Feedback from the 'Forestry & Wilding Pines' consultation brochure

In total, six comments were received in relation to the consultation brochure. The focus of the brochure was on managing wilding spread from new plantation forestry under the District Plan. Related to this topic, was the list of wilding species and what should be on /off the list, as well as questions for discussion.

Forestry, and wilding spread from forestry, were dealt with together because that is the approach currently used in the District Plan, and it also recognises that the main New Zealand commercial forestry species, Pinus radiata and Douglas fir, are already listed in the District Plan as trees with wilding potential.

The brochure has caused confusion in three areas:

- The brochure did not state clearly enough that it was limited to wilding spread from new plantation forestry. The wide ranging nature of the questions included with the brochure caused confusion.

- Some of the feedback relates to the issue of wildings more generally, rather than managing wilding spread from new plantation forestry. Some of this feedback is relevant to the Council's wilding strategy but not the District Plan Review. For example, a number of comments were received about how the backdrop to Queenstown is highly valued, but there is no intention or ability to retrospectively deal with this, and even if that were desirable, it would be through the Wilding Conifer Strategy, not the District Plan.

- The brochure contained a list of species *"currently listed in the District Plan as having wilding potential"*. The list caused confusion with people thinking it was a proposed list, and also criticising the content of the list (which is simply based on the operative provisions of the District Plan).

The Council has its Wilding Conifer Strategy in place for the wider issue of wilding trees not related to new forestry plantations.

Respondent, Date & Method of Contact	***Basic summary of feedback***
Wilding Conifer Group Incorporated Peter Willsman Email 13/07/12	1. Review the existing list of wilding trees WCG support this and would like to be involved in determining the appropriate list. The existing list of species with wilding potential includes plants like lupins or eucalypts trees which the WCG is not concerned with. 2. Allowing consent applications for planting of new wilding trees to be publicly notified WCG support this. In the past, applications for plantations have been approved in inappropriate locations, and with unsuitable consent conditions for wilding spread. For example, the plantation at the base of The Remarkables. However applications should **only be** notified if the risk calculated in the most recent 'Assessing risk of wilding spread' calculator by N.J. Ledgard, is deemed to be high. If the risk is low, the consent does not need to be notified, but wilding conditions would still be required on the resource consent. 3. Prohibiting use of wilding trees in landscape treatment for new houses, or the use / retention of wilding trees to screen new development. WCG support this, particularly on sections/building platforms where seed can spread onto tussock/alpine lands. Trees planted as temporary

	screening or windbreaks can easily be left to grow to mature seeders. This is only necessary where the neighbouring land use is susceptible to wilding invasion, the calculator should be used here also as a decision making tool. 4. Making the planting of wilding trees a prohibited activity on all or parts of the Outstanding Natural Landscapes and Features, and above 1070masl. WCG support this. It is vitally important that we are not facilitating the creation of new seed sources where seed will spread into our amazing landscape. 5. Preparing more specific objectives, policies and assessment matters to ensure where planting is feasible, wilding spread can be controlled. WCG support this, and recognise in some limited locations and with appropriate conditions, plantation forestry for species with wilding potential is possible. 6. Prohibiting planting of wilding trees in all urban zones The WCG does not have a strong view on this. Seed spread from urban areas is likely to be minimal. 7. Making the unintended growing of wilding pines a prohibited activity as per recent Environment Court decisions WCG is aware of the Environment Court decision in the Mackenzie district that proposed a rule along these lines. However the decision was interim, and this matter could be reviewed when the final Environment Court decision is issued. The rule was also proposed in the context of enabling carbon farming on other areas, and the WCG is tentative on this given the susceptibility of the Queenstown Lakes district to wilding spread. The WCG is aware that this could open up a can of worms with situations in Queenstown.
Scion Letter 13/07/12	**General** • Important to recognise that trees & particularly exotic trees are an integral part of the composition of Queenstown & Wakatipu and the surrounding landscape. • For complex landscape environments such as the Queenstown and Wakatipu basin the solution lies in examining the trade-offs between the public and private benefits of trees overall (including wildings) in the landscape so that the contribution to tourism and soil and water conservation is fully recognised and appropriate management strategies developed that further enhance the environment and landscape. • Discussion document does not achieve its aims of informing stakeholders about this complex issue and nor does it present a balanced view that will lead to sustainable outcomes that enhance the environment of the Wakatipu. • Some of the statements about the potential effects of wildings are incorrect tor misleading. • It is important to separate wildings from afforestation and tree planting. Newly established (planted strands of trees may eventually be a seed source but in themselves are not wildings. • Proper management of the surrounding landscape and the plantings itself (e.g. grazing, fertilising, placing plantations according to the surrounding terrain,) can reduce or eliminate the potential for wildings originating from planted stands. • The list of species that have wilding potential is far from complete. Do not differentiate between wildings and forestry species. The inclusion of 2 major economically important forestry species (radiate pine and Douglas Fir) on the list is potentially misleading.

	• Your list contains forestry species that have a low risk of spreading and are actually managed in a forest context. It is not clear why noxious weeds such as broom and gorse are on the list. • The list appears to be focused on historical and current forestry species and not focused on species with wilding potential. Currently the list is misleading about which species are risky and which species are not. • Your plan review lacks in the ability to differentiate between conifer species and their different ability to produce wildings and the important factor that spread and wilding occurrence is influenced by their management and the surrounding vegetation and land use. • The wilding tree list needs to be reviewed and updated in terms of species choice and species status. • There is little justification to allow consent applications for wilding trees to be publicly notified as the list of wilding trees is currently misleading. • No support for the prohibition of wilding trees around new houses. • It is sensible to prohibit the planting of certain conifers in ONLs and ONFs and above 1070masl. • There is a good case to support the creation of more specific objectives, policies and assessment matters to ensure that spread can be controlled. • No support for prohibiting planting wilding trees in urban zones. • The definition of wilding trees includes the occurrence in unintended locations. The task of growing something is linked to a purpose and therefore not unintended. • The district plan should align with the regional and national pest management strategy.
Ernslaw One Ltd Phil De la Mare 13/07/12	• Wilding trees cannot be considered in isolation as part of the District Plan review but must be dealt with exotic trees in the context of pastoral farming, rural subdivisions, amenity plantings, Council parks and reserves, changes to conservation reserves, and existing plantation forests. The issue is one of wise land management. • Under the current commercial environment, the district is not attractive for large scale commercial forestry due to distance to markets, and the only likely scenario for new planting is smaller woodlots to supplement farm income. However, plan changes should not be seen to pick winners, as no one knows what the long term future holds for commercial forestry or what wood based bioenergy heat demand may emerge in the district. • Conifer forests form the immediate backdrop behind the town of Queenstown. Pictures of the skyline Gondola and its Douglas-fir forests are world renown. Most of the district is categorised as outstanding natural landscape, so the issue with wilding trees is one of visual amenity, and not water yield, impact on native flora or grazing species. Therefore, the first question to ask is “what vista does the district want in the next 100 years?” Just as important to consider is that given trees and grazing stock are usually mutually exclusive, so as stock numbers are reduced on hill country farmland, wilding spread will increase, effectively resulting in “trees by default” under these circumstances. The second question therefore is “what tree do we want?” since without grazing, woody species is what fills the gap. Destocking hill country is the fastest way to establish a new cover of woody vegetation, the species of which will be determined by the local seed source. • Any Proposed plan changes must address the very real potential for deforestation liabilities under the Emissions Trading Scheme (the Climate Change Response Act may define the Council to be the requiring authority, and hence expose its ratepayers to missions in liability) if any of these stands cannot be replanted after harvest. The area will always have Douglas-fir and Corsican pine regeneration given the extent of local seed sources, so the plan must address second rotation crops of these species. It is simply wishful thinking to insist these areas are re-established in native woody species, as anyone with experience in re-establishing forests will know.

	• A risk based approach is supported for planting conifers other than Lodgepole Pine (Pinus contorta) which we agree should be designated as a Prohibited tree species. Outside of designated Outstanding Natural Landscape areas, Low wilding risk spread sites, including those subject to moderate grazing pressure or periodic mob stocking, should retain Permitted Activity Status. • By contrast, all sites over 1070m elevation and all other high wilding risk spread risk sites should require a resource consent, and has such have a consent condition requiring a robust and auditable plan for wilding control. • Including Douglas-fir, Radiata pine and all Eucalypts on the districts list of wilding species sets a very dangerous precedent for the forest industry in Otago and Southland. Ernslaw One grows these species in immediately adjacent districts and recognises the real danger is of similar Plan Changes being adopted by neighbouring districts where the issues are quite different (grazing pressure is typically much higher). Our company spends up to $100,000/annum controlling spread of wildings within our estate. • Making the planting of these production conifer and Eucalypt tree species a prohibited species will not achieve anything on its own. Further, any Plan change that seeks to require the applicant go out for full public notification of a proposal to plant land in conifers is strongly opposed, because of the huge and unnecessary costs involved. • Further by encouraging fuel switching from fossil fuel (coal, diesel and natural gas) not just in consented boilers and other heat plants, but also in domestic heating, Council can play its part in creating a vibrant bioenergy market, which would see wilding conifers harvested for their bio-energy value at no cost to the ratepayer. Policy interventions are likely to be much more effective and much better received than iron fisted regulation as currently appears contemplated, and make the area and its heavily fossil fuel dependent tourist industry far more sustainable than it is at present. • Our view is that the optimum solution for Council lies in education and advocacy of successful wilding conifer control methods. The use of prohibitions under the RMA is a lazy planning tool.
Department of Conservation 04/07/12	• The Department of Conservation (DOC) has been undertaking wild tree control in the Wakatipu area for 30 years. Few organisations appreciate more the impact these trees have on almost every facet of the natural landscape. Research by DOC scientists have indicated that of all the weed species in New Zealand wild pines have the potential to impact the most across a wide range of ecosystems and landscapes. Also affected to varying degrees is recreational use, fire severity, visual elements to the landscape, productive values for agriculture etc. • Control of wilding trees is seen as one of the most valuable contributions to conservation DOC can make. • In conjunction with the Wakatipu Wilding Conifer Control Group (WCG) DOC has progressed pine control to the point where control efforts are now bordering the township of Queenstown. This work has the potential to be very controversial, however, up to this point there has been very little negative feedback. Yes there is an intrinsic value to the forests of Queenstown Hill and Ben Lomond but more so there is an appreciation of the truly grand vistas of the Remarkables, the Eyre Mountains, and the scenery looking towards Glenorchy from Bennetts Bluff. None of these regionally and nationally significant landscapes are associated with wilding trees, whilst all of these landscapes are at risk from wild tree spread. • QLDC must be applauded for its foresight in recognising the threat wild trees pose. DOC would support a greater involvement in wild tree issues by the Otago Regional Council. This has recently been demonstrated by ORC in working with the Central Otago District Council. The Queenstown Lakes District Council district plan should recognise the threats posed by a variety of wild tree species even if the ORC RPMS strategy does not. By listing the most at risk species the district council is recognising the greater vulnerability of the landscapes in the Wakatipu and Wanaka areas and the lack of suitably safe areas for potential plantings. Prohibiting key wilding tree species from being planted will not only reduce future spread risks but also provide valuable advocacy to both members of the public,

	private landowners and other organisations of the risks of wilding trees. • What is becoming clear from DOC's and WCG's extensive wild pine operations around the Wakatipu is that the spread of wilding seed into remote areas may not be a regular occurrence but when it happens it's extensive. Even if we estimate that the large seed dispersal events occur only once every 10 - 15 years, the life cycle of a Douglas pine forest is at least 40 years. This equates to at least two large seed dispersal events. Any such seed dispersal event potentially could re-introduce plants into thousands of hectares of previously controlled lands. • The top tree species DOC recommends should be prohibited from planting are: 1. Contorta 2. Douglas fir 3. Scots pine 4. Corsican pine 5. European larch 6. sycamore 7. Hawthorn • Eucalypts and Radiata could be removed from the lists as they do not pose a significant risk of spread. **Proposed changes** • A review of the existing list of wilding species is sensible. As stated above we need to be quite clear that the list contains only those species that pose a risk of spread. • If a species is known or suspected of posing a wilding spread risk then the individual should be required to seek consent via public notification. Where species are known not to cause a spread risk then public notification could be unreasonably onerous • Agree with prohibiting the planting of wilding tree species in any areas in the region. There are plenty of tree species suitable for planting that do not pose a risk of spread-The typography, local wind patterns, altitude etc make anticipating where suitable sites for planting in the Wakatipu exist more of a lottery that a science. • In regards to more specific objectives, policies and assessment matters regarding planting of wilding species. DOC advocates for these types of trees to be banned from further cultivation. • DOC reiterates that the risks are too high of allowing plantings based on computer modelling programmes that do not take into account numerous local factors such as valley winds, local wind eddies, climate change, neighbouring owner issues, future motivations of individuals or groups to comply with any conditions attached to plantings. Is it worth the risk and is it sending the right message? • Agree with bullet point 6 • Strongly agree with bullet point 7. WCG provide subsidies for control on private farm land and manage the tree control work. If that's not enough incentive to undertake pine control nothing will be. Landowners contributing to the districts wild tree problems should get on board as the potential for new wild tree forests throwing millions of seed into previously controlled areas is currently very real. Most sites are well within the stitch in time philosophy and would not be too onerous on landowners at this point in time. **What you think** • It appears that most of the significant issues have been captured in your review. • The wilding list contains all the major problem trees but is confusing having non tree species included in it (note also gorse and broom are dealt with in the ORC RPMS). Considering removing Eucalypt and Radiata.

	• Most of the trees on the council wilding tree list should be prohibited from future plantings in the QLDC. • The RPMS strategy only catches limited wilding species (Contorta). The council should continue to recognise its role at a district level and manage future wild tree threats. Adding banned wild trees to the district plan is a sensible step. • Altitude limits are risky as they do not take into account a whole host of factors key to wild pine spread. The banning of high risk pine species removes the need for these types of limitations.
Nik Ledgard Letter 09/06/12	**1. General comment** Trees, particularly introduced conifers, are an integral part of the Queenstown / Wakatipu landscape. Without a doubt, they have been the biggest influence on visual landscape changes in the last 50 years. To be sure, in places they are causing problems in terms of containment of wilding spread, but they also comprise an accepted part of Queenstown character – a character which the majority of locals and visitors would want to maintain. The challenge is to use and manage them wisely, in an informed manner. To me, your 'Issues and Options' document is not well informed - for reasons outlined below. It comes across as a rather basic knee-jerk reaction to one of the problem issues (wilding spread), and as such is not convincing. **2. 'Wilding spread raises a number of issues'.** Some of your issues are rather misleading. • Landscape and Historic. Generally correct – although 'beauty will always lie with the beholder'. • Conservation and Production. This is only correct if wildings become dense. It is not correct for scattered trees, which these days are often removed well before they can become dense (plenty of examples around Queenstown). • Property. Wilding spread can certainly increase fire intensity, but they (and forests generally) do not increase the risk of fire ie., ignition. Most fires start in grasslands, not forests. • Recreation. Once again, you are talking about dense wilding trees, not scattered outliers. And now that we recognize the threat of wilding trees and apply 'stitch-in-time-saving-nine' tactics, scattered wildings are not affecting 'tramping, walking, cycling and running'. • Water. It is well known that forests will only 'lower water yield' (to a detectable level) if they cover >20% of a catchment. To state that wildings *per se* lower water yield is misleading. **3. Wilding tree list.** Your heading for your information flier is 'Forestry and Wilding trees' ie., you differentiate between the two. But there is no differentiation in your wilding tree list – it is far too all-encompassing. And since when were gorse, broom and lupins considered as trees? Their inclusion in a wilding tree list is highly misleading (to me, it begs the question as to whether there is a hidden agenda behind the whole document). There is a huge difference between the spread susceptibilities of the species listed – ranging from very susceptible (contorta pine) to hardly a risk at all in your area (radiata pine). **4. Current zoning.** I am not sure how the table of Zones and their Status helps in this document. How much of your District do the named Zones cover? And how does it tie in with Proposed Changes, where you mention 'urban zones' and Outstanding Natural areas? **5. Conifers and wildings.** In many areas introduced conifers are a feature of the Wakatipu area. To be sure, there are areas where their spread is causing a problem, but there are far more cases where they are a vital part of the landscape and causing no spread problem at all. Looking down onto the L. Hayes basin from Coronet Peak, there are examples of nearly all the tree species you list and the vast majority are

	not accompanied by wildings. Many serve important roles, particularly for shelter. The lack of spread is mainly due to intensive surrounding land use, but in some cases is because of wilding removal. Your Plan review seems to ignore the fact that conifer species differ in their ability to produce wildings, and that spread is significantly influenced by surrounding vegetation cover and land uses. It also fails to appreciate that wildings are not hard to control – a DOC study around the Twizel area found that wilding control was the most cost effective undertaking of all the conservation actions they carried out. **6. Proposed changes** • I support the review of the wilding tree list • I do not support 'Allowing consent applications for planting new wilding trees to be publicly notified'. This is far too all-encompassing when the list of wilding 'trees' is so misleading, and there is no recognition of the factors influencing spread (such as species choice and surrounding land cover and use) • Similarly, I do not support the prohibition of wilding tree use around new houses and developments. I fail to understand the logic behind this? Spread is often a low risk in such intensivel y managed areas. • I could well support the caution about planting certain conifers in Outstanding rural landscapes and above a certain altitude, as these areas are often extensively managed and hence more prone to wilding invasion. • I support the creation of more specific objectives, policies and assessment matters. • I do not support prohibiting the planting of wilding trees in all urban zones. Once again I fail to see the logic behind this – I cannot envisage a link between wilding spread and urban zones. • I am not sure what is meant by the last bullet point. Why use the words 'unintended growing of wilding pines' when according to your earlier definition of the word 'wilding' as 'the natural regeneration of introduced trees that occur in unintended locations'? **7. What do you think?** • As indicated above, I do not think that you have 'identified the issues' correctly or compiled an accurate wilding list. A more accurate means of determining spread risk, which includes all the major factors, is outlined in 7 below. • One needs to see the locations of Outstanding zones before one can decide on activity status. • Similarly, one needs to see how landscape categories tie in with your zoning areas. • The Plan needs to align with the RPMS (which I have not looked at lately). • An altitude limit has merits, but such a simple cut-off threshold often overlooks other important factors governing the spread of wildings (see 7). **8. Assessing wilding risk** Two decision support systems (DSS), which include the major wilding spread influences, have been developed to assess a) the threat of spread from new plantings (DSS1) and b) the risk of wildings establishing at any particular site (DSS2). The two DSSs can be used to quickly undertake a desktop assessment of likely risk of wilding spread. In 2011, DSS1 was refined by representatives of the forest companies and conservationists to meet criteria suitable for inclusion in the National Environmental Standard for Plantation Forests. These DSSs should be part of any assessment of spread risk when determining how to address wilding trees in the QLDC area.
Sam Kane Comment on	• Requiring new forestry plantations and shelter belts in Rural General zone to have a consent is crazy. It needs to be permitted, provided they are not wilding.

webpage 29/6/12	• Your list of wilding species is inconsistent with reality. I farm radiata, niagra, fur, lupins, and various eucalyptus. These have had ample opportunity (and fifty years) to spread, but have not. Narrow this list up to be better target those with real potential to spread. Property owners (including public bodies) harbouring wilding trees need to be 'encouraged' to eradicate them are (just like farmers are required to keep control of their rabbits).
Russell Hamilton 9 July 2012	• With regard to the District Plan Review – Heritage Landscapes – Macetown & Skippers. • I act for Soho Property Ltd in relation to Coronet Peak Station and Mt Soho Station. Wilding trees are of major concern and we are currently carrying out a comprehensive eradication program. The Sycamores on the DOC reserve at Macetown are the primary seed source in the Macetown area and we have removed significant areas of Sycamores from land adjacent to this area. Clearly unless removal of the seed source is carried out re-infestation will occur. • I wish to request consideration be given in the review that all land holders, including the Crown, must be required to remove wilding trees.