

To: Waitomo District Council - Proposed District Plan
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Submission from: NZ Agricultural Aviation Association (NZAAA)

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Submissions due: 12pm on 23 December 2022

NZAAA would not gain an advantage in trade competition through this submission.

NZAAA wishes to speak to this submission.

If others make a similar submission, we will not consider presenting a joint case.

NZAAA's submissions are set out in the attached table.

Signature:

A handwritten signature in black ink, appearing to read 'Tony Michelle', is written over a faint, large watermark of a stylized aircraft or wing graphic that spans diagonally across the page.

Date: 16/12 2022

Background

The New Zealand Agricultural Aviation Association (NZAAA), a division of Aviation New Zealand (AvNZ), represents fixed-wing and helicopter operators engaged in applying fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:

- Rural production
- Forestry production
- Crop protection and disease control
- Weed and pest control
- Biosecurity threats
- Biodiversity and conservation values

The industry is made up of circa 109 Civil Aviation Authority (CAA) certificated organisations operating circa 76 fixed-wing aircraft and 248 helicopters. Services provided by our industry add an estimated \$2.5BN annually to primary production for the NZ economy alone.

Agricultural aircraft are crucial in maintaining and enhancing production, responding to biosecurity threats, and protecting biodiversity values including farming, plantation forestry, public land, and conservation land.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond (particularly to biosecurity and biosecurity threats) so the industry seeks to ensure the use of airstrips and helicopter landing areas for agricultural aviation activities on an intermittent basis are adequately provided for in plans.

General Submissions

NZAAA seeks to ensure that the agricultural aviation activities provided for within the Plan include activities for primary production (farming and forestry production), biosecurity, and biodiversity (conservation).

The PDP provisions for the intermittent use of aircraft for primary and rural production activities do not reflect the benefits noted in the S32 report: *“On-site air movements for the purpose of rural production are enabled in recognition of the importance of this sector for district economic wellbeing and prosperity”*.

The PDP does not address the intermittent use of airstrips and helicopter landing areas for biosecurity or biodiversity activities in “Natural Open Space Zones” that includes DOC land.

The PDP notes that *“the health and ecological functioning of indigenous ecosystems and habitats is reliant upon management measures and the identification of opportunities for restoration, enhancement and protection”*. Agencies such as LINZ, Tbfree NZ (OSPRI), DOC, Predator Free 20250 (Zero Invasive Predators) and the Regional Councils and local authorities undertake weed and pest control activities on public lands, riverbeds, riverbanks, lakes, and lake shorelines. Additionally, agencies such as MPI and the Regional Council have an interest in the expeditious use of

aircraft to control biosecurity threats such as wilding pines and disease threats to exotic and native vegetation. Agricultural aircraft activities are critical tools in these activities.

In the specific submissions below NZAAA seeks to have the intermittent use of airstrips and helicopter landing areas for biosecurity or biodiversity and conservation activities included as a permitted activity.

Noise rules for agricultural aviation activities

NZAAA opposes provisions in the Proposed District Plan relating to noise from aircraft as they affect agricultural aviation operations. Specific changes are sought in the table attached to this submission. This section provides the analysis on which the specific submissions are based and provide the reasons for the decisions sought.

The Operative District Plan has an exclusion in the Noise chapter for fertiliser or other chemical applications by ground or aerial methods.

Therefore the existing framework for agricultural aviation does not require a resource consent – it is exempt from all noise standards.

The Proposed District Plan substantially changes that framework with the introduction of NOISE-R8 Emission of noise from helipads, farm helipads and helicopter landing areas and NOISE-R1 and NOISE-R10 for fixed wing aircraft.

The Proposed Plan includes farm airstrips and farm helipads as part of agricultural, pastoral and horticultural activities. GRUZ-R1 provides for agricultural, pastoral and horticultural activities as a permitted activity. Therefore the use of farm airstrips and farm helipads is included as part of the permitted activity – yet NOISE-R8 severely restricts the use of farm helipads. Use of farm airstrips (fixed wing aircraft) is not specifically provided for in the NOISE table so NOISE-R1 and standards in Table 2 are to be met – NOISE R10 is relevant. Exemptions apply for agricultural vehicles, machinery and equipment but it is unclear if this includes aircraft.

NOISE-R8 provides for less than 10 helicopter flight movements per month in the general rural, rural production and tourism zones as a permitted activity as long as standards in Table 2 apply, which includes the noise limits which are unlikely to be met.

Ten or more flight movements per month will require a restricted discretionary resource consent.

Agricultural aviation activities are undertaken on an intermittent basis, usually with a very active period of activity in a short space of time. Therefore the threshold of ten aircraft movements in a month is likely to be exceeded within the first 30 minutes of a fertiliser or agrichemical operation on a farm.

NOISE-R8 has the effect of requiring every helicopter use for agricultural aviation activity in the district to obtain a resource consent for noise.

NOISE-R1 requires that performance standards in NOISE-Table 2 are complied with, therefore NOISE-R10 for the general rural zone will apply to fixed wing aircraft and sets noise limits of 50dBA (LAeq) 7am – 7pm, 45 dBA (LAeq) from 7pm – 10pm and 40 dBA (LAeq) from 10pm- 7am to be measured

from the notional boundary of a noise sensitive activity or a residential zone boundary. Given that aerial operations usually start early in the day to maximise safe weather conditions it is anticipated that it is highly unlikely that these standards would be met, even though the activity is intermittent and of short duration.

These rules are opposed in its entirety for the following reasons:

- They are not justified by the s32 Report
- They are inconsistent with the Regional Policy Statement
- They are inconsistent with the policy framework in the Plan
- They are not effects based.

Section 32 Report

There is nothing in the s32 Report for noise that justifies such a substantive change in the provisions for use of helicopters and aircraft for agricultural aviation activities. No resource management issues have been identified that indicate that noise from agricultural aviation is an issue.

The reasonableness assessment states that the objectives do not create unjustifiably high costs to the community. This is disputed as the costs to the community of the provisions for agricultural aviation are unreasonable and costs of consent for farmers are not identified as an anticipated cost.

The efficiency and effectiveness evaluation states that the plan enables activities that create noise such as industrial and farming activities. Yet the use of farm airstrips and farm helipads, which are part of agricultural, pastoral and horticultural activities are rendered inoperable by the provisions, so these activities are not enabled.

Waikato Regional Policy Statement

Chapter 3 of the WRPS has high-level objectives. Relevant objectives are:

3.2 Resource use and development to enable people and communities to provide for their economic, social and cultural well-being – which specifically provides for primary production activities.

3.12 Built environment which enables positive outcomes but minimises land use conflicts.

3.21 Amenity – the qualities and characteristics of areas and features, valued for their contribution to amenity are maintained or enhanced.

Obj 3.2 is implemented in Policy 4.4 which provides for the continued operation and development of primary production, including avoiding or minimising the potential for reverse sensitivity. Method 4.4.1 sets out how this will be achieved.

Obj 3.12 is implemented in Chapter 6 The built environment and has a policy for planned and coordinated subdivision use and development.

One of the implementation methods is 6.1.2 Reverse sensitivity:

Local authorities should have particular regard to the potential for reverse sensitivity when assessing resource consent applications, preparing, reviewing or changing district or regional plans and development planning mechanisms such as structure plans and growth strategies. In particular consideration should be given to discouraging new sensitive activities locating near existing and planned land uses or activities that could be subject to effects including the discharge of substances,

odour, smoke, noise, light spill, or dust which could affect the health of people or lower the amenity values of the area.

The approach in Method 6.1.2 is that sensitive activities shouldn't locate near activities which discharge noise – not that such activities should be limited

Obj 3.21 is implemented in Policy 12.3 Maintain and enhance areas of amenity value and has a focus on the coastal environment, ONF and ONL's and other significant areas. The policy does seem to apply to areas of primary production.

The direction in the WRPS is that primary production should be enabled and reverse sensitivity effects managed by limiting location of sensitive activities. There appears to be no basis in the WRPS for the limitation of agricultural aviation as in the Proposed Waitomo District Plan.

Objective and Policies in Proposed Waitomo District Plan

Strategic Directions.

The strategic directions chapter sets out a range of objectives for the plan to provide strategic guidance. The s32 Report on Noise identifies SD-O5 as relevant.

SD-O5 seeks that compatible activities with similar effects and functions are located together and new development is directed toward appropriate zones including to:

- Consistent with anticipated character and amenity values of areas
- Efficiently use natural and physical resources to meet communities needs
- Recognise existing lawful activities and protect their ongoing operation from incompatible activities.

This objective should lead to ensuring that agricultural aviation activities (existing lawful activities) are able to continue as they are consistent with the character of the Rural Zones and assist in providing for the community's needs.

There is no specific strategic direction objective for the Rural Zone, yet this zone comprises a large area within the district. There are strategic objectives for other zones – but not General Rural.

Noise objectives

NOISE-O1 seeks to enable activities to generate noise that is compatible with the role, function and predominant character of each zone.

NOISE-O2 seeks to ensure that activities do not generate noise levels which adversely affect amenity values and the health and well-being of people and communities.

NOISE-O3 seeks to ensure that new noise-sensitive activities are designed and /or located to minimise conflict and reverse sensitivity effects.

These objectives are implemented through the policies.

NOISE-P1 seeks that noise effects are of a type, scale and level that supports the character and amenity of the relevant zone.

The General Rural zone is described as a working and living environment and that noise from rural activities is an accepted part of these environments, including higher noise levels at night or in the morning during different times of the year. The Rural Productive Zone is described as a higher noise environment.

NOISE-P2 seeks to reduce the potential for reverse sensitivity by managing the location and design of new sensitive activity.

NOISE-P3 seeks to manage noise at source but recognise that some activities are important for economic and social well-being and may exceed noise levels on a temporary or irregular basis.

These objectives and policies support agricultural aviation activities in the rural zones as:

- Agricultural aviation is compatible with the role and function of the rural zones
- The zones are seen as higher noise environments and that noise from rural activities is accepted in these environments
- Agricultural aviation activities are temporary and irregular
- Agricultural aviation activities are important for economic and social wellbeing
- Reverse sensitivity effects are reduced through the location and design of sensitive activities.

These policies do not provide a framework for the restrictions of agricultural aviation activities in NOISE-R8, NOISE-R1 and NOISE-R10.

The objectives and policies of the General Rural Zone are also relevant, in particular:

GRUZ-O6 Maintain the capacity of rural areas and rural resources to support agricultural, pastoral and horticultural activities and lawfully established rural-based activities.

GRUZ-O10 Protect existing lawfully established activities from reverse sensitivity effects.

GRUZ-P1 (1) seeks to ensure that agricultural, pastoral and horticultural activities predominate in the zone.

GRUZ-P2 seeks to recognise the benefits associated with activities that encourage economic benefits to the local communities.

GRUZ-P3 (5) Recognising that farming, forestry and quarrying activities are an established and accepted component of the rural environment and may generate noise, odour, dust and visual effects.

GRUZ-P4 seeks to manage agricultural pastoral and horticultural activities so they do not result in adverse effects on the environment or adjacent sites – but has no specific mention of noise.

These objectives and policies provide a framework for agricultural aviation activities in the rural zones and do not provide a framework for the limitations in NOISE-R8, NOISE-R1 and NOISE-R10.

Effects based

The Resource Management Act is based on the premise that adverse effects are avoided remedied or mitigated.

There is no description of the adverse effects of the emission of noise from helipads, farm helipads and helicopter landing areas that justifies the limitations in NOISE-R8 or from rural airstrips in NOISE-R1 and R-10.

To justify the limitations the effects that are sought to be managed should be described and methods to manage the effects provided with a rationale as to how the methods will achieve that outcome.

The limitations of NOISE-R8 are seeking to manage a very low level of noise – less than 10 flight movements in a month. It is anticipated that such noise would not even exceed the levels in NOISE-R10 when measured over a month. Such an approach is not effects based.

What is the council seeking to manage?

NOISE-R8 includes the Tourism Zone as well as the General Rural and Rural Production Zones. NZAAA wonders if the issue the council is seeking to address is actually the use of helipads and helicopter landing areas in Tourism Zone given that such sites are a discretionary activity in TOUZ-R19 and will require resource consent regardless of NOISE-R8 which is a restricted discretionary activity.

Proposed Solution

To address these issues NZAAA seeks specific changes to the Proposed Plan:

- Remove farm helipads from NOISE-R8
- Apply NOISE-R8 to only the Tourism Zone
- Include exemption for agricultural aviation activities from the Noise rules

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NZAAA SPECIFIC SUBMISSIONS

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	<p>AGRICULTURAL AVIATION ACTIVITIES</p> <p>New</p>	n/a	<p>NZAAA seeks to have agricultural aviation defined to include primary production, biosecurity, and conservation activities undertaken by agricultural aviation</p>	<p><u>Add a new definition:</u></p> <p><u>Agricultural aviation activities; means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).</u></p>
Definitions	<p>AIRCRAFT</p> <p>New</p>	n/a	<p>NZAAA seeks to have the definition of an aircraft included as defined by the RMA to future-proof the plan</p>	<p><u>Add a new definition:</u></p> <p><u>Aircraft; means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the air against the surface of the earth</u></p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
Definitions	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Support in part	NZAAA supports the intent of inclusion of farm airstrips and farm helipads as part of agricultural, pastoral and horticultural activities but seeks that the more appropriate inclusion is agricultural aviation activities, for which a definition is sought.	Amend the definition of agricultural, pastoral and horticultural activities by deleting: Farm airstrips and farm helipads and add: <u>Agricultural aviation activities</u>
Definitions	CONSERVATION ACTIVITIES	Support in part	NZAAA seeks to have weed and pest control and the use of aircraft for biosecurity and biodiversity activities included in the definition.	Retain the definition and add: <u>(j) weed and pest control and the intermittent use of aircraft for conservation purposes.</u>
Definitions	FARM AIRSTRIPS AND FARM HELIPADS	Oppose	Agricultural aviation activities are not limited to rural zones as they occur in other zones such as conservation areas. Therefore NZAAA seeks to have broader definitions incorporated to reflect this.	<u>Delete the definition: FARM AIRSTRIPS AND FARM HELIPADS</u> <u>Include definitions of: HELICOPTER LANDING AREA and RURAL AIRSTRIP as sought below.</u>
Definitions	HELICOPTER LANDING AREA New	n/a	NZAAA seeks to have a definition of a Helicopter Landing Area included in the plan	<u>Add a new definition:</u> <u>Helicopter landing area; means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing</u>
Definitions	HELIPAD	Support in part	NZAAA seeks to have the definition of FARM AIRSTRIPS AND FARM HELIPADS replaced with definitions for HELICOPTER LANDING	Amend the proposed definition by deleting: <u>See also farm helipads and replace with: See helicopter landing areas</u>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			AREA. Therefore the reference in the definition of Helipad should be to Helicopter Landing Area.	means a facility for helicopter movements that may include passenger facilities, but does not include refuelling, servicing, storing of helicopters or freight handling facilities. See also farm helipads. See also helicopter landing area
Definitions	PRIMARY PRODUCTION	Support	NZAAA supports the definition that is consistent with the NPS definition	Retain the definition
Definitions	Lawfully established activities New	n/a	The term lawfully established activities is used a number of times, especially in reference to incompatible activities. It should be clear what is considered to the lawfully established activities.	<u>Include a definition for lawfully established activities:</u> <u>means activities provided for by one of the following:</u> <ol style="list-style-type: none"> 1. <u>permitted through a rule in a plan, or</u> 2. <u>a resource consent, or</u> 3. <u>a national environmental standard; or</u> 4. <u>by an existing use right (as provided for in Section 10 of the RMA)</u>
Definitions	RURAL AIRSTRIP New	n/a	NZAAA seeks to have a definition of a Rural Airstrip included in the plan	<u>Add a new definition:</u> <u>Rural airstrip;</u> <u>means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.</u>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
STRATEGIC DIRECTION	New	N/A	The rural area covers the bulk of Waitomo District but there is no strategic direction for the rural area. It is important that it is clear that there is strategic guidance in the Plan.	<u>Include a new strategic direction: Rural environment</u> <u>SD-OX Primary production activities can operate efficiently and effectively and the contribution that they make to the economic and social well-being and prosperity of the district is recognised and provided for.</u>
STRATEGIC DIRECTION, URBAN FORM AND DEVELOPMENT	SD-05	Support	NZAAA supports strategies that recognise, existing lawful activities and protect their ongoing operation from incompatible activities. However, a definition for lawfully established activities is sought to ensure that there is recognition of such activities.	Retain SD-05 but <u>delete 'lawful activities' and replace with 'lawfully established activities'</u>
Ecosystems & indigenous biodiversity	ECO-P3	Support in part	NZAAA supports policies that enable the removal of indigenous vegetation in appropriate circumstances and seeks to have weed and pest control included as an appropriate activity.	Retain ECO-P3 <u>and add:</u> <u>8. weed and pest control</u>
Ecosystems & indigenous biodiversity	ECO-P12	Support	NZAAA supports policies that enable activities for weed and pest control.	Retain the policy
ECO - Table 1 – Activities rules	ECO-R10	Support in part	NZAAA supports the provision for conservation activities and seeks to include weed and pest control activities by agricultural aircraft	Retain the rule <u>Amend the definition of CONSERVATION ACTIVITIES as sought above to include:</u>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
				<u>“(j) weed and pest control and the intermittent use of aircraft for conservation purposes”</u>
NATC - Table 1 – Activities Rules	NATC-R1.	Support in part	NZAAA supports the provision for conservation activities that include weed and pest control by agricultural aircraft.	Retain the rule <u>Amend the definition of CONSERVATION ACTIVITIES as sought above to include: “(j) weed and pest control and the intermittent use of aircraft for conservation purposes”</u>
Subdivision	SUB-O11	Support in part	NZAAA supports the protection of rural production areas from reverse sensitivities and seeks to have primary production areas included in the objective.	Retain SUB-O11 <u>and add:</u> Ensure new allotments created close to the boundary of a rural production zone, indicative rural production area or an established site of <u>primary production or</u> intensive indoor primary production identify a building platform(s) in a location which minimises reverse sensitivity effects.
Subdivision	SUB-P10	Support	NZAAA supports protecting rural activities from the potential for reverse sensitivity effects as a result of subdivision	Retain SUB-P10
NOISE	NOISE-O1	Support	NZAAA supports the enabling of activities which are compatible with the character of each zone.	Retain NOISE-O1

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
NOISE	NOISE-P1	Support	NZAAA supports the policies that recognise that noise from rural activities is an accepted part of these environments.	Retain NOISE-P1
NOISE	NOISE-P2	Support	NZAAA supports policies that reduce the potential for reverse sensitivity and manage new noise-sensitive activities in proximity to areas that consistently experience higher noise levels.	Retain NOISE-P2
NOISE	NOISE-P3	Support	NZAAA supports the recognition that some noisy activities are important for economic and social well-being and may exceed specified noise levels on a temporary or irregular basis. Agricultural aviation activities are intermittent and short term so are temporary and irregular.	Retain NOISE-P3
NOISE	NOISE-R8	Oppose	As set out in the General submissions above NZAAA opposes rules that inhibit the intermittent use of farm helipads and helicopter landing areas that provide critical support to primary production and conservation. NOISE-R8 should be limited to helicopter landing areas in the Tourism Zone.	<p>Amend NOISE-R8 <u>by deleting: helipads, farm helipads and, and replace with: helicopter landing areas:</u></p> <p>Emission of noise from <u>helipads, farm helipads and helicopter landing areas</u></p> <p><u>Delete: general rural and rural production:</u></p> <p>2) This activity may only be undertaken in the <u>general rural, rural production and</u> Tourism Zone</p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
NOISE	Exemptions	Support in part	<p>NZAAA seeks to have agricultural aviation activities included as an exemption to the noise rules.</p> <p>Consideration should be given to the exemptions being a permitted activity rule to ensure that they are appropriately provided for in the Plan</p>	<p>Retain the exemptions but include as a permitted activity rule and add:</p> <p><u>7. the intermittent use of rural airstrips and helicopter landing areas for agricultural aviation activities</u></p> <p><u>Include definitions of AGRICULTURAL AVIATION, HELICOPTER LANDING AREAS and RURAL AIRSTRIPS as sought above</u></p>
General Rural Zone	GRUZ-O6	Support	NZAAA supports objectives that provide for maintaining lawfully established rural-based activities	Retain GRUZ-O6
General Rural Zone	GRUZ-O10	Support	NZAAA supports objectives that protect existing lawfully based activities from reverse sensitivities	Retain GRUZ-O10
General Rural Zone	GRUZ-O15	Support	NZAAA supports objectives that avoid the establishment of incompatible adjacent land uses that could result in reverse sensitivity effects on rural activities	Retain GRUZ-O15
General Rural Zone	GRUZ-P3	Support in part	<p>NZAAA supports policies that ensure that rural character, amenity and safety are maintained and that reverse sensitivity effects are minimised.</p> <p>The policy should use the term primary production as it encompasses all the activities.</p>	<p>Retain GRUZ-P3 by deleting: farming, forestry, quarrying and add:</p> <p>5. Recognising that <u>farming, forestry, primary production (including agricultural aviation) and quarrying activities</u> are an established and accepted component of the rural</p>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			NZAAA seeks to have agricultural aviation recognised as part of the rural character.	environment and may generate noise, odour, dust and visual effects <u>Include the definition of AGRICULTURAL AVIATION as sought above</u>
General Rural Zone	GRUZ-R1	Support in part	NZAAA seeks that the definition of agricultural, pastoral and horticultural activities includes agricultural aviation activities to ensure that it is provided for in the rules.	<u>Amend the definition for agricultural, pastoral and horticultural activities to include agricultural aviation activities as sought above.</u>
General Rural Zone	GRUZ-R15	Support in part	NZAAA supports the rules for the clearance of non-indigenous and indigenous vegetation of the purposes of pasture renewal and seeks to have weed control included in the rule	Retain the rule <u>and add:</u> 2. Clearance of indigenous scrub vegetation (manuka, kanuka, tree ferns) outside of an identified significant natural area for pasture reinstatement, <u>weed control</u> or for a building platform must: (i) Not occur within 5 m of a water body; and (ii) Not be cleared if the vegetation is greater than 5 m in height.
Natural Open Space Zone	NOSZ-O1	Support	NZAAA supports objectives that protect natural, ecological, and landscape values	Retain NOSZ-O1
Natural Open Space Zone	NOSZ-P1	Support	NZAAA supports policies that protect and enhance natural open space values	Retain NOSZ-P1
Natural Open Space Zone	NOSZ-R3	Support in part	NOSZ-R3 provides for permitted activities on private land. NZAAA seeks to include	Retain NOSZ-R3 <u>and add:</u>

Plan section	Plan provision	Support / Oppose	Reason	Decision sought
			conservation activities that may be undertaken on that land.	<p>5. <u>conservation activities</u></p> <p><u>Amend the definition of CONSERVATION ACTIVITIES as sought above to include: “(j) weed and pest control and the intermittent use of aircraft for conservation purposes”</u></p>
Natural Open Space Zone	NOSZ-R4	Support in part	NOSZ-R4 provides for permitted activities on public conservation land and reserves. NZAAA seeks to have Conservation Activities (as defined) provided for as a permitted activity or alternatively weed and pest control be listed as a specific activity in the rule.	<p>Retain NOSZ-R4 <u>and add:</u></p> <p><u>Conservation activities</u> in the list as a permitted activity or; specifically list <u>weed and pest control</u> as a permitted activity on conservation and reserve land.</p> <p><u>Amend the definition of CONSERVATION ACTIVITIES as sought above to include: “(j) weed and pest control and the intermittent use of aircraft for conservation purposes”</u></p>

