

5 October 2026

Land Exchange Fast-track Team
Department of Conservation

submitted by email to: landexchange@doc.govt.nz



Federated Mountain Clubs of New Zealand Inc.

**Comment on draft report on land exchange proposal for the
Tukituki Water Security project by the Department of
Conservation under the Fast-track Approvals Act 2024**

Tēnā koutou Land Exchange Fast-track team,

1. Thank you for your email of 14 September 2026 inviting Federated Mountain Clubs of New Zealand (FMC) to comment on the Department of Conservation draft report (the **draft report**) on the land exchange proposal¹ by Tukituki Water Security Ltd (the **proposal**). We understand that the proposal is for the exchange of approximately 29.7 hectares of conservation land in the eastern Ruahine Forest Park for approximately 170 hectares of nearby private land, to enable the construction of a dam and reservoir on the Makaroro river.
2. Based on the information and analysis outlined in the draft report we consider DoC's overall conclusions in para 290-302 to be correct. The land exchange would not be expected to enhance overall conservation values.
3. However, we are not convinced by DoC's conclusion in the draft report including Appendix 4D-Recreation that under Scenario 2 there would be an overall enhancement of recreational values with regard to the "DoC-get land". It is difficult to understand the basis for this conclusion. None of the proposed conditions in Appendix 8 would seem likely to provide enhanced recreation opportunities.
4. We remain concerned about the overall dam project and its effect on recreation and other conservation values in the wider area. Focusing solely on the landswap may miss the big picture.
5. Lastly we wish to acknowledge and note our support for the submission made by Fish and Game NZ on the draft report regarding the proposal.

Yours faithfully,

Allan Brent
President
Federated Mountain Clubs of New Zealand

¹ per the Fast-track website <https://www.fasttrack.govt.nz/projects/tukituki-water-security/land-exchange-application>