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10 May 2010

Dr Mike Freeman acting for Environment Canterbury
Environment Canterbury
PO Box 345
CHRISTCHURCH

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Dear Mike

Re: Upper Waitaki Hearings- Lone star Farms, Godley Peaks Station.

In response to the letter from Mr Reid to Dr Freeman dated 30 April 2010 and the closing legal submissions dated 23 April 2010 regarding the above applicant, the following points are noted with respect to the comments provided within the closing submission:

- *Points 4.3 and 4.4 regarding importance of issues and absence of comment on high rainfall in original S42a.*

McNae response: Overall most applicants provided a response to all issues raised not just those of “*high importance*”. While non responses to “*low importance*” issues were not seen as critical it was seen as important to have clarity around which issues were clarified and those that were not. Regarding the high rainfall, this was identified as a high importance issue in the original S42a report however in the formatting of the table this was inadvertently shown on the following page (see top of page 8).

- *4.5 No advanced stock reconciliation completed.*

McNae response: As has been made clear in both my original S42a report and the addendum report there is a need for the applicants to understand the terminology behind the Revised Stock Unit (RSU) calculator as has been used here. Regardless of how well the farm manager, Mr Glover knows the property and its systems, it is important to ensure the data entered into Overseer® is representative of the operation. See comments 30(c) of my original S42a report and 6(d) of my addendum report for further detail. It has been recommended that the future auditing of properties to ensure compliance with the NDA will require the advanced stock reconciliation to be completed. The applicant should be aware that if the RSU figures that have been entered into Overseer® are based on calculated winter stock units rather than actual RSU (see definition within Overseer®)

there is the possibility that their true stocking rate is in fact higher than the Overseer® model represents. This may have some impact in the future once the operation is in place and operating under a restricted nutrient regime.

- *4.6 High variation in rainfall*

McNae response: Response accepted

- *4.7 Olsen P high for dryland and low P is applied*

McNae response: The intention appears to be to reduce the current high Olsen P (Phosphate) levels by applying sub maintenance fertiliser to bring these back to within the economic optimum range. While this is a sound strategy the Overseer® modeling should represent the long term strategy rather than short term plan. In effect once the Olsen P target levels have been achieved then the operation will presumably move back to applying maintenance fertiliser which will have the effect of increasing the potential for higher levels of P runoff. Given the low applications and the size of the block (1.5% of total farm area) this will have nil to very minor impact on P runoff (given the variability within Overseer) however the applicant should be aware of how to best represent future land use within Overseer®.

- *4.8 Large differences in relative productivity*

McNae response: The information appears to have been entered based on actual farm information which is accepted. N.B: This point also relates to the additional point raised in my original S42a report regarding “only 132kg DM/ha production in extensive country”.

I trust this provides sufficient clarity around the responses provided for both Environment Canterbury and the Applicant.

If you have any queries do not hesitate to contact me.

Regards



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