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DST-NRF Centre of Excellence for Invasion Biology

Thursday, 24 January 2019

Re: Houmoed Avenue Extension Phase 1 Faunal Impact Study (submitted to Chand Environmental Consultants) by Simon Todd

To whom it may concern:

I have seen a version of the above-mentioned report dated 10 July 2018, including additions after a Second Revised Draft BAR (posted in December 2019) and wish to express my concern on the following grounds:

1. On page 8, the report states that its approach is risk-averse (following EIA regulations), but later (e.g. page 17) appears to condone taking mitigating action (road design) without any clear knowledge of whether this is appropriate, and further (page 29) suggests that post-hoc monitoring will determine whether these actions are appropriate. To me, this approach is not risk-averse, but risk intensive. The effects of the road are unknown, inadequate studies have been conducted and replacing impact studies with post-hoc monitoring is grossly irresponsible. The result of the suggested mitigation on several species of known conservation importance could be very negative. It seems to me that this requires a thorough investigation as to the best ways in which to mitigate effects of the road prior to construction.
2. On page 11, the amended report suggests that the resolution of species lists considered was at the QDS scale. This is utterly ridiculous in an area of sharp relief. There is reason to believe that the area has been inadequately studied as reports from volunteers in September 2018 include the presence of the Endangered Cape platanna, *Xenopus gilli* in the nearby estate of Lake Michelle. The possibility of populations of this and threatened species occurring at this site stresses the need for a comprehensive faunal survey. The described site visit and sampling (page 12) were inadequate. The Cape platanna is missing from the amended report (pages 16-18) despite there being historical records from this area, suggesting that even this desktop study was inadequate.
3. The planned road will impact on at least three anuran breeding sites, which are of conservation importance. The assertion that sites will “not be in-filled” is insufficient in terms of knowing what impact will be made on the pools. Timing of these operations is also critical. Assertion that there will be “low” impact with mitigation during the operational phase (page 26) is simply conjecture with nothing presented to suggest that this will be the case. The assertion that the “major potential impacts of the road on amphibians are likely to result from habitat loss” (page 17) suggests that the authors of the report have discounted the effects of road kill, which is likely to impact anuran populations. Moreover, the safety and welfare of volunteers who will patrol the Houmoed Avenue Extension, should it be constructed, should be taken into account.

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4. There is an opportunity to improve the habitat conditions of all threatened amphibian species in the area of Houmoed Avenue together with the development of the road, something that all parties would support. However, the current report does not attempt to do this. Taking a look at the functioning of this wetland ecosystem with a sincere attempt to making it function would likely alleviate future conservation issues as well as generating buy-in from local residents. The invasive nature of the reeds in this area likely stymies the potential for many threatened amphibians and other wetland dependent species.

It is my opinion as an amphibian conservation specialist that the future of these populations would be better served by a report that seriously considers the above points and integrates them into the whole wetland system.

Yours sincerely,

Dr John Measey
Senior Researcher

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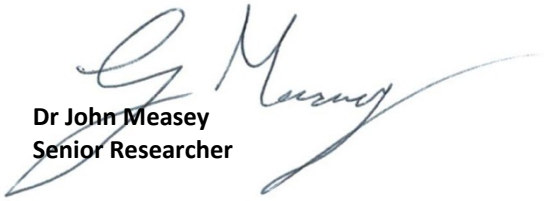

Dr John Measey
Senior Researcher