

**Before the Waikato Regional Council
Hearings Panel**

UNDER the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF Proposed Plan Change 1 to the Waikato Regional Plan
(Waikato and Waipā River Catchments)

**MEMORANDUM OF COUNSEL ON BEHALF OF FISH AND GAME
RESPONDING TO PANEL QUERIES
Submitter # 74085**

Block 1

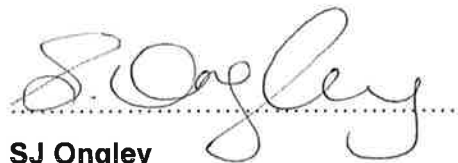
Dated: 16 July 2019

Counsel instructed

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1. In a Memorandum dated 21 May 2019, Fish & Game responded to the Panel's questions directed to Fish & Game at the 'Block 1' hearings. Counsel advised that the other questions from Block 1 would be addressed by Fish & Game following freshwater expert conferencing.¹ The remaining query that Fish & Game has not addressed to-date is:
 - 1.1. Commissioner Ryder's question to Dr Canning on the number of hard bottom streams in catchments covered by PC1.
2. A map showing hard bottom streams in the Region is contained at page 33 of the JWS (Freshwater). Dr Canning provides a better copy of this map together with his full answer to Commissioner Ryder's question, attached. Because the question to Dr Canning followed a discussion regarding relevance of managing nutrients for the purpose of managing nuisance periphyton growth, Dr Canning puts some context around his answer.
3. Dr Canning will be in attendance at the presentation of the JWS scheduled for this Thursday 18 July. Unfortunately Dr Daniel cannot attend as he has had a longstanding trip planned and is in America. Counsel requests that Dr Daniel be excused.
4. Finally, Dr Canning has noticed a typographical error in his Block 1 evidence: Table 1 on page 19 shows the bottom of the C-band for nitrate-nitrogen at 0.74 mg/L, whereas this number should read 0.89 mg/L consistent with the rest of Dr Canning's evidence (e.g. at [2.3.1]).

DATED this 16th day of July 2019



SJ Ongley

Counsel for the Auckland/Waikato and
Eastern Region Fish and Game Council

¹ The Panel had anticipated that some of the queries would be addressed in the freshwater conferencing.