

Comments and Response Report

<p>Ezemvelo KZN Wildlife</p>	<p>By Email</p>		<p>The biodiversity sensitivity has lead to a complete revision of the project objectives and the very sensitive wetland amendments have been withdrawn in response to the specialist and public participation process outcomes.</p>
<p>Omar Parak Sub-directorate: Coastal and Biodiversity Management</p> <p>KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs</p> <p>Private Bag X9152  Pietermaritzburg</p>	<p>By Email 30 March 2020</p>	<p>1. The stream’s realignment is proposed on coastal public property (CPP). The application does not make reference to landowner consent having been sought for the preferred option. The competent authority for matters relating to CPP is the National Department of Public Works &amp; Infrastructure.</p> <p>2. In relation to [1] above, it is unclear if the recommendations of the specialist study “Assessment of the eco-morphological impacts arising from the training of the stream mouth at Zimbali” (compiled by SDP) have been taken into consideration in arriving at the preferred</p>	<p>1. No, the National Department of Public Works had not been contacted when the Draft BAR went out for comment but have since been provided with a copy to comment on.</p> <p>2. The comments of the specialist (SDP) were considered in deciding on the preferred and alternative options. The initial brief was about the threat to the security fence collapsing. If that was the only issue his recommendation would</p>

<p>3200</p> <p>SOUTH AFRICA Tel: +27 33 264 2648</p>		<p>option. The Specialist found that the most applicable means of redressing the situation is to relocate the fence-line up to 40 landward.</p> <p>3. Appendix C: Facility Illustrations – I could not find a Layout Plan (and related alternatives) relating to the stream’s realignment. In this regard, the implications for (and impacts on) the shell midden should be reconciled (i.e. where is the proposed site of dune restoration in relation the shell midden [overlaid]).</p> <p>4. In relation to [3] above/preferred option, where will the 8820 cubic metres of sea sand be sourced from and moved to (i.e. reflected on a Layout) - and what are the implications for the area where the sand is sourced?</p>	<p>have been followed. The discovery of the shell midden and the heritage specialists finding that the midden has historical significance and that it is advisable to shore up the dune to protect this heritage site the preferred option became firm. This shortcoming has been addressed and layout plans have been provided.</p> <p>3. The Layout drawing has been provided and is in Appendix C. Dune stabilisation is to occur immediately in front of the shell midden as prescribed by the engineer who was also responsible for the beach reclamation at Ballito main beach that was affected by the heavy seas of 8 March 2008. The stabilisation work will then be covered over with sea sand and replanted. It will be done in consultation with the heritage specialist who recommended the covering of the shell midden.</p> <p>4. The sand excavated to create the new stream channel will be the source of material to shore up the dune. No foreign material will be imported. The facility illustration was not available at the time the DBAR was circulated but has been included in the Final BAR. With the engineering design it was calculated to be</p>
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			4600 cubic meters and not as reported earlier. Environmentalist estimates are not as accurate as that of engineers.
Malcom Moses Control Environmental Officer — EIA, Ilembe (Electronically) for: Acting Head Of Department: Department of Economic Development, Tourism and Environmental Affairs	By email 15 April 2020	<p>1. The KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs (hereafter referred to as "the Department") has reviewed the abovementioned document and requests the following to be addressed in the Final Basic Assessment Report (BAR):</p> <p>a) Page 7, Section 1 (a), Point (a), Line 1 reads as "the north - western boundary". Is this correct, or should it read "north-eastern boundary"? Please confirm and correct throughout the document if and where necessary.</p> <p>b) Page 7, Section 1 (a), Point (a), Line 6 speaks of energy dissipation structures, however the specifications and dimensions of the said structure is not provided under the Project Description. In principle, please provide the details of all interventions in terms of approximate specifications, dimensions and co-ordinates. Against the listed activities, confirm the size in square metres and the approximate volume (P.S do not merely say "will exceed 10 cubic metres the volume to be approximate state excavated/infilled/moved/dredged etc.). If the thresholds will not be met then simply state so. Similarly do the same for</p>	<p>a) It is meant to be North-eastern boundary.</p> <p>b) A layout drawing has been prepared showing the number and capacity of each structure. The project description has been amended to include the number and dimensions of the dissipating structures.</p>

		<p>all structures proposed (but in square metres).</p> <p>c) Page 9, Section 1 (b) — Activity 19 A: Column 2, Row 2, last line reads: "This activity will be done in terms of a Maintenance Management Plan." Kindly remove this as Activity 19A is being applied for and the Maintenance Management Plan is an exclusion of the listed activity. The application process will result in an environmental authorisation being issued and if granted, the holder will need to comply with the conditions of the authorisation. In this case, a Maintenance management Plan is irrelevant and has no legal standing.</p> <p>d) Page 10, Co-ordinates: Please provide multiple co-ordinates (for example a polygon) per intervention/site as opposed to a single set of co-ordinates. These additional co-ordinates must correspond with the layout proposed.</p> <p>e) Page 11, Section 2 (b), Layout Alternatives: The preferred alternatives seem arbitrary and excessive. Using the Impact Hierarchy, kindly systematically explain how efforts have been made to firstly avoid the impact on the wetlands, ponds and streams, thereafter explain how the extent of all work proposed was</p>	<p>c) The reference to the Maintenance Management Plan has been removed. The intention was to have a plan for the ongoing maintenance of the stream as natural sand drift will cause the stream to migrate north as it has been doing which will eventually under-cut the toe of the dune and the whole process will have to be repeated. With a Maintenance Management Plan in place periodic reshaping of the watercourse will cause minimal disturbance.</p> <p>d) Multiple co-ordinates have been provided in the FBAR See Appendix C</p> <p>e) The alternatives have been amended. The activities that were to take place in the sensitive areas have been left out of the FBAR. The impacts of the remaining activities can be mitigated and does not require off-setting.</p>
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		<p>determined as acceptable (i.e. the footprint that would have the least impact, how it would be mitigated and as an absolutely last option explain what offset measures have been considered, assessed and confirmed). The Department wish to inform you that it does not view rehabilitation as a means for offsetting, as rehabilitation is regarded as the landowners responsibility in any case. Further, the Department reminds you of the "No-Net Loss Principle" in line with best practice and the NEMA Principles. In its current state, without a tangible offset plan, the proposal represents an environmental loss and an incomplete assessment. You are hereby informed that the lack of consideration of this, could be detrimental to the outcome of the review of the assessment.</p> <p>f) Page 17, Section 10: Activity Motivation — The section requires a motivation for the need and desirability of the activity. Whilst the section is very detailed the following is unclear:</p> <ul style="list-style-type: none"> <li>• Why is there an emphasis on "man-made" in relation to ponds and wetlands when it is apparent that the systems that will be affected have settled overtime and is functioning and serving the same purpose that a natural system fulfills. Please advise if the systems (specifically</li> </ul>	<p>f)</p> <ul style="list-style-type: none"> <li>• At the time of development the areas that are now wetlands and ponds were sugar cane fields. In designing the golf course the ponds and wetlands were created hence the reference to “man-made” wetlands and ponds. The ponds did not exist prior to the golf course being built. As features and amenities</li> </ul>
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		<p>the "man — made ponds") have reached equilibrium or if they are adversely affecting the surrounding environment?</p> <ul style="list-style-type: none"> <li>• "The Ponds" which are said to be silted up and now overgrown are said to be unattractive. The intention appears to be to remove the vegetation from "the ponds" and increase the water surface area to the edge of the existing wetland and increase the water depth of the pond/dam. The only motivation presented is simply to improve the aesthetics of the golf course. Are there any other reasons other than improving of aesthetics, to justify the disturbance of vegetation and modification of a system that seems settled? Please quantify the actual biodiversity loss if only the modification of the 3rd and 14th fairway of the golf course is authorized (in line with the EAP recommendation).</li> </ul>	<p>of the golf course operation are amended from time to time to change the challenge the golf course presents to the players of the golf. The ponds are changed just as sand bunkers, T-boxes and other hazards on the golf are changed to make play interesting or more difficult for players. The ponds were not developed as natural habitat but as water hazards in the golf course.</p> <ul style="list-style-type: none"> <li>• The pond has reached equilibrium and is serving as a natural habitat as commented by Mr Richard McKibben of the Lion Heart Experience. The motivation for the alteration of the pond is the requirement of the Zimbali Country Club Management (ZCC) who want to clean the pond to improve the water holding capacity. This pond is a back-up to the irrigation water capacity needed to maintain the golf course. Their main water supply from Bogota Dam is uncertain because the Tongaat Hulett/IFS Water Use Licence for Zimbali Lakes Estate does not make provision for Zimbali Country Club, in spite of negotiations for it to be included, where ZCC has been drawing their water from since the golf course was developed. Hence the requirement to make it deeper to 2m and to restore the former pond area of 1300 meter square. This includes</li> </ul>
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			<p>improving the aesthetics of the pond as well. There is an algal bloom in the pond. The proximity of the sewerage manholes to the pond has led to the water in the pond from becoming nutrified from recent overflows. Clearing the vegetation around the back of the dam will improve accessibility to the sewer for maintenance. 859 meters square vegetation will be removed. Plants to be removed include: (40%) Indigenous aquatic plants:  <i>Cynodon nlemfuensis</i> – Star Grass,  <i>Cyperus textilis</i> – Tall Star Sedge,  <i>Hemarthria altissima</i> – Red Swamp Grass, <i>Kylinga melanosperma</i> – Round-tipped Sedge, <i>Lipocarpha chinensis</i> – Clustered Round Sedge, <i>Nymphaea nouchali</i>- Water Lily, <i>Persicaria lapathifolia</i> – Pale Persicaria,  <i>Phragmites australis</i> – Common Reed, <i>Potamogeton crispus</i> – Wavy-leaved Pondweed, <i>Pycreus polystachyons</i> – Golden Sedge, <i>Typha capensis</i> – Bulrush,  Invasive Alien Plants (70%):  <i>Arundo donax</i> – Spanish Reed) (30%),  <i>Chromolaena odorata</i> – Triffid Weed,  <i>Lantana camara</i> – Lantana, <i>Schinus terebinthifolius</i> – Brazilian Pepper (40%).</p>
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		<ul style="list-style-type: none"> <li>• The "wetlands" on site are said to have negatively affected the playability of the golf course, yet there is no detailed indication as a problem statement, neither is it clear as to exactly how playability will be improved post intervention. Further, the significance of the improvement must be quantified to be able to justify the destruction of the wetland in part or full. For the record, the Department notes the specialist findings on the wetlands and the Recommendations of the Practitioner.</li> </ul> <ul style="list-style-type: none"> <li>• Page 25, Point 2.19 is silent on the offset plan in terms of where, when, how and how much of wetland will be offset. As stated herein, failing to do this implies an incomplete assessment. In terms of the 2014 EIA Regulations, as amended, the Department is obliged to ensure that</li> </ul>	<ul style="list-style-type: none"> <li>• The wetlands that affected the playability of the golf course were shown through the specialist studies and the public participation process as being habitat to threatened amphibia. Due to the sensitivity of the habitat the decision was made by the ZEMA Board to withdraw the activities from the application as the offset cost was too high. The Zimbali Country Club must consider other options to improve the playability of the golf course. A problem statement has been incorporated for the 3<sup>rd</sup> Fairway pond explaining the need for the alterations to the pond. There is a need to secure water capacity for irrigation of the golf course. The water quality in the dam has deteriorated due to a recent sewer leak from a nearby sewer manhole causing an algal bloom and aggressive vegetative growth. The significance of the improvement has been quantified to justify the destruction of the wetland.</li> </ul> <p>The offset plan was not finalised by the time the DBAR was circulated. It is complete and included in the FBAR. An area on the south side of the two ponds on the water course draining from Seaward Estate in Zimbali Coastal Resort, above the bridge is maintained as a</p>
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		<p>the application is considered and assessed in full, prior to issuing an environmental decision. The Department cannot issue a "subject to decision" as there is no tangible offset proposal that has been assessed or presented in the BAR or to other authorities with a concurrent or similar environmental mandate. Please indicate what will be lost for the entire application and the offset that will be required as well as what will be lost for the modification of the 3rd and 14th fairway of the golf course only, and any offset that will be required for such loss.</p> <p>g) Page 84, Section E: The Recommendation of the Practitioner — the recommendation is to have the Department to authorise the application in part, by approving the restoration of the north-eastern wetland and the alteration of pond on the 3rd and 14th fairway of the golf course. The Department is therefore led to believe that the recommendation by the Practitioner is for the Department to refuse the remaining components of the development.</p>	<p>mowed grass area for people to use for picnics or to play games like volley ball or cricket on. It is an amenity area in the estate. This area has a very shallow water table and in the wet season is too wet for the intended purpose. An area of 1053 square meters can be converted to wetland. It is an HGM hillslope seep area where the soil is inundated. The system flows in a northerly direction to join the main water course draining the northern catchment. The soil is dark and humic. The establishment of this picnic area pre-dates the promulgation of the National Water Act. Converting this area to a wetland will be a net gain.</p> <p>f) The need for a split decision has been resolved by the exclusion of the proposed activities on the 14<sup>th</sup>, 15<sup>th</sup> and 16<sup>th</sup> fairways of the golf course. The EAP now motivates for the approval of the three activities included in the Final Basic Assessment Report.</p>
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		<p>h) The comments issued by Mr. Omar Parak of the Departments Coastal Management Unit must be adequately addressed.</p>	<p>g. Mr Parak's comments have been addressed as can be seen in the table above. The Department of Public Works do not identify themselves as the custodian of the Admiralty zone. I first met with Mr Pfume at the Mayville office, who directed me to Mr Blose. On the way to Mr Blose I met Mr Daniel Momberg who did not agree with me that the DPW had to comment. He took me to the engineer (Did not get his name) who directed me to Ilembe. Drove to Stanget only to find out there is no DPW office in Stanger. The officials in the ANC office assisted and redirected me to Mr Blose at Mayville. On presentation of the Draft BAR to Mr Blose he directed me to Mrs Khan at the DPW in Pietermaritzburg. As head of the Ilembe Region of DPW she did not want to accept the DBAR and directed me to Mr Shozi at the National Office in Durban. Mr Shozi wo is the PA for Mr Vilakazi who is the head of DPW KZN. Mr Shozi said he has not received delegated powers to deal with this and feared retribution if he signed anything. He then contacted a lady in Pretoria who also did not want the responsibility but eventually conceded that Mr Shozi must accept the DBAR</p>
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		<p>as once it is submitted, the Department could be obliged to issue a decision based on the information provided, within the stipulated timeframes.</p> <p>Kindly address all of the above in the Final BAR and forward to the Department for its consideration. Should you have any queries with this letter, please do not hesitate to contact the Department for further clarity.</p> <p>Yours faithfully  Issued by: Malcolm Moses, Control Environmental Officer — EIA, Ilembe (Electronically)</p>	<p>withdraw the activities on the 14<sup>th</sup>, 15<sup>th</sup> and 16<sup>th</sup> fairways.</p>
<p>K Fourie  Operations Manager  Siza Water (RF) Pty Ltd  PO Box 1635, Ballito,  4420, South Africa</p>	<p>15 April 2020  Letter sent by email</p>	<p>Further to the draft basic assessment report, concerning the above, we note the following comments;</p> <ul style="list-style-type: none"> <li>• Proposed Watercourse realignment into the sea – No objections. Water &amp; sanitation services not affected</li> <li>• 14Th Fairway Wetland (remove vegetation and deepening the pond) – No objection to removal of vegetation. Depending on closeness to the municipal sewer infrastructure, ensure deepening/widening of the pond does not undermine/affect sewer pumping main.</li> <li>• 16TH Fairway Wetland (filled with G4 &amp; grassed over) – Ensure NGL is not raised</li> </ul>	<ul style="list-style-type: none"> <li>• Your no objection to the stream realignment is noted</li> <li>• The activity on the 14<sup>th</sup> fairway pond has been withdrawn from the application due to the sensitivity of the terrain. Your concern about the sewer line is noted.</li> <li>• The activity on the 16th fairway pond has been withdrawn from</li> </ul>

		<p>or lowered around the municipal sewer infrastructure (sewer manholes).</p> <ul style="list-style-type: none"> <li>• 3RD Fairway Wetland (remove vegetation &amp; silt) – No objections. Water &amp; sanitation services not affected.</li> <li>• 15TH Fairway Wetland (filled with G4 &amp; grassed over) – No objections. Water &amp; sanitation services not affected.</li> <li>• Maximum top water level to remain below the water and/or sewer pipes and infrastructure if affected.</li> </ul> <p>Please ensure the NGL is not raised or lowered around the municipal water and sewer infrastructure and should always be accessible.</p>	<p>the application due to the sensitivity of the terrain. Your concern about the sewer line is noted.</p> <ul style="list-style-type: none"> <li>• Your no-objection to the activity at the 3<sup>rd</sup> -is noted.</li> <li>• Your no-objection to the activity at the 16th is noted.</li> <li>• Your point about water levels in relation to the sewer infrastructure in noted.</li> <li>• The NGL will not be raised or lowered where there is sewer infrastructure</li> </ul>
<p>Nandipha Sontangane Directorate: KZN Forestry Regulations and Support Department of Agriculture, Forestry and Fisheries</p>	<p>Email received from: NandiphaS@daff.gov.za 13 Jun 2020 at 22:10</p>	<p>Comments will be provided soon. The department was not operating due to the national lockdown.</p>	<p>The email regarding comments due is noted.</p>
<p>Masupha Mathenjwa Ilembe District Municipality</p>	<p>Email: Masupha.Mathenjwa@ilembe.gov.za 2020/03/23</p> <p>Email received on 18 May 2020</p>	<p>The email is noted and the necessary comments will be provided as requested, as I am waiting for my supervisor signature.</p> <p>Unfortunately comments are not yet finalized and I will push for the end of this week.</p>	<p>The response to our enquiry regarding comments is recorded</p> <p>Your further response regarding the status of the comments is noted</p>

<p>Varuna Singh  Director of Zimbali  Management Board nd  resident in Zimbali  Coastal Resort</p>	<p>Email received on 2020/05/10</p>	<p>I hope that you are well!  Because I am uncertain regarding the status of the application, I think it important that I place on record my objection formally to the works proposed on the 14-16th holes of the golf course based on the fact that these are biologically sensitive area with many rare species of frogs. There are are other sensitive habitats that we need to preserve.  I understand that the deadline is the 12/05.</p>	
<p>Richard Mckibbin  The LionHeart  Experience  <a href="http://www.thelionheart.co.za">www.thelionheart.co.za</a>  And resident in Zimbali  Coastal Resort</p>	<p>Letter received by email  16 April 2020</p>	<p>Thank you for the opportunity to participate and comment on the draft basic assessment report as an interested and affected party. I am a resident on the estate, a member of the Zimbali Environmental Committee, an environmental consultant at Zimbali and a wildlife conservationist/tour-guide/educator by trade. Together with my wife, Candice Mckibbin, we run The LionHeart Experience, an eco-tourism business that contributes towards conservation by assisting private game reserves with wildlife management operations and towards the scientific industry through biodiversity surveys with the public, data capture, and the documentation of threatened species/important taxa.</p>	

		<p>I would like to comment on the proposals for alterations, with specific reference to the wetlands on the 3rd, 14th, 15th and 16th holes on ZCC.</p> <p>In particular, I would like to focus on the amphibians in these wetlands; amphibian fauna's presence, health and diversity being key environmental indicators, and then comment thereafter.</p> <p>Wetland on the 3rd hole: During night surveys on the estate undertaken over the last 8 years, the only site that I have recorded Spotted Shovel-nosed frog - <i>Hemisis guttatus</i>, is directly south of the delineated wetland on the 3rd hole, in the flooded grassland behind the wetland. <i>H. guttatus</i> currently has a Vulnerable threat status. Considering this, it is probable that the wetland vegetation to be cleared forms part of the habitat of the local population of <i>H. guttatus</i>.</p> <p>Any excavation and clearing of indigenous vegetation within the habitat of this frog species is thus likely to have direct and indirect negative impacts. Zimbali retains very little of the coastal grassland habitat that naturally occurred here, and any extension of this wetland will decrease these remnants of coastal grassland, a niche habitat for this frog species.</p>	
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		<p>The clearing of any alien vegetation within the wetland will have a positive impact and should extend the open water significantly to increase the aesthetics of the golf course.</p> <p>Watercourse - 14th 15th 16th Holes: The watercourse running from the northern boundary of Zimbali, from Seaward estate, and along the western side of Holy Hill along the 15th fairway, is the greatest source of biodiversity within the entire estate of Zimbali. It is a critically important and sensitive wetland that serves as a recruitment area for most of the amphibian species in the estate, as well as being a hotspot for dragonflies, and a nesting area for elusive bird species. I have recorded 17 species of frogs and the highest density of frogs on the entire estate being along this watercourse. It is also home to two amphibian species that are on the Red Data list, one of which is critically endangered (more on this further). Any negative impact on this wetland in any manner must be avoided at all cost in order to conserve this threatened habitat, in line with the principles of National Environmental Management Act (NEMA) and National Environmental Management Biodiversity Act (NEM:BA). It is also a recruitment area for water mongoose, cane rat, various rodent</p>	
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		<p>species (including Vlei rats - <i>Otomys</i> sp.), as well as important habitat for TOPS species such as the Southern African Python – <i>Python natalensis</i>. This wetland is the most high priority and most highly sensitive area in Zimbali. All efforts should be made to protect and enhance this sensitive area. On 1st May 2020, I also confirmed that there is now a pair of long-crested eagles nesting on the estate. We have observed them hunting along the 15th and 16th holes on a regular basis in the last 6 weeks, observed their courtship, and then located the nest with the female actively bringing fresh foliage (for the lining of the nest cup) at -29.543792, 31.204241 on Holy Hill. According to Roberts, 69 – 86% of their diet is made of up Vlei rats, which require sedge and densely vegetated wetlands. Any removal of this important wetland habitat could have a negative impact on this developing ecosystem food web.</p> <p>Courting pair of long-crested eagles above the 16th tee.</p> <p>Female long-crested eagle sitting on the nest 01/05/2020 on Holy Hill</p> <p>In light of all the above, I would like to address the proposed alterations on the 14th 15th and 16th holes.</p> <p>Wetland on the 14th:</p>	
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		<p>Over eight years of regular night surveys in this area has revealed this wetland to be the stronghold of the only confirmed population of the critically endangered Pickersgill's Reed Frog – <i>Hyperolius pickersgilli</i> within the estate (-29.546294, 31.202368). This frog is highly restricted in its habitat requirements, and this population has now become an isolated meta-population within the greater region. This specific population will need to be very carefully monitored and protected and is ranked as 15 (of 38) in terms of conservation priority and management in the Ezemvelo database. This particular wetland is also a breeding site for various waterfowl, including the red-chested flufftails, which will be displaced by these proposed activities due to their specific habitat requirements. Considering this, the clearing of this threatened habitat is in direct contravention of the principles and objectives of NEM:BA, and any negative impact on this important wetland, for aesthetic purposes or other, would further degrade the wetland and its threatened faunal populations in a context where improvement of such an ecosystem type is required. It would also go against the conservation efforts of Zimbali and it would be</p>	
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		<p>counterproductive if this were to proceed in the some of the last remaining natural habitat of a critically endangered species. The biodiversity of this site, and sustaining this important recruitment/breeding area for important species, should not be compromised for increased aesthetics for a golf course.</p> <p>Male <i>Hyperolius pickersgilli</i> photographed north east of the 14th green</p> <p>Female <i>Hyperolius pickersgilli</i> photographed east of the 14th green</p> <p>Wetland on the 15th:</p> <p>In over 8 years of night surveys, during the summer rainfalls, these two wetlands hold the highest diversity of amphibian species per square meter in Zimbali, with over 14 species found just within the current 790m<sup>2</sup> of these two wetlands. One of these species, is the Natal Leaf-folding frog – <i>Afrixalus spinifrons</i>, which I have recorded breeding annually at this specific site (-29.543017, 31.202735). This frog is listed on the Red Data List and removing this wetland would be a significant loss of important frog habitat being a very specific niche habitat, namely a flooded pan/grassland, which is a required breeding habitat for this species. This would have a direct impact on the success of this species that may be</p>	
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		<p>outcompeted by the larger <i>Afrivalus</i> species, <i>A. fornasinii</i> as well as other larger <i>Hyperolius</i> species if forced into surrounding parts of the wetlands.</p> <p><i>Afrivalus spinifrons</i> photographed in the wetlands south of the 15th green, both on floating aquatic vegetation and the large leaved sedge.</p> <p>Wetland on the 16th:</p> <p>The seepage from the west of the 16th tee flows through this wetland, and then continues to feed into the wetlands on the 15th, in particular the wetlands that have been discussed previously above.</p> <p>Due to previous building and other activities on what is an already sensitive site, this wetland at the 16th tee is already not in optimal condition and has been largely silted up in the process. Any and all attempts to restore this wetland and its quality should be made, rather than any alterations. This habitat should sustain healthy populations of frogs and this should be the main management focus in this wetland. Any removal of this wetland will have an adverse effect on the water feeding through into the other wetlands and will likely cause further silt build up, or the drying out of these wetlands on the 15th. Any further negative impact into what should be a healthy and important wetland must be avoided.</p>	
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		<p>In light of this, it is concerning that no evaluation of the impacts to Red Data / threatened frog populations and species has been undertaken as part of this Basic Assessment Process. This is a fatal flaw in the process.</p> <p>General comment on the impacts to a critically endangered wetland ecosystem type:</p> <p>In addition to the potential impacts to threatened frog species that have not been well evaluated as part of the BA process, it is concerning that permanent loss of critically endangered wetland is proposed in a setting where gains in wetland habitat are required to meet conservation targets. Planned losses of such wetlands should be an absolute last resort and requires significant substantiation of socio-economic need and desirability. From my perspective, the need to improve the playability of the golf course, or increase aesthetics, does not justify the proposed loss of critically endangered wetland. If such a trade-off / compromise is accepted, the proposed losses would need to be offset or compensated for by gaining similar wetland habitat at a high offset ratio in line with the national wetland and biodiversity offset guidelines.</p> <p>Conclusion</p>	
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		<p>After investigating the report, I am in favour of the restoration of the wetland on the north eastern boundary with Seaward Estate, as well as with the stream-realignment on the beach near the VOP. I am also in favour of alien invasive plant clearing and control related to the proposed which should be a typical management objective of the estate. However, any and all alterations on the 14th 15th and 16th that will directly impact intact wetland vegetation communities and frog habitat must not proceed, especially since the impacts to frog populations and frog habitat have not been assessed. The reduction in the extent of Critically Endangered wetland habitats that provides habitat to three threatened frog species is not in line with the objectives of environmental sustainability and regional ecosystem conservation management that requires a net gain in the extent of important wetland habitat, not loss. Zimbali hosts some of the last remaining fragments of coastal grassland, wetland and forests, as well as significant biodiversity, rich with threatened species. The protection and restoration of these remaining habitats is of utmost importance.</p> <p>If you have any questions or queries please do not hesitate to contact me at any time,</p>	
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		Kind regards, Richard Mckibbin The LionHeart Experience +27 82 331 3256 richard@thelionheart.co.za www.thelionheart.co.za	
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