



TO: Mr Mark Pinder
City of Cape Town
Transport and Urban Development Authority
PO Box 9181
Cape Town
8000

9 January 2020

Regarding: Objection to the Environmental Authorisation for the PROPOSED PHASE 1 EXTENSION OF HOUMOED AVENUE, SUNNYDALE (DEA:DP REF 16/3/3/1/A6/45/2027/19).

To whom it may concern,

Natural areas on the Cape Peninsula are being increasingly encroached upon from urban and industrial development. Not only does the proposed Houmoed Avenue road extension above impinge on the residents living in the area, but will result in significant transformation of natural wetland habitat, which provides important habitat for a range of biodiversity, as well as providing important ecosystem services to humans. In particular, the wetland area to the north of the proposed road, hosts a breeding population of the Endangered Western Leopard Toad, *Scelophrys pantherinus* - <https://www.iucnredlist.org/species/54723/77159333>.

A key threat facing this species is habitat fragmentation caused by urban development, including an ever expanding road network, as well as direct mortality as a result of roadkill caused by increased traffic. This species relies on being able to migrate between its breeding and non-breeding habitat. The construction of the proposed road would undeniably impact significantly on the population that makes use of the Noordhoek Wetland System, in particular the Sunnyside Wetland. The area provides an important breeding site and refuge for this Endangered species, and a host of other wetland-dependant species, otherwise restricted on the south and west due to dense urbanisation.

Despite recommendations and comments pertaining to wetland and amphibian concerns being received as part of the public participation process, many of these seem to have been disregarded in the passing of the Environmental Authorisation (EA).

There are several key issues with regard to the specialist reports advising the Basic Assessment Report for this proposed road development, namely:

1. Lack of a specialist amphibian study as part of the faunal report:

While a specialist amphibian report was recommended, none ever took place. The general faunal assessment that was commissioned was not carried out by an amphibian expert, and the survey that was done, was done so over a period of only two days, outside of the breeding season of the species of concern. Furthermore, the desktop study references literature that is outdated, and, in the case of



identifying likely species occurrence, inaccurate. For example, some species that are listed are unlikely to be present, while others, for example, another Endangered species, the Cape Platanna, *Xenopus gilli*, for which records from the area have been reported (confirmed by amphibian expert Dr John Measey), is entirely excluded.

Despite an amphibian expert, Marius Burger, having been consulted to provide comment on the amphibian section of the faunal report, none of these comments have been formally included in the review and authorisation process (Marius Burger, pers. comms.).

Furthermore, insufficient detail on the development and implementation of a long-term monitoring is provided in the faunal report. This too should be advised by a specialist amphibian study.

2. Lack of wetland considerations

Two listed activities that directly impinge on wetland habitat are authorised in the EA. Wetland loss in South Africa remains extremely high. Despite this, and the recognised value of wetland habitat and the ecosystem services it provides, developments that impact directly on wetlands continue to be approved. While the legislation provides to prevent this, this has been disregarded in this authorisation.

Further, given that the proposed road directly borders the Sunnydale wetland, inadequate wetland buffer zones have been considered in this development authorisation.

Specifically, in terms of amphibian movement buffers of up to 400m are advisable and a minimum buffer of 100m from the wetland edge (as per wetland delineations) is required. The proposed alternatives in the EA do not allow for this.

3. Flawed mitigation recommendations

While design interventions to allow for movement of fauna, with particular reference to the Endangered Western Leopard Toad, are recommended, these have not been tested and no reference for the need for the development of a plan and long-term monitoring of the effectiveness of this intervention are discussed in the faunal report. Should the road still be approved following appeal, any mitigation options need to be more carefully considered. The overwhelming evidence for adequate amphibian protection in terms of roadkill mitigation shows that road closures during seasonal amphibian migration is the intervention most likely to be beneficial (Sutherland *et. al.* 2018).

Recommendations:

1. That a specialist amphibian assessment is still conducted, by a relevant expert, within an appropriate timeframe to maximise detection of species.
2. A local needs and risk assessment is conducted to understand whether the local community require/would benefit from the proposed road extension.



3. All comments and recommendations from the public participation process are transparently included in the EA.
4. Wetland buffer zones be given more careful consideration.
5. In the event that the road development is still, inexplicably, approved, mitigation measures to avoid wetland disturbance, and in particular impact on the Western Leopard Toad and Cape Platanna need to be of the utmost importance:
 - a. These would entail very careful consideration of road design to prevent roadkill, and allow for monitoring of the population for the long-term.
 - b. While the use of barriers or drift fencing to prevent toads getting on to the road is briefly mentioned in the report, this would require significant manpower to monitor to prevent deaths of toads while blocked by these barriers, and to aid their movement to the breeding sites to which they are trying to get.
 - c. Investigation of a raised road in conjunction with tunnels or culverts of optimum design must be conducted. It is suggested that a specialist be consulted in this regard, and that Cape Town Environmental Education Trust (CTEET) be engaged in the process as they are developing and testing possible roadkill mitigation structures for the Western Leopard Toad.

The Western Leopard Toad is an iconic species to this area, and further loss of its habitat should be impermissible. I trust you will take the legislation into guiding the correct decision pertaining to this issue.

Sincerely,

Dr. Jeanne Tarrant

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