

WESTERN LEOPARD TOAD CONSERVATION COMMITTEE



To whom it may concern

PROPOSED CONSTRUCTION OF HOUMOED AVENUE EXTENSION, NOORDHOEK, PHASE 1 (DEA&DP Reference No.: 16/3/3/6/7/1/F1/45/2016/17)

The application for the proposed Houmoed Avenue Extension Phase 1 refers, and also our previous submission dated 31 May 2018.

We are dismayed to find that the latest version of the documentation attached to this application, including the faunal study by Simon Todd, still does not include a proper and full amphibian impact assessment, as recommended previously by the Committee as well as other credible professionals. It is clear that the potential impact upon the endangered western leopard toad species is also one of the central concerns held by many local environmental organisations and local community members. It is of concern to the Committee that still no specific attempt has been made to establish specifically the potential impact upon the Western Leopard Toad species during the EIA process since the conservation of the species and its associated habitat is the focussed interest of the Committee. The application fails to answer this critical question and, in the absence of which, no justifiable approval of the proposed road will be possible.

In light of the recent discovery by a ToadNUTs volunteer, and verified by Dr John Measey, of the presence of the Endangered Cape Platanna (*Xenopus gilli*) in the Lake Michelle water body, a discovery that would have gone unnoticed without the dedication of a member of the public, we again insist on a full amphibian study to be conducted by a recognised amphibian expert, and with the full involvement of ToadNUTs. It is quite clear that the Noordhoek wetland system is a very important, inter-connected and increasingly rare, amphibian habitat and which is deserving of a much greater level investigation than has been afforded to it in the current environmental application for this proposed road development.

We have also been made aware of a letter by Marius Burger and which apparently served to advise and confirm to the EAP the estimated and non-specific potential faunal impact rating of the faunal report in so far as it supposedly covers amphibian impacts. The letter by Mr. Burger is apparently an "internal" letter which has recently been released to the public for information but is not available for comment. The Committee takes exception to this approach and is of the view that the letter is, in its purpose and effect, of potentially great importance to the findings of the application and must therefore be released for public comment.

In the interests of the western leopard toad, the local amphibian population in general and due process, the Committee hereby registers its objection regarding the failure of the application to have established what the specific potential impact will be on specifically the Western Leopard Toad species; amphibians in general and the manipulated approach of the EAP in limiting access and comment on the input of Marius Burger to the faunal report and application.

Sincerely

Tony Rebelo
Chairman
Western Leopard Toad Conservation Committee