Notification for comment prior to distribution which would have allowed the misinformation contained therein to be addressed. It is devoid of satisfactory explanation or detail in the critical areas surrounding the optimal timing of the proposed draw-down and optimal recovery times in this event (i.e. imminent rainfall subsequent to reduction), nor clarification of the intended overall management of levels during the 'Trial' period which, outside of the proposed draw-down, should comply with Operating Condition 7.4(b) as noted above. It is apparent that the consent has been changed to a period of 4 years and 5 months without substantiation (more confused by different ending dates quoted). Overall, the exercise as written gives a strong notion that there could be multiple attempts at draw-down and long recovery periods. This most certainly should not be the case.

The timing of the draw-down along with the ability to return the lake to its normal operating range within the shortest possible timeframe **is the major concern of a large sector of our members and other lake users**. Unease over the prospective execution of this process during the prime months of boating activity remains high within the community. We trust that these comments will be given serious consideration in deliberating this matter. We wish to be represented at any convened Hearing.

Nāku noa, nā

Jim S

Jim Stanton
Representative – Lake Levels Management

Reina

Reina Engelen
Chairperson