CASE FOR THE NAPIER HARBOUR BOARD

On behalf of the Napier Harbour Board, in whom the Whanganui-o-Rotu is vested, I fully concur in the written reply made by the representative of the Crown in answer to the arguments in support of the Petition filed by the Petitioners herein and in addition and supplementary thereto say:—

Paras. 123 to 139.

1. (a) That the statement made by the Petitioners in Paragraph 3 of the Petition that "according to the Maori Elders this Lagoon was formerly an inland lake having no natural outlet" and their contention in their argument filed herein that the Lagoon was a fresh water lake, is not borne out by Maori history, nor can any written evidence or record of the same be found to verify the statements.

(b) According to the Maori Elders the first Maori to come here was Tara. He was a great grandson of Toi Kairakau as appears in the following Whakapapa given by Elsdon Best in *The Maori*, Vol. 1 page 48:—

TOI
RONGO-UEROA
WHATONGA
TARA

Tara lived 26 generations ago (about 650 years). According to the evidence given by Waha Pango, one of the oldest Maoris who appeared before the Royal Commission at Napier in 1920, there was an opening to the Lagoon said to be half a mile in width at the mouth. When Tara, coming from Wairoa in his cance, paddled into the entrance and jumped ashore he suddenly heard a Putorino being played at Wairoa and expressed his astonishment by emitting several (100) Kctekete (noise made by clicking the tongue against the roof of the mouth). The name of the entrance has since been known as Keteketerau. Traces of this entrance can still be seen to this day.

[His Honour is referred to the dip in the Napier-Petane Road some little distance on the Petane side of the Beacons. The two banks of the original opening can be clearly seen.]

Hence, at the very beginning of the occupation of this district by the Maori the waters of the Lagoon were tidal with a natural outlet at Keteketerau.

(c) The next important date is some 150 years later during the time of Tawhao. According to John White in his Ancient History of the Maori Vol. VI page 212 the following is the Whakapapa of Tawhao

RANGI-NUI-A-MONOA (Toi's wife)

OHO-MAI-RANGI

MUTU-RANGI

HOTU-OPE

HOTU-ROA

HOTU-MATAPU

MO-TAI

UE

RAKA

KAKATI

TAWHAO

(d) The Lagoon got the name of Te Mara-a-Tawhao, which means, the garden of Tawhao, and was so called on account of the prolific supply of food obtained there. This food as described in the Petition signed in 1919 by Mohi te Atahikoia and 47 others is set out as follows:—

"The foods in the sea were the fishes schnapper, mullet, kahawai, shark, eels, and the shell fish, pipis kuku kina, and paua; also several other kinds of foods

of the Maori are in this sea.

Para. 140.